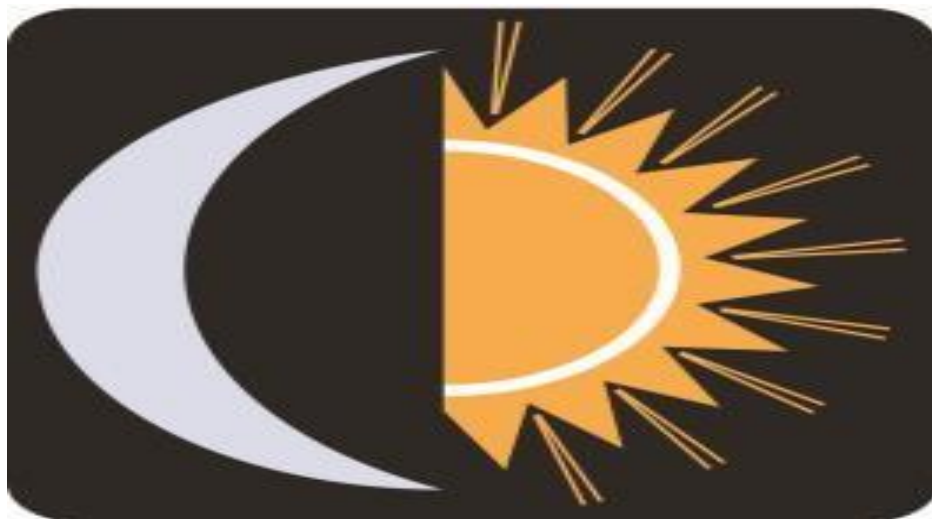




COMMUNITY HOLISTIC CARE MULAGO

SAFEGUARDING POLICY AND PROCEDURE MANUAL

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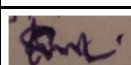
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Issue Date	Issue No	Obsolete/Current/Archived	Reason/Notes
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REVIEWERS & APPROVALS

This document has been reviewed and approved by the undersigned.

Name	Position	Signature	Date
Bedah Kasakuru	Board Chair		12/01/2025
Janeper Kadondl	Chief Executive Officer		12/01/2025
Tonny Ninsiima	Chief Finance Officer/ HR		12/01/2025

OWNERSHIP/CUSTODIAN OF THE POLICY

This policy document is entrusted to the Chief Executive Officer (CEO) and the Human Resources Manager (HRM)/Finance Officer, who hold primary responsibility for its implementation in line with Community Holistic Care Mulago's (CHCM) legal and ethical obligations. They are also responsible for evaluating its effectiveness and providing clarification on its interpretation.

Supervisors at all levels are responsible for ensuring that staff under their supervision are informed about the policy and adequately trained in its application.

The policy shall be reviewed every three (3) years, or as necessary, to ensure it remains aligned with relevant regulations and best practices. Any suggestions for review or amendments shall be submitted to the CEO or HRM for consideration, including obtaining Management and/or Board approval for any revised policy.

DISTRIBUTION LIST

The current version of this document is available to staff on the Google Drive folder titled "CHCM Policies" and on the CHCM website.

INTRODUCTION

Community Holistic Care Mulago (hereafter referred to as "CHCM") recognizes that all individuals—both adults and children—regardless of color, age, race, religion, belief, gender, disability, socio-economic status, political affiliation, or ethnic origin, have the right to be protected from all forms of abuse, neglect, and exploitation.

This policy applies to all network members, including CHCM employees, partner staff, interns, and volunteers who interact with children, adults in vulnerable situations, and adults at risk, both within CHCM and in organizations that collaborate with CHCM, including partner institutions.

The CHCM Ways of Working Document, which is provided to all employees, clearly states the organization's zero tolerance for violence, including physical and psychological violence, injury, abuse, maltreatment, and sexual exploitation against employees, interns, volunteers, adults in vulnerable situations, and adults at risk.

This policy builds upon the relevant provisions of the Ways of Working Document in order to make safeguarding clearer and easier to implement. Practicing safeguarding is central to CHCM's work. This policy therefore examines internal practices within CHCM and establishes measures to protect staff, beneficiaries, and all stakeholders with whom the organization engages.

The Central Management Team and managers of CHCM are responsible for ensuring the implementation of this policy, promoting its relevance across all areas of work, holding individuals accountable, and fostering a safe and respectful working environment.

DEFINITIONS

1. **Child:** A child is any person under the age of 18 years. This definition reflects international best practices and is adopted in the Children's Act, 1998 (Act 560).
2. **Adults in Vulnerable Situations:** Persons over the age of 18 who have some form of physical or mental disability.
3. **Staff:** All individuals within the CHCM network who support the organization in delivering its objectives.
4. **Associates, Affiliates, Interns, and Volunteers:** Individuals engaged in a formal working relationship with CHCM, whether on-site or remotely.
5. **Partners:** Individuals or organizations that collaborate with CHCM on project implementation or research activities.
6. **Beneficiaries:** Individuals who directly receive services or benefits from CHCM interventions, including participants in programs and events organized by CHCM.
7. **Safeguarding:** The process of protecting individuals associated with CHCM from abuse, neglect, and exploitation, including physical, emotional, psychological, sexual, or economic harm.
8. **Adult at Risk:** Any person aged 18 years or above who may require community care services due to mental health issues, learning or physical disability, sensory impairment, age, or illness, and who may be unable to protect themselves from significant harm or exploitation.

TYPES AND DEFINITIONS OF ABUSE

CHCM recognizes that abuse of children and adults may occur in various forms, including but not limited to:

1. **Physical Abuse:** The use of physical force against a person, including hitting, slapping, pushing, kicking, inappropriate restraint, or other forms of physical punishment.
2. **Sexual Abuse:** Any unwanted or non-consensual sexual activity or behavior, including sexual harassment, inappropriate touching, or sexually suggestive remarks.

3. Psychological or Emotional Abuse: Behavior that causes emotional distress, humiliation, fear, trauma, or psychological harm. This may occur through verbal or non-verbal actions.
4. Financial or Material Abuse: Includes theft, fraud, exploitation, or improper use of property, finances, benefits, or assets belonging to an adult at risk.
5. Discriminatory Abuse: Abuse based on an individual's race, gender, disability, religion, sexual orientation, age, or other characteristics, including harassment, insults, or hate incidents.
6. Neglect or Self-Neglect: Failure to provide adequate care for oneself or others, including neglect of personal hygiene, health, or essential needs.
7. Domestic Abuse: Any incident or pattern of controlling, coercive, threatening, or violent behavior between individuals who are or have been intimate partners or family members, regardless of gender or sexuality.

POLICY STATEMENT

Safeguarding Principles

CHCM is committed to ensuring that the following principles are upheld:

1. The rights of all children and adults shall be respected regardless of their cultural, religious, political, ethnic, or geographical background.
2. All CHCM activities shall prioritize the best interests of children, adults in vulnerable situations, and adults at risk.
3. All staff and associated personnel must prevent rights violations and immediately report any observed incidents.
4. CHCM shall not place staff, beneficiaries, or stakeholders in situations that may compromise their personal safety or security.
5. All allegations or concerns regarding abuse or neglect shall be taken seriously, investigated promptly, and addressed appropriately.
6. CHCM shall initiate a preliminary investigation within 48 hours of receiving reports of abuse or rights violations and provide findings within seven days, ensuring that all parties receive a fair hearing.
7. CHCM shall promote awareness and shared responsibility among staff and stakeholders for preventing, identifying, and responding to abuse.
8. CHCM shall safeguard adults at risk by valuing, listening to, and respecting their views and experiences.
9. All staff shall receive safeguarding training appropriate to their roles.
10. CHCM shall not knowingly recruit staff or volunteers who pose a known risk to the safety or well-being of children or adults at risk.

This policy applies to all CHCM employees regardless of role, location, or level of responsibility.

POLICY COMMITMENT

The Central Management Team (CMT) holds overall responsibility for the implementation of this Safeguarding Policy.

Managers and Heads of Departments must ensure that staff within their units are aware of and comply with this policy.

The Board of Governance/ Trustee is responsible for reviewing and updating the policy periodically to ensure it reflects organizational developments and best practices.

All staff and associated personnel—including research assistants, consultants, translators, volunteers, and other collaborators—must adhere to this policy and to CHCM workplace standards outlined in the Ways of Working Document.

Employees are required to report any suspected abuse involving vulnerable individuals. Failure to report suspected abuse may constitute a breach of CHCM safeguarding policy and may lead to disciplinary action.

SUPPORT FOR SURVIVORS AND VICTIMS

Support shall be provided to survivors or victims of abuse regardless of whether a formal investigation has been conducted. This support may include psychosocial counseling, referrals to specialists, and other appropriate services.

Survivors and victims retain the right to decide whether they wish to access the support services available to them.

SAFEGUARDING PROGRAMMING AT CHCM

CHCM recognizes that unintended harm can occur, particularly when working with vulnerable populations. This policy therefore establishes minimum safeguarding standards designed to reduce risks when engaging directly or indirectly with children and adults at risk.

SAFEGUARDING PROCEDURES

Responding to Complaints or Concerns

CHCM is committed to responding to all safeguarding concerns. A Safeguarding Team shall be established to receive, assess, and respond to complaints.

The team will consist of staff with relevant expertise in prevention, investigation, and survivor support. Immediate protective action will be taken where a child or adult at risk faces imminent danger.

CONFIDENTIALITY

Information relating to safeguarding concerns involving children or adults at risk cannot be kept confidential by individual staff members.

All safeguarding information must be handled with strict confidentiality and shared only with appropriate personnel in accordance with CHCM procedures.

RAISING A COMPLAINT OR CONCERN

Staff may submit complaints verbally or in writing to the Human Resources Manager or the Safeguarding Team.

All allegations must be documented, signed, dated, and submitted to the Human Resources Manager and the Safeguarding Team.

The individual accused will be treated with respect and fairness, and all allegations will be handled confidentially.

SAFEGUARDING TEAM

The Safeguarding Team shall consist of:

- The Human Resources Manager
- Two additional staff members appointed by the Central Management Team

Members will serve for three years, with the possibility of reappointment.

RETALIATION

CHCM strictly prohibits retaliation against complainants, victims, or witnesses. Any employee found engaging in retaliatory actions will face disciplinary measures.

OUTCOMES OF MISCONDUCT

Employees who violate this Safeguarding Policy may face disciplinary action, which may include termination of employment.

FALSE ALLEGATIONS

Employees who knowingly make false allegations may be subject to disciplinary action, including dismissal.

SAFE RECRUITMENT

CHCM recruitment processes shall incorporate safeguarding considerations, including:

- Disclosure of relevant criminal convictions
- Reference checks
- Verification that applicants do not pose risks to vulnerable individuals

Individuals with convictions related to sexual offenses or abuse will not be considered for volunteer or supervisory roles.

TRAINING

All employees shall receive regular safeguarding training delivered by qualified professionals. Training will include:

- CHCM safeguarding policies
- Reporting procedures
- Investigation processes
- Strategies for integrating safeguarding across CHCM programs

Managers are responsible for ensuring staff receive ongoing training and reinforcement of safeguarding practices.

ADDITIONAL DONOR-STANDARD SAFEGUARDING PROVISIONS

1. Safeguarding Code of Conduct

All staff, volunteers, consultants, and partners representing CHCM must adhere to the following standards when working with children and adults at risk.

Personnel must:

- Treat all beneficiaries and colleagues with dignity, respect, and fairness.
- Ensure that interactions with children and adults at risk are appropriate, transparent, and respectful.
- Obtain informed consent before taking photographs, collecting personal information, or sharing stories of beneficiaries.
- Ensure activities involving children or adults at risk are conducted in safe and appropriate environments.
- Immediately report any safeguarding concerns or suspected abuse.

Personnel must not:

- Engage in sexual exploitation or abuse of beneficiaries.
- Exchange money, employment, goods, or services for sexual favors.
- Engage in sexual relationships with children under the age of 18, regardless of local consent laws.
- Use abusive, discriminatory, or degrading language or behavior.
- Develop relationships with beneficiaries that may be exploitative or abusive.
- Share images or personal information of beneficiaries without proper consent and authorization.

Failure to comply with this Code of Conduct may result in disciplinary action, including termination of employment or partnership.

2. Protection from Sexual Exploitation and Abuse (PSEA)

CHCM maintains a zero-tolerance policy toward Sexual Exploitation and Abuse (SEA).

Sexual exploitation refers to any abuse of a position of vulnerability, power, or trust for sexual purposes, including profiting financially, socially, or politically from the exploitation of another person.

Sexual abuse refers to actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

CHCM strictly prohibits:

- Sexual exploitation of beneficiaries or community members.
- Sexual relationships between staff and beneficiaries that involve power imbalance or dependency.
- Any form of sexual harassment within the workplace or project environments.

All staff and partners must sign and adhere to the CHCM Safeguarding and PSEA commitments as part of their contractual obligations.

3. Risk Assessment and Safeguarding in Program Design

Safeguarding considerations shall be integrated into all CHCM programs and activities.

Program managers must:

- Conduct safeguarding risk assessments before implementing projects.
- Identify potential safeguarding risks related to fieldwork, service delivery, research, and community engagement.
- Implement mitigation measures to minimize harm to beneficiaries and staff.
- Ensure that safeguarding considerations are included in project planning, budgeting, and monitoring processes.

All CHCM programs must ensure that beneficiaries know how to report concerns safely.

4. Reporting Mechanisms and Whistleblowing

CHCM shall maintain safe, accessible, and confidential reporting channels for safeguarding concerns. Safeguarding concerns may be reported through:

- The Human Resources Manager
- The Safeguarding Team
- Direct reporting to a supervisor or manager
- Anonymous reporting mechanisms where available

All reports shall be: Treated confidentially, Assessed promptly and fairly and investigated in accordance with CHCM procedures and applicable laws

CHCM will protect whistleblowers and ensure that individuals reporting concerns do not face retaliation.

5. Data Protection and Confidentiality

CHCM is committed to ensuring that all safeguarding information is handled securely and confidentially.

Personal information relating to safeguarding cases shall:

- Only be shared on a strict need-to-know basis
- Be stored in secure systems or restricted files
- Be handled in accordance with CHCM Data Protection Policy and relevant legal requirements

Photographs, case stories, or other information relating to beneficiaries must never be used without informed consent.

6. Partnership and Due Diligence

CHCM expects all partners, consultants, and collaborating organizations to adhere to safeguarding standards equivalent to those of CHCM.

Prior to entering into partnerships, CHCM shall:

- Conduct due diligence assessments on partner organizations.
- Ensure partners have appropriate safeguarding measures in place.
- Include safeguarding clauses in partnership agreements.

If safeguarding concerns arise involving partners, CHCM may:

- Require corrective action
- Suspend collaboration
- Terminate the partnership if necessary

7. Monitoring and Compliance

The implementation of this Safeguarding Policy shall be regularly monitored to ensure compliance.

Monitoring mechanisms may include:

- Periodic policy reviews
- Staff safeguarding training assessments
- Incident reporting reviews
- Internal audits

Findings from monitoring exercises shall be used to strengthen safeguarding systems and improve organizational practices.

8. Policy Review

This policy shall be reviewed every three years, or earlier if necessary, to ensure alignment with:

- International safeguarding standards
- National legal requirements
- CHCM organizational developments
- Lessons learned from implementation

The Board of governance holds final responsibility for approving any policy revisions.