



# Justice Revived Foundation

## Child Safeguarding Policy

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### 1 | Policy Purpose, Scope & Legal Basis

Justice Revived Foundation (JRF) exists to **eradicate discrimination, abuse and injustice** against women, children and other vulnerable groups. Protecting children from harm is therefore fundamental, not optional.

- **Purpose:** To prevent, identify and respond to any form of abuse, neglect, exploitation or violence against children engaged with JRF's work.
- **Scope:** Applies to **all staff, Board members, consultants, volunteers, interns, suppliers, implementing partners and visitors** in every location and programme where JRF operates.
- **Legal & Normative References:**
  - Ghana **Children's Act, 1998 (Act 560)** and Amendments
  - Criminal Offences Act, 1960 (Act 29) – Sections on defilement, assault, human trafficking
  - Domestic Violence Act, 2007 (Act 732)
  - UN Convention on the Rights of the Child (UNCRC)

- African Charter on the Rights and Welfare of the Child
- **IASC Minimum Standards** for Child Protection in Humanitarian Action
- Donor safeguarding clauses (e.g., FCDO, USAID “Child Safeguarding Standards”)

## 2 | Definitions & Abbreviations

Term / Acronym	Definition
<b>Child</b>	Any person under 18 years of age (Act 560).
<b>Child abuse</b>	Physical, sexual, emotional maltreatment, neglect, exploitation or trafficking.
<b>Child safeguarding</b>	All measures JRF takes to prevent and respond to child abuse in the organisation’s operations and through partners.
<b>DSL</b>	Designated Safeguarding Lead – HQ level.
<b>SFP</b>	Safeguarding Focal Point – field / programme level.
<b>DBS</b>	Ghana Police “Criminal Background Check”.
<b>CPIMS</b>	Child Protection Information Management System – the secure JRF database for safeguarding cases.
<b>CoI</b>	Conflict of Interest.

## 3 | Guiding Principles

1. **Best Interests of the Child:** Always the primary consideration.
2. **Zero Tolerance:** No form of abuse is acceptable; all concerns are acted upon.
3. **Do No Harm:** All activities designed and delivered to minimise risk.
4. **Equity & Non-Discrimination:** Safeguarding applies to every child irrespective of gender, disability, ethnicity, religion, or socio-economic status.
5. **Survivor-Centred & Child-Friendly:** Respect the child’s dignity, evolving capacities and right to participate in decisions that affect them.
6. **Confidentiality & Data-Minimisation:** Share information strictly on a need-to-know basis.
7. **Accountability & Continuous Learning:** Systems are monitored, improved and openly reported to stakeholders.

## 4 | Governance, Roles & Responsibilities

### 4.1 Oversight Structure

Level	Key Duties
<b>Board of Directors</b>	Approves policy; receives quarterly safeguarding dashboard and serious-case notifications within 48 hours.

Level	Key Duties
<b>Executive Director (ED)</b>	Ensures resources, risk appetite, escalates Category A cases to Board & authorities.
<b>Designated Safeguarding Lead (DSL)</b>	Policy custodian, case-management oversight, external liaison (e.g., DSW, DOVVSU), training curriculum owner.
<b>Safeguarding Focal Points (SFPs)</b>	Field-level first responders; keep incident registers; support safe referrals.
<b>HR Manager</b>	Embeds safer recruitment, performance management and sanctions.
<b>All Staff / Representatives</b>	Duty to prevent, recognise & report concerns; comply with Code of Conduct.

#### 4.2 High-Level RACI

Task	Board	ED	DSL	SFP	HR	Staff
Approve policy / major updates	A/R	C	C	I	I	I
Case intake, triage & investigation	I	C	A/R	R	I	C
Training rollout	I	C	A/R	R	C	R
Safer recruitment vetting	I	C	C	I	A/R	I
Partner due diligence	I	C	A/R	R	C	I

*A = Accountable, R = Responsible, C = Consulted, I = Informed*

#### 5 | Safer Recruitment & Vetting

Stage	Minimum Safeguarding Control	Owner
Vacancy advert	Safeguarding statement & reference to child-facing work	HR
Short-listing	At least <b>two</b> panel members; bias-mitigation checklist	Recruiting Manager
Interviews	Behavioural questions on child protection; panel gender balance	Panel Chair
Pre-offer checks	DBS certificate ≤ 12 months old; two written refs incl. one direct supervisor; ID & academic credential verification; CoI declaration	HR
Contract clauses	Mandatory adherence to Child Safeguarding, PSEA & Anti-Fraud Policies; breach = grounds for dismissal	HR
Probation	Specific safeguarding behaviour goals; check-in at 3 months	Line Manager & SFP

#### 6 | Behaviour Standards & Code of Conduct

**All representatives must:**

- Treat every child with respect and courtesy.
- Ensure **two-adult rule** when working directly with children.
- Obtain **informed written consent** from guardians (and assent from children  $\geq$  12 years) before photographs, audio or video.
- Use **child-safe language** in communication and documentation.
- Report any concern, even if uncertain.

**All representatives must not:**

- Engage in **one-to-one private communication** with a child on social media.
- Give gifts, money or promises of employment to an individual child.
- Physically punish, shame, or degrade a child.
- Engage in any sexual activity with a person under 18 years or who appears to be under 18.
- Sleep in the same room or bed as a child unless required for safety and authorised by the DSL.

The full **Code of Conduct** (Annex A) must be signed annually.

## 7 | Reporting & Complaints Mechanisms

Channel	Access Details	Language(s)	Availability
Hotline	+233 (0) 595 6536 91	English, Twi, Ewe, Ga	24/7
Secure Email	<a href="mailto:safeguarding@justicerevivedfoundation.org">safeguarding@justicerevivedfoundation.org</a> (PGP)	English	24/7
Web Form	<a href="http://www.justicerevivedfoundation.org/report">www.justicerevivedfoundation.org/report</a>	Multi-language	24/7
Child-Friendly Boxes	Locked, SFP-managed at each project site	Local language signage	Weekly collection
In-Person	Any SFP, DSL or manager	All	Working hours

- **Anonymous reporting** allowed.
- Every report **acknowledged within 24 hours**; triage within 48 hours.
- **No retaliation** – breach leads to disciplinary action.

Early-warning **red flags** for staff include: unexplained gifts, secrecy about meetings, favouritism, grooming behaviours.

## 8 | Case Management & Response Procedures

### 8.1 Classification

Category	Definition	Response Time
<b>A – High Risk</b>	Sexual abuse, trafficking, severe physical violence, repeated offences, or staff/volunteer implicated	Immediate safety plan; notify DSL & ED within 2 hours; report to Police/DOVVSU in ≤24 h
<b>B – Moderate</b>	Neglect, emotional abuse, policy breach without immediate danger	Safety assessment within 24 h; internal investigation start ≤72 h
<b>C – Low</b>	Breach of Code of Conduct without harm (e.g., unapproved photos)	Corrective action plan within 5 days

## 8.2 Investigation Flow (Annex C Flowchart)

1. **Intake & Triage** → 2. **Immediate Safety Actions** → 3. **Assign Case Lead & Investigation TOR** → 4. **Gather Evidence & Interview** (child accompanied by guardian/support person) → 5. **Analysis & Conclusions** → 6. **Decision & Sanctions** → 7. **Referral & Support** → 8. **Closure & Lessons Learned.**
- Investigations target **completion within 30 calendar days.**
  - Case files stored in **CPIMS** with restricted access.
  - DSL provides survivor with **support map** (psychosocial, medical, legal aid) and monitors follow-up.

## 9 | Information Sharing, Confidentiality & Record-Keeping

Item	Standard
Storage	Encrypted drive, unique case ID, access limited to DSL, SFP, ED.
Retention	10 years (or until child reaches 25 years, whichever is longer).
Transfers	Secure file transfer; password in separate channel.
Reporting	Quarterly anonymised trends to Board; donor reports per grant agreement.
Data Subject Rights	Children (via guardian) may request access to their data unless it jeopardises safety or investigation integrity.

## 10 | Partner, Supplier & Volunteer Standards

- **Due Diligence Checklist** (Annex E) completed pre-contract.
- Contractual **Safeguarding & PSEA Clauses** – right to suspend/terminate on breach.
- Partners must designate their own **Safeguarding Focal Person** and share incident data (anonymised) quarterly.
- JRF conducts **spot checks** and provides **capacity-building workshops.**

## 11 | Training, Awareness & Culture

<b>Audience</b>	<b>Frequency</b>	<b>Format</b>	<b>Owner</b>
New staff, interns, volunteers	Within 2 weeks of start	Induction workshop + e-learning quiz	DSL & HR
All staff	Annual	Scenario-based refresher, policy re-sign	DSL
SFPs & Investigators	Every 2 years	3-day specialised training (interviewing children, evidence handling)	DSL
Partners & Contractors	Pre-implementation & annual	Half-day orientation + materials	SFP
Children & Communities	Continuous	Posters, child-friendly sessions, radio spots	Programme Manager

## 12 | Monitoring, KPIs & Continuous Improvement

- **KPIs (reported quarterly):**
  - % staff trained / re-signed Code of Conduct
  - **of reports by category & outcome**
  - Avg. time triage → investigation start
  - Survivor satisfaction (voluntary, anonymous survey)
  - % partners with approved safeguarding plans
- **Annual Audit:** DSL samples case files, tests control efficacy, benchmarks against donor standards.
- **Lessons Learned Workshops** post-case feed into policy updates and training content.

## 13 | Sanctions & Escalation

<b>Breach Level</b>	<b>Indicative Sanction</b>
Minor (e.g., inadvertent policy lapse)	Formal warning, mandatory retraining
Moderate (e.g., neglect, boundary violation)	Final warning, performance review, possible suspension
Severe (e.g., sexual abuse, exploitation, physical violence)	Immediate suspension, dismissal, police referral, partner debarment, donor notification

All sanctions reviewed by **ED**; **Board** ratifies severe cases.

## 14 | Policy Review & Amendment

- **Scheduled Review:** Every two years (next by January 2027) or sooner if:
  - Ghanaian law changes.
  - Donor requirements shift.



- Serious incident reveals policy gap.
- Updates circulated to all stakeholders within **10 working days** of Board approval.

**15 | Annexes (Templates & Tools)**

- A. Child Safeguarding Code of Conduct (staff/partners)
- B. Child Concern / Incident Reporting Form
- C. Case Management SOP & Flowchart
- D. Photography & Media Consent Forms (parental & child assent)
- E. Partner Safeguarding Capacity Assessment Tool
- F. Referral Directory (Police/DOVVSU, Social Welfare, Health, Counselling)
- G. Investigation TOR Template & Interview Guides
- H. Child-Friendly Complaints Mechanism Poster (English/Twi/Ewe/Ga)

*Prepared by Designated Safeguarding Lead (DSL) – July 2025*