

**FEDERATION OF FISHERIES ORGANISATIONS UGANDA
(FFOU)**



**WOMEN, CHILDREN AND VULNERABLE ADULTS
SAFEGUARDING POLICY**

SEPTEMBER 2022

Introduction

Federation of Fisheries Organisations Uganda (FFOU) is a Non-profit making Organisation national umbrella body for all non-state actors in the Fisheries Sub sector, currently working with 131 member Associations/Organizations which brings together all the Fishing Communities across the five great lakes of; Victoria, Kyoga, Albert, George, Edward and the surrounding districts in Uganda.

FFOU is committed to journeying with children to adulthood in fishing community ensuring that they live to realize their dreams and ambitions. Our work with youth, children includes skills development, health, economic strengthening, and Human rights. Since our work involve regular contact with women, youth and children in organizations and fishing communities, protecting them from presupposes from any kind of harm, real or potential, is an integral part of ensuring that women, youth and Children live their lives to the full. It is with this in mind that this women, youth and Child Safeguarding Policy has been written.

FFOU recognizes the importance of safeguarding and is committed to ensuring it manages a wide range of risks such that women, youth, children and adults at risk/fishing communities, staff, other associates and the organizations as a whole are kept safe from harm, either direct or indirect, intentional or as a result of unintended consequences. The principle of 'best interests' will guide our actions in response to concerns and breaches of this policy.

Safeguarding refers to the responsibility of FFOU to make sure our staff, operations and programs do no harm to women, youth, children and vulnerable/at risk adults, or expose them to abuse or exploitation, and includes protecting our staff from inappropriate behaviors such as bullying and all forms of harassment.

Definition of Key Words

A Child: As any person under the age of 18 years.

Vulnerable or at-risk adults: People living and working in fishing communities in which we work who may be vulnerable because of poverty, exposure to conflict or emergency, or because of their identity e.g. disability and sex.

Direct contact/working with children/adults at risk: describes being in the physical presence of a child or adult at risk while executing FFOU work, whether contact is

occasional or regular, short or long term.

Indirect Contact/impact on children/adults at risk: describes having access to information on children or adults at risk while executing FFOU work, such as names, locations, photographs and case studies. It also describes the impact that our programs or projects may have on children or fishing communities, even if they are not our service users.

Harm and Abuse: Harm and abuse constitutes 'all forms of physical and/or emotional ill- treatment, sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to a child or adult's health, survival, development or dignity in the context of a relationship of responsibility, trust or power. While abuse encompasses a wide range of conduct and situations, the main types of abuse can be categorized and defined as follows:

- **Physical abuse** occurs when a person purposefully injures or threatens to injure a child or adult or when a lack of an interaction, which is reasonably within the control of a parent or person in a position of responsibility, power or trust, exposes that child or adult to physical harm. There may be single or repeated incidents. This abuse may include slapping, punching, shaking, kicking, burning, shoving or grabbing.
- **Emotional Abuse** includes the failure to provide a developmentally appropriate, supportive environment, including the availability of a primary attachment figure, so that a child can develop a stable and full range of emotional and social competencies commensurate with her or his personal potential and in the context of the society in which the child lives. It also occurs when a child or adult is repeatedly rejected or frightened by threats. This may involve restriction of movement, name calling, being put down or continual coldness from relatives or caregivers; to the extent that it affects the child or adult's physical and emotional or mental health.
- **Neglect** is the persistent failure or the deliberate denial to provide the child or adult, in the context of resources reasonably available to the family or caretakers, with clean water, food shelter, sanitation or supervision or care to the extent that the child or adult's health and development are placed at risk. This includes the failure to properly supervise and protect children or adults from harm as much as is feasible¹.
- **Sexual Abuse** occurs when a child or adult is used by older or bigger child, adolescents or adults for their own sexual stimulation or gratification – that he or she does not fully comprehend, is unable to give informed consent to, or for which

the child or adult is not developmentally prepared and cannot give consent, or that violate the laws or social taboos of society, regardless of the age of majority or age of consent locally. These can be contact or non-contact acts.

Commercial or other exploitation of a child refers to use of the child in work or other activities for the benefit of others. This includes, but is not limited to, Child Labour and child prostitution. These activities are to the detriment of the child's physical or mental health, education, or spiritual, moral or social-emotional development.

¹ NB Identifying neglect in resource poor contexts can be especially difficult. Failure to provide adequately for children in situations of extreme poverty does not necessarily constitute neglectful behavior. Rather, it is a case of assessing available resources and the efforts parents and carers are making to meet the needs of their children.

Sexual Exploitation and Abuse

- **Sexual Exploitation²**

Sexual exploitation means any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. Sexual exploitation includes e.g. purchasing the services of prostitutes and asking for sex in exchange for providing employment

- **Sexual Abuse**

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

Guiding Principles

All children have a fundamental right to be respected, nurtured, cared for and protected. This right is embedded in the Constitution of Uganda, international and other domestic laws.

The rights of the child are paramount and override all other considerations. The protection of the child is always the primary consideration.

The best way to protect children is to empower children to protect themselves

Practical Principles

Proactive safeguarding of children requires:

- o Ownership of the policy and a conviction of its necessity
- o Implementation, evaluating and monitoring of our policy, which is vital in making certain our policy is actually protecting our children, which it is user-friendly and is in keeping with new situations and legislation.

FFOU Commitment

In the light of Christian teaching, civil legislation and guidance, FFOU is committed to taking the necessary steps to:

² Definitions of “sexual exploitation” and “sexual abuse” from the United Nations Secretary General’s Bulletin: Special measures for protection from sexual exploitation and sexual abuse (ST/SGB/2003/13).

- Demonstrate that the right of the child and vulnerable adult to protection from harm is paramount.
- Cherish and safeguard children and vulnerable adults.
- Foster best practice
- Demonstrate accountability through establishing effective structures
- Support other organizations and personnel in safeguarding children and vulnerable adults.
- Establish safe recruitment and vetting practices – aimed at preventing those who pose a risk to children and vulnerable adults from holding positions of trust
- Maintain codes of behavior – having clear guidelines that set out what is and is not acceptable behaviors as an essential part of keeping children and vulnerable adults safe
- Operate safe activities for children and vulnerable adults – helping to ensure they can play and learn in a *safe environment*

Children and vulnerable adults who may be at increased risk of abuse

Children and vulnerable adults from minority ethnic groups, whose culture may be misunderstood and against whom there may be prejudice and discrimination.

Other groups of children and vulnerable adults who might be particularly vulnerable include asylum-seekers, those who are in care, children and adults with disabilities, children and vulnerable adults who are living with parents or carers who misuse drugs and/ or alcohol, homeless children and vulnerable adults, children living without an adult carer, (e.g. orphans and street children), refugees and internally displaced persons and children.

FFOU Extensive Understanding of Abuse

Physical abuse

Physical abuse is causing or inflicting physical harm on a child or failing to protect a child or vulnerable adult from harm.

It may involve:

- Hitting, caning, shaking, throwing, cutting, rough handling
- Poisoning, burning, scalding
- Drowning, suffocating
- A parent /carer falsely claiming a child has symptoms of a disease or illness
- Deliberately causing illness in a child
- Attempting or causing physical harm to a child in any other way.
- Physical abuse can also be caused by **failing to take action** to protect a child.

Emotional abuse

Emotional abuse is the persistent emotional ill treatment of a child causing severe and persistent adverse effects on the child's emotional development. It may involve:

- Making children feel that they are worthless or unloved, inadequate or that they are valued only insofar as they meet the needs of another person
- Imposing expectations on children that are not in keeping with their stage of development. This may include expecting children to interact with people in ways that are beyond their developmental capability, or imposing adult responsibilities on them
- Over-protecting a child and limiting his or her exploration and learning
- Preventing a child from participating in normal social interaction with people

- A child seeing or hearing the ill treatment of another person (e.g. domestic violence)
- Causing children frequently to feel frightened or in danger
- The exploitation or corruption of children.

Some level of emotional abuse is involved in all types of ill treatment of a child, though it may occur alone. Emotional abuse is normally found in the relationship between a caregiver and a child rather than in any specific event or series of events.

Sexual abuse

Sexual abuse involves forcing or enticing a woman or child to take part in sexual activities, including prostitution, whether or not the child is aware of what is happening.

The activities may involve:

- Penetrative physical contact activities e.g. rape, buggery or oral sex
- Non-penetrative physical contact activities, e.g. fondling or touching a child for the purposes of sexual gratification
- Non-contact sexual activities, e.g. involving children in looking at, or in the production of pornographic material or watching sexual activities
- Encouraging children to behave in sexually inappropriate ways.

Boys and girls can be sexually abused by males and/ or females, by adults and by other young people. This includes people from all different walks of life.

Neglect

Neglect is the persistent or on-going failure to meet a child's basic physical and/or psychological needs. It causes significant harm to the child and impairs his/ her health and development.

It involved depriving a child of:

- Food, clothing, warmth, hygiene
- Intellectual stimulation
- Supervision and safety
- Attachment to and affection from adults
- Access to appropriate medical care or treatment.

Neglect generally becomes apparent in different ways over a period of time rather than at one specific point. Neglect may also occur during pregnancy as a result of maternal

substance abuse.

All forms of abuse are a betrayal of trust and an abuse of power. It makes women and children feel diminished or threatened and it causes them harm. All forms of abuse can have devastating consequences.

All forms of abuse are wrong.

Signs / Indicators of Abuse

Physical abuse

Most women, children and vulnerable adults will collect cuts and bruises in their daily life. These are likely to be in places where there are bony parts of their body, like elbows, knees and shins. Some children, however, will have bruising which can almost only have been caused non- accidentally. An important indicator of physical abuse is where bruises or injuries are unexplained or the explanation does not fit the injury or when it appears on parts of the body where accidental injuries are unlikely, e g, on the cheeks or thighs. A delay in seeking medical treatment when it is obviously necessary is also a cause for concern. Bruising may be more or less noticeable on children with different skin tones or from different racial groups and specialist advice may need to be taken.

The signs of physical abuse may include:

- Unexplained bruising, marks or injuries on any part of the body
- Bruises which reflect hand marks or fingertips (from slapping or pinching)
- Scalds, cigarette burns, or burns from fire
- Bite marks
- Broken bones

Changes in behaviors, which can also indicate physical abuse, include:

- Fear of parents/guardians being approached for an explanation of an injury
- Aggressive behaviors or severe temper outbursts
- Flinching when approached or touched
- Reluctance to get their clothing changed, for example in hot weather or for swimming
- Depression
- Withdrawn behaviors

- Running away from home

Emotional abuse

Emotional abuse can be difficult to measure, and often children and adults who appear well cared for may be emotionally abused by being taunted, put down or belittled. They may receive little or no love, affection or attention from their parents or carers. Emotional abuse can also take the form of children not being allowed to mix or play with other children.

The physical signs of emotional abuse may include:

- A failure to thrive or grow, particularly if the child puts on weight in other circumstances,
e.g. in hospital or away from the parents'/guardians' care
- Sudden speech disorders
- Developmental delay, either in terms of physical or emotional progress.

Changes in behaviors, which can also indicate emotional abuse, include:

- Neurotic behaviors, e.g. sulking, hair twisting, rocking
- Being unable to play
- Fear of making mistakes
- Sudden speech disorders
- Self-harm
- Fear of parent/carer being approached regarding their behaviors.

Sexual abuse

Adults who use children or vulnerable adults to meet their own sexual needs can abuse both girls and boys of all ages, including infants and toddlers. Usually, in cases of sexual abuse, it is the child's behaviors, which may cause you to become concerned, although physical signs can also be present. In all cases, children who tell about sexual abuse do so because they want it to stop. It is important, therefore, that they are listened to and taken seriously.

The physical signs of sexual abuse may include:

- Pain or itching in the genital area
- Bruising or bleeding near genital area
- Sexually transmitted disease

- Vaginal discharge or infection
- Stomach pains
- Discomfort when walking or sitting down
- Pregnancy.

Changes in behaviors, which can also indicate sexual abuse, include:

- Sudden or unexplained changes in behaviors e.g. becoming aggressive or withdrawn
- Fear of being left with a specific person or group of people
- Having nightmares
- Running away from home
- Having sexual knowledge which is beyond their age, or developmental level
- Making sexual drawings or using sexual language
- Bedwetting
- Eating problems such as over-eating or under-eating (anorexia)
- Self-harm or mutilation, sometimes leading to suicide attempts
- Saying they have secrets they cannot tell anyone about
- Substance or drug abuse
- Suddenly having unexplained sources of money
- Not allowed to have friends (particularly in adolescence)
- Acting in a sexually explicit way towards adults.

Neglect

Neglect can be a difficult form of abuse to recognize, yet it has some of the most lasting and damaging effects on children/adults.

The physical signs of neglect may include:

- Constant hunger, sometimes stealing food from other children
- Constantly dirty or 'smelly'
- Loss of weight, or being constantly underweight
- Inappropriate dress for the weather conditions.

Changes in behaviors, which can also indicate neglect, include:

- Complaining of being tired all the time
- Not requesting medical assistance and /or failing to attend medical appointments
- Having few friends
- Mentioning they are being left alone or unsupervised.

► *These definitions and indicators of abuse **are not** meant to be definitive but only to serve as a guide. It is also important to remember that many children will show some of these signs at some time, and that the presence of one or more should not be taken as proof that abuse is occurring. There may well be other reasons for changes in behaviors, such as a death or the birth of a new baby in their family, relationship problems between their parents /carers etc.*

We do not make any judgment as to whether a child has or has not been abused. That is the responsibility of the experts.

Code of conduct

FFOU Code of Conduct commits signatories to abiding by the policy and procedures and specifically behavior protocols regarding their interaction with vulnerable people, communities, children and communities, use of children's images and information and reporting concerns.

Reference to FFOU Code of Conduct will be made in all relevant contracts and agreements, such as employment contracts, grant agreements, agreements with contractors involved in working with women, children and fishing communities.

Formal agreements will highlight FFOU commitment to safeguarding and require compliance with the principles and practices of this policy and the code of conduct, or relevant safeguarding standards. Consequences of breaching the policy and code are explicit and include disciplinary action up to and including dismissal, or termination of contract, along with possible further action as required, e.g. referral to national authorities.

Recruitment and selection

In addition to FFOU standard recruitment processes, the following safeguarding measures will be included:

All staff and volunteers will, prior to taking up their position, be required to:

- Accept and commit to our safeguarding policy and our Code of Conduct;
- Complete a written application form;
- Provide the name and contact information of two-character references;
- Provide photographic evidence of their identity;

- Undergo a criminal records check, where possible, in their country of origin;
- Comply as appropriate with any applicable laws and regulations regarding working with children, women and fishing communities.

No person who is prohibited by their local laws from working with vulnerable people, in communities or children may take up any role working with FFOU.

Volunteers engaged by FFOU will be required to commit to the organization's safeguarding policy and code of conduct and receive an induction on implementing the policy in the local context in which they are working. FFOU will be responsible for ensuring volunteer recruitment practices are in line with international standards.

Education and Training

FFOU understands that, in order for the safeguarding policy to be well understood and effectively implemented, it is essential that there are high levels of awareness regarding the policy and that staff and others are clear, confident and competent in putting the policy into practice.

FFOU will:

- Disseminate and promote the policy widely. Copies of the policy will be made available and accessible to all stakeholders, both in hard copy and electronically.
- The policy will be distributed to partners and any other relevant parties beyond the organization to ensure that the policy commitments, principles and practices are publicized and that everyone is clear about the Organisation's position in relation to safeguarding.
- Briefings and trainings will be incorporated into standard induction processes for all staff, and at the annual staff meetings/workshops. Those staff in direct contact with children and communities must have a full briefing on the policy, and how it applies to them and the work they are undertaking, prior to working directly with children and communities.
- Ensure further training is provided for staff with specific responsibilities for the policy.

Use of Images and Information

FFOU is committed to portraying women, children and adults in fishing community a respectful, appropriate and consensual way and never in a vulnerable or submissive manner. Individuals representing the organization or its partners must adhere to the

following guidelines when capturing, storing, and displaying or publishing children and adult's images:

- All images that are used must be accompanied by signed, written and informed consent. The child and/or his or her guardian, or adult must be informed of the nature of their agreement prior to signing the consent form.
- Personal information about a child or adult (such as full name and date of birth or full names of family members) and information that could be used to identify his/her specific location within a country (such as village or community names, school, parish, etc.) will not be used, especially where this is linked to an image.
- Local cultural traditions must be respected in all images.
- No images of children or adults shall be used that could be considered sexually suggestive.
- Children or adults that have experienced violence, exploitation, have been otherwise abused or are in some way particularly vulnerable or at risk, will not be identified by either personal details or images which represent them in a way that may lead to their identification.
- No secondary publication of images. Every time FFOU photographs are used in a presentation the presenter must read out a statement to the audience noting that photographs of FFOU images may not be used.
- Images shall portray an honest representation of the context and the facts.
- All images and stories, along with accompanying details of individuals, will be used and kept according to relevant data and privacy laws.
- All photographers will be screened for their suitability, including police checks where appropriate.

Information and Communication Technology

FFOU prohibits any use of its computer systems and networks in violation of any applicable law or the organization's policy, including those covering safeguarding, equal opportunities, racial and sexual harassment, discrimination, confidentiality, copyright and proprietary rights, publications, bullying, data protection and privacy; and/or any use that may potentially cause any damage, PR risk, legal or other liabilities to the organization or its people.

Violation of any of the policies by any user may result in disciplinary action including termination of employment or contractual/other relationships or even criminal prosecution.

Partners and Safeguarding

All partner organizations that work with FFOU and are working with children and fishing communities, are required to have in place and adhere to minimum standards for safeguarding, which are set out in the procedures linked to this policy.

During grant application and contracting processes, FFOU will assess the need for partners to comply with the safeguarding standards, and where activities involve working with or having an impact on children and fishing communities, (i.e. where grantees/contractors are engaged in an activity, on behalf of or funded by FFOU, that involves direct contact with, or facilitates access to children and fishing communities) they will be required to indicate their current level of compliance with FFOU minimum safeguarding standards and/or describe plans to ensure any areas of non-compliance will be met before, or within an agreed period after, the commencement of the grant/contract.

Existing grantees and contractors will also be required to develop safeguarding measures in line with the minimum standards, either within the current grant period or on renewal, or at an agreed point as appropriate.

Compliance with the agreed minimum standards will be written into all contractual, partnership agreements and grantee contracts where these involve working with children and fishing communities, and will be monitored via existing reporting and monitoring arrangements.

FFOU Associates

FFOU provides a range of people with access to our work and to children and fishing communities we work with. This is highly privileged access and should only be granted for legitimate work purposes. FFOU associates include donors, consultants and others brought into contact with children and fishing communities by FFOU.

Preventing harm to vulnerable people, children and fishing communities is our highest priority, and it is possible some associates could inadvertently create situations that may impact negatively on vulnerable people, children and fishing communities or in worst-case scenario, pose a real risk to those we are supporting. Even where we may know and trust the associates, it is still important that we take great care to ensure communities are not exposed to any inappropriate or harmful conduct on their part, whether intentional or unintentional.

All associates who come into contact with children and fishing communities through our work, *whatever their role or status*, must have clearance, i.e. permissions from relevant managers. Most importantly, all associates will be provided with, and briefed on, FFOU safeguarding policy and Code of Conduct and will at all times be accompanied and supervised by staff when coming into contact with children and fishing communities.

Reporting safeguarding concerns through the Complaint Procedure

FFOU considers the abuse of marginalized and vulnerable people, women, children in fishing communities to be completely unacceptable. We will take all concerns and reports of abuse seriously and act on these reports immediately and in compliance with the mandatory reporting laws.

Individuals representing FFOU or her partners are duty-bound to report concerns or allegations. These concerns may relate to a vulnerable person, beneficiary, child or a staff member involved in FFOU or her partner or a concern about a vulnerable person, beneficiary, child or person/s outside of the organization's programs.

FFOU and partners will agree on local reporting mechanisms which are relevant for the project and the context in which it is being delivered. Partners receiving reports of concerns which have arisen because of the project being supported by FFOU, will report the concerns through the appropriate channels by **FFOU Legal Aid Project** so that FFOU can ensure appropriate measures are taken.

Any individual, who has observed or was told about behaviors that could be considered abuse, must immediately report the information as outlined below.

Any individual who has concerns about the appropriateness of actions involving vulnerable people in fishing communities or children by those representing FFOU or her partners must immediately report their concerns. Concerns include suspected actual or potentially abusive or harmful behaviors towards a child³, behaviors or situations that might place a child at risk of harm, or suspected or actual sexual exploitation or abuse of vulnerable people.

No adverse action will be taken against individuals who report violations of this policy in good faith, as described in FFOU Whistleblowing Policy. Any employee who intentionally makes false and malicious allegations will face disciplinary action.

Investigating cases of alleged abuse

Upon receipt of an allegation of abuse, FFOU Legal Aid Project and/or partners will activate a prompt, thorough and confidential investigation that treats all parties with respect and fairness, in line with the investigation procedures. FFOU will also take preliminary or temporary action to prevent any potential continuation of abuse. Throughout the investigation, every effort will be made to protect the rights and safety of the vulnerable person or child, there will be no contact between the alleged offender and the beneficiary or child, and the vulnerable person/child will be interviewed and assessed by an external investigator with no affiliation to the organization and skilled in communicating with and assessments of abuse.

FFOU employees or volunteers found guilty of abuse shall face disciplinary action, up to and including termination of employment/engagement.

In the case of alleged abuse by representatives of FFOU partner institution, we will collaborate with the management of the partner institution to investigate the case. If the partner institution is unwilling to collaborate, FFOU may end the relationship with the partner.

³ Principally this relates to children FFOU is in direct contact with through its work, but could encompass actual or potential harm to other children that we are in indirect contact with or are made aware of, e.g. in the wider communities in which we work.

Monitoring and Review

FFOU will ensure that implementation of the safeguarding policy is subject to regular monitoring and will review the policy every two years (although changes may be made prior to formal review should legal, policy or practice changes suggest this is necessary).

The national standards for safeguarding, as set out in the procedures associated with this policy, should be used as a guide when monitoring implementation of the safeguarding policy – the aim is to ensure all offices meet these standards.

The Senior Management Team will be responsible for supporting and maintaining an overview of implementation and compliance issues across the organization.

Preventing harm to children in fishing communities

We believe children should have access to good role models they can trust, who will respect and

nurture their spiritual, physical and emotional development. They also have a right to an environment free from abuse and neglect.

At FFOU Uganda we aim to develop a culture of safety that minimizes the risk of children being abused. We do this by:

- Adhering to Safe Recruitment and vetting practices that help to prevent those who pose a risk to children from holding positions of trust
- Developing Codes of Behavior having clear guidelines that set out what is and is not acceptable behaviors in keeping children safe
- Operating Safe activities that help to ensure a safe environment for children and adults.

Trips away from home

During our activities that require children to travel from home and school like during music dance and drama festival, sports galas, Parental/ head teacher's Consent is required.⁴ These trips are meticulously planned in advance to ensure the safety and welfare of the children

Communicating our Safeguarding Message

We recognize that our Safeguarding Policies and procedures are only effective if everyone (including children) understands their purpose and knows how to use them.

- FFOU Uganda is committed to spreading the Safeguarding message at every opportunity so as to help create a more robust safeguarding culture in our local area and beyond.

⁴ Cf. Parental Consent Form to Capture Images of Child (Appendix pg. 42)

- FFOU National Executive Committee, all members of staff and volunteers are required to sign up to uphold our Safeguarding Policies and Procedures. Those who enter our premises or have dealings with our organization will be made aware of the main points of our Policy.
- We actively encourage good and timely communication among our personnel so that no child is ever put at risk through a failure to correctly communicate necessary information.
- A summary of our Child Protection Policy is available to all. We take every opportunity to disseminate our Policy and our Safeguarding throughout the local community and beyond.

- We communicate with, listen to and actively involve parents/caregivers in the life of our School. We seek to ensure that they understand our Safeguarding Policy and what it aims to achieve. We invite parents/caregivers to dialogue with us and help us develop our safeguarding culture both within our organization and beyond in the local neighborhood.
- We encourage a culture where children are listened to and given the confidence to speak out if they have concerns. Children are helped to know their rights and to appreciate their responsibility to respect the rights of others in an age-appropriate way. We involve children in decision-making in matters relating to them in an age-appropriate manner.⁵
- We are committed to ensuring that we find effective ways to communicate with those who may have communication problems.
- We take every opportunity to disseminate our Safeguarding Policy.
- Posters outlining what is considered acceptable and unacceptable behaviors for children are posted in appropriate places around the School.
- Our Complaints' Procedure is displayed prominently in our premises, together with the name and contact details of the person(s) who should be contacted if anyone wishes to make a complaint are also prominently displayed and affixed to this Policy
- The name and contact details of our Child Protection Officer is displayed prominently in our premises and is affixed to this Policy.
- The contact details of our local Police Service are also displayed on our premises and affixed to this Policy.
- A list of contact details of organizations / persons who may be contacted if an adult or child is seeking support in matters relating to safeguarding children.

⁵ Cf. Communication Policy for Communicating with Children (Appendix pg. 54)

ANNEX 1: FFOU Safeguarding Procedures

The following procedures provide detailed guidance for implementing FFOU safeguarding policy across all its business areas.

Planning for implementation of the safeguarding policy

FFOU has developed a detailed overall plan for the safeguarding policy to ensure effective implementation across the organization.

Individual teams will be responsible for ensuring the principles, procedures and good practices

outlined in the policy are incorporated into their work. Where appropriate, revisions to other FFOU policies, procedures and technical guides like recruitment and selection policies, to include safeguarding are recommended.

Local reporting mechanisms will be developed to ensure concerns are reported and responded to appropriately and effectively. Local systems and processes such as those relating to recruitment and selection will always be reviewed to ensure appropriate safeguards are incorporated depending on availability of criminal records checks and in line with any relevant Labour Law stipulations, for example.

Support to implementation

FFOU recognizes that safeguarding is the responsibility of everyone in the organization and that, regardless of individual roles, we all have obligations under the policy a contribution to make in creating safe environments for staff, children and communities.

Managers have a particular responsibility to ensure the policy and associated safeguarding measures are in place, circulated and working effectively and will receive specific training on this.

FFOU has also established focal points whose role is to support implementation of the policy across the organization. The focal points exist as a resource to support managers and other colleagues in achieving full and effective implementation of the policy, and have specific roles on monitoring and reporting concerns.

Risk Assessing

All areas of operation for FFOU shall be subject to a risk assessment. This is particularly important for any activity/event involving or impacting on children and communities so that potential risks can be identified and addressed.

Recruitment and selection

Working with children and fishing communities

Direct contact/working with children and fishing communities: describes being in the physical presence of children or communities in the context of FFOU work, whether contact is occasional or regular, short or long term.

Indirect Contact: describes having access to sensitive data in the context of FFOU work, such as children or adult's names, locations (addresses of individuals or projects), photographs and case studies. It also describes the impact that our programs or projects may have on children or communities, even if they are not our direct communities.

Sensitive data is defined as:

- Any personal data on children or adults that would provide an opportunity to make contact – e.g. full names, addresses, birthdates; and
- In the context of the data protection law:
 - Racial or ethnic origin;
 - Political opinions (if any);
 - Religious (or similar) beliefs;
 - Physical or mental health;
 - Sexual life;
 - Commission or alleged commission of offences; and
 - Details of proceedings for any offence committed or alleged to have been committed.

Determining Contact Levels

The Level of contact for a post should be decided, by the manager recruiting and relevant

human resources recruiting staff, at the time the job description, and contract is agreed and prior to obtaining approval to recruit/contract.

Direct Contact

High Risk

- Post holder has regular and frequent one-to-one contact with children/fishing communities that FFOU works with.
- Post holder manages FFOU programs involving children/fishing communities
- Post holder will work in an emergency context/country

Medium Risk

- Post holder has regular but infrequent contact with children/communities that FFOU works with.
- Post holder has regular but infrequent access to sensitive data
- Post holder supports FFOU programs involving children/fishing communities

Indirect Contact

High Risk

- Post holder has regular and frequent access to sensitive data over a continued period of time
- The post holder has a high-profile job within FFOU which would lead to high reputational risk if the individual is involved in a safeguarding concern

Medium Risk

- Post holder has regular but infrequent access to sensitive data

Background checks

For all staff:

- Commitment to safeguarding should be in advert/contract and Job Description (JD)
- Internal copy of the JD should show level of contact.
- Applicants should be informed of checks that will be carried out for the level detailed in their JD. Confirmation of contract is dependent on checks being carried out and results.
- Reference checks are carried out
- Requesting referee comments on applicants (staff and consultants working with children/communities or access to sensitive data) suitability to work with children/communities
- Verification of identity - established through an official document (e.g. passport, ID card).
- Verification of qualifications
- Checking gaps in employment history,
- Checking/following up on any disclosures of convictions/disciplinary
- Disclosure of convictions

In addition, for High-Risk groups

- Criminal Record /Police Background check/similar (where available)
- One member of the interview panel should have experience in interviewing applicants who work directly with children/communities/have access to sensitive data.
- Interview should include specific safeguarding related questions
- Job offer **is subject** to positive clearance. Employment can be taken up with approval from the senior management. Preventative measures will be put in place (e.g. no access to sensitive data, no unsupervised access to children/communities) and measures will be put in place to ensure that offer can be withdrawn if results of check are unsatisfactory.
- Reference enquiry will stipulate that applicant will be working with children/communities or have access to sensitive data and solicit comments around this
- Reference enquiry will be sent to a senior person who has experience of the applicants work with children/communities/ sensitive data.

- References will be followed by telephone calls to validate referee and discuss specific questions around applicants' suitability to work with children/communities.

For Medium Risk groups

- Interview should include specific safeguarding related questions and consideration given to including an interviewer experienced in interviewing candidates who will have direct contact with children/communities
- Reference enquiry will stipulate that applicant may be working with children/communities or have access to sensitive data and solicit comments around this
- Reference enquiry will be sent to a senior person who has experience of the applicants work with children/communities/sensitive data

Education and Training

FFOU notes that, in order for the safeguarding policy to be well understood and effectively implemented, it is essential that there are high levels of awareness regarding the policy and that staff and others are clear, confident and competent in putting the policy into practice.

All staff, volunteers and associates will be required to sign the Code of Conduct upon joining the organization, or at the point of engagement. This will be accompanied by a briefing on the Safeguarding policy and the Code of Conduct and what this means for staff and associate conduct.

Staff, volunteers and associates with a medium to long term engagement with FFOU (over 3 months) will need to be inducted more fully on the safeguarding policy. This induction will take the form of a short workshop, included in the annual staff day, which will enable participants to explore more fully what is meant by harm and abuse, their obligations under the safeguarding policy, what to do if they have concerns and how to overcome challenges with reporting.

Staff who have specific responsibilities, e.g. Focal Points, managers responsible for risk assessing business areas, or those responsible for assessing and engaging partners, will have additional training on how to perform their roles fully. FFOU will develop and maintain a staff training plan for Safeguarding which is regularly reviewed as part of the implementation plan.

Communications and safeguarding guidelines

The public use of images and stories poses potential protection-related risks for FFOU as highlighted below⁶:

- Images containing personal information can be used as a means of identifying children or adults, making contact with them at a distance or even tracing them to where they live.
- Images may be altered or adapted for inappropriate use.
- Displaying and using inappropriate images, stories etc. or images and stories for which consent and permission have not been obtained, is unethical and may lead to increased organizational risks such as reputational damage.

⁶ Based on A Child Protection Toolkit (KCS 2006) and Plan International guidelines.

Personal information about a child or adult (such as full name and date of birth or full names of family members) and information that could be used to identify his/her specific location within a country (such as village or community names, school, parish, etc.) should not be used, especially where this is linked to an image. The maximum information given about a child or adult should be first name and name of the district in which they live.

Children or adults that have experienced violence, exploitation, have been otherwise abused or are in some way particularly vulnerable or at risk, should not have their faces displayed or in any other way be represented in a way that may lead to their identification. In addition, their real names should be changed, and this change be indicated. Other identifying details should also be changed.

FFOU will not use images of children or adults in states of undress, as doing so may promote the sexualization of children and contribute to maintaining negative perceptions. Such images could also be interpreted as sexually suggestive and impact negatively on their dignity or privacy.

All images and stories, along with accompanying details of individuals, should be used and kept according to relevant data and privacy laws. It is recommended that:

- Images are stored securely (e.g. lockable safe/cabinet, electronic files password protected, limited access etc.); and
- Images are destroyed five years after the date on the consent form unless further consent is obtained.

Consent

The informed, written consent of the child **and/or** parent/guardian or adult should always be obtained before a photograph or image is used, and its intended and/or possible use(s) explained. The implications of using images, including risks and possible negative consequences, especially where images used on websites should also be fully explained. Ideally, children and adults should be consulted on use of images and stories at the start of a project and consents obtained that will prevail for the duration of the project⁷.

User friendly consent forms should be used for obtaining consent and, where possible, those featured should be shown the image before it is published.

Group Photographs: As with individual photographs, it should be explained to the group what the photographs will be used for and consent sought from individuals in the group. Any individuals who wish to opt out should be allowed to do so.

General Photographs: Where using images of children or adults in crowd scenes where it may be difficult or impossible to get consents, the following should be taken into consideration:

- Would those attending the event expect photographs to be taken?
- Would those featured in the photograph probably consider themselves to be in a public place, with no expectation of privacy?
- Is it unlikely that anyone would object to the photograph being taken? (An individual could be in a public place, but may not want any images in which they are present being used.)

Where photographs are being taken at a planned event, as far as possible individuals should be told in advance that cameras will be present and how the photos will be used, in order that they can opt out of the event or notify organizers that they do not wish to be featured in any photographs.

⁷ Consents should be renewed if the nature of the project work changes or there are significant variations or changes to the way that images and stories will be used that were not anticipated at the start of the project.

Personal use of images

FFOU aims to promote its work as far as possible, but it is important to differentiate between images being produced professionally and therefore subject to review and sign off, and the use of images for personal use. Although staff and others, including visitors, may be keen to share their images widely, photographs or video taken of children, families and communities for personal use must not be published on the Internet, via social media or in printed materials without the prior permission of FFOU.

Guidelines for use of photographers/writers contracted by FFOU

Guidelines for photographers/writers commissioned by FFOU, need to include a statement that they are considered as Associates and as such are subject to this Policy.

Reporting Concerns

Concerns regarding inappropriate use of the images of children should be referred to the Focal Point as described in FFOU reporting guidelines;

Events/Activities involving children

All events or activities must be risk assessed at the planning stage and the event/activity designed and managed to include mitigating actions. Parental/carer and child consent is also required for children to participate in the event or activity.

ICT

FFOU implements an ICT policy which covers use of, or access through, *the organization's* ICT systems. All users must be aware that FFOU may block spam to prevent network overload and that all materials (including E-mails) generated on *the organization's* computer systems are the property of FFOU.

Subject to applicable law, FFOU reserves the right to monitor, inspect, copy, review, and store at any time, without prior notice, any and all of the following, as reasonably required to ensure compliance with these policies: usage (including private use as permitted in the policies) of [Organisation] computer systems and networks, including access to E-mail and the Internet, as well as any and all materials, files, information, software, communications, and other content transmitted, received, stored, or printed in connection with this usage.

Partners

All partner organizations that work with FFOU and are working with children/fishing communities, are also required to have in place the above safeguarding standards.

Following an assessment of the partner organization's current adherence to the standards, partners should be supported to develop their own implementation plan to strengthen current measures to meet the standards. The implementation plan should include the capacity building support that FFOU will provide, and be costed fully.

Associates

FFOU provides a range of people with access to our work and to vulnerable people, children and communities we work with. This is highly privileged access and should be granted only for legitimate work purposes. Safeguarding children and communities, is our highest priority, and it is possible some associates could inadvertently create situations that may impact negatively on children/communities or in worst-case scenario, pose a real risk to vulnerable people, children and communities. Even where we may know and trust associates, it is still important that we take great care to ensure communities are not exposed to any inappropriate or harmful conduct on their part, whether intentional or unintentional.

Associates may make visits to the programs and projects we are supporting. We will always do everything we can to make sure that the visits are safe for all parties and that any risks associated

with visits are minimized as far as possible.

All visitors to our work, *whatever their role or status*, must have clearance to be there, i.e. permissions from relevant managers. Most importantly, all visitors should be provided with, and briefed on, FFOU Safeguarding Policy and Code of Conduct and should at all times be accompanied and supervised by staff. A de-brief after the visit would also represent good practice and provide the opportunity to remind the visitor about the rules on use/sharing of images, as well as creating space for the visitor to ask any questions or raise any issues or concerns arising from the visit.

All visitors must complete a visitor agreement form prior to making a visit.

Any concerns that arise from visits should be raised with relevant managers and with the Focal Points.

Reporting and responding to concerns, complaints, allegations, suspicions, and incidents

FFOU is committed to responding to all reports or indications, including rumors, that suggest a child or vulnerable person is being exploited or abused or may be at risk of harm.

Preparing for receiving reports

A key element in making appropriate and effective responses to concerns is having a clear picture of the local context so that responses are made in line with legal, social welfare and any other considerations.

FFOU requires mapping exercises to be undertaken in all countries and localities where it supports programs/projects. These mapping exercises identify important information such as the age of consent⁸ and key legal provisions that exist for the protection of vulnerable people, children and communities as well as the agencies that have responsibility for investigating abuse issues and meeting the protection and health needs of vulnerable people and children, as well as deciding on what steps must be taken when concerns arise.

FFOU and partners will from time to time agree on local reporting mechanisms. Partners will appoint a Focal Point to receive reports of incidents or concerns. The Focal Point is responsible for ensuring that the report is managed in line with the local reporting mechanism. Any concerns or incidents which arise from FFOU funded projects, will be reported through to FFOU Director Programs. Any concerns or incidents which relate to FFOU employee or volunteer will be reported to the FFOU Focal Point.

FFOU Director Programs is responsible for ensuring that the reporting and responding procedures are followed, so that possible or actual cases of abuse and/or breaches of the Safeguarding Policy and Code of Conduct are responded to appropriately and referred promptly to the relevant authorities as required.

All reports and concerns should be recorded. **NB** All reports and other documentation relating to concerns must be treated as confidential and stored securely, whether kept physically or electronically. Access to and sharing of documents must be strictly on a 'need to know' basis.

The Focal Point and Director will make immediate decisions regarding the need for urgent action (medical attention, protection, referral to national authorities). Immediate protection measures may also include the need for suspension without prejudice of the person that is the subject of concern.

Case discussions involving relevant staff will take place as soon as possible following receipt of a

report, but no later than 24 hours after the event. Decisions will be taken on appropriate action and onward referral as appropriate.

⁸ The policy defines children/communities as those under 18 and prohibits any sexual relationships or activities with children/communities, but it is important to know the local age of consent in order to determine whether or not a reported concern represents a criminal matter

Reports, responses and any investigations will be coordinated by the Focal Point. Investigations will be objective, transparent, and will be guided by external professional expertise and support as required.

Reporting mechanisms and referral pathways will be widely publicized.

Disclosure

If you receive a disclosure alleging abuse, you should stay calm, listen carefully, be reassuring and explain that you will have to share the information with others. You must NOT promise to keep the disclosure a secret.

Any disclosure must be immediately reported to the Focal Point, and recorded in writing as soon as possible. It is not your responsibility to carry out an investigation.

Accountability

Establishing clear governance and accountability mechanisms is critical to successful implementation of the policy. The policy will be 'owned' by the Director and [Organisation] Board of Trustees who will collectively be responsible for supporting overall implementation

The Focal Point is responsible for supporting the implementation of the policy and procedures across FFOU. The Director will receive monitoring reports from the heads of departments.

Monitoring implementation

[Organisation] will ensure that implementation of the Safeguarding policy is subject to regular monitoring and will review the policy every three years (although changes may be made prior to formal review should legal, policy or practice changes suggest this is necessary).

The senior management will present reports on progress towards full implementation of the Policy to the Board on an annual basis. These reports will include updates and a summary of progress as well as key successes, challenges and obstacles to implementation. The reports will also include any breaches of the Policy, subsequent actions and outcomes so that the nature and frequency of protection incidents can be monitored over time.

The standards for safeguarding should be used as a guide when monitoring implementation of the Safeguarding Policy.

FFOU Safeguarding Checklist

Whilst there is not comprehensive set of standards for safeguarding in the sector, the following are an adaptation of standards for Safeguarding. These standards will be used to review implementation of FFOU safeguarding policy and procedures.

Safeguarding Culture	
1.	The organization has clearly defined values and an open and transparent culture which embraces diversity, challenges inequality and encourages staff and associates to speak out
2.	There is a zero tolerance of unacceptable behaviors within the workplace, and unacceptable behaviors are challenged
3.	Senior staff model leadership behaviors which create safe environments and demonstrate accountability for safeguarding
4.	The organization attracts a diverse staff team, particularly for positions who have key decision-making responsibilities for safeguarding staff, children and communities
5.	Staff, associates and communities, in all their diversity, participate in decision-making and are treated with dignity and respect
6.	Communities are aware of what behaviors they can expect from the organization (through the use of appropriate awareness-raising tools and approaches relevant to age, language and capacity) and are empowered and enabled to report if behavioral commitments are not met
Governance Accountability	
1.	The Board of Trustees and Senior Management Team have clearly defined accountabilities for safeguarding
2.	Focal points for safeguarding, who coordinate the development and implementation of the safeguarding policy and procedures, are assigned from different positions
3.	A safeguarding policy (or combination of policies) is in use and regularly communicated to all staff, associates, children and communities in a manner which suits them
4.	An implementation plan is in place, identifying gaps in safeguarding measures and actions to address the gaps, which is monitored on a quarterly basis
5.	Monitoring and evaluation processes include indicators for measuring safeguarding practices, using international standards as a basis
6.	Learning is fed back into organizational implementation plans
Safe People Practices	
1.	Job advertisements and job descriptions make reference to the organization's commitment to safeguarding
2.	Background checks and thorough reference checks are made for staff which include suitability to work with vulnerable people
3.	Equality of opportunity is maintained for all candidates
4.	All staff and associates receive induction and refresher trainings on safeguarding and are aware of their obligation to report harm
5.	Supervision and performance appraisals include adherence to the safeguarding policy(ies) and code of conduct
6.	References are provided for those exiting the organization which include any substantiated safeguarding concerns
Safe Programming Practices	
1.	The national and local situation, legal context, customs and support services where programs are delivered is mapped and understood
2.	Potential risks of harm to different groups of children and communities presented by programs and projects are identified and addressed
3.	Program and project plans and budgets include activities to safeguard children and communities including awareness raising
4.	Partners, suppliers and contractors are assessed for their contact with children ⁹ and communities, current commitments and capacity to implement measures on safeguarding, which informs their access to communities/ communities/ rights holders
5.	Clauses on required safeguarding commitments are included in all contract agreements and

⁹ This should include access to sensitive data on children and vulnerable adults

	partners, suppliers and contractors are monitored for their adherence to requirements
6.	Training on safeguarding is delivered to partners, suppliers and contractors where necessary (particularly where these organizations will have contact with children and communities)
Safe Communications	
1.	Safeguarding measures are incorporated into all forms of funding, media and communications activities
2.	Information on, and images of, children and communities is published only after voluntary and informed consent is received and stored securely
3.	Children and communities are portrayed with dignity and no identifying information is made public
4.	The best interests of children and communities are prioritised over the opportunity for increased funding, positive public profile and advocacy
5.	The use of digital platforms, and engagement of children and communities through these platforms, meets safeguarding requirements
6.	Information and Communications Technology (ICT) systems and guidelines ensure that ICT cannot be used to access inappropriate images and/or information on children and communities
Safe Reporting and Response	
1.	Complaints and reporting mechanisms have been set up in consultation with diverse groups of children and communities and are survivor centered
2.	Written procedures are in place on responding to reports or concerns relating to harm and abuse, including making referrals and reporting criminal cases safely
3.	Investigations are undertaken by experienced professionals, who are trained on sensitive investigations such as allegations of sexual exploitation and abuse or child abuse
4.	Relevant staff are trained on how to appropriately receive, document and refer safeguarding concerns that might arise through existing monitoring procedures
5.	Policies are in place that cover disciplinary processes and whistle blower protection
6.	Substantiated reports of serious policy violations, harm and abuse result in either disciplinary action or contractual consequences

Signed by Names: Kanyana Ezra

Title: President

Date: 07/09/2022

For and on behalf of the National Executive Committee (NEC)