

**CHILD AND VULNERABLE ADULT SAFEGUARDING
POLICY**

OF

FESTUS FAJEMILO FOUNDATION(FFF)

**NO 15, CHARITY ROAD, JOREBET PLAZA, NEW
OKO –OBA, ABULE –EGBA, LAGOS**

duly signed on this

28TH DAY OF FEBRUARY, 2017

Afolabi Fajemilo
Executive Director

Olujimi Olusola III
Chairman, Board of Trustees

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1.0 Introduction

Children /Vulnerable Adults represent a large number of persons **Festus Fajemilo Foundation (FFF)** work with. FFF as an organization believes that every child / vulnerable adult has the right to protection, regardless of gender, ethnicity and religion. This policy has been created because respecting the dignity of all children and vulnerable adults and keeping them safe is a foundational principle of the work of FFF, and is committed to ensuring a safe environment for children through investing the necessary resources needed to apply the procedures contained in this policy.

Any form of sexual behaviour with a child / vulnerable adult is always sexual abuse and is contrary to human dignity and to the laws of the country. Therefore, FFF hereby states unequivocally that sexual abuse of a child by a member staff or anyone who has close contact with children or vulnerable adult within the system is morally reprehensible and a violation of the dignity and rights of the person, as well as a criminal act. Any other form of abuse is not tolerated by FFF.

This policy is designed to provide guidance to FFF and to all staff working in their institutions and all other persons who have contact with children or vulnerable adults in the institutions run by FFF, so that they understand the importance of child / vulnerable adult protection issues as well as undertake their legal, ethical and policy responsibilities within and outside of working hours. A code of conduct is given in section 13.0 to guide the conduct of all staff toward each child and vulnerable adult. Persistent breach of the code of conduct or proven allegation of abuse against a staff irrespective of his or her position is a sufficient reason to apply disciplinary measures.

This policy shall apply to all staff and all other persons, who have direct and indirect contact with children or vulnerable adults in institutions owned or run by FFF

2.0 Rationale of Child and Vulnerable Adult Safeguarding Policy

FFF recognises that abuse of any kind is not in keeping with the Gospel message, nor within the scope of religious practices. Abuse is not permitted or condoned in any manner nor is the possession of or access to child pornography and other offensive materials. Therefore, every effort is made to protect children and vulnerable adults and to ensure that they are not abuse at any time physically, sexually, emotionally, psychologically or through neglect and economic exploitation. FFF will by no means knowingly employ or engage, directly or indirectly, anyone who poses an unacceptable risk to children and vulnerable adults. It is hereby convey to all staff that persistent breach of the code of conduct (see section 11.0) or proven allegation of abuse against a child or vulnerable adult is a sufficient reason for **disciplinary measures including dismissal**.

In the unfortunate event that there is abuse of positions of power and trust by maltreatment of children and vulnerable adults¹ or allegations of such, it is necessary to have procedures in place to protect the rights of the child and the rights of the adult who is accused and to deal with complaints against a staff, volunteer or anyone in position of authority or trust over children and vulnerable adults within FFF.

¹ Whenever this Child Safeguarding Policy refers to a child or children, this also includes those considered to be “vulnerable adults.”

3.0 Responsibilities of FFF under the policy

Conscious of the fact that FFF works with and serves people from diverse backgrounds, sensitivity to cultural differences is required and appropriate boundaries must be maintained at all times and by adhering to good practice guidelines, both children and adults are protected.

FFF is committed to the care and protection of children and vulnerable adults by:

- Raising awareness of child protection issues among members, employees, and volunteers;
- Implementing a good recruitment policy, followed by on-going training and supervision of staff;
- Ensuring that all staff and none staff who have direct or indirect contact with children or vulnerable adult within organisation / project are familiar with the policy;
- Requiring a formal code of conduct for all staff, and volunteers and others with any kind of contact with children or vulnerable adults in any institution / project owned, sponsored, or administered by FFF.

- Conducting risk assessment of FFF owned, sponsored, or administered institutions / projects and take appropriate action(s);

- Following clear procedures for dealing with allegations of abuse.

Organisation/institution such as schools, hospitals and clinics, social service programs and youth groups, under FFF auspices shall have procedures in place in line with this policy and appropriate for the situation. All employees and volunteers are informed of the procedure to be used if a complaint of child abuse is alleged. The response to any misconduct on the part of a member of staff, or volunteer with any child must be founded on acknowledgement of the wrong that has been done to the child, the hurt which such abuse imposes, and the potential for long-term damage to the child.

4.0 Who does the child and vulnerable adults safeguarding policy cover?

This document sets out the Child and Vulnerable Adult safeguarding Policy and Procedures for FFF. This policy covers everyone who has direct and indirect contacts with children and vulnerable adults within FFF. Direct and indirect contact with children and vulnerable adults are defined under 6.6 and 6.7 below.

4.1 The specific objectives of the policy

In line with article 24 of the United Nation's Convention on the Rights of the Child and the Child Rights Act of Nigeria signed into Law in 2006, FFF recognizes the right of the child to enjoy the highest attainable level of protection and freedom from abuse. This policy is formulated for this reason. Therefore, this policy has five main specific objectives as follows:

4.1.1 To protect all children and vulnerable adults from abuse: This policy seeks to provide adequately secured and safe environment for all the children² and vulnerable adults who are in direct or indirect contact with staff of FFF.

² Some children are particularly vulnerable, e.g. children with disabilities; children who are refugees, asylum seekers, orphans; children living in residential care or hostels, in dysfunctional families; children from ethnic or religious minority communities who suffer from discrimination.

4.1.2 Protect staff of FFF from possible false allegations of Child and Vulnerable Adult abuse now or in the future: The policy demands the highest standard of propriety for the conduct and behaviour of personnel when dealing with children and vulnerable adults. In this way staffs protect themselves against allegations of abuse.

4.1.3 This policy also protects the image of FFF. A policy with clear procedures and good practices will protect the image of FFF when dealing with any complaint of abuse made against a member of staff, volunteer or anyone with direct or indirect contact with children on behalf of FFF. The existence of this policy and the provision of education on this issue are preventative measures for the future. This policy also may serve as a guideline, as appropriate, in handling cases where the accused persons is deceased or has left the service of FFF when the allegation is made.

4.1.4 To Prevent potential child and vulnerable adult abusers from infiltrating or joining FFF as staff or volunteers.

4.1.5 Raise awareness and to sensitize all major stakeholders about the need for children and vulnerable adults safeguarding at all times.

4.2 In this policy, guidelines are adopted that will assist in:

4.2.1 Responding promptly to those who have experienced abuse in their lives at the hands of members or staff of FFF or persons or group acting on behalf of the Foundation.

4.2.2 Seeking accountability from those who commit abuse;

4.2.3 Responding appropriately to staff, volunteers and any person, who have allegations of abuse lodged against them;

4.2.4 Facilitating reconciliation, when possible and appropriate, for individuals, families, communities affected by abuse when the congregation is involved in any manner;

4.2.5 Cooperating with civil and religious authorities in determining the truth of an allegation;

4.2.6 Assuming responsibility for seeking solutions that are just.

5.0 Review of the policy

This policy will be reviewed every 3 years and to ensure that it remains relevant, given the constantly changing environment in which FFF works.

Whenever there are emerging trends in Child Safeguarding, an administrative circular to effect a change shall be issued. Once multiple changes have been effected by an administrative circular, a policy review committee shall be constituted by the head of FFF. This committee shall have as responsibility to incorporate on-going debates on Child Safeguarding issues. The child and vulnerable adult safeguarding focal person within FFF shall be a permanent member on the review committee for as long as he/she is still in the service of Festus Fajemilo Foundation. Other members on the committee shall be appointed at the time of review.

6.0 Definitions of some terms

- 6.1 **Child** means every human being below the age of 18 years, unless under the law applicable to the child, majority is attained earlier.³
- 6.2 **Vulnerable Adult** is a person of 18 years of age or older, who is unable to protect his/her own rights, interests and/or vital concerns and who cannot seek help without assistance because of physical, mental, or emotional impairment.
- 6.3 **Child safeguarding means** all actions taken to protect children and vulnerable adults, from physical, sexual, neglect and emotional abuse including economic exploitation. The actions include, but not limited to policies, standards, guidelines and best practice procedures to protect children and vulnerable adults from both intentional and unintentional abuse.
- 6.4 **Child Abuse** is the harm or threatened harm to a child's health or well-being that occurs through non-accidental injury or cultural practices, either physical or in some other way. Abuse occurs when a child is treated in a way that is harmful, wrong, offensive, or improper by adults or other children.
- 6.5 **Do no harm:** Basic ethical principle stating that the primary concern must always be to protect the participants (alleged abuser and victim) from harm.
- 6.6 **Direct Contact with Children:** In this case, it implies to being in the physical presence of a child or children in the context of FFF's work, whether contact is occasional or regular, short or long term.
- 6.7 **Indirect Contact with Children**
This means having access to information on children in the context of FFF's work, such as children's names, locations, addresses, health condition, family background, photographs, video recordings, and case studies. Such information may be contained in official reports, publications, and database.
- 6.8 **Volunteers:** Someone who has agreed to work without pay.
- 6.9 **Child and vulnerable adult safeguarding concern:** A breach by a project personnel of the Code of Conduct and risk related to the project environment (e.g. rooms without windows for visual monitoring by another adult).
- 6.10 **Alleged child and vulnerable adult abuse incident:** An incident where a child and vulnerable adult abuse has been observed or is suspected, alleged or disclosed. A child and vulnerable adult abuse incident should be called 'alleged' until proven.
- 6.11 **Child-safe organisation:** An organisation where children are protected from physical, sexual or emotional abuse, including neglect. This is what organisations should aim at.

³ Definition of the United Nations Convention on the Rights of the Child, Article 1, 1989; the Committee on the Rights of the Child, the monitoring body for the Convention, has encouraged States to review the age of majority if it is set below 18 and to increase the level of protection for all children under 18.

7.0 Kinds of Child and Vulnerable adult Abuse

There are basically five kinds of abuse namely: physical, sexual, neglect, emotional and commercial or economic exploitation.

7.1 Physical abuse is any deliberate physical injury or pain inflicted on a child or vulnerable adult. It also includes failure to prevent a child from physical injuries or suffering. Examples of physical abuse are caning, flogging, kicking, throwing to the ground, poisoning, burning, drowning, suffocating, rubbing pepper in the eyes, cutting with razor blade or knife, binding with rope, or inappropriately giving of drugs to children to control behaviour.

A common practice these days is the torture of children so that they confess to be witches or after alleged confession to witchcraft. Torturing of children for any reason constitute physical abuse. Other forms of physical abuse include suspending the children from the ceiling and other heights, kneeling down and putting heavy weights on the raised hands or head of the child, kneeling down on stones or pieces of broken bottles, lying on or rolling on wet floor. No treatment of this kind is tolerated by Festus Fajemilo Foundation.

7.2 Sexual abuse of a child means forcing or enticing the child to take part in sexual activities, whether or not the child is aware of what is happening. It involves the use of a child for sexual gratification or pleasure by an adult or older child or adolescent. It is an act of taking advantage of children because they are vulnerable and not physically strong. Sexual abuse includes incest. Incest with children is when the child is sexually violated by close blood relative including a parent, older sibling, grandparent or such other relative in the child's family life.

Sexual abuse can fall under two categories, namely: **Non-contact sexual abuse** and **Contact sexual abuse**.

7.2.1 Non-contact sexual abuse is when someone abuses a child sexually without touching the child. This can take on the following forms:

- Forcing a child to watch sexual acts (watching others having sex for example).
- Forcing a child to listen to sexual talk including comments, tapes, and obscene phone calls.
- Forcing a child to look at sexual parts of the body of either the abuser or of someone else includes buttocks, anus, genital area, breasts and mouth.
- Exposing or "flashing" genital organs or other parts of the body with sexual intent.

7.2.2 Contact sexual abuse is when someone abuses a child sexually by having physical contact with the child. This can take on the following forms:

- Touching and/or fondling a child's sexual areas (private parts and/or breasts), including kissing.
- Forcing a child to engage in acts of oral sex. Oral sex is when someone forces a child's mouth to come in contact with his/her penis, the vagina or anus. Someone who uses their mouth on a child's sexual areas.
- Forcing a child to have sexual intercourse. Sexual intercourse can take place vaginally, orally or anally. Penetration must occur and it includes penetration using objects or body parts (such as a person's finger, tongue or penis).
- Deriving voyeuristic pleasure by showing sexual activity or forcing two or more children to have sex with each other.

7.2.3 Sexual harassment in schools

This is any unwanted and /or inappropriate sexual touching and or language that make the school environment feel unsafe and hostile to a child. If an educator, and /or older student touches a child sexually, or speaks to that child in a manner that indicates sexual intention, that is harassment. Another form is where an educator threatens to fail a student or influence their schooling in a way that will harm their grades if they refuse to have sex with them.

7.2.4 Characteristics of a Child Sex Offender

Sex offenders come from all countries, all cultures, all religions and all social classes. They are not confined to any section of society, and may be people who hold a position of trust, power or authority in relation to a child or a vulnerable adult. A large majority is male. Most of them generally are considered as 'normal' people. They may be staff members (including senior executive management personnel), professionals, clergy men and women, caretakers, volunteers, relatives or neighbours. Sex offenders operate in different ways and fit into different categories. Generally, they operate strategically to obtain substantial access to children. They target weak institutions and infiltrate organisations with low standards of child protection, in order to orchestrate opportunities to work with children. They groom their victims, weeks, months, even years and seek their confidence. In the majority of cases, abusers gain access to their victims through deception and enticement, seldom using force. Hence abuse typically occurs within a long-term, on-going relationship between the offender and victim. Furthermore perpetrators try to make the victim docile and feel guilty. Perhaps, this is one reason why approximately less than 10 % of abuse is ever reported.⁴

Child sex abuser usually desires to work with vulnerable children, like to have close contact with and be alone with children under the guise of coaching, counselling, care or therapies. He or she often shows inappropriate attitude to children, insensitive to children issues and the effect of child abuse and may be heavily interested in child photography. Institutions should always be sensitive to the antics of child sex abusers.

7.3 Neglect is a form of child abuse. A child is said to be neglected when there is persistent failure to meet the child's needs for food, shelter, clothing, warmth and medical care, or when there is failure to protect a child from exposure to any kind of danger, resulting in serious impairment of a child's health or development. Child neglect also includes failure to respond to a child's basic emotional needs and lack of supervision by adults. Neglect also includes persistent failure to provide regular parental guidance.

Another example of child neglect is where a parent or guardian upon whom the student is dependant refuses to pay the child's school fees as a form of punishment, or refuses to give the child money to get to school, or does not give the child money to buy school clothes or books. This is all provided that the parent or guardian has the financial means to provide all the things mentioned but merely refuses to do so for unjustifiable reasons. It is also neglect if a child is refused food in boarding facility as a means of punishment.

But it is not neglect if a parent does not give a child something he or she **wants**, like a new computer or a cell phone. It is not neglect if an adult or older child refuses to give any object to a child or vulnerable adults when there is good reason to believe that the object will constitute harm or cause injury to the child or vulnerable adult.

⁴ The Child Sex-Offending Cycle (adapted from the Core Sex Offender Management and Intervention Program, 2001)

7.4 Emotional abuse is harm done by persistent or severe emotional ill-treatment or rejection, such as degrading punishments, ridicules, threats, bullying, harassment, and not giving care and affection, resulting in adverse effects on the behaviour and emotional development of a child. Emotional abuse occurs when it is conveyed to children that they are worthless or unloved, unwanted, or inadequate. Causing children to feel that they are in some grave danger also constitutes emotional abuse. For instance, it is common to hear people tell children, “I will kill you if you do that” or “I will break your head”, “bastard” “stupid”, “never do well” “dullard”, etc. These abusive, threatening or violent words have negative effects on the emotional development of children. False accusations particularly of witchcraft or other culturally derived stereotypes of children have great potential to damage the mind of the child. Other forms of abuse include teasing of children with disabilities by teachers and other children or any adult. Children lose value, self-respect and develop feeling of worthlessness. Shouting at a child all the time for every mistake or offence does not allow the child morals and teachings. Shouting at a child raises a lot of tension within the child and impairs learning. Everyone including a child learns better in an atmosphere with low tension or anxiety.

Emotional abuse is not easy to identify because unlike physical abuse it does not leave any physical scars or wounds. It is when yelling and anger go too far or when parents or educators or other older children constantly criticize, threaten, or dismiss children until their self-esteem and feelings of self-worth are damaged. Emotional abuse can hurt and cause damage just as physical abuse does. It attacks the abilities and nature of the child. At times it is disguised as a joke, but it is hurtful.

7.5 Economic or commercial Exploitation

This refers to the practice where children are used by people for economic gains. Many foster parents are often guilty of this. Various forms of economic exploitation of children include:

- Using children to hawk various items on the streets, motor parks and other dangerous places
- Using children as domestic servants
- Using children as guide by beggars, thus depriving them of schooling and play
- Using children to work in factories, mines, farms as source of cheap labour.
- Using children to work on school’s farm or teacher’s farm.

8.0 Places and situations that predispose a child and vulnerable adult to abuse

Abuse can take place anywhere (home, schools and other public spaces) in the forms that have been described above. Any one or a combination of the different kinds of abuse described above can occur under the following conditions: in institutions, in religious houses and during cultural festivals or ceremonies.

8.1 Child Abuse in institutions

Abuse of children and vulnerable persons can happen in private or government owned institutions where services are being provided. The institutions can be hospitals, day care centres, schools, rehabilitation and vocational training centres, orphanages, dormitories, etc. all the different kinds of child abuse described above can occur within institutions. In a broader sense, abuse of children in institutions covers such aspects as poor standards of care, lack of positive response to the needs of the children, incompetent and inadequate staffing, lack of facilities and equipment. Overcrowded classrooms and children wards are very common. There are still classrooms for children without windows, roofs or desks. Children sit on bare ground inside of classrooms or outside under trees where they are exposed to inclement weather. Other forms of abuse include harsh treatment of children within the institution, denial of medical

attention and sexual harassment. Bullying is quite common in boarding facilities in secondary schools. It is an abuse when services for children are poorly organised or lacking.

8.2 Child abuse under religious setting

Abuse of children under religious setting means any form of abuse of children that occurs administered under the guise of religion. Common forms of child abuse under the guise of religion include physical, sexual, emotional and commercial exploitation. Children are known to have suffered severe forms of body injuries and psychological trauma at the hands of religious men and women in the country.

8.3 Child abuse under cultural practices

Abuse of children regularly takes place under certain cultural practices that are harmful to the health and dignity of children. For examples, forced marriages, facial and body marks and female genital mutilation are carried out during certain cultural ceremonies. These cultural practices have a negative effect on the health, physical and psychological well-being of children.

9.0 Training and increase awareness of child and vulnerable adult safeguarding issues

There is an on-going training program for all staff newly recruited into Festus Fajemilo Foundation. The training shall include information on child protection and safeguarding procedures and with whom any concerns about issues of child abuse should be raised. The purpose of induction is to:

- Provide information about our policies and procedures;
- Support individuals in a way that is appropriate for the role for which they have been engaged;
- Convey the conduct expected of staff within the FFF with respect to children and vulnerable adults;
- Provide opportunities for a new member of staff or volunteer to discuss any issues or concerns about their role or responsibilities; and
- Enable the person's line manager or mentor to recognise any concerns or issues about the person's ability or suitability at the outset and address them immediately.

A key step in reducing risks to children and vulnerable adults is to constantly raise awareness about child and vulnerable adult safeguarding issues. As mentioned above, the staff of FFF shall receive regular training on child and vulnerable adult safeguarding issues and on their obligations under the policy, including mandatory reporting of concerns or allegations of child and vulnerable adult abuse.

10.0 Disclosure, Investigation and Reporting Procedures

10.1 CVAS Focal Person: There shall be a focal person for child and vulnerable adult safeguarding in the Project. The Focal Person is

Ms Olufunke Ogunrombi

Address of Focal Person No 15, Charity Road, New Oko Oba, Abule Egba, Lagos.

Telephone(s) of Focal Person: **08033255811,08096508183**

The duties of the Focal Person shall include:

- i. Responsible for matters concerning child and vulnerable adult abuse
- ii. Undertake risk analysis
- iii. Receive reports of concerns and allegations from FFF staff / partners.
- iv. Conduct preliminary investigations on reports of concerns / allegations
- v. Report findings to organizational heads
- vi. Liaise with other agencies working in the same area to get information and support.
- vii. Organise training for new staff of the project and representative of the project on Child and vulnerable adult safeguarding policy
- viii. The focal person is expected to play other roles that may be assigned.

At the level of FFF, the Child and Vulnerable Adult Safeguarding focal person will receive and carry out preliminary investigations on all concerns or allegations of any form of abuse by a staff against a child or vulnerable adult, child to child abuse or a vulnerable adult abusing another vulnerable adult.

Upon receiving a preliminary investigative report from the focal person, the head of FFF may decide to deal with the matter at his or her level or decide to refer it to an investigative committee to be headed by the focal person for further investigation and recommendations. The head of FFF may act according to the findings and recommendations of the committee or according to existing policy.

10.2 How FFF Will Act in an event of allegation or concerns

Prudence and integrity demand that once an allegation has been made, the Foundation reasonably and carefully responds according to its written policy. The entire process shall be conducted with respect and discretion in a spirit of charity, compassion, and transparency, both for the complainant and for the accused member.

FFF shall comply with all national, State, and local laws that prohibit child abuse and require the reporting of such an allegation.

Where it is established that abuse has taken place, the offender must take responsibility for his/her action and will be dismissed from their post immediately, and the matter handed over to the appropriate authorities. Where it is established that abuse has not occurred, steps will be taken to sensitively reinstate the staff member without delay.

10.3 Disclosure

FFF recognizes that disclosures (i.e. when a specific allegation of abuse is made against a named individual) and suspicion (i.e. when concern is expressed about abuse that may have taken place or may take place) should always be investigated and acted upon swiftly, making the welfare of children the paramount consideration.

Members of staff or volunteers who become aware of an alleged incident involving a member of the Foundation, staff, or volunteer are urged to make known relevant information concerning any instances of possible or certain abuse regarding any staff, or volunteer. No action will be taken against anyone who reports in good faith information indicating perceived misconduct. Any information offered in confidence should be received on the basis that it will be shared with relevant people in authority.⁵

Interviewing a child must be undertaken with great care and sensitivity, particularly in any initial interview with a child who makes a complaint. No further interviews of the child should take place, pending the formal investigation in accord with the protocols, without consent of the child's parent(s) or guardian, unless the complaint is against the parent or guardian.

When a child discloses that he/she is being or has been abused, the person to whom the disclosure is made should:

1. Listen to and receive what the child is saying
2. Take the allegation of abuse seriously
3. Reassure the child that they have done the correct thing by telling you
4. Let the child know that you need to tell someone else; do not promise total confidentiality
5. Let the child speak freely but do not press for information or excessive detail
6. Let the child know clearly what you are going to do next and that you will let him/her know what happens
7. Record carefully what you have heard while it is still clear in your mind—include the date, time, and length of the conversation and any incident disclosed.
8. If the child is capable you may give him/her the option to write a statement.

10.4 Investigating and Reporting Procedure

If any member of the Foundation, staff, or volunteer suspects abuse; or if a child makes a disclosure; or if a person external to FFF reports a suspicion or allegation relating to any member of staff, or volunteer related to FFF, the following steps should be taken immediately:

1. The matter shall be reported without delay to the appropriate level of leadership in the organization and investigation should commence immediately. An allegation will be taken seriously and responded to promptly and fairly
2. Full cooperation with any investigation will be given; the investigation will be thorough and objective with the goal of determining the facts.
3. In cases of allegations of abuse, the leadership of FFF shall where necessary;
 - a) Inform and cooperate with law enforcement officials and child protection agencies, as required by law;
 - b) Respect and adhere to the laws of the civil jurisdiction involved;
 - c) Inform and cooperate with relevant authorities, as appropriate;
 - d) Inform parents or caregivers, as appropriate;
 - e) Inform relevant stakeholders
4. If a member of staff or volunteer is the subject of an allegation of child abuse, that member will be asked to take leave from their duties until the investigation has been

⁵ A promise of total confidentiality should never be made, especially to a child. Instead the child should be assured that only those who need to know will be told.

- completed. (Such a suspension does not imply guilt, but rather protects all parties while an investigation is undertaken.) Disciplinary measures will be taken against the staff if the allegation is proven against him or her.
5. Confidentiality and discretion will be maintained to the fullest extent possible. FFF is committed to protecting the canonical and civil rights of the victim and the accused during the investigations. The Do-no-harm principle should be strictly adhered to.
 6. The head of FFF or his/her designee shall respond pastorally to the alleged victim and the victim's family, while the investigation is carried out, in the following way:
 - Make no judgment of the allegation;
 - Inquire about the welfare of the alleged victim;
 - After consultation with legal counsel, offer assistance in obtaining medical treatment or psychological counselling as deemed appropriate until the matter is resolved.
 7. The head of FFF or his/her designee shall respond to an accused staff or volunteer hereafter referred to as the accused person, taking as appropriate, the following steps:
 - a) Inform the accused person of the accusation or suspicion of involvement.
 - b) Inform the accused person of his or her legal rights and obligations attendant to the report of alleged abuse.
 - i. The accused person is advised that conversations between him or her and the head of FFF or anyone he or she confides in are not privileged; these individuals could be called to testify in a criminal court.
 - ii. Inform the accused person that his or her statement to the leadership of FFF may not be privileged communication under civil law, and that he/she has the right not to respond to the accusations.
 - iii. Advise and assist him/her to obtain appropriate legal counsel separate from that of FFF, if that is deemed appropriate.
 - c) Provide the accused person with psychological counsel as needed.
 - d) Place appropriate restrictions on any organisational involvement or official activities or duties by the accused person until the issue is resolved.

8. Investigating team

If an allegation toward a staff, volunteer or anyone with close contact with children as permitted by FFF, is credible, an investigating team which comprises competent persons shall be set up to investigate the allegation and make recommendations. FFF shall determine the composition of the team.

9. The duties of the investigative team may include:
 - a) Conducting an investigation in connection with the allegation or suspicion, maintaining confidentiality;
 - b) Determining the extent to which the allegation can or cannot be substantiated;
 - c) Reporting the findings and making recommendations to head of FFF for further action.
10. In the event that an allegation of abuse becomes public, a designated spokesperson shall relate to the public in a manner that balances openness and confidentiality. To honour confidentiality of all involved, the members of staff or volunteer shall refrain from

speaking publicly and/or privately or speaking to the press or any of the social media about the allegation without authorisation from FFF.

11. Depending on the results of the investigation, the head of FFF may
 - a) Inform the accused person(s) of the findings;
 - b) Inform the alleged victim and his/her family;
 - c) Impose restrictions on the accused person and that include removing the accused person permanently from all duties, assignments, activities, or environment posing a foreseeable danger of abuse or;
 - d) Assign the staff or volunteer to other department after appropriate consultation with him or her;
 - e) Respond to the needs of the accused person including whatever treatment is prescribed by expert medical/psychological consultants;
 - f) Notify the appropriate insurance carriers of the outcome of the investigation;

12. If an accused person including a staff or volunteer desire a review of the case, he/she may direct her appeal to the head of FFF.

13. If it is determined that an allegation is mistaken or without foundation, positive steps are taken to ensure that the person wrongly accused is completely cleared of any suspicion and every effort is made to redress any wrong, hurt, or injustice caused to the accused.

11. Risk Assessment

FFF will carry out risk assessment once a year with the active support and participation of relevant staff members in the various units / departments where the assessment is carried out.

12.0 Staff Recruitment and Training

Criteria for recruitment and training shall be as contained in staff employment's letter and volunteer conditions of service.

13.0 Code of Conduct

Children are the most important gifts God has entrusted to us. As a staff or volunteer, I promise to strictly follow the rules and guidelines in this Code of Conduct as a condition of my providing services to the children, and vulnerable adults of Festus Fajemilo Foundation. Following strictly the code of conduct will enable everyone working with children and vulnerable adults to avoid situations that might lead to abuse or allegation of abuse.

13.1 As staff or volunteer of FFF, I will:

- i. Contribute to create and uphold an environment where children and vulnerable adults are listened to and respected as individuals, and which is safe, positive and encouraging to them.
- ii. Avoid situations where I am alone with children and/or vulnerable adults at FFF.
- iii. Ensure physical contact is at all times appropriate and not an invasion of the child's and vulnerable adult's privacy.
- iv. Ensure the use of the 'Two Adult Rule'. I take care that another adult is present or within reach when conducting one-to-one coaching, counselling, medical or rehabilitation procedures etc. If I must be alone with a child or vulnerable adult, I take care that the event is held in a room with doors and windows left opened and another adult is within visual contact throughout the period. Where one-to-one meeting with a child or vulnerable adult is appropriate, I will inform my supervisor or another adult in advance where and when this will happen.
- v. Use positive reinforcement rather than criticism or violence when working with children or to manage their behaviour.
- vi. Use positive, non-violent methods to manage children's behaviour.
- vii. Report suspected abuse to the administrator, or appropriate person and I understand that failure to report suspected abuse to civil authorities may constitute a misdemeanour, according to the law.
- viii. Cooperate fully in any investigation of abuse of children or vulnerable adults.
- ix. Follow this policy to protect children and vulnerable persons, the Code of Conduct and Reporting Protocol, regarding the safety and well-being of these persons.
- x. Protect and handle personal data of children and vulnerable adults with care and ensure that this is also respected by third parties who receive information about children from me.

I will never:

- i. Hold, kiss, embrace or touch children and vulnerable adults in an inappropriate way or in a manner which is not culturally acceptable.
- ii. Accept expensive gifts from children nor give one to them without the knowledge of the head of FFF or my immediate superior and their parents.
- iii. Engage in activities involving close body contact with children and vulnerable adults beyond the professional requirements.
- iv. Make comments or actions that suggest sex to a child and a vulnerable adult even as a joke, or show or cause a child to see erotic and pornographic materials.

- v. Engage in sexual activity or have a sexual relationship with a child or a vulnerable adult, regardless of consent or local custom. Mistaken belief in the age of a child is not a defence.
- vi. Marry a person below the age of 18, regardless of consent and local custom.
- vii. Assist a child or a vulnerable adult in tasks that he or she can do unaided or unless requested (such as taking them to the toilet, bathing or changing clothes).
- viii. Strike, spank, shake, slap or otherwise physically assault or physically abuse children or vulnerable adults. All disciplinary measures are non-violent and do not humiliate.
- ix. Act in ways intended to shame, ridicule, threaten, humiliate, belittle or degrade children and vulnerable adults or otherwise perpetrate any form of emotional abuse.
- x. Discriminate against or favour particular children and vulnerable adults to the exclusion of others.
- xi. Spend excessive time alone with a child or a vulnerable adult, away from others, behind closed doors or in a secluded area (see 'Two Adult Rule' above).
- xii. Take a child or vulnerable adult to their home or my home, or visit a child or vulnerable adult at their home where I may be alone with that child or vulnerable adult, or sleep in the same room alone with them.
- xiii. Exploit children for their labour (e.g. domestic servants) or for sexual purposes (e.g. prostitution) or trafficking of children; The definition of child domestic work (house help) does not include occasional babysitting, gardening, help during school holidays or out of school time.
- xiv. Under no circumstances, give alcohol or tobacco to children and vulnerable adults.
- xv. Take a child alone in a vehicle unless it's absolutely necessary and with consent of the parents and appropriate authority. If there is one adult, there should be a minimum of two children present for the entire journey. In exceptional circumstances, when it becomes necessary to make a journey or part of a journey alone with a child, the child's parent or guardian should be informed as soon as possible.

14.0 Confirmation of understanding and receipt by staff and volunteers

I understand that as a staff/volunteer working with children or vulnerable adults, I am subject to a thorough background check including criminal history. I understand that any action inconsistent with this Code of Conduct or failure to take action mandated by this Code of Conduct may result in my removal as a staff/volunteer working with children or vulnerable adults. By signing below I confirm I have read its content and commit to it. I will abide by the Code of Conduct set out in Section 13.0 of the policy.

Staff/volunteer Name _____

Staff /volunteer Signature _____

Date _____

Administrator/Manager's Name _____

Signature of manager/administrator _____

Date _____