

CARING TOUCH FAMILY FOUNDATION

SAFEGUARDING POLICY

The Protection of Every Child Is Not a Program. It Is a Conviction.

ZERO TOLERANCE

Caring Touch Family Foundation has an absolute zero-tolerance policy toward all forms of abuse, exploitation, neglect, and harm involving children. No exception. No context. No excuse.

INTRODUCTION: WHY SAFEGUARDING IS FOUNDATIONAL

Caring Touch Family Foundation exists because children have been abandoned, exploited, abused, trafficked, and neglected. We exist because the world has failed them. That failure is the crisis we are answering. It would be an unspeakable contradiction if any child were to experience harm through contact with an organization built to protect them.

This is not a theoretical concern. The evidence is unambiguous: organizations that work with vulnerable children are at heightened risk of harming them if safeguarding is treated as a compliance exercise rather than a cultural conviction. The abusers who target children are frequently attracted to environments that give them access. Good policies alone do not protect children. A culture of protection does — one in which every adult associated with the Foundation considers safeguarding their personal responsibility, speaks up without hesitation when something is wrong, and understands exactly what to do when a concern arises.

This Safeguarding Policy is one instrument in that culture. It sets out our legal obligations, our internal procedures, and our standards for every person who works with, volunteers for, partners with, or visits the Foundation. But the policy is not the protection. The protection is the community of formed, vigilant, courageous adults who inhabit it.

1. Scope and Application

1.1 Who This Policy Applies To

This policy applies without exception to:

- All employed staff of Caring Touch Family Foundation, regardless of role, seniority, or location
- All volunteers, interns, and students on placement
- Board members and trustees
- Contractors, consultants, and service providers who work on Foundation premises or with Foundation beneficiaries
- Partners and partner organization staff who engage with Foundation program or beneficiaries
- Donors, supporters, and other visitors to The Ark or any Foundation program site
- Semi-adopters, sponsors, and any individual who has an approved relationship with a child in our care

Every person in the above categories is required to read, understand, and sign confirmation of this policy before beginning any activity that brings them into contact with children associated with the Foundation.

1.2 Children Covered by This Policy

This policy covers all children with whom the Foundation has any form of contact or responsibility, including:

- Children residing at The Ark residential shelter
- Children participating in any Foundation program, including outreach, community development, and scholarship programs

- Children who are the subject of semi-adoption or sponsorship arrangements
- Children of staff or volunteers who accompany their parent to Foundation events or premises
- Any child who comes into contact with Foundation staff or representatives in the course of Foundation activities

For the purposes of this policy, a child is any person under the age of 18 years, as defined by the Child Rights Act 2003 of Nigeria and the United Nations Convention on the Rights of the Child.

2. Legal Framework

2.1 Nigerian Law

- Child Rights Act 2003 (CRA) — establishes the rights of children and the obligations of the state and private organizations for their protection. All Foundation activities comply with the CRA.
- Violence Against Persons Prohibition Act 2015 (VAPP) — prohibits and criminalizes physical, sexual, and psychological violence, including against children.
- Trafficking in Persons (Prohibition) Enforcement and Administration Act 2015 (TIPPEA) — prohibits child trafficking and establishes mandatory reporting obligations. The Foundation has a direct relationship with NAPTIP (National Agency for the Prohibition of Trafficking in Persons), which operates the national anti-trafficking hotline.
- Criminal Code Act (applicable in southern Nigeria) and the Penal Code Act (applicable in northern Nigeria) — criminalize abuse, assault, sexual offences against children, and related conduct.
- Nigeria Data Protection Act 2023 — governs the handling of personal data about children and safeguarding records.

2.2 International Standards

- United Nations Convention on the Rights of the Child (UNCRC) — ratified by Nigeria in 1991. Articles 19 (Protection from Violence), 34 (Sexual Exploitation), 36 (Other Exploitation), and 39 (Recovery and Reintegration) are particularly relevant.
- UN Optional Protocol on the Sale of Children, Child Prostitution, and Child Pornography
- Sustainable Development Goal 16.2 — end abuse, exploitation, trafficking, and all forms of violence against and torture of children
- UNICEF Child Online Protection Guidelines
- Inter-Agency Standing Committee (IASC) Guidelines for Integrating Gender-Based Violence Interventions in Humanitarian Action
- Core Humanitarian Standard on Quality and Accountability (CHS) — including commitments to safe and equitable access and do no harm

3. Definitions — Types of Harm

Safeguarding encompasses the prevention of and response to all forms of harm to children. The following definitions apply across this policy. They are provided not as academic categories but as practical recognition tools: every person associated with the Foundation must be able to identify what they are observing.

TYPE OF HARM	DEFINITION AND RECOGNITION INDICATORS
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TYPE OF HARM	DEFINITION AND RECOGNITION INDICATORS
Physical Abuse	The deliberate infliction of physical injury or harm on a child, or failing to protect a child from physical injury. Indicators: unexplained injuries, bruising in unusual patterns or locations, fear of specific adults, flinching at sudden movements, injuries inconsistent with the explanation given.
Sexual Abuse	Any sexual act or contact involving a child, including penetrative and non-penetrative acts, exposure to sexual material, sexual coercion, and online sexual exploitation. Indicators: age-inappropriate sexual knowledge or behavior, withdrawal, nightmares, physical symptoms (pain, discharge), reluctance to be alone with specific individuals.
Emotional and Psychological Abuse	The persistent emotional mistreatment of a child causing severe and persistent adverse effects on their emotional development. Includes: humiliation, threats, rejection, isolation, witnessing violence, and constant criticism. Indicators: low self-esteem, extreme anxiety, significant changes in behavior, delayed emotional development.
Neglect	The persistent failure to meet a child's basic physical, emotional, or developmental needs. Indicators: poor hygiene, inappropriate dress for weather, frequent hunger, untreated medical conditions, fatigue, poor school attendance, the child appearing uncared for.
Trafficking and Exploitation	The recruitment, transportation, transfer, harboring, or receipt of a child for the purpose of exploitation. All children under 18 can be victims of trafficking — consent is irrelevant. Indicators: evidence of being controlled by others, inability to confirm their address or location, signs of debt bondage, multiple indicators of being moved frequently.
Online and Digital Abuse	Any form of abuse facilitated through digital technology, including cyberbullying, online grooming, sexual exploitation via online platforms, sharing of intimate images, and radicalization. Indicators: distress after using devices, secrecy about online activity, unexpected gifts or money, unusual contact with unknown adults.
Domestic Violence (witnessed)	Children who witness domestic violence in their household suffer significant harm, even when not directly targeted. This is recognized as a form of harm requiring a safeguarding response.
Harmful Traditional Practices	Practices that are culturally embedded but harmful to children, including female genital mutilation (FGM), forced early marriage, and certain initiation practices involving harm or exploitation. The Foundation does not regard cultural context as a mitigating factor for harmful practices.
Institutional Abuse	Abuse or harm inflicted within an institutional setting, including by staff, volunteers, or other residents. This is a specific risk in residential settings and is addressed by the Foundation's residential safeguarding protocols.

4. Governance and Accountability Structure

4.1 Designated Safeguarding Lead (DSL)

The Foundation designates a Designated Safeguarding Lead (DSL) who holds primary responsibility for:

- Receiving and recording all safeguarding concerns and disclosures
- Assessing the seriousness of concerns and determining the appropriate response
- Making referrals to statutory authorities (NAPTIP, Police, Social Welfare) where required

- Maintaining the Foundation's Safeguarding Register (confidential record of all concerns and responses)
- Ensuring that all staff, volunteers, and relevant parties receive appropriate safeguarding training
- Leading the Foundation's response to safeguarding incidents and investigations
- Reporting to the Board on safeguarding matters at each Board meeting, and immediately in the event of a critical incident
- Reviewing and updating this policy annually and following any critical incident

The DSL is contactable at: caringtouchfoundation@gmail.com (subject: SAFEGUARDING — FOR DSL).

In the absence of the DSL, the Deputy Designated Safeguarding Lead (Deputy DSL), appointed by the Board, assumes all DSL responsibilities. The identity of the Deputy DSL is documented in the Foundation's internal Safeguarding Contacts Register.

4.2 Board Safeguarding Responsibility

The Board of the Foundation holds ultimate accountability for safeguarding. Board responsibilities include:

- Ensuring the Foundation has an adequate, reviewed, and implemented Safeguarding Policy
- Appointing the DSL and Deputy DSL
- Receiving safeguarding reports at every Board meeting
- Ensuring safeguarding receives adequate resource allocation within the Foundation's budget
- Ensuring that the Foundation's culture consistently reflects its safeguarding commitments
- Reviewing the Foundation's safeguarding performance as part of annual governance review

4.3 Every Person's Responsibility

Safeguarding is not the exclusive responsibility of the DSL, the Board, or management. It is the shared, non-delegable responsibility of every person associated with the Foundation. Every individual who encounters a child through their relationship with the Foundation:

- Has a personal duty to treat every child with dignity, respect, and care
- Has a personal duty to be alert to indicators of harm
- Has a personal duty to report concerns promptly, without filtering, minimizing, or investigating independently
- Has a personal duty to support the DSL's response by cooperating fully with any investigation
- Has a personal duty to maintain confidentiality about all safeguarding matters except as required by the reporting process

5. Safe Recruitment and Vetting

5.1 Recruitment Principles

The Foundation is committed to recruiting only individuals who are suitable to work with children. Suitability is determined not only by professional competence but by character, values, and the absence of any history that would make a person a risk to children. No urgency of need, no gap in staffing, and no relationship with the candidate overrides these standards.

5.2 Mandatory Pre-Appointment Checks

The following checks are mandatory before any person begins any role that involves contact with children, without exception:

- Police clearance certificate or criminal record check confirming no convictions for offences against children or other persons
- Verification of identity (government-issued photo identification)
- Verification of professional qualifications and credentials where claimed
- Minimum two professional references, one of whom must have directly supervised the applicant in a previous role
- Reference check specifically addressing the applicant's suitability to work with children and any known safeguarding concerns
- Completion of the Foundation's safeguarding and child protection training before beginning work with children
- Signing of the Foundation's Safeguarding Code of Conduct before beginning any role

For international staff or volunteers: equivalent checks from their country of origin are required, translated into English where necessary, in addition to Nigerian checks.

5.3 Safeguarding in Job Descriptions and Interviews

Every job description for roles involving children explicitly states safeguarding responsibilities. Every interview for such roles includes specific questions designed to assess the candidate's:

- Understanding of safeguarding and child protection
- Values and attitudes toward children, particularly vulnerable children
- Ability to recognize indicators of harm
- Understanding of appropriate boundaries in relationships with children
- Willingness and ability to report concerns regardless of who is involved

5.4 Probationary Safeguarding Oversight

All new appointments involving children are subject to a probationary period during which safeguarding conduct is actively monitored. Any concern about a staff member's conduct with children during probation is addressed immediately and may result in termination before the probationary period concludes.

5.5 Ongoing Vetting

Safeguarding checks are not one-time pre-appointment events. The Foundation conducts periodic renewal of background checks and maintains continuous monitoring of staff conduct. Any staff member or volunteer who is charged with or convicted of a relevant offence during their association with the Foundation must disclose this immediately to the DSL. Failure to disclose constitutes gross misconduct.

6. Safeguarding Training

6.1 Training Standards

All persons associated with the Foundation receive safeguarding training appropriate to their role and level of contact with children. Training is not optional and is not deferred. No person begins work with children until their required training is complete.

ROLE CATEGORY	TRAINING REQUIRED BEFORE WORKING WITH CHILDREN
All staff and volunteers (any level of contact)	Foundation Safeguarding Induction: definitions of harm, recognition of indicators, reporting procedures, Code of Conduct, boundaries, and the Foundation's zero-tolerance culture. Duration: minimum half-day. Refreshed annually.
Residential caregivers at The Ark	Full safeguarding training including: trauma-informed care, attachment and safeguarding, safeguarding in residential settings, institutional abuse prevention, managing disclosures, and online safety for children in care. Duration: minimum two days. Refreshed annually.
Designated Safeguarding Lead and Deputy	DSL-level training: statutory frameworks, inter-agency working, conducting initial assessments, managing complex cases, working with statutory authorities, maintaining safeguarding records, and supporting staff through investigations. Refreshed every two years.
Board members	Board-level safeguarding governance training: understanding legal obligations, overseeing the DSL function, safeguarding in grant-making and partnerships, handling allegations against senior staff. Duration: minimum half-day. Refreshed every two years.
Donors and visitors to The Ark	Safeguarding orientation before any visit: basic conduct standards, photography restrictions, what to do if they observe a concern, and the Foundation's reporting contact. Duration: minimum 30 minutes.

6.2 Training Records

The DSL maintains a training register documenting the training completed by every staff member, volunteer, and relevant associate. The register is reviewed quarterly. Persons whose training has lapsed are reminded and their access to activities involving children is suspended until training is renewed.

7. Safe Practice — Behavioral Standards and Code of Conduct

The Safeguarding Code of Conduct sets out the behavioral standards expected of every person associated with the Foundation. It is the operational expression of the Foundation's safeguarding values in daily practice. All persons covered by this policy sign the Code of Conduct before beginning any activity involving children.

7.1 Required Behaviors

- Treat every child with dignity, respect, warmth, and consistency
- Maintain appropriate professional boundaries at all times — in person, in writing, and online

- Ensure that one-on-one time with a child occurs in a visible, open, public space where possible
- Where a private conversation with a child is necessary, inform another staff member or volunteer of the location and expected duration
- Listen carefully and without judgement when a child discloses or hints at a concern
- Report all concerns to the DSL promptly, completely, and without filtering or minimizing
- Use only approved communication channels when communicating with children
- Follow the Foundation's Photography and Media Policy in all interactions involving children
- Support a child's right to refuse physical contact — no form of touch should be imposed on a child who is unwilling
- Maintain the confidentiality of all safeguarding information except as required by the reporting process

7.2 Prohibited Behaviors

- Physical punishment of any kind, in any form, under any circumstances — absolute prohibition
- Any form of sexual contact or sexually suggestive behavior with or in the presence of a child
- Sharing personal contact information (phone numbers, social media accounts, home address) with children in the Foundation's care or programs
- Communicating with children through personal social media accounts, messaging applications, or any channel not approved by the Foundation
- Taking or sharing photographs or video of children without following the Foundation's Media Consent Protocol
- Being alone with a child in a closed, unobserved space without another adult present or immediately available
- Inviting a child to a personal home or private location outside the Foundation's premises without documented organizational approval
- Using language that is demeaning, shaming, or threatening toward a child
- Using alcohol or any controlled substance on Foundation premises or when responsible for children
- Discriminating against any child on the basis of gender, ethnicity, disability, religion, family background, or any other characteristic
- Sharing any information about the personal history, circumstances, or identity of children in the Foundation's care with any person who does not have an authorized need to know

7.3 Physical Contact

Appropriate physical contact with children in a residential and formation context includes: a hand on the shoulder, a reassuring arm, holding hands with a young child when walking, a hug initiated by the child and responded to proportionately. All physical contact must:

- Be initiated by or welcomed by the child
- Be visible to others
- Be appropriate to the child's age, developmental stage, and individual preferences
- Never be used as a means of control, punishment, or coercion

Caregivers who are uncertain whether a specific form of physical contact is appropriate should ask the DSL. The test is always: would this contact be appropriate if observed by a senior member of the Foundation's leadership?

7.4 Online and Digital Conduct

All online interactions involving children are governed by this policy. Specifically:

- No staff member or volunteer may communicate with a child in the Foundation's care or programs through a personal social media account or personal messaging application
- All digital communication with children uses only Foundation-approved channels, which are visible to the DSL and at least one other member of staff
- Staff who become aware of a child attempting to make contact through unofficial channels must report this to the DSL immediately and must not respond through those channels
- No child's image, name, location, or identifying information may be shared online by any staff member, volunteer, or visitor without the Foundation's documented Media Consent Protocol having been followed

8. Recognizing and Responding to Concern

8.1 Recognition

Every person associated with the Foundation has a responsibility to be alert to the signs that a child may be experiencing harm. The following indicators, particularly in combination, should prompt immediate concern and reporting:

■ PHYSICAL INDICATORS — Notice and Report

Unexplained injuries, bruising, burns, or marks — particularly in unusual locations or in patterns inconsistent with the explanation given

Injuries at different stages of healing, suggesting repeated harm

Significant changes in physical presentation: dramatic weight loss or gain, signs of chronic hunger, persistently poor hygiene

Physical symptoms consistent with sexual abuse (pain, discharge, bleeding in genital areas)

A child who flinches, recoils, or shows fear in response to normal interactions or to specific individuals

■ BEHAVIOURAL AND EMOTIONAL INDICATORS — Notice and Report

Significant, unexplained changes in behavior: increased aggression, withdrawal, regression to earlier developmental stages

Age-inappropriate sexual knowledge, language, or behavior

Sleep disturbances, nightmares, or fear of sleeping alone (in a child who did not previously exhibit these)

Persistent and disproportionate fear of specific adults, specific places, or specific situations

Self-harming behavior: cutting, burning, hair-pulling, eating disorders

A child who appears emotionally flat, dissociated, or unable to engage with their environment in ways previously normal for them

A child who makes statements suggesting they are being harmed, or who begins to disclose and then stops

A child who gives implausible or inconsistent explanations for their physical or emotional state

■ CONTEXTUAL AND ENVIRONMENTAL INDICATORS — Notice and Report

Evidence that a child has unsupervised or unexplained contact with adults outside the Foundation's approved relationships

Unexplained gifts, money, or items in a child's possession

Evidence of a child being controlled, monitored, or threatened by another person

Signs of a child being used for labor, begging, or any exploitative purpose

A child who appears frightened of describing their circumstances or family situation

Digital devices or online activity that a child becomes secretive or anxious about

8.2 Receiving a Disclosure

A disclosure is when a child tells you, directly or indirectly, that they are being harmed or have been harmed. Receiving a disclosure is one of the most significant moments in safeguarding. How you respond in that moment shapes whether the child will continue to speak, whether they will trust adults in the future, and whether the harm can be addressed.

What to DO when a child discloses:

- Stay calm. Your calm communicates that what the child is telling you is receivable and that you are safe.
- Listen actively. Give the child your full attention. Do not look shocked, horrified, or disbelieving, even if you are.
- Believe the child. Children rarely fabricate accounts of serious abuse. Receive what they are saying as credible until there is clear evidence otherwise.
- Use open, non-leading questions to encourage the child to speak in their own words: "Tell me more about that." "What happened next?" Do not suggest answers or put words in the child's mouth.
- Reassure the child: "You were right to tell me. This is not your fault. I am going to make sure the right people know about this so we can keep you safe."
- Tell the child honestly that you will need to share what they have told you with the right people to keep them safe — do not promise confidentiality you cannot keep.
- Record what the child said as soon as possible after the conversation, in their words, not yours. Date, time, and sign the record. Submit it to the DSL the same day.

What NOT to do when a child discloses:

- Do not investigate. You are not the investigator. Your role is to receive and report.
- Do not promise confidentiality. You cannot keep that promise, and making it would be harmful to the child and to the process.
- Do not confront the alleged perpetrator. This can jeopardize evidence and put the child at greater risk.
- Do not make judgements aloud about the alleged perpetrator. Focus entirely on the child.
- Do not delay reporting because you are uncertain. Report your concern and let the DSL assess it. The reporting threshold is concern — not certainty.

- Do not share what the child has told you with anyone other than the DSL.

9. Reporting Procedure — Step by Step

The fundamental rule: when in doubt, report. The reporting threshold is reasonable concern, not certainty. You are not required to investigate, to assess risk, or to determine what happened. You are required to tell the DSL what you have observed or been told, promptly and completely.

9.1 Internal Reporting Process

STEP	WHAT TO DO AND WHY
Step 1: Ensure immediate safety	If a child is in immediate danger, your first priority is their physical safety. Remove the child from the dangerous situation if it is safe to do so. Call emergency services (Police: 199) if there is immediate physical risk.
Step 2: Do not investigate or confront	Do not speak to the alleged perpetrator. Do not alert others to your concern beyond what is necessary to protect the child immediately. Do not conduct your own investigation.
Step 3: Contact the DSL immediately	Report your concern to the DSL by the most direct means available: in person, by phone, or by email marked SAFEGUARDING — URGENT. Do not delay to gather more information.
Step 4: Complete the Concern Report Form	Within 24 hours of the initial report, complete the Foundation's Safeguarding Concern Report Form. Record: what you observed or were told, verbatim where possible; the date, time, and location; the names of those present; and any immediate action taken. Sign and date the form.
Step 5: Submit the form to the DSL	Submit the completed form to the DSL directly and in person or by secure email. The DSL signs receipt and records the submission in the Safeguarding Register.
Step 6: Maintain confidentiality	Do not discuss the concern with colleagues, other children, families, or anyone not directly involved in the response. Confidentiality is not to protect the alleged perpetrator — it is to protect the integrity of the process and the safety of the child.
Step 7: Cooperate with the response	You may be asked to provide further information, to participate in a formal inquiry, or to give a statement. Cooperate fully. Your role in the investigation is to be a reliable witness — not an investigator or advocate.

9.2 DSL Decision and Response

Upon receiving a concern report, the DSL will:

- Assess the level and immediacy of risk to the child
- Determine whether the concern requires immediate referral to statutory authorities or can be addressed through internal procedures first
- Document the decision and the reasoning for it in the Safeguarding Register
- Notify the Foundation's leadership of any significant concern
- Support the child with appropriate pastoral and psychological care throughout the process

9.3 External Referral to Statutory Authorities

The DSL must refer a safeguarding concern to external statutory authorities in the following circumstances:

- Any credible disclosure or evidence of physical, sexual, or psychological abuse of a child
- Any concern that a child is at ongoing risk of significant harm
- Any concern involving potential criminal conduct
- Any allegation against a staff member or volunteer
- Any situation where the DSL has reasonable concern that a child cannot be adequately protected within the Foundation's internal processes alone

EXTERNAL REFERRAL CONTACTS

Nigerian Police Force: 199

NAPTIP (National Agency for the Prohibition of Trafficking in Persons): 0800-NAPTIP (0800-6278) — 24-hour hotline

Ministry of Youth and Social Development (Oyo State): for welfare and placement matters

National Human Rights Commission (NHRC): for rights-based escalation

UNICEF Nigeria Child Protection: for cases with international dimensions

9.4 Reporting Timelines

CONCERN LEVEL	REPORTING TIMELINE
Immediate risk to life or physical safety	Emergency services (Police: 199) immediately. DSL notified simultaneously.
Credible disclosure of current or recent abuse	DSL within 1 hour of the disclosure. Written report within 24 hours.
Observed indicators without disclosure	DSL within 24 hours. Written report within 48 hours.
Historical concern (past harm, no current risk)	DSL within 48 hours. Written report within 72 hours.
Concern about behavior or practice (not about a specific child)	DSL within 5 working days. Written report within the same period.

10. Allegations Against Staff, Volunteers, or Associates

An allegation that a person in a position of trust within the Foundation has harmed a child, or may have harmed a child, is one of the most serious situations this policy addresses. It requires a response that is rigorous, impartial, and fair to all parties — and in which the protection of the child is always the primary consideration.

10.1 The Principle of Impartiality

No person accused of harming a child should be assumed guilty before an investigation has been conducted. Equally, no accusation should be dismissed, minimized, or handled informally because the alleged perpetrator is popular, well-regarded, senior, or has a long relationship with the Foundation. The process protects both the child and the person accused — by ensuring that all decisions are made on the basis of evidence, not reputation or relationship.

10.2 Immediate Response to an Allegation

- The person receiving the allegation reports immediately to the DSL — even if the allegation is about the DSL, in which case it is reported directly to the most senior Board member available
- The alleged perpetrator is immediately suspended from all contact with children, pending investigation. Suspension is a neutral act — it is not a finding of guilt. It is necessary to protect children and the integrity of the investigation.
- The DSL assesses whether the allegation requires immediate referral to the Police or NAPTIP — if there is any credible indication of criminal conduct, this referral is made without delay
- The DSL notifies the Foundation's most senior leadership, unless the allegation is against that person, in which case the Board Chair is notified directly
- The alleged perpetrator is informed of the allegation and of the suspension, in a private meeting with the DSL and one other senior person present. They are told that an investigation will be conducted and that they will have the opportunity to respond.

10.3 Investigation Process

- Where a statutory authority (Police, NAPTIP) is conducting an investigation, the Foundation cooperates fully and does not conduct its own parallel investigation that could compromise theirs
- Where the Foundation conducts its own investigation, it is led by the DSL and is independent of line management structures
- The investigation includes: interview with the child (conducted by a trained professional, not the DSL), interview with the alleged perpetrator, interviews with witnesses, review of relevant records
- All investigation records are maintained confidentially in the Safeguarding Register
- The investigation concludes with a written report and a determination: substantiated, unsubstantiated, or inconclusive

10.4 Outcomes

DETERMINATION	OUTCOME
Substantiated (balance of evidence supports the allegation)	The matter is referred to statutory authorities if not already done. The individual is dismissed. The relevant regulatory and professional bodies are notified. The child receives appropriate support.
Unsubstantiated (insufficient evidence to confirm or deny)	The suspension is lifted if appropriate. The DSL documents the concern and determines whether enhanced monitoring is appropriate. The child receives continued support.
Inconclusive (genuinely unclear)	The DSL determines whether continued precautionary measures are appropriate. The child receives continued support. The matter is reviewed after a defined period.

DETERMINATION	OUTCOME
Malicious or deliberately false allegation	The DSL documents the finding. No disciplinary action is taken against the child who made the allegation. Support is offered to understand what led to the allegation.

IMPORTANT: PARALLEL PROCESS PROTECTION

Where an investigation relates to criminal conduct, the Foundation's internal disciplinary process must not run simultaneously with the statutory investigation in a way that could compromise evidence or prejudice proceedings. The DSL takes advice from the investigating authority on the timing of any internal process.

11. Safeguarding in Residential Care — The Ark Specific Protocols

The Ark residential shelter presents specific safeguarding considerations that go beyond those of a day program or outreach activity. Children who live at The Ark are in the Foundation's full-time care. The Foundation holds the equivalent of parental responsibility for their safety, welfare, and development, twenty-four hours a day, seven days a week. This section sets out the additional protocols that apply specifically to The Ark residential context.

11.1 Physical Environment Safety

- All areas of The Ark accessible to children are regularly inspected for physical hazards. A hazard log is maintained and reviewed monthly.
- Access to The Ark premises is controlled. All visitors are signed in and out. No visitor is left unsupervised with children at any time.
- All sleeping areas are single-sex. No adult staff member sleeps in a child's sleeping area unless there is an emergency and another staff member is informed.
- Locked rooms, storage areas, and spaces not ordinarily accessible to children are kept secure at all times.
- The physical environment is maintained to a standard that affirms the dignity of the children who live there.

11.2 Nighttime Safeguarding

- A minimum of two staff members are on duty at The Ark at all times, including overnight.
- Night duty staff conduct regular, documented checks on sleeping children.
- Any unusual event during the night is recorded in the Night Duty Log and reviewed by the DSL the following morning.
- Children who are distressed at night are attended to by a same-sex caregiver where possible. Where this is not possible, the caregiver must inform their colleague of the interaction and its location.

11.3 Peer-to-Peer Safeguarding

A significant proportion of safeguarding incidents in residential settings involve harm perpetrated by one child resident against another. The Foundation takes peer-to-peer harm as seriously as it takes adult-perpetrated harm and responds to it with the same rigor.

- Children are educated, in age-appropriate terms, about the right of every person to physical and emotional safety and the obligation to respect others' boundaries
- The community culture actively promotes children looking out for one another — the Care Ambassador role in the Leadership Guild is one expression of this
- Any incident of physical aggression, sexual contact, or sustained emotional harm between children is reported to the DSL and responded to through the standard safeguarding process
- The child who caused harm receives therapeutic support and appropriate consequence. The child who experienced harm receives therapeutic support and protection. Both responses happen simultaneously.
- The Foundation does not use the language of “bullying” to minimize serious peer-on-peer harm. Where the harm meets the threshold of abuse, it is responded to as abuse.

11.4 Managing Challenging Behavior Without Physical Restraint

The Foundation does not use physical restraint as a behavior management tool. No child is physically restrained, confined, or subjected to physical force as a means of managing their behavior, except in the single circumstance where a child presents an immediate physical danger to themselves or others and no other option is available. In that circumstance:

- The minimum force necessary to prevent immediate harm is used
- A second adult is called to be present as soon as possible
- The child is spoken to calmly throughout
- The incident is recorded in full and reported to the DSL the same day
- The child's caregiver reviews the situation with the DSL to understand what triggered the behavior and how to respond differently in future

11.5 Transitions and Reintegration

When a child leaves The Ark — whether through family reintegration, semi-adoption transition, or independent living preparation — the safeguarding plan does not end at departure. The Foundation:

- Conducts a formal transition assessment identifying any ongoing safeguarding risks in the receiving environment
- Ensures that the receiving family, guardian, or institution has been assessed and approved as a safe placement
- Maintains contact with the child for a minimum of six months following transition to monitor their welfare
- Has a clear escalation pathway if post-transition safeguarding concerns arise

12. Photography, Media, and Children's Identity

12.1 The Media Consent Protocol

No photograph, video, audio recording, or identifying information about a child associated with the Foundation may be captured, stored, or shared without following the Media Consent Protocol. This applies to all persons: staff, volunteers, visitors, donors, partners, and media representatives.

STAGE	REQUIREMENT
Stage 1: Guardian Consent	Written consent obtained from the child's legal guardian, specifying: the purpose of the recording, how it will be used, where it will be published, how long it will be retained, and the right to withdraw consent at any time.
Stage 2: Child Assent	Age-appropriate explanation provided to the child and their assent obtained. A child who appears uncomfortable or unwilling is not photographed or recorded, regardless of guardian consent. No child is pressured or incentivized to give assent.
Stage 3: DSL or Leadership Review	All images of children are reviewed by the DSL or designated senior leader before publication. The reviewer confirms: the child is clothed appropriately; the image presents the child with dignity; the image does not reveal identifying features of the child's circumstances; the image is consistent with the Foundation's Child Image Standards.
Stage 4: Storage and Deletion	All consented images are stored securely with access restricted to authorized personnel. Images are deleted from all systems at the end of the agreed retention period or immediately upon withdrawal of consent.

12.2 Child Image Standards

Every image of a child used in any Foundation communication — online, in print, in presentations, or in any other medium — must meet the following standards:

- The child is clothed appropriately and presented with dignity
- The image communicates hope, strength, or joy as the primary message — not suffering, helplessness, or desperation
- The image does not reveal information that could identify the child's location, school, family members, or circumstances
- Where the image shows a child in a context related to their history (for example, in a care setting), the image does not reduce the child to their victimhood
- The child appears comfortable and at ease in the image

12.3 No Personal Photography by Visitors

Visitors to The Ark, including donors, sponsors, partners, and media representatives, are prohibited from taking personal photographs or video recordings of children at any time, on any device, without the explicit advance approval of the DSL and the completion of the Media Consent Protocol for each child who would appear in the recording. This rule is communicated at every visitor orientation and enforced without exception.

13. Child-Friendly Safeguarding

Children have a right to know how to keep themselves safe and how to seek help. The Foundation's approach to safeguarding is not only adult-facing. It is also delivered directly to children in age-appropriate forms.

13.1 What Children at The Ark Know

Every child at The Ark, in terms appropriate to their age and developmental stage, knows:

- That their body belongs to them and that no one has the right to touch them in a way that makes them feel uncomfortable or unsafe
- That there are trusted adults at The Ark to whom they can go if they feel unsafe, worried, or if something has happened to them
- That telling a trusted adult about something that is happening to them is not betrayal — it is courage
- That they will be believed, supported, and protected when they speak up
- The name and face of at least two adults at The Ark whom they can approach with a safeguarding concern
- That they can speak to their caregiver, to any other staff member, to the DSL, or to any visiting professional if they have a concern

13.2 Pillar 3 Formation and Safeguarding

The emotional intelligence curriculum of Pillar 3 (Character, Emotional Intelligence & Inner Life) directly supports safeguarding by forming in children the capacity to:

- Name their emotional experience, including discomfort, fear, and violation
- Trust their instincts about unsafe situations and relationships
- Seek help from trusted adults without shame
- Distinguish between appropriate and inappropriate touch and relationships
- Understand their own dignity and the dignity of others as non-negotiable

Safeguarding formation is not a separate program at The Ark. It is woven into the daily fabric of formation life.

13.3 The Suggestion Box and Confidential Reporting for Children

Every child at The Ark has access to a confidential Suggestion Box in which they can place written concerns — anonymously if they choose — about anything that is worrying them. The box is opened by the DSL weekly. Any concern raised is taken seriously and responded to appropriately. Children are informed about the box and its purpose during their orientation to The Ark, and reminded of it regularly.

14. Safeguarding for Online and Digital Activities

The digital formation activities of Pillar 6 (Digital Literacy, Technology & Future Readiness) introduce children to digital tools and online environments under structured, supervised conditions. Safeguarding in digital contexts requires specific protocols.

14.1 Supervised Internet Access

- Children do not have unsupervised access to the internet at The Ark
- All internet access is through Foundation-managed devices with appropriate content filtering
- Browsing history is reviewable by the DSL and is reviewed regularly
- Children are educated about online safety, privacy, and what to do if they encounter harmful content, as part of the Pillar 6 curriculum

14.2 Social Media and External Communication

- No child at The Ark has a personal social media account created, maintained, or used in connection with Foundation activities
- No child communicates digitally with external individuals (including sponsors or semi-adopters) except through Foundation-approved channels, which are monitored by the DSL
- All digital communication between children and external parties is reviewed by a staff member before sending and upon receipt
- Any unsolicited digital contact received by a child from an external person is reported to the DSL immediately

14.3 Children and AI Tools

Where AI tools are used in the Pillar 6 curriculum, their use is supervised, purposeful, and consistent with the digital safety standards of this policy and the Pillar 6 content framework. No child uses AI tools to create or view harmful, exploitative, or inappropriate content.

15. Safeguarding in Partnerships and External Relationships

15.1 Partner Organization Standards

The Foundation will not enter or maintain a partnership with any organisation that:

- Does not have its own adequate safeguarding policy and procedures
- Has a known or alleged record of child abuse, exploitation, or neglect
- Engages in practices inconsistent with the Foundation's safeguarding standards
- Refuses to submit to the Foundation's safeguarding expectations for activities involving children

All partnership agreements include a Safeguarding Clause that:

- Requires the partner to have and implement an adequate safeguarding policy
- Requires the partner to report any safeguarding concern involving Foundation beneficiaries to the Foundation's DSL immediately
- Authorizes the Foundation to terminate the partnership in the event of a safeguarding failure by the partner

15.2 Safeguarding for Visitors and Donors

Every visitor to The Ark — regardless of their seniority, their donation history, or their relationship with the Foundation — receives a safeguarding orientation before entering the residential programme area. This orientation includes:

- The Foundation's zero-tolerance policy toward all forms of harm
 - The prohibition on personal photography of children
 - The requirement to report any safeguarding concern observed during the visit
 - The prohibition on direct physical contact with children beyond age-appropriate greetings, unless the child initiates and the visit supervisor approves
 - The visitor's signature confirming they have received and understood the orientation
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16. Confidentiality and Information Sharing in Safeguarding

Safeguarding information is confidential. Confidentiality in safeguarding is not, however, absolute. The protection of a child takes precedence over confidentiality obligations.

16.1 Who Has Access to Safeguarding Information

- The DSL and Deputy DSL
- The Foundation's most senior leadership, for matters of significant concern
- Board members, for matters reported at the Board level
- Statutory authorities, as required by law and referral obligations
- External investigators or inquiry panels, where the Foundation's cooperation is required by law or professional obligation
- No other person has access to safeguarding records without the specific authorization of the DSL

16.2 Information Sharing with Statutory Authorities

When sharing information with statutory authorities in the course of a safeguarding referral or investigation, the Foundation:

- Shares the minimum information necessary to enable the authority to carry out its function
- Documents what information was shared, with whom, on what date, and under what authority
- Does not share information beyond the safeguarding context without a separate legal basis

16.3 Confidentiality for the Child

The identity and circumstances of a child who is the subject of a safeguarding concern or investigation are protected to the maximum extent possible throughout the process. Specifically:

- The child's identity is not shared with staff who do not need to know, even within the Foundation
 - Information about the child's circumstances is shared with the child's guardian only where this does not put the child at additional risk (for example, where the guardian is the alleged perpetrator)
 - The child is kept informed about the process in age-appropriate terms, including what information is being shared and why
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17. Record-Keeping and the Safeguarding Register

17.1 The Safeguarding Register

The DSL maintains a confidential Safeguarding Register documenting all safeguarding concerns, disclosures, investigations, referrals, and outcomes. The Register:

- Is maintained in a secure, access-controlled system or locked physical file
- Is accessible only to the DSL, Deputy DSL, and the most senior Foundation leadership
- Contains a separate file for each concern or case, with all documentation related to that concern
- Is retained permanently, in accordance with safeguarding record retention best practice and legal requirements

17.2 Safeguarding Concern Report Form

The Safeguarding Concern Report Form is the standard document used to record a concern or disclosure. Every report includes:

- Date, time, and location of the concern or disclosure
- Name and role of the person making the report
- Name and age of the child concerned (where known)
- A factual account of what was observed or disclosed, in the child's words where applicable, distinguishing clearly between observation and interpretation
- Any immediate action taken
- Name of the DSL to whom the report was made and the time of that report
- Signature and date of the person completing the form

17.3 Record Integrity

Safeguarding records are the Foundation's most sensitive documents. Their integrity is non-negotiable:

- Records must be factual. No speculation, opinion, or interpretation is included unless clearly labelled as such.
- Records must be contemporaneous. Forms are completed as close to the event as possible, ideally within 24 hours.
- Records must be complete. Nothing is omitted because it is uncomfortable or because it implicates a well-regarded person.
- Records must not be altered. If an error is discovered, a dated correction is made alongside the original record — never replacing it.

18. Whistleblowing

The Foundation is committed to a culture in which every person associated with it can raise safeguarding concerns without fear of retaliation, dismissal, or disadvantage. This commitment applies to concerns raised about any person, at any level of the Foundation.

18.1 How to Raise a Whistleblowing Concern

A whistleblowing concern is any concern that the Foundation's safeguarding practices, or the conduct of a specific individual, represent a risk to children — particularly where internal reporting channels have failed, are compromised, or are controlled by the person of concern.

- Internal: Contact the DSL or, if the concern involves the DSL, the Board Chair directly

- External: Contact the Nigeria Data Protection Commission, NAPTIP, or the Ministry of Humanitarian Affairs and Social Development if internal channels are unavailable or have failed
- Anonymous: Concerns may be raised anonymously through the Foundation's confidential reporting email: caringtouchfoundation@gmail.com (subject: CONFIDENTIAL SAFEGUARDING CONCERN). Anonymous concerns are taken seriously and investigated to the extent possible given the information provided.

18.2 Protection for Whistleblowers

- No person who raises a safeguarding concern in good faith will face any form of retaliation, disadvantage, or negative consequence as a result of making that report
 - This protection applies even if the concern turns out to be unfounded, provided it was raised honestly and not maliciously
 - Any retaliation against a person who has raised a safeguarding concern constitutes serious misconduct and will be subject to disciplinary action
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19. Policy Review and Monitoring

19.1 Annual Review

This policy is reviewed annually by the DSL in consultation with the Foundation's leadership and at least one external safeguarding advisor. The review considers:

- Any safeguarding incidents or near-misses that occurred during the review period
- Changes in applicable law, regulatory guidance, or best practice
- Feedback from staff, volunteers, children, and families
- The Foundation's operational changes that may affect safeguarding risks or practices

19.2 Monitoring

Between annual reviews, the DSL monitors compliance with this policy through:

- Regular review of training completion records
 - Regular review of the Safeguarding Register for patterns and gaps
 - Random compliance checks: review of case files, visitor logs, and media consent records
 - Staff supervision sessions that include safeguarding as a standing agenda item
 - Safeguarding report to the Board at every Board meeting
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