



Safeguarding and Child Protection Policy

Introduction

Safeguarding is the responsibility that an organisation has to ensure that their employees and volunteers, partners, vendors, operations and programmes do no harm to children, young people or vulnerable adults 1 (together referred to as 'vulnerable people' under this policy); that they do not expose them to the risk of discrimination, neglect, harm and abuse; and that any concerns the organisation has about the safety of vulnerable people within the communities in which they work, are dealt with and reported to the appropriate authorities. It is also the responsibility that the organisation has for protecting its employees and volunteers when they are vulnerable, for example, when ill or at risk of harm or abuse.

Child protection is a central part of but not separate to safeguarding. It is the process of protecting individual children identified as either suffering or at risk of significant harm as a result of abuse or programme of work. It also includes measures and structures designed to prevent and respond to abuse

Through their work, NANA employees, employees of partner organisations and volunteers may engage with young people and vulnerable adults either directly or indirectly.

NANA recognises it has an obligation to put in place all reasonable safeguarding measures to ensure, as far as possible, the safety and protection of children, young people and vulnerable adults, including those with whom we work and those in the communities where NANA work is undertaken.

Purpose

The purpose of this policy is to provide clarity to ALL on how they should engage with children, young people and vulnerable adults when working for, on behalf of, or in partnership with NANA. It is also to help us make sure that employees, volunteers and other representatives are protected.

Any breach of this policy will be treated as a disciplinary matter, which may result in immediate termination of employment or contract, withdrawal of volunteer status, and reporting to the police, relevant regulatory authority or other body

Definitions

Abuse - a violation of an individual's human and civil rights by any other person or persons. It can take the form of physical, psychological, financial or sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the health, survival, development or dignity of a child, young person or vulnerable adult.

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Abuse can be a single act or repeated acts and can be unintentional or deliberate. Abuse often involves criminal acts.

Discriminatory abuse – abuse motivated by a vulnerable person’s age, race, nationality, sex, sexual orientation, disability, or other personal characteristic.

Financial or material abuse - including theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

Neglect - the persistent failure to meet a vulnerable person’s basic physical and/or psychological needs, likely to result in the serious impairment of his/her health or development. Examples include failure to provide adequate food, clothing and shelter, failure to protect them from physical or psychological harm or danger; failure to ensure adequate supervision (including the use of inadequate care-givers); or failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a vulnerable person’s basic emotional needs.

Physical abuse – includes hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm, misuse of medication, restraint, or inappropriate sanctions.

Psychological abuse - includes emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks. Examples include not giving a vulnerable person opportunity to express their views, deliberately silencing them or ‘making fun’ of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on a vulnerable person, which may include interactions that are beyond a vulnerable person’s developmental capability. It may involve serious bullying (including cyber bullying), or the exploitation or corruption of a vulnerable person.

Sexual abuse - involves forcing, enticing or coercing someone to take part in sexual activities, whether or not the vulnerable person is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving a vulnerable person in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse can be carried out by adults or other children.

Child – NANA regards a child as anyone under the age of 18 years. It is widely recognised that children are generally more vulnerable to abuse and exploitation due to factors such as age, gender, social and economic status, developmental stage, and dependence on others.

Vulnerable person/people – for the purposes of this policy this is an umbrella term which covers children, young people and vulnerable adults

Vulnerable adult - a person, 18 years and above, who by reason of disability, age, gender, social and economic status, or illness, the context they are in, may be unable to take care of or to protect him or herself against abuse, harm or exploitation.

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Youth or young people - individuals aged 15 to 35– NANA recognises that this group spans the categories of ‘children and ‘adults’ but regards young people as having particular safeguarding needs and requiring distinct consideration aside from younger children and older adults

Scope

This policy is mandatory for all NANA employees. For the purposes of this policy, ‘employee’ is defined as anyone who works for or on behalf of NANA, either in a paid or unpaid capacity. This therefore includes directly employed staff, trustees, contractors, employees and volunteers of sub contractors, agency workers, consultants, volunteers, interns and all visitors to NANA offices.

Policy Statement

NANA has zero tolerance against abuse and exploitation of vulnerable people. NANA also recognises that safeguarding is everyone’s responsibility and that it has an obligation to put in place reasonable measures to ensure, as far as possible, the safety and wellbeing of vulnerable people with whom it works with.

NANA works to the following key principles to protect vulnerable children and people:

- Everyone has an equal right to protection from abuse and exploitation regardless of age, race, sex, sexual orientation, marriage and civil partnership, pregnancy or having a child, gender reassignment, language, religion, political or other opinion, national, ethnic or social origin, disability, birth or other status.
- The best interests of the vulnerable child and/or person are paramount and shall be the primary consideration in our decision making
- NANA will take responsibility to meet our obligations regarding our duty of care towards vulnerable children and/or people, and act where we believe that a child, young person or vulnerable adult is at risk or is actually harmed.
- NANA will ensure that employees and volunteers are inducted in our Safeguarding Standards
- NANA will ensure that all partners are informed and in compliance with our Safeguarding Standards.
- When working with or through partners or sub contracted agencies, NANA will ensure that their safeguarding procedures are consistent and in line with the principles and approaches set out in this policy.
- NANA respects confidentiality and has a responsibility to protect sensitive personal data. Information should only be shared and handled on a need to know basis, that is, access to the information must be necessary for the conduct of one's official duties. Only individuals who have legitimate reasons to access the information are allowed to receive it.
- NANA commits to monitoring the implementation of the safeguarding policy. This policy will be reviewed every two years and earlier if necessary.

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Responsibilities

All employees, volunteers, consultants, agency staff, sub contractors, partner organisations and visitors are obliged to follow this policy and maintain an environment that prevents exploitation and abuse and which encourages reporting of breaches of this policy using the appropriate procedures.

All people working with NANA will:

- Read, understand and adhere to NANA Safeguarding Policy and NANA Code of Conduct Policy
- Strive to promote a zero tolerance approach to discrimination, sexual harassment and abuse in all working environments
- Strive to develop relationships with all stakeholders which are based on equality, trust, respect and honesty
- Place the safety and welfare of children and vulnerable people above all other considerations
- Report any concerns they may have about the welfare of a child or vulnerable person
- Report any concerns they may have about the behaviour of a person representing NANA in relation to safeguarding

All people working with NANA will not:

- Sexually harass, assault, or abuse a child or another person
- Physically harass, assault (including hitting, slapping, kicking, etc.) or abuse a child or another person
- Emotionally abuse a child or another person, such as engaging in behaviour intended to shame, humiliate, belittle or degrade
- Condone, or participate in behaviour which is abusive, discriminatory, illegal, or unsafe to children or vulnerable people
- Develop, encourage, or fail to take action of relationships with children or other vulnerable people which could in any way be deemed sexual, exploitative or abusive
- Act in ways that may be violent, inappropriate or sexually provocative to children or other persons
- Agree with a child to keep a secret which has implications for their safety or the safety of other young people.

NANA International commits to:

- Valuing, listening, and respecting all children and young people.
- Ensuring that all staff and people directly associated with our work understand their personal responsibility to prevent harm and report any form of child abuse and sexual exploitation of children.
- Diligently implement our child safeguarding system by applying relevant policies, procedures, training, and other learning opportunities across NANA and with our partners and relevant third parties.
- Ensuring that the organisation creates the right culture and a safe and trusted environment for anyone to report child safeguarding incidents and/or concerns verbally or in writing and through child friendly and accessible mechanisms.

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- All safeguarding actions and decisions are taken in the best interests of the child and put the safety and welfare of the child first.
- Reporting suspected or known child safeguarding concerns, violations of this policy and Code of Conduct through the NANA reporting channel within 24 hours of the incident coming to NANA's attention.
- Implement systems and processes to ensure we do not knowingly employ or contract anyone who poses a risk to children or brings them into contact with children connected to NANA.

NANA Management

Managers at all levels are responsible for ensuring employees, volunteers, consultants, visitors and partner organisations are aware of the policy and are supported to implement and work in accordance with it, as well as creating a management culture that encourages a focus on safeguarding. They must ensure that they are responsive, acting immediately if they become aware of any safeguarding concerns, and supportive towards employees or volunteers who complain about breaches in this policy.

NANA Executive Board

NANA Executive Board is responsible for ensuring the effective implementation of this policy and associated procedures and ensuring that everyone linked with NANA is equipped and supported to meet their responsibilities.

Implementation and Review

- NANA Child Safeguarding Policy will have an initial review after one year and then after every two years.
- NANA's Child Safeguarding Policy and procedures together with the NANA Code of Conduct covers all aspects of our operations and programming and will be implemented in all NANA programs across all regions.

Procedure Overview

Recruitment and Selection:

All NANA employees and volunteers must sign and abide by this safeguarding policy and the Code of Conduct. The code sets out the standards of practice we expect of employees and volunteers - in terms professional competence, integrity, acting as a representative and in safeguarding - which support our vision, mission and values

Induction and Support:

- Training on safeguarding will be provided to all employees and volunteers
- NANA will ensure that clear processes for reporting and dealing with safeguarding concerns and incidents are widely communicated, regularly reviewed and consistently applied. Where allegations are made about an employee, careful consideration must take place about the appropriateness of the person continuing to work with NANA

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Data Protection

- NANA will ensure that personal information is kept confidential unless we have the agreement of the individual and/or their parent/guardian, except where it is necessary to pass this to a specialised child welfare or law enforcement agency in relation to a safeguarding incident

Social Media

- NANA has a policy regarding the media and the use of actual names, images, including photographs and recordings (the 'Social Media Policy'). This should be applied in all situations. Specifically relating to protection of children, young people and vulnerable adults

Raising and responding to concerns

NANA places a mandatory obligation on all employees, volunteers, contractors and partners to report concerns, suspicions, allegations and incidents which indicate actual or potential abuse or exploitation vulnerable people or which suggests this policy may have in any other way been breached. It is not the responsibility of the employees to decide whether or not abuse has taken place, however, concerns should be raised with an individual's line manager who will initiate the procedure for dealing with suspected or actual incidents of abuse

To ensure that all such situations are handled appropriately and effectively:

- Reports must be made, and decisions and actions taken
- All sensitive and personal data must be kept confidential (including the names of anyone who makes a report of abuse) and be shared on a strictly 'need to know basis', that is, access must be necessary for the conduct of one's official duties.
- NANA is committed to a robust, confidential reporting and investigation (liaising with the appropriate authority) procedure which leads to timely and effective reporting and investigation involving the right internal or external professionals
- All staff, partner staff, implementing partner staff, contractors, visitors, and volunteers are mandated to report any suspected child safeguarding incidents or concerns to **safeguarding officer** (Sadiya Adamu): +2348034747901 and **GESI Manager** (Jamila Musa Abdullahi): +2347066613436 and Child safeguarding concerns involving criminal conduct reported to the relevant statutory authority unless to do so would place the child at additional risk of harm or there is another justifiable risk in reporting
- There is no threshold for reporting a child safeguarding concern as described in this policy. Any concern, however minor, must be reported.
- All suspected or actual incidents are to be reported as a matter of urgency and always within 24hrs of a person becoming aware of the incident.

Poor Safeguarding Practice

Poor safeguarding practice takes place whenever staff or any other person fail to provide the standard of care and support expected and directed by policies, procedures and training delivered by NANA. Poor safeguarding practice can occur through non-compliance with policies and

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procedures and when staff and third parties to whom this Policy applies ignore the rights and welfare of beneficiaries. Continued poor safeguarding practice may cause harm and can become abuse.

NANA takes poor safeguarding practice seriously and deems it unacceptable. Poor safeguarding practice must be reported. All reported cases of poor safeguarding practice will be dealt with in line with NANA safeguarding policies and/or disciplinary processes.

Examples of poor safeguarding practice include:

- When insufficient care is taken to prevent harm; for example, in failing to complete adequate risk assessments and take mitigating actions
- Allowing abusive or concerning practices to go unreported.
- Placing children or young people in potentially compromising, dangerous or uncomfortable situations with adults, including through the use of technology/social media.
- Ignoring health and safety guidelines.

NANA’s mandatory ‘Child Safeguarding Procedures’ must be followed at all times.

Appendix 1

Sample Parental Consent for Photographic/Film Use of Children under 18 years of age/vulnerable adult:

I, (adult’s name) _____

Of _____ (address)

Being the child/children’s/ parent or legal guardian, hereby give permission to take and use publicity photographs/film of

(child/children’s name/s) _____ Age of child

_____ Age of child

_____ Age of child

I also consent to use of the photos for publicity, marketing, and advertising for NANA projects. I agree that the photos/film may be combined with other images, text and graphics and be cropped, altered or modified in any way that NANA deems appropriate. I consent to the provision of this form and the details within it to NANA, and to their storing these on a database. I understand that the child’s/children’s name/s will not be given to press or public without my consent. I also understand that I may cancel this permission in writing, and that NANA will take all reasonable steps to ensure

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that the photograph/film is withdrawn from future use. I further understand that I shall receive no remuneration for this assistance

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Admin/HR Clearance

I _____ hereby declare that I understand and agree to abide by the above principles and procedures in the NANA Safeguarding and Child Protection Policy. I understand that any violation of the safeguarding policy will be reported through the local reporting channels and appropriate action will be taken.

Name: _____

Signature: _____ Date: _____

Name _____ of _____ organization:

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