

PAL NETWORK

SAFEGUARDING POLICY

2020



PAL NETWORK
People's Action for Learning

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Definitions

"**Designated Safety Officer**" refers to an ad-hoc position determined programmatically as the officer in charge of ensuring safeguarding efforts and practices are as efficient and effective as possible.

"**Management**" refers to Chief Executive Officer and other senior officers as determined in the PAL Network Organogram

"**Partner**" is a grantee or organisation that has entered into a formal agreement with PAL Network to implement an activity. It is different from the PAL Network members.

"**Member**" is an organisation or program admitted to PAL Network membership or an individual appointed as an honorary member.

"**PAL Leaders**" are the heads of the membership organisations/programs and serve as the formal representatives of the member organisations to the PAL Network.

"**Safeguarding**" refers to specific mechanisms, processes, steps and procedures put in place to protect PAL Network staff, partners, children, vulnerable groups, and individuals who come directly into contact with PAL Network's work. In its broad sense, it means protecting people and the environment from unintended harm, but in this policy, we are focused on preventing and responding to **harm caused by physical, emotional and sexual exploitation, abuse**. The aim is to minimise the likelihood and impact of these actions towards both the people we are trying to help and also people who are working with our organisation.

"**Child protection**" is a set of measures adopted by the PAL Network to protect the rights of the children it comes into contact with.

Sexual exploitation is a term that means "any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another."¹

Sexual abuse means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.²

Child abuse is a term used to refer to actions that result in a child experiencing harm, usually as a result of failure on the part of the parent or guardian to ensure a reasonable standard of care and protection. It may include both actions and omissions on the part of the parent or guardian and is normally categorised into four main forms – physical, sexual and emotional abuse, and neglect. It is often the case that a child

¹ UN Secretary-General's Bulletin on protection from sexual exploitation and abuse (PSEA) (ST/SGB/2003/13)

² IBID

discovered to be suffering one form of abuse will also be experiencing others. The following four categories of abuse are universally found³

"PAL Network Participants" include staff, associates, consultants, the board, advisory members and volunteers

"Neglect" is the persistent or severe neglect of a child, or the failure to protect a child from exposure to any kind of danger, including cold or starvation, or extreme failure to carry out essential aspects of care, resulting in significant impairment of the child's health or development, including non-organic failure to thrive. Neglect may be willful or otherwise.

³ Do you have a source for the above definitions? If not, consider using World Health Organization definitions https://www.who.int/violence_injury_prevention/violence/global_campaign/en/chap3.pdf

PART A: INTRODUCTION

1.1 Vision of PAL Network

A world where all children have a foundation for lifelong learning.

1.2 Mission of PAL Network

Generate evidence through assessment and action to inform, influence and improve children's learning.

1.3 Legal Status of PAL Network

PAL Network is a non-profit organization, registered with NGO Coordination Board under the NGO Act, Laws of Kenya.

1.4 Purpose of Safeguarding Policy

The purpose of this policy and its subsequent procedures are to protect children, young people and vulnerable adults from harm and abuse so that all staff and those working on behalf of the PAL Network are aware of their roles and responsibilities in identifying concerns, sharing information, and taking prompt action.

1.5 Guiding Values and Principles

- Safeguarding is everyone's responsibility
- PAL Network applies a Do No Harm perspective to its work
- PAL Network has a duty of care to staff, volunteers, partners, and all people living in the communities where we serve.
- PAL Network believes in non-discrimination, and all children and vulnerable adults will be treated equally regardless of their gender, race, religious or political beliefs, age, physical or mental health, sexual orientation, family and social background and culture, economic status or criminal background
- PAL Network will follow the principle of acting in the best interests of children and vulnerable adults.
- PAL Network will act with integrity, transparency, and accountability.
- PAL Network has zero tolerance for all forms of abuse and exploitation

1.6 Scope and Compliance

This policy applies to:

1. PAL Network staff
2. PAL Network Associates – these include board members, volunteers, interns, consultants and contractors, suppliers, supporters (including donors, sponsors, advocates, ambassadors). This policy also applies to staff and representatives of partner organizations/government with whom PAL Network has a formal working relationship, and anyone who has been brought into contact with children while working for or with PAL Network.
3. PAL Network visitors – this includes journalists, media, researchers, or anyone else who may come into contact with children through PAL Network activities.

4. PAL Network visitors, including journalists, media, researchers, or anyone else who may come into contact with children through PAL Network activities.
5. The Safeguarding policy covers two contexts
 - PAL Network Secretariat presented as PART B
 - PAL Network membership presented as PART C

1.7 Staff and PAL associated persons' responsibilities

1.7.1. Responsibilities to a Child

PAL staff and associated personnel must not:

- i. Engage in sexual activity with a child. Mistaken belief in the age of a child is no defense.
- ii. Sexually abuse or exploit children.
- iii. Subject a child to physical, emotional or psychological abuse, or neglect.
- iv. Engage in any commercially exploitative activities with children including child labour or trafficking.

1.7.2 Responsibility to at risk Adult

PAL staff and associated personnel must not:

- i. Sexually abuse or exploit at risk adults
- ii. Subject an at risk adult to physical, emotional or psychological abuse, or neglect protection from sexual exploitation and abuse

1.7.3 Responsibility to any adult with lesser power

PAL staff and associated personnel must not:

- i. Sexually exploit or abuse any person.
- ii. Exchange money, employment, goods or services for sex or sexual favours. This includes, but is not limited to, using the services of sex workers, demanding sexual activity in exchange for assistance/service that is due to beneficiaries and demanding sexual activity in exchange for employment or administrative service.

1.7.4 Other responsibilities

PAL staff and associated personnel are obliged to:

- i. Contribute to creating and maintaining an environment that prevents sexual exploitation/abuse and safeguarding violations and promotes the implementation of this Safeguarding Policy.
- ii. Report any concerns or suspicions regarding safeguarding violations by an PAL staff member or associated personnel to the appropriate staff member as set out in clause 2.4 below.

1.7.5 Additionally, while not prohibited unless stated so by country level policy, the following types of sexual relationships are strongly discouraged as they generally involve unequal power dynamics and may be perceived as exploitative:

- i. Relationships between PAL's secretariat staff or PAL member staff and local partner organization staff members, volunteers or data collectors.
- ii. Relationships between PAL board member, advisory committee member or leadership team member and members of PAL Network staff, local partners, volunteers or data collectors.

PART B: SAFEGUARDING AT THE PAL NETWORK SECRETARIAT

The Safeguarding policy shall apply to the following:

2.1 Safe Human Resource Provisions

- 1) PAL Network shall always aim to recruit a suitably qualified staff with the desired competencies and skills to carry out their function in an effective, efficient and safe manner. The recruitment processes used shall adhere to the safeguarding requirements that reflects PAL Network's commitment to protecting children and vulnerable persons from harm or abuse by persons contracted by PAL Network.
- 2) Management shall implement all the provisions of safe recruitment, identify gaps in safeguarding policies and alert the Board on any policy disharmony in Safeguarding. Management shall also develop protocols and risk registers that minimise incidences of safeguarding violations.
- 3) All the PAL Network employees shall abide by and promote Safeguarding in strict compliance with relevant laws. Each Staff has individual culpability in the event of violating safeguarding provisions.
- 4) All interactions and engagements with partners shall promote Safeguarding at all times.

2.2 Categories of Abuse

PAL recognises the following violations against Safeguarding

- (i) **Physical abuse** including 1) Severe physical punishment 2) Beating or slapping 3) Hitting or kicking 4) pushing 5) Shaking or throwing 6) Pinching or biting 7) Choking 8) Hair pulling 8) Terrorizing with threats, 9) Use of force in handling 10) Deliberate poisoning 11) Suffocation 12) Fabricated/induced illness 13) Allowing or creating a substantial risk of significant harm to an individual 14) Neglect
- (ii) **Sexual abuse** including 1) Exposure of the sexual organs 2) Any sexual act intentionally performed in the presence of the children and vulnerable groups 3) Intentional touching or molesting of the body of a child whether by a person or object for the sexual arousal or gratification 4) Masturbation in the presence of the child 5) sexual intercourse with the child whether oral, vaginal or anal.
- (iii) **Sexual exploitation** including 1) Inciting, encouraging, propositioning, requiring or permitting a child to solicit for or to engage in prostitution, or other sexual acts 2) Allowing a child to be involved in the exhibition, modelling, or posing for sexual arousal, gratification, or sexual act, including its recording (on lm, videotape or other media) or the manipulation, for those purposes, of the image by computer or other means. 3) Showing sexually explicit material to children, which is often a feature of the 'grooming' process by perpetrators of abuse;
- (iv) **Emotional abuse** including 1) Physical fighting in front of children 2) Verbal altercations before children, 3) Exposure to inappropriate or abusive material through new technology, 4) Exposure to violent material through technology, 5) Act in ways intended to shame, humiliate, belittle or degrade children, 5) Perpetrate any form of emotional abuse 6) Discriminate against and show differential treatment, or favour particular children to the exclusion of others based on race, culture, age, gender, disability, religion, sexuality, or political persuasion.
- (v) **Economic exploitation** refers to the use of a child in any way for economic gain. This includes child labour, child slavery, child sex tourism, and even the "sale" or illegal adoption of children for profit. It also includes use of children to help sell and distribute illegal drugs, and children being recruited as soldiers, and forced to fight.

2.3 Safeguarding Policy Implementation

PAL shall take into consideration the following nine (9) components in safeguarding

2.3.1 Risk assessment/Risk mitigation

- (i) On the promulgation of the Safeguarding Policy, PAL will conduct an initial safeguarding risk assessment of all its programs, fundraising, communications, marketing, social media, Human resource and physical office locations.
- (ii) The risks shall be captured in a standard template
- (iii) The overall PAL risk register shall contain the safeguarding risks.

2.3.2 Awareness

- (i) All PAL employees, associates, consultants, volunteers, interns and board shall sign an acknowledgment that they know, understand and will follow this Safeguarding Policy.
- (ii) The Administration Unit shall keep the repository of all signed agreements.

2.3.3 Safe recruitment

- (i) It shall be a requirement that candidates for employment, board, advisory groups, volunteers, interns, relevant personnel of contractors and partners undergo an background check to ensure that they have no history of child/vulnerable person abuse.
- (ii) PAL shall also undertake an appropriate criminal record or police background check, to the extent permitted by law, before employment or engagement with PAL, and periodically after that as required by law.
- (iii) The Chief Executive Officer may, with justification, determine exemption to police background checks provided that the contexts are not feasible. In this case apart PAL shall only rely on original police clearance certificate provided by the applicant.
- (iv) PAL shall not recruit any person with a legal conviction for any crime against children or sexual exploitation or abuse against an adult to the extent permitted by applicable law.

2.3.4 Safeguarding Training

- (vi) All new PAL participants shall be inducted on the PAL safeguarding provisions within two weeks of engagement.
- (vii) There shall be an annual refresher training for all the PAL staff.
- (viii) Management on a needs basis may institute additional training in the event of adverse changes in the safeguarding landscape, mainly when occasioned by legal requirements.
- (ix) The board shall commit financial resources for additional training for staff in the first line with high-risk exposure.
- (x) Where PAL is working with partners, all the induction protocols including training shall include safeguarding components in appropriate languages.
- (xi) PAL shall always endeavour to engage a resourceful, experienced and competent trainer to carry out the annual refresher trainings

2.3.5 Safe programme planning

To ensure that PAL programs do not violate safeguarding, the Board shall ensure that;

- (i) All plans including annual plans and specific project plans disclose safeguarding risks. The Board may order for safeguarding re-assessment depending on the life of the program and all changes to the approved plans should include the effect on Safeguarding.

- (ii) Management regularly monitors the implementation landscape to establish any sudden and significant changes and ensure that safeguarding is maintained. The decisions to make may include suspending some activities, scaling back, or cancelling of activities.

2.3.6 Communications

PAL recognises the sensitivity of all images (photos, video). PAL shall, therefore, ensure that;

- (i) Images captured represent member agencies and communities in a respectful and dignified manner.
- (ii) PAL shall restrict access to images to prevent abusers from taking, accessing, sharing and/or using images of children and vulnerable adults obtained through PAL
- (iii) PAL shall ensure that all images of children and vulnerable adults taken are used only with full and informed consent, in the manner in which they were originally intended.
- (iv) PAL shall not identify details of the child or vulnerable adult used in publishing the photo.
- (v) PAL staff will always gain consent from the child's parent or immediate guardian. However, for vulnerable adults or anyone without cognitive ability, consent shall be obtained through their carers. A copy of the consent form will be filed with the image or video, which will be in a password-protected file and accessible only to those with the authority to do so.

See Appendix 2 for safe communication guidelines and Image Consent Form.

2.3.7 Social media

- (i) PAL shall ensure that children and vulnerable adults in contact with the programs are represented with dignity through social media.
- (ii) PAL staff shall never post photos of children in project areas taken on their mobile phones or cameras and uploaded to Staff personal social media sites.
- (iii) If PAL is to use images or videos of children and vulnerable adults on its organisational social media or social media advocacy campaigns with other partners, the same principles of informed consent MUST apply. The challenge with online images, however, is that once posted online, it is impossible ever to remove them.
- (iv) If pictures have to be used on social media, strict online security settings shall be used to ensure that they cannot be downloaded or copied by anyone. This nature of online images needs to be explained to the child's parent or immediate guardian or any adult in such an image.

2.3.8 Management responsibilities

- (i) The principal responsible officer for safeguarding shall be the Chief Executive Officer.
- (ii) All staff members have a personal responsibility to strictly abide by safeguarding requirements as set out by the CEO through guidelines, forms, and restrictions.
- (iii) The Board on the recommendation of the CEO shall designate at least one staff (not below an officer level) as the focal person called the Designated Safety Officer (DSO).
- (iv) The DSO shall
 - (1) Take stock of the implementation of safeguarding including coordinating training, identifying gaps, good practice, receiving complaints of Safeguarding, preparing safeguarding reporting.
 - (2) Work with management to ensure the induction of new staff on safeguarding, ensure compliance and model safeguarding behaviour.

- (3) Ensure that safeguarding is promoted in partnerships including ensuring that protocols and contracts of engagement promote Safeguarding.

2.3.9 Monitoring and review

- (i) The CEO has the overall responsibility of monitoring the implementation of safeguarding.
- (ii) The CEO shall establish mechanisms to support the member countries to develop the safeguarding guidelines.
- (iii) The CEO shall develop a peer assessment of compliance within the network.
- (iv) PAL shall provide technical support to the members to develop compliance protocols.
- (v) A safeguarding 'spot check' will also be conducted during each monitoring visit to member organisations.
- (vi) This policy is due for review every two years at a minimum, or sooner if there is a significant change in programme context, partner, or donor compliance expectations.

2.4 Reporting mechanisms

- 1) PAL Secretariat shall adopt a simple, user-friendly, transparent, lawful and appropriate community-based reporting mechanism. The mechanism shall include use of simple posters or brochures to illustrate **what** kind of behaviour or concerns should be reported, **who** they should be reported to, **when** and **how**.
- 2) A variety of reporting options will be provided including reporting through the Integrated Incident Management (IIM) system (<https://palnetwork.org/writeup/>) system, phone and email. Written complaints can also be made, but it should be stressed that if there is a serious concern, time will be of the essence, and written complaints may take longer for the response.
- 3) **PAL Network takes seriously its duty of care to whistle blowers.** No one making a legitimate report about a safeguarding concern will face retribution from PAL. To the extent possible, whistle blowers will have their identity protected for their own safeguarding. However, in cases where the safeguarding concern being reported is a criminal matter, PAL cannot guarantee that the staff member will have their identity protected, as they may need to give testimony to authorities.
- 4) After completion of investigations, stern action, not ruling out criminal prosecution, will be taken against whistle blowers proven to have preferred false allegations on any individual. **Please refer to the separate PAL Whistle-Blowing Policy for more details.**
- 5) For reports which are deemed to be serious safeguarding concerns, the CEO will provide an initial report to the Board within 24 hours. If an investigation is warranted, this should be conducted, keeping the Board apprised of the progress.

2.5 Disciplinary Action

Failure to adhere to the safeguarding policy and its code of conduct, inappropriate behaviour toward children or vulnerable adults, or failing to report a known or suspected safeguarding incident committed by a PAL employee or affiliate, is grounds for discipline, up to and including termination of the employment or other affiliation with PAL.

2.6 Field visits

- (i) All visitors must be briefed on PAL Safeguarding code of conduct and images and video behaviour protocols prior to a field visit.

- (ii) Upon arrival, visitors receive a brief written or oral orientation and sign an acknowledgment of receipt of the protocols.
- (iii) The signed acknowledgment is kept on file by the host organisation. Non-employees, donors, sponsors and other development partners must be accompanied by a PAL or affiliate employee when making field visits.

See Appendix 4 for PAL Safeguarding Concern Reporting Flowchart

2.7 Confidentiality

- (i) In all matters dealt with as part of this policy, it is essential to respect the need for confidentiality.
- (ii) In certain circumstances, any lack of confidentiality may have devastating effects on the lives of children and may also result in severe consequences for adults involved in the process.
- (iii) In responding to issues and concerns regarding possible abuse, Staff and others must exercise extreme vigilance in protecting information and must pass on this information via the reporting process described in this policy, only to those people who need to be aware of it.

PART C: SAFEGUARDING AT THE MEMBERS' LEVEL

Each PAL Network Member shall commit to develop, implement and continuously improve the practice of Safeguarding.

3.1 Introduction

PAL Members shall develop a safeguarding policy that;

- 1) Is fully compliant with the relevant with the National legislations
- 2) Responds to the regional and International statutes related to human rights and protection of children and vulnerable persons
- 3) Is approved by relevant policy organ of the member
- 4) Has zero tolerance towards incidents of violence, harm or abuse against children or vulnerable adults, committed either by employees or others affiliated with the Member's work.
- 5) Defines bullying, sexual harassment and abuse targeted at both beneficiaries, including adults at risk, partner staff and Staff within an organisation.
- 6) Is committed to the continuous improvement of safeguarding efforts, which emphasises the protection of children and vulnerable persons from any form of abuse, harm or exploitation.

3.2 Areas to be covered by the Member's Policy on Safeguarding

At the minimum, the policy shall cover the following areas. The areas do not appear in any order of preference.

No	Aspect/Area	Details
1	Processes when dealing directly with children.	1.1 Commit to obtaining parental consent in circumstances that require children to participate in project activities 1.2 State how children will be protected in the use of information technology. 1.3 Commit to protecting data about children including the anonymity. 1.4 State the process of using of photographs, videos and other communications material of or about children.
2	Whistleblowing processes	1.1 Commit to protecting whistleblowers from reprisals. 1.2 Outline transparent processes for dealing with concerns raised by whistleblowers. 1.3 Commit to share the safeguarding policy with downstream partners. 1.4 State the measures in place to support Staff to report concerns internally and confidentially. 1.5 Mechanisms of informing children and vulnerable groups about safeguarding commitment. 1.6 Mechanisms through which communities can hold the organisation accountable.
3	Clear handling framework of safeguarding violations	3.1 Developing and keeping a detailed register of safeguarding issues (When cases happen, processes of how the issues were handled and clarity on how current and historical issues are dealt with) 3.2 Investigation and disciplinary procedures 3.3 Working mechanisms with the National Authorities where Safeguarding is violated 3.4 Statement of capability in investigating and addressing safeguarding violations
4	Safe Human resources	4.1 Recruitment process consider and evidence the level of safeguarding risk in a job role

	recruitment and engagement	<p>4.2 Requirements in shortlisting to address Safeguarding</p> <p>4.3 Background checks to ensure no criminal record on safeguarding violations</p> <p>4.4 Contract/engagement provisions requirements on safeguarding including disclosures</p> <p>4.5 Provisions for continuous training on safeguarding for the human resources</p> <p>4.6 Minimums on mandatory induction and refresher training for new people and existing human resources, code of conduct requirements, registers of training on Safeguarding, opportunities for Staff to practice Safeguarding</p> <p>4.7 The establishment and resourcing of Designated Safeguarding Officer including capacities and continuous development of the DSOs</p>
5	Risk management	<p>5.1 A risk framework that details the classification of risks, likelihood of occurrence and the likely impact</p> <p>5.2 A regular risk register across the program</p> <p>5.3 Risk ownership including oversight</p>
6	Involving contractors, consultants, grantees, partners, and suppliers	<p>6.1 List of all those who should sign the Safeguarding including suppliers, contractors and sub-contractors</p> <p>6.2 Procurement processes compliance</p> <p>6.3 Additional demands when contractors work with children</p> <p>6.4 Monitoring of compliance for contractors and suppliers</p>
7	Code of conduct	<p>7.1 Provisions for behaviour required during the working hours</p> <p>7.2 Provisions for behaviour required outside working hours</p> <p>7.3 Alignment with the National legislations</p>
8	Governance and accountability	<p>8.1 Commitment that the Board (policy making organs) approves the safeguarding policy</p> <p>8.2 Commitment to regular review of the safeguarding report</p> <p>8.3 State self-audit mechanisms for safeguarding</p> <p>8.4 Commitment to peer audit mechanisms</p> <p>8.5 Provide for external audits for safeguarding</p> <p>8.6 State the duration for the policy to be reviewed</p> <p>8.7 State the resourcing disclaimer including no funding from organisations and individuals supporting terrorism, discrimination, human trafficking, child soldier, child abuses and slavery</p>
9	Guidelines for monitoring overseeing the implementation of the policy	<p>9.1 State the process of monitoring compliance to safeguarding</p> <p>9.2 State mechanisms of testing the effectiveness of the policy in managing safeguarding needs</p> <p>9.3 State clearly the timeframe for dealing with complains</p> <p>9.4 Develop and implement a system of receiving, processing and handling violations of Safeguarding</p> <p>9.5 Develop forms to be filled by parties needed to ensure compliance (Staff, partners and suppliers)</p>

3.3 Responsibilities of PAL Network

- 1) Support each Member to develop a safeguarding policy that meets all the requirements above

- 2) Develop mechanisms that allow members to implement peer monitoring of safeguarding and learning to promote the practice of safeguarding.

3.4 Responsibilities of the Members

- 1) Develop and implement the safeguarding policy and communicate to downstream partners and suppliers
- 2) Regularly update the guidelines to reflect the legislative landscape and international and Network-wide good practice
- 3) Resource safeguarding mechanisms including appointing designated safety officers, safe recruitment, routine self-audits that are at least annual
- 4) Schedule and conduct safeguarding self-audits
- 5) Participate in safeguarding peer assessments
- 6) Make annual disclosures on safeguarding

Appendices

Appendix 1: PAL Safeguarding Protocols and Code of Conduct

I, _____ (insert name)
agree that in the course of my association with PAL Network;

I will:

- Create and maintain an environment which prevents sexual exploitation and abuse of children and vulnerable adults and promotes the implementation of this code of conduct;
- Be careful about perception and appearance in their language, actions and relationships with children and vulnerable adults. Their behaviour—including in person and on digital platforms, both online and offline—demonstrates a respect for children, vulnerable adults and their rights;
- Ensure that all physical and online contact with children and vulnerable adults is appropriate in the local culture;
- Use positive, non-violent methods to manage children’s behaviour;
- Accept responsibility for personal behaviour and actions as a representative of the organisation;
- Always accountable for their response to a child’s behaviour, even if a child behaves in a sexually inappropriate manner; adults avoid being placed in a compromising or vulnerable position with children;
- Where possible and practical, follow the ‘two-adult’ rule while conducting PAL’s work, wherein two or more adults supervise all activities that involve children, and are visible and present at all times;
- Inform my supervisor/manager if I am investigated for any crime or charged with any criminal offense
- Comply with safeguarding related investigations (internal and external) and make available any documentary or other information necessary for the completion of the investigation;
- Comply with applicable digital child safeguarding protocols, when handling any personal data about individual children or adult beneficiaries, noting in general that collecting or using such data must be limited to the minimum necessary, and that such data must be maintained and transferred in a secure, confidential manner;
- Immediately report through established reporting mechanisms any known or suspected safeguarding incident or breach of this Policy by a PAL employee or affiliate, or a development partner from any other agency

And I will not:

- Use inappropriate language when speaking with or whilst in the presence of a child or any vulnerable adult
- Use any form of physical violence against children
- Engage in behaviour to shame, humiliate, belittle or degrade a child or young person, or otherwise emotionally abuse a child or young person
- Act in a sexually provocative manner or engage children in any form of sexual activity, including paying for sexual services
- Hold, kiss, cuddle or touch a child in an inappropriate, unnecessary or culturally insensitive way
- Exchange money, employment, goods, or services for sex (including sexual favours, other forms of humiliating, degrading, or exploitative behaviour, or hiring sex workers) or other exploitative demands. This includes exchange of assistance that is already due to beneficiaries;

- Discriminate against any individual based on gender, age, race, ability, nationality, cultural background, religion, sexual orientation or any other status
- Spend time outside work requirements with any child or young person connected with PAL Network's programs
- Hire children for domestic or any other labour which is inappropriate for their age or development, interferes with their education or play, or places them at risk of injury
- Do things for children of a personal nature which they can do for themselves such as toileting or changing their clothes
- Sleep in close proximity to any children unless it is absolutely necessary, in which case I will keep my supervisor/manager informed and ensure another adult is present, where possible (noting that this does not apply to my own children)
- Access or create sexually abusive images of children, and
- Use computers, mobile phones, video or digital cameras or any other technology for the purpose of exploiting or harassing children or any vulnerable individual.

I understand that;

- A breach of the Policy or Code may provide grounds for my employment with PAL Network to be terminated.
- A breach of the Policy or Code could result in criminal prosecution.
- It is my responsibility, as a person engaged (employee, volunteers, consultant, associate or partner) by PAL Network, to use common sense and avoid actions or behaviors that are abusive or exploitative of children or young people, or could be construed as such.

I authorize PAL Network to undertake any necessary inquiries, including criminal record checks and reference checks, as part of my appointment or recruitment process.

I agree to comply with the PAL Safeguarding Protocols and Code of Conduct.

Name and Title, Staff or other

Signature

Date

Name and Title, Witness

Signature

Date

PAL Network

Appendix 2: Images and Videos Consent Form

We would be grateful if you would fill in this form to give us permission to take photos of your child and use these in our printed and online publicity.

I give
permission to take photographs and / or video of my child.

To give your consent, please answer the questions overleaf, then sign and date the form where shown and fill in any other relevant information

1) May we use your image(s), or those of your child(ren) if under 18, in our publicity material, including printed publications, video recordings and on our website (delete if this does not apply)?

Yes / No

2) We sometimes send publicity material about our services, including photographs where appropriate, to the partner organisations, who may use the image in printed and/ or electronic form and then store it in their archive. Can we use your photograph, or your child's, in this way?

Yes / No

I grant full rights to use the images resulting from the photography/video filming, and any reproductions or adaptations of the images for fundraising, publicity or other purposes to help achieve the group's aims. This might include (but is not limited to), the right to use them in their printed and online publicity, social media, press releases and funding applications.

Name of child	
Name of parent / guardian	
Signature of parent / guardian	
Date	

FOR INTERNAL USE

Event and location:

Photographer's name:

Contact details for person photographed (if needed):

Appendix 3: Incident Reporting Form

PAL Network is committed to practices that protect children and vulnerable adults from harm. PAL will be proactive in responding to any concerns regarding the safety and/or wellbeing of a child or vulnerable adult in any of the communities in which it works, or any person who has come into contact with PAL staff, volunteers, and others associated with PAL Network.

This form should be completed if you become aware of a potential safeguarding concern whether an individual of concern has provided you with a direct report, you have directly observed a concern, or you have been informed of concern by a third party. Please complete this form within 24 hours of being alerted to an incident and forward it to your Line Manager. If a child or vulnerable adult is at immediate risk of harm, provide a verbal report to the PAL safeguarding focal point first and follow their guidance on immediate action to take. Once the individual is safe, complete this form and send it to your manager.

This page is to be completed by the PAL staff member, with the information provided by the person reporting the concern if separate (and if that person can provide the information clearly).

Date of report:	
Time report was completed:	
Name(s) of persons involved	
Date incident occurred:	
Time incident occurred:	
Location where incident occurred:	
List any witnesses to the incident:	
Description of incident (please state facts):	
Immediate action taken:	
If no action taken – reason:	

Name of person completing form	
Contact phone number	
Signature	
Name of Line Manager this form was submitted to	
Signature of the Line Manager	

This page is to be completed by the Line Manager.

Action taken:

If no action taken – reason:

If action taken, timeframe and persons responsible:

Name of organisation(s) notified:	
Contact phone number:	
Contact person in organisation:	
Date notified:	
Time notified:	

Appendix 4: Reporting Framework

