



SAFEGUARDING POLICY

Meeting Point International (MPI)

2026

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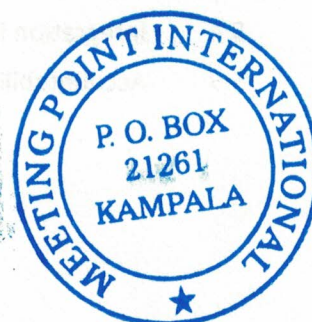


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LIST OF ACRONYMS

ACHPR	African Charter on Human and Peoples' Rights
ACRWL	African Charter on the Rights and Welfare of the Child
CRPD	Convention on the Rights of Persons with Disabilities
CHS	Core Humanitarian Standards
CV	Curriculum Vitae
DFID	Department for International Development
EAC	East African Community
ED	Executive Director
FGM	Female Genital Mutilation
HIV/AIDS	Human Immunodeficiency Virus/Acquired Immunodeficiency Syndrome
HR	Human Resource
IASC	Inter-Agency Standing Committee
ICERD	International Convention on Elimination of all Forms of Racial Discrimination
ICESCR	International Covenant on Social and Cultural Rights
ILO	International Labor Organization
MPI	Meeting Point International
NCA	National Children Authority
NCP	National Child Policy
NGO	Non-Governmental Organization
SEA	Sexual Exploitation and Abuse
SEAH	Sexual Exploitation, Abuse and Harassment
SOPs	Standard Operating Procedures
UDHR	Universal Declaration of Human Rights
UN	United Nations
UNCAT	United Nations Convention Against Torture
UNCRC	United Nations Convention on the Rights of the Child

1. INTRODUCTION

Founded by Rose Busingye in 1992, Meeting Point International (MPI) is a Ugandan non-governmental organization working with women, men, youth and children from the slums of Kampala, who are mainly affected and infected by HIV/AIDS.

Our Vision: For every person to discover their infinite value and dignity, through a journey towards their own human development and that of their communities.

Our Mission: MPI aims at continuously accompanying every person and community, prioritizing victims of HIV/AIDS, promoting education at all levels and committing to poverty alleviation.

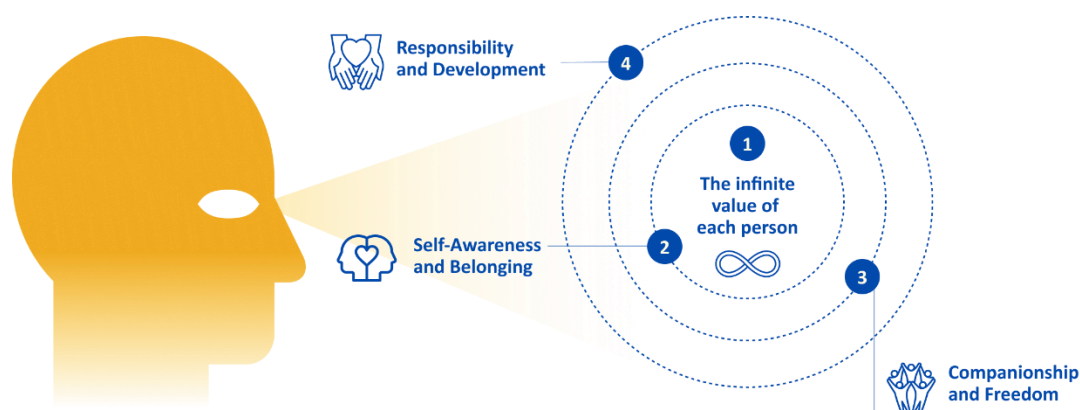
1.1 MPI's Safeguarding Eco-System

MPI views safeguarding not as a standalone policy but as an integrated ecosystem comprising:

- A. PREVENTION: Proactive measures including training, risk assessments safe programming.
- B. PROTECTION: Clear reporting mechanism, survivor support, and safe environments.
- C. RESPONSE: Robust investigation, corrective action, and accountability measures.
- D. GOVERNANCE: Board oversight, strategic leadership, and resource allocation.

This ecosystem approach ensures safeguarding is embedded in MPI's culture, operations, and partnerships.

1.2 MPI's Method



1 Everything begins with the **infinite value of each person**.
Every individual is **unique and irreplaceable**, not defined by their limitations, current or past circumstances, illness, poverty, wealth, or even death.

2 Our goal is to help each person **discover their infinite value**, foster relationships where they realize **they are important** and create simple communities where they can belong.

3 Through companionship, each person can **become free** and able to be themselves and express who they are.

4 When someone discovers their infinite value and gains freedom through this companionship, they **take responsibility for their value** and become the main character in their own development and that of their communities.

1.3 What Safeguarding Means to MPI

Safeguarding refers to the responsibility of MPI to ensure that all staff, operations, and programs protect children, vulnerable adults, and employees from harm. This means creating an environment where no one, whether a program participant or an employee, is exposed to physical, emotional, or sexual abuse or harassment.

Safeguarding covers both the behavior of staff and associated personnel, as well as risks that may arise from how programs are designed or implemented. It also applies to the workplace, recognizing that abuse, harassment, or misuse of power can occur between colleagues or within supervisory relationships. MPI is committed to preventing and responding to such risks in all aspects of its work.

The two aspects of safeguarding include two dimensions:

- Internal safeguarding: Measures to prevent and address harm caused by staff or associated personnel within the organization. This includes protecting employees from abuse, harassment, or exploitation occurring in the workplace or through staff conduct (e.g., harm directly caused by the organization given the location of its office, harm indirectly caused by the organization given the poor quality of a service provider).
- External Safeguarding: Measures to ensure that MPI's programs, operations, and partnerships do not expose communities, beneficiaries, or other stakeholders to harm. This includes addressing risks linked to program design, implementation, and interactions between staff and external populations (e.g., harm not caused by the organization but the organization can address it; harm not caused by the organization and cannot be addressed directly by the organization).

1.4 Purpose of the Safeguarding Policy for MPI

The purpose of this policy is to foster a safe, supportive, and inclusive environment at MPI and to protect all individuals engaged with the organization from harm, abuse, exploitation, and neglect.

It provides clear guidelines, responsibilities, and procedures for preventing and addressing safeguarding concerns, and reflects MPI's commitment to upholding the rights and dignity of every individual. The policy ensures that all interactions and activities are conducted in a manner that prioritizes safety, respect, and accountability, in line with international safeguarding standards, national laws, and organizational values.

1.5 Aim of the MPI Safeguarding Policy

1. To ensure the safety, protection, and well-being of all people including staff, volunteers and interns involved in or impacted by the activities of MPI, with a focus on vulnerable groups.
2. To promote a culture of respect, accountability, and vigilance, where safeguarding is integrated into all aspects of organizational practice.
3. To prevent harm, abuse, exploitation, and neglect through clear policies, proactive measures, and continuous training for staff, volunteers, and stakeholders.

1.6 Objectives of the MPI Safeguarding Policy

Raise Awareness: Educate all stakeholders about safeguarding principles (the universal ones are: Do No Harm; Zero Tolerance; Safety & Human Dignity), their rights, and their responsibilities in ensuring a safe environment.

Implement Standards: Establish and maintain safeguarding procedures that align with national laws, international conventions, and best practices.

Capacity Building: Provide regular training and capacity-building sessions for staff, volunteers, and partners to empower them with the skills and knowledge to identify and address safeguarding concerns.

Reporting and Response: Develop clear, confidential, and accessible mechanisms for reporting, responding to, and resolving safeguarding concerns or incidents.

Foster Inclusivity: Create an inclusive environment that respects diversity and actively promotes equity and dignity for all individuals.

Continuous Improvement: Regularly review and update safeguarding policies and practices to adapt to emerging challenges and ensure effectiveness.

1.7 Application and Scope of MPI Safeguarding Policy

This policy applies to all staff members and representatives of MPI, including full-time and part-time staff, as well as individuals engaged on short-term contracts such as consultants, contractors, researchers, and volunteers. Compliance with this policy is mandatory, and all relevant individuals are required to read, acknowledge, and adhere to it as a condition of their engagement with MPI.

It also applies to visitors of MPI programs (including media), volunteers, board members, interns, supporters (such as donors, sponsors, advocates, and ambassadors), trustees, members, staff of partner agencies, and any other individuals or groups who come into contact with vulnerable people, including through access to their personal information and images.

2. KEY SAFEGUARDING DEFINITION AND CONCEPTS

2.1. Key Safeguarding Definitions

Abuse: Any action or inaction that causes harm, exploitation, or mistreatment of an individual. Types of abuse may include:

- **Physical Abuse:** The actual or potential physical harm, perpetrated by another person (adult or child) leading to physical bodily harm/injury. It may involve acts such as: hitting, picking, pinching, beating, kicking, burning, slapping, pushing, shaking, drowning, starving and poisoning. It also includes all acts of rough handling, physical punishment and heavy work. Some indicators of physical abuse include unexplained body injuries (wounds, bruises, burns, fractures) especially on protected parts of the body, body injuries at different stages of healing; slap, cane or pinch marks; untreated medical problems, weight loss, malnutrition and dehydration.
- **Emotional Abuse:** Emotional maltreatment that impacts on a person's emotional wellbeing and development. It includes humiliating/degrading acts such as ridicule, blaming, controlling, intimidation, harassment, verbal insults, bad eye, bullying, isolation, discrimination, coercion, ignoring, shouting at, threatening etc. Some indicators of emotional abuse include low self-esteem, isolation/withdrawal, constantly upset, tearful, confused, weight gain/weight loss, poor eating and sleeping habits.
- **Sexual Abuse:** The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. It should cover sexual assault (attempted rape, kissing/touching, forcing someone to perform oral sex/touching) as well as rape. Under the UN regulations, all sexual activity with someone under the age of 18 is considered to be sexual abuse.
- **Neglect:** The persistent failure to meet a child's or vulnerable person's basic physical, psychological, or emotional needs, resulting in, or likely to result in, harm to their health or development. This includes failing to provide essential needs such as food, shelter, healthcare, education, and care, where there is the capacity to do so. Indicators may include poor living conditions, persistent hunger, untreated illness, poor hygiene, social isolation, or being out of school despite being of school-going age. Neglect may also occur in the workplace where insufficient attention to staff safety, support, or wellbeing affects their ability to perform their duties.
- **Exploitation:** The abuse or misuse of power, trust, or vulnerability for personal gain, including sexual, financial, social, or political benefit. It may involve coercion, manipulation, or unequal power relations and can result in harm to an individual's well-being. Exploitation includes, but is not limited to, labour and sexual exploitation, trafficking, forced or hazardous work, and situations where sex or services are exchanged for money, goods, employment, or assistance. Indicators may include excessive working hours, little or no pay, unsafe conditions, work inappropriate to age or capacity, or signs of distress and dependency.
 - o **Sexual exploitation:** Any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes. According to IASC 2020 (see "3.5 Compliance with IASC" paragraph below for further information), sexual exploitation is a sexual relationship that involves exchange of money, employment, goods or services for

sex including sexual favors or other forms of humiliating, degrading and exploitative behavior.

Child: Any person under the age of 18, as defined by international law (e.g., the UN Convention on the Rights of the Child).

Confidentiality: Protecting the privacy and safety of individuals by ensuring that sensitive information is shared strictly on a need-to-know basis. Due to the highly sensitive nature of safeguarding cases, MPI protects data by use of coded or anonymized information to limit access to identifiable details and prevents unintended disclosure, reduces the risk of stigma or retaliation, and ensures that dignity, trust, and protection remain central throughout reporting, case management, and follow-up processes.

Duty of Care: An organization's legal and moral obligation to take all reasonable measures to ensure the safety, dignity, and well-being of beneficiaries, staff, volunteers, and partners. This duty of care includes preventing harm, addressing safeguarding risks, providing safe and supportive environments, responding appropriately to concerns, and ensuring that both beneficiaries and MPI staff are protected from abuse, exploitation, retaliation, or undue physical and psychosocial harm arising from the organization's activities.

Harm: Physical or psychological damage or impact caused to an individual, whether it is caused intentionally or accidentally, or by acts or omissions, as a result of their contact with MPI or the work of the organization as set out in this Policy. Harm is caused by a broad range of actions or failure to act, including forms of Abuse and Exploitation.

Safeguarding: The proactive measures taken by the organization to protect vulnerable persons and others from harm, exploitation, and abuse, while promoting their health, well-being, and development.

Vulnerability: Refers to the increased risk of harm, abuse, neglect, or exploitation experienced by individuals or groups due to factors that may limit their ability to protect themselves or access support.

Vulnerable Person: An individual whose ability to protect themselves from harm, abuse, or exploitation is impaired due to factors including but not limited to: age (minors under 18 and elderly persons), physical, sensory, or cognitive disability, mental illness, social or economic marginalization, displacement, dependency on care services (such as individuals living with HIV or AIDS) that may increase their susceptibility to harm, stigma, or discrimination.

Risk: The possibility that harm, abuse, neglect, or exploitation could occur to a child, vulnerable adult, or staff member as a result of actions, decisions, or omissions by individuals, organizations, or systems.

Sexual Harassment: A continuum of unacceptable and unwelcome behavior and practices of a sexual nature that may include, but are not limited to, sexual suggestions or demands, requests for sexual favors and sexual, verbal or physical conduct or gestures, that are or might reasonably be perceived as offensive or humiliating.

Stigma: A set of negative beliefs, attitudes, and perceptions that society or individuals hold about a person or group, often based on characteristics such as health status (including HIV/AIDS), disability, gender, or social identity. Stigma can lead to discrimination, social exclusion, shame, and reduced access to services, increasing an individual's vulnerability to harm, abuse, or exploitation.

2.2. Key Safeguarding Concepts

Best interests of the vulnerable people: The needs, rights and interests of the children, students and vulnerable adults must be the primary consideration in all decisions concerning their safety and well-being. All actions on Safeguarding are taken in the best interests of the students, children and vulnerable adults, which are paramount.

Confidentiality: Protect the privacy and dignity of individuals by maintaining strict confidentiality in safeguarding reporting and response processes.

Consent: Nothing in this policy should be conceived as compelling or requiring a victim or survivor to disclose their experiences against their wishes. Consent must always be sought from victims/survivors in relation to actions taken including referral to protection services. However, for children and young people consent must be carefully balanced with their best interest and their ability to make informed decisions.

Do No Harm: Ensure that all activities and interventions prioritize the safety and well-being of individuals, avoiding any action that could inadvertently cause harm or exacerbate vulnerabilities.

Duty of Care: MPI must take appropriate steps to ensure the safety and well-being of all its staff including volunteers and interns, children, students and representatives who are in contact with the institution or engaged in its programs.

Empowerment: Actively building the capacity of all individuals to recognize risks, protect themselves, and speak up when unsafe. For beneficiaries, this means providing the knowledge, tools, and safe spaces to participate in safeguarding processes. For staff, empowerment includes strengthening reporting mechanisms, ensuring they can safely raise concerns, and providing support to manage risks associated with reporting, such as retaliation or stigma. True empowerment ensures that all individuals feel respected, supported, and able to act to prevent and address harm, making safeguarding a shared responsibility in practice.

Multi-disciplinary Work: MPI should employ an interdisciplinary approach to safeguarding considering different areas of competence or expertise must guide the decision making for the benefit of the children and vulnerable people served by MPI.

Non-Discrimination: Promote inclusivity by guaranteeing equal access to support and protection for all individuals, irrespective of gender, age, disability, ethnicity, or any other status.

Participation and Empowerment: Actively involve individuals and communities in the development, implementation, and review of safeguarding measures, respecting their rights and perspectives.

Protection: The act of safeguarding individuals from actual or potential harm, abuse, or exploitation, especially the most vulnerable ones.

Safeguarding Risk Assessment: The ongoing process of identifying, evaluating, and addressing potential risks to prevent harm or abuse to beneficiaries, staff, and others affected by organizational activities. Safeguarding risk assessments must be conducted, reviewed and updated whenever there are changes in context, operations, or personnel. This could form part of the reporting either on a semestral basis. Regular assessments ensure that emerging risks are promptly addressed, preventive measures remain effective, and the organization actively maintains a safe environment in practice rather than as a one-time exercise.

Victim-Survivor-Centered Approach: When working with survivors who have experienced harm, MPI must put the needs and rights of the victim and survivor at the center of decision making. The victim or survivor has the right to be listened to, believed and supported in a way that respects their wishes and choices and considers their needs and experiences. They have the right to be involved in decisions that affect them.

Respect diversity and individuality: MPI safeguarding interventions must recognize and respect differences in culture, ethnicity, gender, religion, ability/disability, and socio-economic status. Upholding diversity and individuality ensure that all beneficiaries, staff, and stakeholders are treated fairly and equitably, reducing the risk of nepotism, favoritism, or discrimination. Safeguarding practices should actively promote inclusion, respect, and equal access to protection and support, ensuring that interventions are sensitive to individual needs while fostering an environment of trust, dignity, and fairness.

Transparency and Accountability: Ensuring clear, open, and consistent safeguarding practices that are not only formally documented but actively implemented and monitored in practice. This includes clearly communicating expected standards of behavior, establishing accessible reporting and complaint mechanisms, and holding individuals and the organization accountable for breaches of safeguarding standards through timely, fair, and proportionate action. Transparency and accountability are essential to building trust, preventing misconduct, and demonstrating a genuine commitment to safeguarding rather than a purely procedural or symbolic one.

Zero Tolerance for Abuse: A policy stance that any form of abuse is unacceptable and will be met with immediate action. All individuals associated with MPI have a duty of care to ensure that their actions do not cause harm, recognizing that positions of responsibility and trust may involve power that must not be misused. MPI is committed to protecting everyone from all forms of abuse. MPI has a zero-tolerance mandate also on Sexual Exploitation, Abuse and Harassment (SEAH) and is committed to preventing, identifying, and responding effectively to any form of SEAH involving everyone associated with the organization.

3. LEGAL FRAMEWORK

This Safeguarding Policy for MPI is guided by international, regional, and national legal frameworks that protect children, vulnerable people, and staff. All individuals including staff members share universal rights as enshrined in United Nations Conventions and as domesticated in national laws. However, certain categories of individuals, such as children, refugees, women, people with disabilities, and other vulnerable groups, are afforded additional protections in recognition of their heightened vulnerabilities.

3.1 *Key International Instruments*

The key international instruments that relate to safeguarding in MPI's context, among others, include:

- **Universal Declaration of Human Rights (UDHR), 1948** – Recognizes among other rights the right to be free from torture and degrading treatment.
- **International Covenant on Economic, Social and Cultural Rights (ICESCR), 1976** – This covenant recognizes rights to favorable conditions of work; social protection; adequate standards of living; highest standards of physical and mental health; education, cultural freedom, and scientific progress.
- **International Convention on the Elimination of all Forms of Racial Discrimination (ICERD), 1965** – The convention defines discrimination and places responsibility on state parties to put a stop to all forms of discrimination in the enjoyment of human rights.
- **The United Nations Convention Against Torture and other cruel, inhuman or degrading treatment or punishment (UNCAT), 1984** – The convention requires state parties to prevent acts of torture and to ensure that effective remedies are available to survivors when torture occurs.
- **United Nations Convention on the Rights of the Child (UNCRC), 1990, and its Optional Protocol on the Sale of Children, Child Prostitution and Child Pornography, 2000** – Provides protections for children from all forms of violence, including sexual violence.
- **Convention on the Rights of Persons with Disabilities (CRPD), 2006, and its Optional Protocol, 2008** – Affirms the full and equal enjoyment of human rights by persons with disabilities. It defines obligations on State Parties to ensure accessibility, protection, against exploitation or abuse, and measures to enable persons with disabilities to exercise their rights fully.
- **ILO Convention No. 182 on the Worst Forms of Child Labor, 1999; Convention No. 138 on Minimum Age, 1973; Convention No. 190 on Violence and Harassment, 2019** – Establish obligations to protect individuals from abuse, forced labor, trafficking, and unsafe or degrading conditions.

3.2 *Regional Instruments*

The regional instruments that relate to safeguarding in MPI's context include:

- **African Charter on Human and Peoples' Rights (ACHPR), 1981/1986** – The foundational human rights instrument for Africa.
- **African Charter on the Rights and Welfare of the Child (ACRWC), 1990/1999** – Africa's comprehensive child protection standard addressing child marriage, child labor, harmful cultural practices.

- **Protocol to the African Charter on Human and Peoples' Rights on the Rights of Women in Africa (Maputo Protocol), 2003/2005** – Strongest legal protections for women against violence, exploitation with reproductive rights.
- **East African Community (EAC) Gender Policy, 2017** – Guides gender-responsive safeguarding in the region.
- **African Union Convention for the Protection and Assistance of Internally Displaced Persons (Kampala Convention), 2009** – Relevant for displaced communities.

3.3 *National Laws of Uganda*

National laws of Uganda that relate to safeguarding in MPI's context include:

- **The Constitution of the Republic of Uganda, 1995**, chapter 4, provides the bill of rights and the rights of children. It specifically provides for the right to protection from all forms of violence and exploitation for every Ugandan.
- **The Employment Act, 2006**, section 7, provides comprehensive guidelines for the prevention and management of sexual harassment in the workplace. The act also prohibits employment of children under 12 years, provides for the rights of employees and protection of workers from harmful labor activities, with guidance on how to handle grievances related to breach of employment contracts, which includes misconduct related to abuse and exploitation of others.
- **The Employment (Sexual Harassment) Regulations of Uganda, 2012**, directs employers to develop policies against sexual harassment and provides guidance on management of sexual harassment complaints in the workplace.
- **The Penal Code Act, Cap. 120 (Amendment, 2007)**, provides for different criminal offences under the laws of Uganda, sanctions and general rules governing criminal responsibility, including sex-related crimes.
- **The Children's Act, Cap 59, 2004**, puts in effect the constitutional provisions on children and rights of children espoused by the United Nations Convention on the Rights of the Child.
- **The Children's Amendment Act, 2016**, amends the Children Act Cap. 59 to enhance the protection of children against all forms of abuse and exploitation, including institutional abuse, sexual abuse and exploitation, child marriage, child sacrifice, child labor, child trafficking, and Female Genital Mutilation (FGM). It also strengthens provisions for guardianship, intercountry adoption and prohibits corporal punishment.
- **The National Child Policy (NCP), 2020-2025**, Uganda's overarching blueprint for child well-being, with a dedicated implementation plan and budget.
- **The National Children Authority (NCA)**, established by the 2016 Children Act amendment by the government's lead agency for providing structure and mechanism, monitoring and evaluation of children's rights laws and policies.

Other Laws that provide for safeguarding children and adults-at-risk from other forms of harm include:

- **The Human Rights (enforcement) Act, 2019**, gives effect to article 50 of the constitution by providing procedures for enforcing human rights under chapter 4 of the constitution. Page 24 of 54.

- **The Domestic Violence Act, 2010**, provides for the protection and separation of survivors of domestic violence and sanctions of perpetrators.
- **Prevention of Trafficking in persons' Act, 2009**, provides for the prohibition of trafficking in persons, creation of offences, prosecution and punishment of offenders, prevention of trafficking in persons and protection of victims of trafficking.

3.4 Alignment with National Policy Framework

MPI's safeguarding approach is aligned with and supports the objectives of Uganda's National Child Policy (NCP) 2020 and its Implementation Plan. We are committed to contributing to its strategic areas of child protection, health, and development.

MPI recognizes the mandate of the National Children Authority, established under the Children's Amendment Act (2016), and affirms its commitment to adhere to the standards and reporting frameworks

3.5 Compliance with IASC

In addition, this policy shall also be guided by the IASC standards (The global Inter Agency Standing Committee technical note 1, 2020) through the following principles:

3.5.1 IASC Six Core Principles Relating to Sexual Exploitation and Abuse

- 1) Sexual exploitation and abuse by humanitarian workers constitute acts of gross misconduct and are therefore grounds for termination of employment.
- 2) Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of a child is not a defense.
- 3) Exchange of money, employment, goods, or services for sex, including sexual favors or other forms of humiliating, degrading or exploitative behavior is prohibited. This includes an exchange of assistance that is due to beneficiaries.
- 4) Sexual relationships between humanitarian workers and beneficiaries are strongly discouraged since they are based on inherently unequal power dynamics. Such relationships undermine the credibility and integrity of humanitarian aid work.
- 5) Where a humanitarian worker develops concerns or suspicions regarding sexual abuse or exploitation by a fellow worker, whether in the same agency or not, he or she must report such concerns via established agency reporting mechanisms.
- 6) Humanitarian workers are obliged to create and maintain an environment which prevents sexual exploitation and abuse and promotes the implementation of their Code of Conduct. Managers at all levels have responsibilities to support and develop systems which maintain this environment.

These principles serve as a foundation for all safeguarding efforts within MPI, aligning our commitments with internationally recognized standards of protection and care.

3.5.2 Leadership Accountability Statement

The MPI Management and Board fully endorse and are accountable for implementing these IASC principles, committing necessary resources to ensure a safe environment for all we serve.

4. PREVENTION STRATEGIES FOR MPI

4.1 Prevention

MPI should establish structures and procedures to identify, prevent and respond to safeguarding risks in its programs and operations and continually assess and manage safeguarding risks. These actions are based on the comprehensive understanding of local contexts and Up-to-date risk assessment.
Before any specific actions are planned or a new project is developed, a risk assessment must be completed and should have detailed mitigation actions with appropriate actions to address them.
All those working for and or on behalf of MPI must be vetted to ensure they do not pose risks to the students' children and vulnerable young people.
All contracts with consultants, contractors, suppliers and partners must include specific reference to the students, children and young people safeguarding and Code of Conduct.
MPI ensures that all new students, employees, volunteers, and board members undergo thorough induction on safeguarding policies and practices, including PSEA, prior to any engagements with the organization. In addition, refresher training is provided on a quarterly basis to all staff and stakeholders to reinforce knowledge, awareness, and compliance. These training programs are proactive measures designed to prevent harm before it occurs, build a culture of vigilance, and empower everyone connected to MPI to recognize, respond to, and report safeguarding concerns effectively.

4.2 Awareness and Training

This policy must be provided to all the MPI beneficiaries including those working for and or on behalf of MPI to enhance their awareness and knowledge of safeguarding. It is the responsibility of the institution to ensure that every staff, beneficiary and stakeholder acknowledges having received, read and understand the Safeguarding Policy and procedures and thereby have a signed commitment to this effect on their file.
Appropriate training and orientation regarding this policy and MPI approach to safeguarding, including regular refresher trainings, must be provided to all those working for MPI, beneficiaries and stakeholders who encounter the organization.
All visitors must revive safeguarding orientation on the safeguarding rules they will need to follow before a visit takes place.
Staff with specific tasks on safeguarding (Safeguarding Focal Person and Committee members) must receive additional training to enable them to effectively discharge their roles.

4.3 Reporting Concerns and Incidents

MPI must establish safe, accessible, appropriate and accountable reporting procedures. Safeguarding reporting channels must be put in place and ways of reporting concerns and incidents must be widely publicized.

All MPI staff and representatives are required to report any suspicions or incidences of abuse, exploitation or harassment of fellow staff, beneficiaries and anyone that comes into contact with MPI programs and activities regarding any behavior that contravenes this policy.
Failure to report to a relevant person's suspicion of misconduct relating to a child or vulnerable person is a breach of MPI Policy and could lead to disciplinary action taken against staff member and any other stakeholder that interacts with the child or vulnerable person.
It is the mandatory responsibility for a person/everyone to report any safeguarding concerns to the appropriate authorities according to the procedure(s) laid out in this policy or complementary policies and ensure appropriate action is taken to all reports while putting the survivor(s) at the center of every action/response.
When a report is made without bias (heard, witnessed or experienced), no retaliatory action shall be taken against the person making the report, even if it is later determined that the report was unfounded. This ensures that individuals can raise safeguarding concerns safely and without fear of punishment or negative consequences, supporting a culture of transparency and accountability.
All Safeguarding reports must be considered seriously, regardless of how much time elapsed since the incident is said to have occurred and irrespective of who is perpetrator, reporter or victim, even if the incident seemed unlikely or fantastical.

4.3.1 Survivor-Centered Response and Support

MPI's primary concern is the safety, dignity, and well-being of survivors. Any person reporting an incident of SEA has the right to:

- Confidential, respectful assistance from a trained Safeguarding Focal Point.
- Safe referral to medical, psychosocial, legal, and protective services, in line with the Inter-Agency Referral Form and Guidance¹.
- Informed consent and control over their personal information and the process.
- Protection from retaliation and re-traumatization.
- Support regardless of investigation outcome.

4.3.2 Internal Reporting Mechanisms and Procedures

MPI establishes the following confidential mechanisms accessible to all staff, volunteers, partners, and community members:

- 1) **Primary:** Report in person or via phone to the designated Safeguarding Focal Point
Names.....
MPI Contact.....
- 2) **Alternative:** Email
- 3) **Procedure:** All reports are logged, assessed for immediate risk, and handled according to the MPI Case Management Standard Operating Procedure (SOP). Anonymous reports accepted.

¹ https://interagencystandingcommittee.org/sites/default/files/migrated/2017-02/1866_psc_iasc_ref_guidance_t2_digital.pdf

4.4 *Responding*

In a life-threatening situation anyone working with MPI must act in order to protect the victim/survivor from further harm.

All those working for or on behalf of MPI must cooperate with any incident assessment, or investigation of safeguarding concerns whether conducted internally or by an external agency mandated by MPI.

MPI must hold anyone found guilty of abuse, neglect, exploitation or any other form of misconduct related to Safeguarding accountable. The consequences faced by the guilty party must be in line with the provision of the national legislation. The status held by the person accused of misconduct must not affect management or the reported incident or the consequences they face for their misconduct if found guilty.

Reported incidents must be responded to in the shortest time possible, the recommended time is 24 hours. Timeliness is very paramount in responding to reported cases.
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4.5 *Monitoring and Evaluation*

MPI will ensure that the implementation of the Safeguarding Policy is regularly monitored for compliance. Internal monitoring will be the responsibility of the Safeguarding Focal Person within the organization, while external reviews such as safeguarding audits will be conducted by qualified third parties to ensure objectivity and accountability.
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5. SAFEGUARDING RISK ASSESSMENT

MPI operates with awareness of the safeguarding risks prevalent in Uganda, including child labor exploitation, exposure to harmful practices, and the vulnerabilities exacerbated during school holidays. Our programs are designed to mitigate these specific risks. All risk assessments must be documented using the official “MPI Safeguarding Risk Register” template readily accessible in the administration office. All registers are to be submitted to the Safeguarding Focal Person for logging on a designated secure location, which will be reviewed quarterly by the Safeguarding Committee to identify systemic risks.

5.1 Purpose of Risk Assessment

Safeguarding risk assessment is a critical process aimed at identifying, evaluating, and addressing potential risks to children and vulnerable people in organizational operations, projects, and environments. By proactively managing these risks, MPI ensures a safe and protective environment, minimizes harm, and upholds its commitment to safeguarding principles.

5.2 Relevance of Safeguarding Risk Assessment

Risk assessment is integral to the success and accountability of a Safeguarding Policy for the following reasons:

- **Prevention:** Identifies risks before they result in harm, enabling timely preventive actions.
- **Tailored safeguarding risk mitigation measures:** Adapts safeguarding approaches to specific risks, ensuring solutions are context-appropriate and effective.
- **Compliance:** Ensures compliance with legal, regulatory, and contractual obligations regarding safeguarding.
- **Trust Building:** Demonstrates a commitment to the safety of children and vulnerable people, fostering trust among stakeholders, beneficiaries, and communities.
- **Continuous Improvement:** Provides opportunities to reflect on and improve safeguarding policies, processes, and practices based on evolving risks and challenges.

5.3 Key Steps in Conducting a Safeguarding Risk Assessment

1. **Identify Potential Risks:** Map areas where children or vulnerable individuals may be exposed to harm in MPI activities, projects, or work environments.
2. **Analyze Likelihood and Impact:** Assess how likely each risk is to occur and its potential impact on the individuals involved.
3. **Prioritize Risks:** Rank risks based on their severity and urgency to allocate resources efficiently.
4. **Develop Mitigation Measures:** Create specific actions or controls to eliminate or reduce identified risks.
5. **Monitor and Review:** Regularly review risks, mitigation strategies, and outcomes to ensure continued effectiveness and adapt to emerging concerns.

5.4 Integration into Organizational Processes

The safeguarding risk assessment will be embedded in key MPI processes such as project planning, recruitment, staff training, and stakeholder engagement. By doing so, safeguarding becomes an integral part of the organizational culture and decision-making.

5.5 Accountability and Reporting

MPI commits to documenting risk assessments and sharing findings with relevant stakeholders. This ensures transparency and accountability in safeguarding efforts.

6. SAFEGUARDING CODE OF CONDUCT

Protecting children and vulnerable individuals from abuse is a fundamental priority for MPI. Every complaint, allegation, or suspicion must be treated with the utmost seriousness. Staff members and associates have a responsibility to uphold a professional role when interacting with children and vulnerable people. This includes establishing and maintaining clear professional boundaries to prevent misunderstandings or breaches of trust in the professional relationship.

All staff must conduct themselves in a manner that aligns with their role as representatives of MPI and as positive role models for children and beneficiaries. The following is a clear and concise guide outlining the Code of Conduct expected of MPI staff and representatives to safeguard children and vulnerable individuals from harm. It also provides guidance on what to do if there are concerns about the safety or well-being of a child or vulnerable person.

6.1 MPI Safeguarding Dos and Don'ts

Safeguarding Dos	Safeguarding Don'ts
• Familiarize yourself with MPI's safeguarding policy. • Complete relevant safeguarding training and sign the safeguarding declaration. • Identify and know the designated Safeguarding Focal Person. • Treat children and vulnerable people with respect, dignity, and recognition of their individual rights. • Engage with children and vulnerable people in ways that enhance their capacities and potential. • Strive to understand children and vulnerable people within the context of their lives. • Plan and organize workspaces to minimize risks to children and vulnerable people. • Educate children and vulnerable persons about their rights, responsibilities, and project-related entitlements. • Give special protection to vulnerable groups, such as those previously abused or with disabilities. • Maintain professional boundaries in all interactions with children and vulnerable persons.	• Do not hit, physically assault, or abuse children or vulnerable persons, nor use force as a form of punishment. • Avoid developing relationships with children or vulnerable persons that could be deemed exploitative or abusive in any way. • Refrain from actions that may be abusive or place a child or vulnerable person at risk of harm. • Do not use language, make suggestions, or offer advice that is inappropriate, offensive, or abusive. • Avoid behaving in a physically inappropriate or sexually provocative manner with a child or vulnerable person. • Never allow a child or vulnerable person you are working with to stay overnight at your home unsupervised. • Do not sleep in the same room or bed as a child or vulnerable person you are working with. • Avoid performing personal tasks for children or vulnerable persons that they can do for themselves, such as bathing.

● Declare any gifts received from children or vulnerable persons. ● Ensure fairness in all selection processes. ● Be ready to explain and justify your actions as needed. ● Show sensitivity to cultural, religious, and gender differences. ● Adhere to health and safety regulations. ● Avoid, wherever possible, one-on-one interactions with children in secluded or remote areas. ● Dress appropriately and safely for required tasks. ● Announce your intention before entering spaces like changing rooms. ● Always uphold MPI's values in your conduct. ● Create a welcoming, inclusive, and safe environment for all children and vulnerable persons. ● Treat all individuals equally, irrespective of gender, race, religion, age, health, orientation, background, or status. ● Foster open communication and involve children and vulnerable persons in decisions affecting them. ● Report any concerns of abuse or breaches of safeguarding policies promptly and according to guidelines. ● Disclose all charges, convictions, or offenses relating to exploitation and abuse, including those under traditional law, both prior to and during your association with MPI. ● Take responsibility for your actions and avoid situations where allegations could arise. ● Regularly self-assess your behavior and language, recognizing and addressing risky situations. ● When working with children or vulnerable people, ensure another adult is present whenever possible.	● Do not condone or participate in illegal, unsafe, or abusive behavior involving children or vulnerable persons. ● Refrain from actions intended to shame, humiliate, belittle, or degrade children or vulnerable persons, or perpetuate emotional abuse. ● Avoid discriminating against, showing favoritism, or providing gifts or inappropriate attention to specific children or vulnerable persons. ● Never involve children or vulnerable persons in sexual relationships or activities, including paying for sexual services. ● Avoid asking children or young people to perform personal jobs or errands. ● Do not patronize children or vulnerable persons. ● Refrain from discussing your own sexual relationships with children or vulnerable persons. ● Do not disclose personal contact details to children or vulnerable persons. ● Avoid accessing social networking sites with children. ● Do not assume all children or vulnerable persons seek physical comfort when distressed. ● Refrain from touching a child or vulnerable person in a way that could be considered indecent. ● Avoid physical contact with children or vulnerable persons when they are in a state of undress. ● Do not change clothes in the same place as children or vulnerable persons. ● Avoid sharing showers or bathrooms with children or vulnerable persons. ● Never take pictures in secret or photograph injuries.
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	• Do not use language or behavior that is inappropriate, harassing, abusive, sexually provocative, discriminatory, demeaning, or culturally insensitive. • Avoid inviting unaccompanied children or vulnerable persons into your home, hotel, or private location unless they are at immediate risk of harm. • Do not provide children or vulnerable persons with alcohol or illegal drugs. • Refrain from holding, kissing, cuddling, or touching a child or vulnerable person in an inappropriate, unnecessary, or culturally insensitive way. • Avoid seeking contact or spending time with children or vulnerable persons outside program times. • Do not use computers, mobile phones, cameras, or social media inappropriately, or for exploiting or harassing children or vulnerable persons. • Never hire minors for domestic or other labor. • Avoid using alcohol or drugs in the presence of children or vulnerable persons, or offering or accepting such substances from them.
Dos when a child or vulnerable person discloses an incident to you: • Use language that the individual can easily understand. • Allow the individual to speak for themselves when disclosing an incident. • Listen attentively and trust that their account is accurate. • Offer immediate support and reassurance to the individual. • Record a factual account of the conversation as soon as possible, using the individual's exact	Don't when a child or vulnerable person discloses an incident to you: • Do not promise the child or vulnerable person to keep their disclosure a secret. Instead, explain that the information may need to be shared with appropriate professionals to ensure their safety or the safety of others. Share this only with those who need to know. • Remain composed, do not panic, overreact, judge, or make assumptions.

words whenever feasible. Ensure the record is signed, dated, and securely stored. • Document the time, date, and location of the disclosure, noting whether the event was witnessed and any present witnesses (e.g., incident report, patient notes, client case file). • Note the presence of anyone else at the time of disclosure. • Report the disclosure promptly to the Safeguarding Focal Person by sharing your documented account. • Seek appropriate advice and support immediately – you are not expected to handle the situation alone. • Ensure that the individual is not in immediate danger. If they are, contact the police or seek medical assistance. • Secure the scene if necessary and if it can be done safely. • In cases of suspected financial abuse, store items such as cheque books or bank cards in a plastic bag to preserve them as potential evidence. • Use a body map to document and illustrate physical injuries, if applicable. • Provide clear information to the individual about the steps that will be taken and assure them that their issue will be treated with seriousness. • Inform the individual that they will receive feedback regarding their disclosure. • Remain calm and compassionate throughout the process. • Ensure the individual understands the concept of confidentiality, clarifying that the information may need to be shared with relevant professionals, but only those who need to know. • Reassure the individual that they have made the right decision by speaking up.	• Avoid repeatedly questioning or asking the child or vulnerable person to recount the disclosure multiple times. • Do not discuss the disclosure with anyone who does not need to know about the situation. • Refrain from attempting to investigate or prove/disprove possible abuse on your own. • Never assume someone else is aware of the situation or will take action – take responsibility for reporting it. • Do not try to resolve the matter yourself. • Avoid confronting the suspected abuser directly. • Refrain from asking closed or leading questions – allow the child or vulnerable person to share their story in their own words. • Do not postpone or delay listening to the individual. • Stay professional – do not let your emotions, such as anger, pity, or shock, influence your response. • Record the details as they are shared–do not interpret or add your own perspective. • Avoid contacting the family before referral if it may place the child or vulnerable person at greater risk of harm. • Do not voice your personal opinions or be judgmental in your response. • Take every concern seriously – do not dismiss the disclosure. • Only gather the basic facts necessary to report the incident – do not investigate or interview beyond what is required. • Refrain from consulting individuals who are not directly involved in handling the situation. • Never ignore an allegation of abuse or harm.
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● Clearly explain your role in handling the information and the actions you will take as a result of their disclosure. ● Outline the procedure to the individual and involve them in the process of sharing information. Fully consider their wishes and feelings as part of this process.	● Be precise and factual – do not elaborate or add unnecessary details in your notes. ● Do not seek proof before reporting your concerns – your responsibility is to document and report, not to validate the claims.
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6.2 *Program Visitors and Consultants*

All visitors and consultants to MPI must abide by the Code of Conduct. Only approved by the Technical Advisor and confirmed consultants may interact with beneficiaries/participants in the presence of staff. MPI reserves the right to deny access to any visitor or consultant. To ensure safe interactions, visitors and consultants are expected to:

- Arrange visits in advance and notify staff of the date, time, and purpose.
- Read and sign the safeguarding declaration and Code of Conduct before engaging with program beneficiaries, children, or vulnerable persons.
- Dress appropriately and be accompanied by a staff member throughout their visit.
- Avoid being in isolated settings with individual children without staff present.
- Obtain prior approval from the safeguarding focal point for interviews or detailed information requests. Beneficiaries/participants must not feel pressured to answer questions.
- Refrain from using children's photos or images without written authorization from the safeguarding focal point. MPI may deny requests that risk child safety or exploitation.

Note: Any violation of these conditions by a visitor or consultant must result in their immediate removal from the premises and a formal report to the Safeguarding Focal Person. Repeated or severe violations will lead to the blacklisting of the individual or their organization and mandatory review of the approving manager.

6.3 *Positive Duty to Intervene*

All staff and representatives have a duty not only to abide by this Code but also to safely intervene, stop, or report any observed violation by others, including peers, supervisors, visitors, or partners. Silence in the face of a breach is considered a failure of this duty. Staff are responsible for ensuring visitors and consultants understand and adhere to these guidelines. Any non-compliance should be addressed politely and promptly.

7. STANDARDS FOR HUMAN RESOURCES (ADMINISTRATION)

MPI is committed to safeguarding children and vulnerable people by ensuring safer recruitment practices. This involves deterring unsuitable applicants, thoroughly assessing candidates, and integrating safeguarding measures into every step of recruitment and staff management.

7.1 *Staff Recruitment*

Job Descriptions: Clearly highlight MPI's zero tolerance for abuse, exploitation, or harassment. Include safeguarding responsibilities, organizational values, and the importance of promoting appropriate behavior.

Advertising: Advertisements for vacancies must emphasize MPI's commitment to safeguarding children and vulnerable persons, outlining expected values, rigorous recruitment processes, police checks, and evaluations of candidates' qualifications and attitudes to ensure a safe, abuse-free environment.

Risk Assessment: Assess the risk level for roles involving contact with children and vulnerable people. Specify if a Police certificate of good conduct is required before hiring and during employment for certain roles.

Candidate Evaluation: Hire individuals with the right skills, commitment to MPI's values, and a clean record of safeguarding conduct.

Shortlisting Applications: Applications and CVs must be thoroughly reviewed to resolve gaps or discrepancies in employment history. At least two people should be involved in shortlisting to avoid missing key details. Any anomalies, inconsistencies, or gaps must be identified, noted, and addressed during the process.

Assessment & Selection: The assessment process will evaluate candidates' qualifications and suitability to work with vulnerable groups. Interviews must include questions on safeguarding, the Code of Conduct, and working with children or vulnerable people.

Invitation to Interview: Interview invitations must highlight that candidates' identities will be verified, offers are conditional on references and police checks (if required), and include the Code of Conduct and Safeguarding Policy for prior review.

Interview Panel: Interview panels must consist of at least 3-4 members, including one to observe and take notes, and a safeguarding specialist, to ensure accurate records and address safeguarding concerns effectively. The safeguarding specialist on the interview panel holds veto authority over any candidate based solely on safeguarding suitability concerns arising from the interview or documented history. This veto can only be overridden by a written, reasoned decision by the Executive Director, copied to the Safeguarding Committee.

Scope of the Interview: The interview panel will evaluate the applicant's suitability by addressing employment gaps, attitudes toward the Code of Conduct, resource use and behavior boundaries, and motivation for joining the organization.

References and Checks: Independent professional references must be obtained and concerns followed up. Candidates should provide identity documents, original educational certificates, and a Police certificate of good conduct. References must be written (not "To Whom It May Concern"), verified, and compared with application details to address discrepancies. The HR department ensures thorough screening to assess candidates' suitability and past behavior, prioritizing safety for children and vulnerable persons.

Conditional Offer of Appointment: Offers will be subject to satisfactory references and relevant police clearance checks, as outlined in the HR Manual.

Induction of New Members: New staff, volunteers, and board members will receive safeguarding training, sign the Safeguarding Declaration and Code of Conduct, with copies retained in their files.

Volunteering Opportunities: Volunteers must be suitable to work with vulnerable people, have a UACE certificate or equivalent, and relevant experience. For placements over 3 months, reference and criminal checks are required.

Capacity Building: Annual refresher training will be conducted, with members renewing their safeguarding commitments by signing updated declarations.

7.2 MPI Standards for Communication

Consent for image or story use must be **recorded** (written or audio) using a standardized form that should be established by MPI clearly states the **specific use, duration, and platforms**. This consent is **time-bound and project-specific**, not perpetual. A process for **withdrawal of consent** must be clearly communicated to beneficiaries. All digital images must have clear captions with clarity on when and who took the images before external sharing. When using images or information from children and vulnerable people, respect and dignity must be maintained to accurately raise awareness of their situations.

- Obtain documented consent from the beneficiaries involved if they are above 18 years. Those below 18 years, MPI shall seek assent from either their parent/guardian or caregiver, explaining the purpose and use of the image or information.
- Ensure subjects are appropriately clothed and not in suggestive poses.
- Avoid revealing identifying details in file labels, metadata, or published content.
- Respect local traditions and restrictions on personal images.
- Do not create, store, or share images that exploit, mislead, distort reality, or harm the subject.
- Use balanced visuals to reflect both positive and challenging realities.
- Store images with pseudonyms if necessary to protect identities, especially for victims of abuse or exploitation.
- Maintain decency, avoid sensationalism, and ensure images align with organizational values.

- Profile photos or images of children under court protection requires written authorization and must not be used for unrelated purposes or sold.

All concerns about poor practices or policy breaches must be handled confidentially to protect children and vulnerable people.

7.3 Safeguarding Awareness Raising

MPI will continually promote awareness on preventing abuse, exploitation, and harassment, including SEAH, throughout employees' tenure. The Safeguarding Policy, Code of Conduct, and consequences of misconduct will be addressed during orientation and revisited annually. All staff must sign safeguarding declarations, with copies retained for reference and staff files.

In addition, regular awareness trainings are conducted throughout employment to reinforce safeguarding knowledge, update staff on policy changes, and ensure that all employees remain informed and confident in their responsibilities to prevent and report any safeguarding concerns. Post-Training Knowledge Check for all staff after basic safeguarding induction should be conducted with a scenario-based assessment (not a pass/fail test, but a confirmation of understanding) to ensure core concepts like "no proof to report" and "boundaries" are understood. Completion is documented alongside the signed declaration.

Recognizing the policy personal nature, emphasis will be placed on fostering an open, positive, non-discriminatory, and non-abusive work environment. Staff are responsible for familiarizing themselves and their dependents with the Policy and Code of Conduct, which are integral to all employment contracts.

7.4 MPI Safeguarding Structures

7.4.1 The Safeguarding Committee

The Safeguarding Committee is a dedicated team within MPI tasked with ensuring the effective implementation of safeguarding policies. This small but essential Committee is responsible overseeing, guiding, monitoring, and supporting all safeguarding activities and empowering the Safeguarding Focal Person to ensure that they carry out their activities effectively.

In addition to its investigative role, the Committee actively monitors safeguarding practices to identify gaps or areas for improvement. By collaborating closely with the Safeguarding Focal Person, the Committee reinforces the organization's commitment to protecting children and vulnerable people, fostering a safe and ethical environment for all stakeholders.

7.4.2 MPI Governance & Escalation Pathway

1. The Safeguarding Focal Person reports functionally to the Safeguarding Committee and administratively to the ED.
2. The Safeguarding Committee reports directly to the Board of Directors and has a standing agenda item at every Board meeting.

3. The Board receives a Quarterly Safeguarding Health Report from the Committee, not just annual updates. This report includes metrics on reports, investigations, training coverage, and partner compliance.

7.4.3 The Safeguarding Focal Person

He or she will be the champion for all safeguarding matters and will plan and coordinate implementation of all safeguarding activities. In addition,

- Serve as the primary point of contact for all safeguarding concerns and issues.
 - Provide guidance and support to staff, beneficiaries, and stakeholders on safeguarding matters
 - Receives and addresses reports of abuse, exploitation, or policy violations with confidentiality and professionalism.
 - Coordinate and facilitate safeguarding training sessions to promote awareness and compliance.
 - Monitor and ensure compliance with safeguarding policies and practices across the organization. Identify potential risks and proactively address them to maintain a safe environment.
 - Collaborate with the Safeguarding Committee to investigate cases and implement safeguarding measures effectively.
- Promote a culture of safety, respect, and accountability for children and vulnerable people.

7.4.4 The Executive Director

- The Executive Director oversees policy implementation, decides on sanctions for breaches, and ensures accountability to stakeholders on safeguarding matters.
- Provide overall leadership and accountability for safeguarding within the organization.
- Ensure the Safeguarding Policy is implemented, monitored, and regularly reviewed.
- Promote a culture of safeguarding and uphold zero tolerance for abuse, exploitation, and harassment.
- Allocate resources to effectively support safeguarding activities and training.
- Oversee the response to safeguarding incidents, ensuring timely and appropriate actions are taken.
- Act as a role model by adhering to safeguarding policies and the Code of Conduct.
- Support the Safeguarding Committee and focal person in their responsibilities.
- Ensure the organization complies with legal and regulatory safeguarding requirements.

7.4.5 The Board of Directors

The Board of Directors holds a crucial role in safeguarding by providing leadership and oversight to ensure the policy is effectively implemented and maintained. The Board is responsible for:

- Ensuring the organization's safeguarding framework aligns with its values, legal requirements, and best practices.
- Appointing a dedicated focal person within the Board to support management in safeguarding-related matters.
- Monitoring and evaluating the overall implementation of the Safeguarding Policy to identify gaps or areas for improvement.

- Receiving and addressing appeals, concerns, or complaints involving senior management or staff, ensuring accountability at all levels.
- Establishing clear procedures for addressing safeguarding breaches, including decisions on appropriate actions or sanctions.
- Promoting a culture of safety, respect, and zero tolerance for abuse, exploitation, or harassment across the organization.

8. SAFEGUARDING CASE MANAGEMENT SYSTEM

Effective safeguarding case management is essential for ensuring a consistent, thorough, and professional approach to addressing incidents of abuse, exploitation, or misconduct involving vulnerable people. It outlines the processes, roles, and responsibilities involved in handling safeguarding cases while prioritizing the safety and well-being of those affected.

8.1 *Principles of Safeguarding Case Management*

Confidentiality: All safeguarding cases must be treated with the utmost confidentiality. Information should only be shared on a need-to-know basis and handled securely to protect those involved.

Impartiality: Cases must be handled fairly and without bias, ensuring that all parties are treated equitably throughout the process.

Survivor-Centered Approach: The safety, dignity, and well-being of survivors must remain a priority, ensuring their needs are respected and addressed in all actions taken.

Timeliness: Safeguarding cases should be managed promptly to minimize harm and ensure swift action to address risks.

Accountability: All actions must be documented, and those responsible for handling cases should be held accountable for their decisions and outcomes.

8.2 *Reporting Mechanisms for Violations on Vulnerable People*

All staff and representatives must promptly report any suspicions or incidents of abuse, exploitation, harassment, or any behavior violating this policy involving vulnerable people. Reports should be made to the relevant safeguarding authority or designated officer. Confidential information must be handled responsibly, ensuring that details of cases are not shared indiscriminately. Persons designated to serve in these positions will sign contract addendums indicating their willingness to take on these roles, so that they can be held to account.

All case records, including digital evidence, witness statements, and reports, shall be stored on a password-protected, access-logged server designated for sensitive data, in compliance with the Data Protection and Privacy Act, 2019. A Chain of Custody Form must accompany any physical evidence. The retention period shall be a minimum of seven years after case closure or longer if required by ongoing legal proceedings.

Clear and accessible reporting channels must be in place, allowing staff, beneficiaries, and other stakeholders to report safeguarding concerns. These channels should include anonymous options and ensure safety for whistleblowers.

8.2.1 Initial Assessment

Once a report is received, an initial assessment is conducted to:

- Determine the immediate safety needs of the affected individual.
- Identify whether the case requires urgent action.
- Decide on the next steps, such as an investigation, referral, or support services.

8.2.2 Investigation

Appointment of Investigators: Highly dependent on who the perpetrator is, The Board chair, ED, or Safeguarding Focal Person or Committee assigns qualified investigators to handle the case. Investigators must be impartial and well trained in safeguarding investigation and possessing experience in safeguarding processes.

Investigation Appointment Matrix: Investigators are appointed based on the alleged perpetrator's role:

- Staff/Volunteer: Safeguarding Committee appoints
- Senior Management (ED/Director): Board Safe guarding Lead appoints
- Board Member: External Investigation commissioned by Board
- Partner Personnel: MPI Safe guarding Committee appoints

Mandatory External Investigations: Allegations against ED, Board chair or Safeguarding Committee Member require immediate independent external investigation

Investigation timelines

- Initial assessment and safety plan: Within 24 hours
- Investigation commencement: Within 48 hours
- Investigation completion: 21-30 days for standard cases
- Emergency support provision: Within 24 hours

Gathering Evidence: The investigation involves collecting relevant information, including interviews with the affected individual, witnesses, and the subject of the concern. Care must be taken to avoid re-traumatizing survivors during this process.

Documenting Findings: All evidence must be documented clearly and securely, ensuring that it is thorough and unbiased.

8.2.3 Case Resolution

Decision-Making: Based on the investigation findings, decisions are made regarding actions to address the case. This may include disciplinary measures, legal referrals, or providing support to the survivor.

Referral to Authorities: For cases involving criminal activity, relevant authorities should be notified promptly while ensuring the safety of the survivor.

Support for Survivors: Survivors must be offered counseling, medical care, and other relevant support services as needed.

8.2.4 Monitoring and Follow-Up

Ongoing Support: Regular check-ins with the survivors should be conducted to monitor their well-being and ensure they feel safe.

Implementation of Actions: Ensure that all recommended actions, such as disciplinary measures or legal referrals, are implemented effectively.

Learning and Improvement: After a case is resolved, lessons learned should be documented to improve safeguarding policies and procedures.

8.2.5 Record Keeping (Data Management)

All case records, including digital evidence, witness statements, and reports, shall be stored on a password-protected folder or system designated for sensitive data, in compliance with GDPR principles and Ugandan data protection laws (The Data Protection and Privacy Act, 2019). A Chain of Custody Form must accompany any physical evidence. The retention period shall be a minimum of seven years after case closure or longer if required by ongoing legal proceedings.

Chain Custody of Evidence: All safeguarding evidence and records must be stored with a verifiable chain of custody using encrypted digital systems with access logs, not manual files. This includes:

- Time stamped entry / exit logs for all evidence
- Password protected, encrypted storage
- Need-to-know access basis only
- Audit trail of all document views / edits
- Secure destruction procedures

Case Management system: MPI maintains a centralized digital Case Management system to track all safeguarding cases, ensuring consistent monitoring, deadlines, outcomes reporting.

Retention Policy: A clear policy on the duration of record retention should be established, ensuring compliance with data protection laws and safeguarding standards.

8.3 Reporting Misconduct at Workplace

8.3.1 Standard Operating Procedures (SOPs) for Reporting Misconduct in the Workplace

The SOPs for reporting misconduct in the workplace outline the complete reporting process, starting from suspicion or allegation of misconduct. They provide a clear framework for how this information will be managed internally, acted upon, and shared with external stakeholders such as member organizations and funding partners.

These procedures emphasize the organization's unwavering commitment to:

- Preventing misconduct,
- Ensuring the safety and well-being of survivors or complainants,
- Maintaining the integrity of investigations,
- Upholding confidentiality, and

- Complying with all relevant legislation and contractual obligations set by funding partners.

Once allegations, reports, or complaints have been made, these SOPs shall serve as the definitive guide to managing and addressing such cases.

8.3.2 Child-Friendly Reporting Information and Processes

Recognizing that children may feel afraid or reluctant to report abuse or violence against them, MPI is committed to establishing mechanisms that encourage and support them in speaking out. These include:

- Providing access to trusted adults who can listen and respond appropriately,
- Creating a safe and welcoming environment where children and vulnerable feel secure, and
- Empowering children and vulnerable people to have a voice in shaping a child-safe and child-friendly atmosphere within MPI.

8.3.3 Requirement for Proof

MPI does not require individuals involved in the delivery of its work to be safeguarding experts or to possess conclusive evidence before reporting a concern. All individuals are obligated to report any knowledge, suspicion, or concern—whether substantiated or not—about a safeguarding incident. It is essential that individuals with such knowledge or suspicions avoid:

- Gathering evidence,
- Discussing the matter with colleagues, the child, or the vulnerable person involved, and
- Conducting their own investigations.

8.3.4 Confidentiality, Safety, and Wellbeing

The wellbeing of the child or vulnerable person is always of utmost importance. MPI is firmly committed to safeguarding the confidentiality, safety, and wellbeing of all individuals involved in reporting a safeguarding incident. This includes the person(s) making the report, as well as the person(s) against whom the allegation is made. In responding to allegations, MPI ensures that:

- All parties are treated fairly,
- The rights of every individual are respected, and
- Confidentiality is maintained throughout the complaints and investigation process.
- Breaches of confidentiality by staff members will result in disciplinary action, up to and including termination of employment.

8.3.5 Disciplinary Procedures in Relation to Safeguarding

The appointment of investigators is governed by the Investigation Appointment Protocol to ensure absolute impartiality and avoid conflicts of interest. Under no circumstance shall an individual implicated in or closely associated with an allegation participate in the selection of investigators.

- If an individual is accused of harm or suspected of committing a legally defined act of harm, they will be suspended and placed on 'neutral ground' during the investigation. Staff must not share updates about the inquiry without formal approval from the HR Manager and Safeguarding Focal Person. Suspension is not a disciplinary action unless an offense is proven. If no offense is established, the individual will be reinstated following HR and Safeguarding Committee guidance.

- In cases where a police investigation is required, the organization will comply with instructions to pause internal procedures. False accusations will be reported to the police as potential criminal offenses.
- If harm is proven, the individual's contract will be terminated, and the Safeguarding Focal Person will file a detailed incident report which will be developed by the designated person and shared with all the key stakeholders for further review.
- For criminal offenses, MPI will work with police and its legal team to pursue justice, support affected individuals and provide necessary legal or counseling assistance.

8.3.6 MPI Disciplinary Timelines

- Initial assessment & safety plan: Within 24 hours of report.
- Investigation commencement: Within 48 hours.
- Investigation completion (standard cases): Target 21-30 days.
- Provision of emergency psychosocial support: Immediate, within 24 hours.
- These timelines must be documented and communicated to all MPI stakeholders.

8.3.7 Protection and Rehabilitation Measures for Affected People

MPI will collaborate with member organizations and specialized partners to ensure victims of abuse receive necessary emergency assistance. This includes services such as rescue and protection, psychosocial support, counseling, and medical care in cases where MPI lacks the expertise to address specific needs. Victims of abuse will be safeguarded from further harm by the perpetrator(s) and provided with comprehensive medical care, psychosocial support, and counseling to aid their recovery.

9. POLICY IMPLEMENTATION, MONITORING, AND REVIEW

9.1 *Policy Implementation*

The policy aims to ensure that MPI is a safe space for children and vulnerable persons by integrating safeguarding into its processes, structures, and operations. A comprehensive implementation plan will be established and embedded into annual, short-, medium-, and long-term strategic plans. This plan will outline:

- Key activities, responsibilities, timelines, and resource requirements.
- A monitoring framework with indicators, means of verification, and activities.
- A data collection plan to track progress, document lessons, and address challenges for ongoing improvement.

9.2 *Monitoring Policy Progress*

MPI will engage stakeholders to ensure the policy is approved, enacted, and implemented effectively. Monitoring will include:

- Evaluating the policy environment.
- Assessing stakeholder engagement.
- Tracking compliance, performance, and progress against set standards, timelines, and budgets through regular data collection and reviews (e.g., monthly, quarterly, annually).

9.3 *Evaluating Policy Impact*

Evaluation is critical for evidence-based design and accountability. MPI will conduct quarterly and annual reviews to:

- Assess progress toward achieving policy goals,
- evaluate effectiveness, efficiency, and outcomes, and
- document lessons, challenges, and best practices.

Findings will inform MPI policy improvements, address contextual changes, and guide the next policy cycle to avoid implementation gaps.

9.4 *Policy Review*

Annual Strategic Review: The Board shall receive and discuss an Annual Safeguarding Report (from the Safeguarding Committee) covering: all incidents and trends, partner compliance status, training coverage and effectiveness, risk audit findings, and budget utilization for safeguarding activities.

“Health Check”: Every 24 months, MPI shall conduct a lighter-touch review against evolving international standards (e.g., CHS, IASC) to ensure MPI’s policy remains at the forefront of best practice.

Trigger-Based Reviews. This policy shall be reviewed immediately following:

- Any critical incident or major change in operational context
- Changes in national / international legislation (expansion, new programs)
- Significant organizational change

- Donor audit findings requiring policy revision

The review will also involve conducting a self-audit of the status of compliance with safeguarding standards, and a thorough risk assessment to generate reports which will inform policy key decisions by MPI Board of Directors. The findings shall be disseminated to relevant stakeholders and to the broader public to increase the policies' transparency and to learn how to improve the policy for the future.

10. PARTNERSHIPS AND SAFEGUARDING COMPLIANCE

10.1 *Partner Compliance Requirements*

- Sign this Safeguarding Policy as binding
- Develop their own safeguarding policies aligning with MPI
- Participate in MPI Safeguarding training
- Submit to MPI monitoring and evaluation of safeguarding practices

10.2 *Partnerships and Safeguarding Standards*

MPI recognizes the critical role that partnerships play in achieving its mission and objectives. To ensure that safeguarding principles are upheld across all activities, MPI is committed to fostering partnerships built on shared values, respect, and accountability. This chapter outlines the expectations, requirements, and actions related to safeguarding compliance for MPI's partners.

10.3 *Safeguarding Responsibilities of Partners*

Compliance with Safeguarding Policy: All partners of MPI are required to adhere to MPI's Safeguarding Policy and ensure that their programs, operations, and staff comply with the highest safeguarding standards.

Safeguarding Policy Alignment: Partners must have their own safeguarding policies in place or formally commit to implementing and adhering to MPI's Safeguarding Policy.

Capacity Building and Training: MPI will provide or facilitate training and capacity-building opportunities for partners to enhance their understanding of safeguarding principles and practices.

Monitoring and Reporting: Partners must implement mechanisms for monitoring safeguarding compliance and promptly report any safeguarding concerns or incidents to MPI.

10.4 *Partner Screening and Assessment*

MPI conducts thorough screening and assessments of potential and existing partners to ensure safeguarding compliance, including:

- Evaluating safeguarding policies and practices.
- Reviewing past safeguarding performance and incidents.
- Assessing the partner's commitment to creating safe environments for vulnerable populations.

10.5 *Partner Safeguarding Due Diligence Toolkit*

As part of due diligence, MPI requires potential partners to provide written permission for MPI to conduct confidential reference checks with at least one previous donor or collaborating organization regarding their safeguarding practices and any known incidents. This must include:

- A **Standardized Assessment Questionnaire** demanding evidence, not just affirmation.
- A **Scoring Matrix** with clear red flags and minimum thresholds for partnership.
- A mandatory **Reference Check Protocol** for past safeguarding performance.
- A requirement for partners to provide their **annual safeguarding incident reports** (if applicable).

- **Implement a Tiered Risk-Based Approach.** Categorize partners based on risk (e.g., direct implementation with children = high risk; advocacy-only = lower risk). Due diligence intensity should scale accordingly.

10.6 Due Diligence Requirements

The Assessment components include:

- Review of Partners existing safeguarding policy
- Background checks on key personnel
- Assessment of organizational safeguarding culture
- Review of past safeguarding performance (if applicable)
- Site visits and interviews with staff and beneficiaries

10.7 Consequences of Non-Compliance

MPI reserves the right to take appropriate action if a partner fails to comply with safeguarding requirements or is found to be in violation of safeguarding principles. These actions may include:

- a) **Capacity Support:** Offering additional training or support to address gaps in safeguarding practices.
- b) **Funding Suspension:** Temporarily suspending funding or support until safeguarding concerns are resolved.
- c) **Termination of Partnership:** Terminating the partnership if safeguarding violations are severe, persistent, or unresolved.

10.8 MPI Non-Compliance Process

Stage 1 (Minor Gap): Formal Improvement Plan to be established by MPI that considers embedding concerns that are more Specific, Measurable, Achievable, Relevant Time-bound (SMART). In this case, MPI monitors closely.

Stage 2 (Major Gap/Non-Response): Immediate suspension of activities/funding involving vulnerable populations such as i) Suspension of related disbursements; ii) Partner must accept an MPI-led or MPI-commissioned audit, and iii) Partner must implement all audit recommendations.

Embed Financial Controls and Contractual Enforcement: Work with Finance to ensure funding agreements and payment systems have contractual clauses that allow for immediate payment freeze upon activation of Stage 2, without requiring full termination.

Stage 3 (Severe Violation/No Cooperation): i) Immediate termination of Partnership/Employment; ii) Public reporting as required per donor agreements; iii) Full investigation and referral to authorities if applicable; iv) Blacklisting from future MPI partnerships.

10.9 Withdrawal of Funding

If safeguarding violations are identified, MPI may withdraw funding in accordance with contractual agreements and the following steps:

- Conducting a thorough investigation to verify safeguarding breaches.

- Notifying the partner of findings and providing a timeline for corrective action.
- Withdrawing funding if no satisfactory corrective action is taken within the specified timeline.

MPI Contractual Clauses: All Partnership agreements include clauses allowing immediate payment suspension for safeguarding violations.

- **Pre-Condition for Funding:** Evidence of safeguarding compliance is required before any fund disbursement.
- **Financial Leverage:** MPI finance department maintains authority to freeze payments upon Safeguarding Focal Point recommendation.
- **Audit Rights:** All partners grant MPI the right to conduct unannounced safeguarding audits.

10.10 Staff Termination

MPI requires its partners to have clear procedures for handling safeguarding violations by their staff, including:

- Conducting internal investigations into reported concerns.
- Taking disciplinary actions, including termination of employment, against staff members found to have violated safeguarding principles.
- Collaborating with MPI to ensure transparency and accountability in addressing safeguarding violations.

10.11 Commitment to Safeguarding in Partnerships

MPI remains steadfast in its commitment to ensuring that all partnerships reflect its safeguarding values. By working collaboratively with partners, MPI strives to build a network of organizations that prioritizes the safety, dignity, and rights of all individuals, particularly vulnerable groups.

10.12 MPI Safeguarding Commitment Form

As a partner of MPI, all the stakeholders (internal and external) affirm their commitment to upholding safeguarding principles and ensuring the safety, dignity, and well-being of all individuals, particularly children, women, and other vulnerable groups. By signing this form, all the stakeholders agree to the following:

1. **Compliance with Safeguarding Policy:** Commit to adhering to MPI's Safeguarding Policy and incorporating its principles into all our operations, programs, and activities.
2. **Promotion of Safeguarding Culture:** Pledge to foster a culture of respect, accountability, and vigilance to prevent harm, abuse, exploitation, and neglect.
3. **Safeguarding Practices and Standards:** Agree to implement safeguarding practices that align with international standards, national laws, and MPI's values.
4. **Reporting and Accountability:** Establish clear mechanisms for reporting and addressing safeguarding concerns in a transparent and timely manner.
5. **Training and Awareness:** Commit to providing regular training and awareness sessions for our staff and representatives to ensure they understand safeguarding responsibilities.

10.13 Partner Safeguarding Agreement

Legal Integration: All safeguarding obligations, including the right to audit and consequences of breach, must be explicitly stated in the main Memorandum of Understanding (MOU) or contract with Partners, not merely as an annex.

Signatory Authority: The Safeguarding Commitment Form must be signed by a representative with legal authority to bind the organization. MPI reserves the right to verify the signatory authority.

Pre-Condition Partnership: No Partnership agreement shall be valid without a signed safeguarding commitment form that has been integrated into the main contractual document.

ACKNOWLEDGMENT AND AGREEMENT

We, the undersigned Representative of _____ (Name of Partner Organization), acknowledge and accept our responsibilities under this safeguarding commitment. We understand that failure to adhere to these principles may result in actions, including suspension of funding or termination of partnership, as outlined in MPI's Safeguarding Policy.

Name of Partner Organization : _____

Representative Name : _____

Representative Title : _____

Signature : _____

Date : _____

Witness

Name of witness on behalf of MPI : _____

Witness Title : _____

Signature : _____

Date : _____

Policy Approval

The Safeguarding Policy of Meeting Point International (MPI) is subject to thorough review and approval by the organization's leadership. The approval process involves consultation with key stakeholders, including board members, management, staff, and relevant external partners, to ensure that the policy aligns with MPI's values, objectives, and legal obligations. By formally endorsing this policy, MPI demonstrates its unwavering commitment to safeguarding principles and to fostering a culture of safety, accountability, and respect across all its programs and operations.

SAFEGUARDING POLICY ACKNOWLEDGMENT FORM

I, (Name of Staff)
..... (Position of Staff), acknowledge receipt of the
Safeguarding Policy.

I confirm that I have read, understood, and accepted the policy as part of my employment conditions with
Meeting Point International (MPI).

Name : _____

Signature : _____

Date : _____