



SAFEGUARDING · POLICY 01

Child Safeguarding and Child Protection Policy

How CYEF keeps children and young people safe across football, education, creative programmes and every activity carried out in the Foundation's name.

Document	Child Safeguarding and Child Protection Policy
Version	1.0
Owner	CYEF Safeguarding Focal Person, Safeguarding Lead
Approved by	CYEF Board of Directors
Date adopted	pending board adoption
Review cycle	Reviewed every two years, or sooner following a serious incident or a change in the law
Applies to	All directors, staff, coaches, mentors, volunteers, interns, contractors, partners, vendors and visitors

1. Purpose and commitment

Chipukeezy Youth Empowerment Foundation works with children and young people every week, on football pitches, in schools, at community events and on creative platforms. Many of them come from circumstances that already carry risk. That contact is a privilege, and it carries an absolute duty of care.

CYEF is committed to creating an environment where every child taking part in our programmes is safe, respected and listened to. We accept that no organisation is immune to abuse happening within it. What distinguishes a safe organisation is not the claim that harm cannot occur here, but the systems that make harm less likely, easier to spot and impossible to ignore.

This policy sets out that system. It applies without exception to everyone acting for or on behalf of CYEF.

Our core statement

The welfare of the child is paramount. Every child has the right to protection from all forms of abuse, exploitation and neglect, regardless of age, sex, disability, ethnicity, religion, background or ability. CYEF will take every concern seriously, will never conceal a safeguarding matter to protect the Foundation's reputation and will act in the child's best interests at all times.

2. Scope

This policy applies to:

- Directors, board members, employees, coaches, mentors, teachers and programme staff
- Volunteers, interns, attachment students and community facilitators
- Contractors, consultants, photographers, videographers and media crews
- Partner organisations, sponsors, vendors and their personnel while at CYEF activities
- Visitors, guests and any person given access to children through CYEF

It covers all CYEF activity, whether it takes place on a pitch, in a classroom, at a tournament, during travel, at an event, online or in any other setting connected to our work. A child is anyone under the age of 18, in line with the Children Act, 2022. Where a programme serves young adults over 18, the conduct standards in this policy still apply.

3. Legal and standards framework

This policy is drafted against Kenyan law and international safeguarding practice.

Instruments this policy is built on

Framework	What it requires of CYEF
Children Act, 2022	Treat the best interests of the child as the primary consideration, protect children from abuse, neglect and exploitation and report suspected abuse to the relevant authorities. Failure to report carries penalties
Sexual Offences Act, 2006	Recognise and report sexual offences against children, including offences committed by adults in positions of trust
Counter-Trafficking in Persons Act, 2010	Recognise trafficking indicators and report them
Data Protection Act, 2019	Handle safeguarding records lawfully, securely and only for as long as necessary
UN Convention on the Rights of the Child	Uphold children's rights to protection, participation and to be heard
International Safeguards for Children in Sport	Maintain the eight safeguards expected of any organisation delivering sport to children

CYEF works to the eight International Safeguards for Children in Sport. The table below shows where each is addressed, so that a partner or funder can verify coverage quickly.

The eight International Safeguards and where CYEF meets them

Safeguard	Where it sits
1. Developing your policy	This document
2. Procedures for responding to concerns	Section 8, and the Incident Reporting and Escalation Procedure
3. Advice and support	Section 9
4. Minimising risks to children	Section 7, and the Risk Management and Event Safety Policy
5. Guidelines for behaviour	Section 6, and the Code of Conduct
6. Recruiting, training and communicating	Section 5
7. Working with partners	Section 11, and the Partner and Vendor Safeguarding Expectations
8. Monitoring and evaluation	Section 12

4. Definitions

Safeguarding is the action CYEF takes to prevent harm to children before it happens. **Child protection** is the response when harm is suspected, alleged or disclosed. Both are covered here.

4.1 Forms of abuse

Type	What it looks like
Physical abuse	Hitting, caning, shaking, burning or any deliberate act causing physical harm. Corporal punishment is prohibited in Kenya and is never permitted at CYEF, including as a coaching or disciplinary method
Sexual abuse	Any sexual act or attempted act with a child, exposure to sexual content, grooming, sexual comments or exchanging support, selection or opportunity for sexual favours
Emotional abuse	Persistent humiliation, ridicule, threats, shouting, rejection or placing expectations on a child that are unreachable for their age or ability
Neglect	Failing to meet a child's basic needs while in our care, including food, water, shelter, supervision, medical attention or protection from danger
Exploitation	Using a child for labour, financial gain, publicity or the benefit of an adult or the organisation, including exploitative use of a child's image or story
Online abuse	Grooming, harassment, bullying, sharing images without consent or unsupervised private contact with children through social media or messaging
Peer abuse	Bullying, hazing, initiation rituals, discrimination or sexual harassment between children

4.2 Sport-specific risks

Sport carries risks that generic policies miss. CYEF names them so they can be managed:

- The authority a coach holds over selection, playing time and progression, which can be used to coerce a child into silence
- Physical contact that is legitimate in training but can be used as cover for abuse
- Changing rooms, showers and overnight travel to fixtures
- Transport to and from matches, particularly where a single adult travels alone with a child
- Overtraining, playing through injury or pressure to compete when unwell
- Scouting and trial situations, where the promise of an opportunity creates pressure to comply

5. Safe recruitment and training

Most abuse in youth organisations is committed by people who sought access to children. Recruitment is therefore a safeguarding control, not an administrative task.

5.1 Before anyone works with children

- A written application and a documented interview that includes direct questions about working with children
- A valid **Police Clearance Certificate** (Certificate of Good Conduct) from the Directorate of Criminal Investigations, obtained through eCitizen. The certificate is valid for twelve months and is re-checked on renewal, not filed once and forgotten
- At least two references, taken up directly and including the most recent role involving children
- Verification of identity and of any qualification claimed
- A signed copy of the CYEF Code of Conduct
- A safeguarding briefing before first contact with children

No person begins unsupervised work with children before these steps are complete. Where a role is urgent, the person may work only under direct supervision of a vetted member of staff until clearance is finished.

5.2 Training

- Every person in contact with children receives a safeguarding induction covering this policy, the Code of Conduct and how to report a concern
- Refresher training runs annually, and after any significant incident or policy change
- The Safeguarding Focal Person receives deeper training on managing disclosures, recording and referral
- Attendance is recorded, so CYEF can evidence who has been trained and when

6. Standards of behaviour

The full expectations sit in the CYEF Code of Conduct, which every person signs. The essentials are set out here because they are not negotiable.

6.1 Always

- Work in open, observable settings where other adults can see you
- Treat every child with respect, and listen when a child raises something
- Maintain the boundary between an adult in a position of trust and a child
- Report any concern promptly, however small it seems
- Use CYEF channels for all communication with children, copying a parent, guardian or second adult

6.2 Never

- Spend time alone with a child out of sight of others, or take a child to your home
- Use physical punishment, humiliation, shouting or degrading language
- Engage in any sexual behaviour, relationship or suggestive contact with a child
- Give personal gifts, money or preferential treatment to an individual child
- Contact a child privately through personal phone numbers or social media accounts
- Share a room, bed or changing facility with a child
- Transport a child alone, unless it is an emergency that is reported immediately afterwards
- Take, keep or share images of children on personal devices
- Use alcohol, tobacco or other substances in the presence of children at CYEF activities

Position of trust

Coaches, mentors and teachers hold power over a child's progression. A sexual relationship with a child is a criminal offence regardless of any apparent agreement, and a child cannot consent to it. Any adult who attempts to trade selection, opportunity or support for personal or sexual benefit will be removed and reported to the police.

7. Managing risk in activities

Risk assessment happens before an activity, not after an incident. The Risk Management and Event Safety Policy carries the full method. In practice, for every training session, match, tournament, trip or event:

- A named adult is responsible for the activity and is known to participants
- Adult-to-child ratios are set in advance and are tighter for younger children, for overnight activity and for mixed groups
- Female participants have at least one female chaperone present. This applies to the girls' football programme without exception
- Emergency contacts, medical information and consent records are held by the responsible adult and are accessible on site
- First-aid provision and a route to medical care are confirmed before the activity starts
- Changing and toilet facilities are supervised at the entrance, never inside
- Transport arrangements are recorded, with no adult travelling alone with a single child
- Registers are taken at the start and end of the activity

8. Responding to concerns

The detailed steps are in the Incident Reporting and Escalation Procedure, and the external routes are in the Child Protection Referral Pathway. The principles are as follows.

8.1 If a child discloses

1. **Listen.** Let the child speak without interruption. Take it seriously
2. **Do not investigate.** Do not press for detail, ask leading questions or attempt to establish what happened. That is the role of the authorities
3. **Do not promise secrecy.** Explain gently that you will have to tell someone whose job is to keep them safe
4. **Reassure.** Tell the child they were right to speak and that it is not their fault
5. **Record.** Write down what was said, in the child's own words, as soon as possible, with the date, time and place. Record facts and not opinions
6. **Report.** Pass it to the Safeguarding Focal Person the same day

8.2 Timescales

Situation	Action
A child is in immediate danger	Contact police or emergency services at once, then the Safeguarding Focal Person
Any other safeguarding concern	Report to the Safeguarding Focal Person within one working day
Concern involves the Safeguarding Focal Person	Report directly to the Board Chair, or externally to Childline 116
External referral where abuse is suspected	Made without delay, and never held back pending an internal view

Concerns are reported whether the suspected harm involves a member of CYEF personnel, another child, a family member or any other person. Reporting is not conditional on certainty. It is not the reporter's job to decide whether abuse occurred.

8.3 Confidentiality

Safeguarding information is shared strictly on a need-to-know basis. It is never discussed with colleagues, partners or the community as news. Records are stored securely with access limited to the Safeguarding Focal Person and the Board Chair, and are handled in line with the Data Protection Act, 2019.

9. Advice and support

Anyone who is worried about a child can seek advice before making a formal report. The Safeguarding Focal Person is available for exactly this, and no one is criticised for raising something that turns out to be innocent.

- Children are told, in language they understand, who they can talk to and how

- Contact details for the Safeguarding Focal Person are displayed at activity venues and published on the CYEF website
- Children with disabilities, girls in mixed settings and children not living with a parent receive additional attention, because they face raised risk and often have fewer routes to speak
- Staff and volunteers who report a concern receive support, and are protected under the Whistleblowing and Protected Disclosure Policy
- Where a child needs counselling, medical care or legal support, CYEF assists with referral through the routes in the Child Protection Referral Pathway

10. Photography, media and online safety

The Media, Photography and Image Use Guidance carries the full standard. In summary:

- Written guardian consent is required before any identifiable image of a child is captured for CYEF use, and the child's own agreement is sought as well
- Captions never combine a child's full name with a school name or a location
- Images show children appropriately dressed and engaged in the activity, never in a manner that could be read as sexualised or degrading
- Photographers and media crews are briefed and supervised, and do not have unsupervised access to children
- Images are stored on CYEF systems and are removed from personal devices after handover
- Consent can be withdrawn at any time, and CYEF will remove the image from material it controls

11. Working with partners

CYEF delivers through schools, clubs, sponsors and specialist partners. Safeguarding responsibility does not transfer with the activity.

- Partners are given this policy and the Code of Conduct before joint activity begins
- Partners working directly with children are asked to confirm their own safeguarding arrangements, or to work under ours
- Written agreements state who holds safeguarding responsibility during shared activity and how concerns are escalated between organisations
- Visiting personnel are not given unsupervised access to children
- CYEF may end a partnership where safeguarding standards are not met

12. Monitoring, evaluation and review

- The Safeguarding Focal Person reports to the board at least twice a year on concerns raised, action taken and lessons learned
- A safeguarding self-audit runs annually against the eight International Safeguards
- Children, parents and guardians are asked for their views on whether they feel safe and whether they know how to raise a concern
- This policy is reviewed every two years, and immediately after a serious incident or a change in the law
- Anonymised trends inform training, ratios and programme design

13. Breaches of this policy

Failure to follow this policy is a disciplinary matter. Depending on severity it may lead to removal from the activity, suspension pending investigation, termination of employment or engagement and referral to the police or the Department of Children Services.

Where an allegation is made against a member of CYEF personnel, that person is removed from contact with children while the matter is assessed. That step is a neutral protective measure and is not a finding of guilt. CYEF will not handle a criminal matter internally in place of reporting it.

14. Key contacts

Internal

Role	Contact
Safeguarding Focal Person	CYEF Safeguarding Focal Person · info@chipukeezyfoundation.org
Foundation office	info@chipukeezyfoundation.org · +254 748 390 908
Address	Tala, Machakos County, Kenya

External

Service	Contact
Childline Kenya national child helpline	116 · toll free, 24 hours · childlinekenya.co.ke
Police and emergency services	999 or 112
Sub-County Children Officer	Machakos County, through the Department of Children Services
Department of Children Services	childrenservices.go.ke
Office of the Data Protection Commissioner	odpc.go.ke

This policy sits alongside the CYEF Code of Conduct, Incident Reporting and Escalation Procedure, Child Protection Referral Pathway, Media, Photography and Image Use Guidance, Risk Management and Event Safety Policy and Whistleblowing and Protected Disclosure Policy. Read together, these form the CYEF safeguarding framework.