Denny Social Welfare Hub

"Impacting lives for a better society"

Incorporated Trustees | CAC/IT/NO 147826

Child Safeguarding Policy

Protecting Children from Harm, Abuse, Neglect and Exploitation

Document Title	Child Safeguarding Policy
Organisation	DENNY SOCIAL WELFARE HUB (DSWHUB)
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Approved By	Board of Trustees
Owner	Executive Director / Secretary to the Trustees

1. About Denny Social Welfare Hub

DENNY SOCIAL WELFARE HUB ("DSWHUB", "the Organisation", "we", "our") is a not-for-profit, non-political organisation registered with the Corporate Affairs Commission of the Federal Republic of Nigeria as Incorporated Trustees under Registration Number CAC/IT/NO 147826 on 1 July 2020. Our registered office is at 4, Alimosho Road, Off Lagos-Abeokuta Expressway, by Pako Bus Stop, Iyana Ipaja, Lagos, Nigeria.

Our objects, as set out in our Constitution, are to:

- Build communities in which all children live with a loving adult or caregiver in a safe family home with easy access to food, healthcare, education, recreation, and emotional support;
- Advance the rights of vulnerable women and girls, including returnees, and build their capacity to improve their status, reproductive health, and economic and political participation;
- Expand the capacity of local women, girls, women's groups and communities to access and participate in the design and implementation of policies and programmes that affect their health and development;
- Provide legal assistance to individuals and local groups, and support public interest litigation;
- Care for and protect children by preserving family life and preventing family disintegration through a social developmental approach.

2. Purpose

DSWHUB works directly with children, including children in vulnerable family situations and children at risk of family disintegration. This Policy sets out our absolute commitment to safeguarding children and the standards of behaviour and practice required of every Trustee, employee, volunteer, intern, consultant, partner, contractor and visitor representing or engaging with DSWHUB.

This Policy reflects our obligations under the Child's Rights Act 2003 (as domesticated in Lagos State and other states), the Violence Against Persons (Prohibition) Act 2015, the Trafficking in Persons (Prohibition) Enforcement and Administration Act 2015, the United Nations Convention on the Rights of the Child, and the Keeping Children Safe International Safeguarding Standards.

3. Scope

This Policy applies to every person who acts on behalf of DSWHUB, whether paid or unpaid, full-time or part-time, including:

- Trustees and members of the Governing Body;
- Employees on any form of contract;
- Volunteers, interns, students on placement, and pro-bono lawyers;
- Consultants, contractors and service providers;
- Implementing partners, sub-grantees and downstream organisations;
- Donors, journalists, researchers and other visitors to programme sites or beneficiary communities.

4. Definitions

4.1 Child

A child is any person under the age of 18, in line with the Child's Rights Act 2003 and the UN Convention on the Rights of the Child, regardless of any lower age of majority in customary or religious practice.

4.2 Child Abuse

Any act or failure to act that results in actual or potential harm to a child. This Policy recognises four primary categories:

- Physical abuse — hitting, shaking, burning, poisoning, or otherwise causing physical harm;
- Sexual abuse — any sexual activity with a child, sexual touching, exposure to pornography, online grooming, or coercion or inducement to engage in sexual activity, regardless of consent;
- Emotional abuse — persistent emotional ill-treatment, threats, humiliation, rejection, intimidation or witnessing domestic violence;
- Neglect — persistent failure to meet a child's basic physical, emotional, medical or educational needs.

4.3 Other Harms Recognised

- Child labour and economic exploitation;
- Child trafficking and forced movement;
- Child marriage and harmful traditional practices including female genital mutilation;
- Bullying, including online bullying;
- Online safety violations including grooming, sextortion and unauthorised image sharing.

4.4 Safeguarding Concern

Any information, allegation, suspicion or observation that a child has been, is being, or is at risk of being harmed by any adult or by another child.

5. Guiding Principles

1. Zero Tolerance — DSWHUB has zero tolerance for child abuse, exploitation or neglect by anyone associated with the Organisation.
2. Best Interests — In every decision affecting a child, the child's best interests are the paramount consideration.
3. Do No Harm — All activities, communications and images must be assessed for any risk of harm to children.
4. Listen and Believe — Children are listened to, taken seriously and supported when they raise concerns.
5. Prevention First — We invest in screening, training, and safe programme design to prevent harm before it occurs.
6. Confidentiality — Information about safeguarding cases is shared only on a strict need-to-know basis to protect the child.
7. Accountability — Every Trustee and staff member is personally accountable for safeguarding within their role.

6. Code of Behaviour with Children

6.1 You Must

- Treat all children with respect, dignity and equality regardless of sex, age, disability, religion, ethnicity, family status or any other characteristic;
- Be visible to other adults whenever you are with a child work in open, observable spaces;
- Use age-appropriate, non-sexualised language at all times;
- Obtain informed consent from a parent or legal guardian, plus the child's assent, before any photograph, recording or interview;
- Report any concern about a child's safety immediately under Section 9;
- Follow all programme protocols on transport, accommodation, home visits and one-to-one contact.

6.2 You Must Not

- Engage in any sexual activity with a child, regardless of the age of consent under any law or custom this is gross misconduct and a criminal offence;
- Hit, slap, shake or use any form of physical or humiliating discipline;
- Use language that is sexually provocative, demeaning, racist or otherwise inappropriate;
- Be alone with a child in a private space, including a vehicle, room or accommodation, except in a documented emergency;
- Sleep in the same room or bed as a child who is not your own;
- Take a child to your home, hotel or accommodation;
- Give personal gifts, money or favours to an individual child outside of approved programme activities;
- Develop a private relationship with a child via personal phone, social media or messaging;
- Photograph a child in a state of undress, in a sexualised pose, or in a way that could identify and locate the child without specific safeguarding consent;
- Consume alcohol or drugs while working with children, or allow your judgement to be impaired;
- Withhold a report or concern, even if the information was shared 'in confidence'.

7. Safer Recruitment

All persons engaged by DSWHUB in any role with potential contact with children must, before commencing duties:

8. Complete a written application disclosing previous work with children;
9. Provide at least two professional references, both of which must be taken up in writing or by telephone and recorded;
10. Provide a valid means of identification (NIN, international passport, driver's licence or voter's card);
11. Sign a Self-Declaration Form disclosing any criminal record, allegation, investigation or dismissal relating to children, vulnerable adults, fraud or violence;
12. Provide police clearance or equivalent character verification where reasonably available;
13. Sign this Child Safeguarding Policy and the Code of Conduct as a condition of engagement;
14. Complete safeguarding induction training within their first 30 days.

All recruitment advertisements shall state that DSWHUB is committed to safeguarding and that successful candidates will be subject to background checks. The same standards apply to volunteers, interns and consultants.

8. Training and Awareness

- Induction safeguarding briefing within 30 days of joining (mandatory for all);
- Annual refresher training for staff, volunteers and Trustees;
- Specialist training for the Designated Safeguarding Lead and programme staff with direct child contact;
- Child-friendly awareness sessions for beneficiary children and caregivers, including how to report concerns;
- Training records are maintained by the HR/Operations function for at least seven years.

9. Reporting a Safeguarding Concern

9.1 Designated Safeguarding Lead (DSL)

The Board shall appoint a Designated Safeguarding Lead and a Deputy DSL. Their names, photographs and contact details shall be displayed at all programme sites and on the website. Until otherwise appointed, the DSL is the Executive Director and the Deputy is the Secretary to the Trustees.

9.2 How to Report

Any person with a concern, suspicion or allegation must report it as soon as possible — and within 24 hours at the latest to the DSL by:

- Telephone: +234 903 924 2821
- Email: info@dswhub.org
- In writing, in a sealed envelope marked 'Confidential Safeguarding';
- In person to any Trustee where the DSL is unavailable or implicated.

Reports may be made anonymously, but where the identity of the reporter is known, it will be protected to the fullest extent possible.

9.3 What to Report

You do not need proof. A concern, suspicion, observation, disclosure by a child, or third-party report is enough. Do not investigate yourself. Do not discuss the case with anyone other than the DSL.

9.4 Immediate Steps

15. Ensure the child is safe and receives any urgent medical attention required;
16. Listen carefully without leading or pressing the child for details;
17. Reassure the child that they were right to speak up, but do not promise confidentiality;
18. Record what was said in the child's own words, signed and dated, as soon as possible;
19. Pass the report to the DSL within 24 hours.

10. Response and Investigation

10.1 Initial Assessment (within 48 hours)

The DSL convenes a Safeguarding Response Team comprising the DSL, one Trustee, and the HR Lead. The Team must:

- Confirm the child's immediate safety;
- Decide whether to suspend the subject of the allegation pending investigation;
- Decide on referrals to external authorities.

10.2 External Reporting Obligations

Where the concern indicates a possible criminal offence or where required by law, the DSL must, without delay, report to one or more of the following:

- Nigeria Police Force — Gender, Children and Vulnerable Persons Unit;
- National Agency for the Prohibition of Trafficking in Persons (NAPTIP) — for trafficking, sexual exploitation, or violence against persons;
- Lagos State Ministry of Youth and Social Development or the relevant State Ministry;
- National Human Rights Commission;
- Relevant donor or partner under their reporting requirements, within their stated timeframe (typically 24 to 72 hours).

10.3 Confidentiality

Information is shared on a need-to-know basis only. All written and electronic records are stored under restricted access and retained for a minimum of seven years, or until the child reaches the age of 25, whichever is later.

10.4 Outcomes

Confirmed breaches of this Policy by a Trustee, employee, volunteer or contractor will result in disciplinary action up to and including summary dismissal or termination of engagement, in addition to any criminal referral. False or malicious reporting is itself a disciplinary offence.

11. Communications, Images and Online Safety

- Specific written consent must be obtained from a parent or guardian, plus the child's assent, before any photograph, video or interview is collected or published;
- Children must be appropriately dressed and presented with dignity in all images;
- Names, schools, exact locations and other identifiers must not be published with images of children except where there is a clear, documented reason and full consent;
- Programme staff must not connect with beneficiary children on personal social media accounts;
- Image files are stored securely, are not shared with third parties without consent, and are destroyed in line with our Data Protection Policy.

12. Roles and Responsibilities

- The Board of Trustees holds ultimate responsibility for safeguarding, approves this Policy, reviews safeguarding reports at every Board meeting, and appoints the DSL;
- The Executive Director ensures the Policy is implemented, resourced and reported on;
- The Designated Safeguarding Lead receives reports, manages cases, makes external referrals and maintains the Safeguarding Register;
- Line Managers ensure their teams are trained, comply with the Code of Behaviour and report concerns;
- Every individual covered by this Policy has a personal duty to comply and to report concerns.

13. Monitoring and Review

The DSL submits a quarterly safeguarding report to the Board covering: number and nature of concerns received; status of cases; training delivered; and any policy gaps identified. This Policy is reviewed every two years, or sooner where law, donor requirements or organisational learning requires.

Approval

This policy is approved by the Board of Trustees of DENNY SOCIAL WELFARE HUB and shall take effect from the date stated above. It will be reviewed every two years or earlier if there is a material change in law, donor requirement, or organisational practice.