

International Churches of Christ-Kenya



SAFEGUARDING POLICY ON PREVENTION OF SEXUAL EXPLOITATION, ABUSE AND HARASSMENT (PSEAH) OF CHILDREN AND VULNERABLE PERSONS

VERSION CONTROL		
Date of Approval	1 st March 2025	Authorization:
Current Version	01	Lead Evangelist: William Auki Signed.....
Effective Date	1 st March 2025	Church Board Chair: Robert Matano Signed.....

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1.0 INTRODUCTION

Safeguarding is the responsibility that all organisations including churches have to ensure that their employees, members, operations and programmes do no harm to children, young people or vulnerable adults ('vulnerable people') with whom they interact or support. The organisation ensures that its members do not expose vulnerable people to the risk of discrimination, harm and abuse; and that any concerns the organisation has about the safety of vulnerable people are dealt with and reported to the appropriate authorities. Thus, the process includes protecting children and vulnerable people from all forms of exploitation, abuse and harassment, including those of sexual nature.

2.0 PURPOSE

The purpose of this policy and associated procedures is to provide clarity to **ALL members** on how they should engage with children, young people and vulnerable adults when working for, on behalf of, or in partnership with the International Churches of Christ Kenya (ICOC-K). The policy will help us to develop good practices across the diverse areas in which we operate and increase accountability in this crucial aspect.

This policy affirms the commitments made by ICOC-K and informs members of responsibilities in relation to safeguarding vulnerable people from all forms of abuse by addressing the conduct of members associated with the church and the design and implementation of Church's programs and activities.

3.0 DEFINITION OF TERMS

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

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

Psychological abuse - includes emotional abuse, threats of harm, deprivation of contact, humiliation, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services. Examples include deliberately stopping vulnerable persons from expressing themselves, 'making fun' of what they say or how they communicate.

Sexual abuse involves forcing, enticing, or coercing someone to take part in sexual activities, whether or not the vulnerable person is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape) or non-penetrative acts such as kissing, rubbing, and touching outside of clothing. They

may also include non-contact activities, such as involving a vulnerable person in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet).

Sexual Harassment: This involves such unwelcome sexually determined behaviour as physical contact and advances, sexually coloured remarks, showing pornography, and sexual demands, whether by words or actions. Such conduct can be humiliating and discriminatory when the victim has reasonable ground to believe that his/her objection would disadvantage him/her in some way or create a hostile environment.

Sexual exploitation-Sexual exploitation occurs when someone uses, or tries to use, a differential power relationship or another person's vulnerable position or trust for sexual purposes. This can include coercing or engaging a person into a sexual act, or pornography, with or without the person's consent, in exchange for goods and services, e.g. money, food, or protection.

Child – ICOC-K regards a child as anyone under the age of 18 years. It is widely recognised that children are generally more vulnerable to abuse and exploitation due to factors such as age, gender, social and economic status, developmental stage, and dependence on others. The child may be a child of a member who accompanies the parents/guardians to church or any other child who participates actively in activities sponsored by the church.

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

Youth or young people - individuals aged 15 to 24– ICOC-K recognises that this group spans the categories of 'children' and 'adults' but regards young people as having particular safeguarding needs and requiring distinct consideration aside from younger children and older adults. The young person may be a child of a member who accompanies the parents/guardians to church or any other youth who participates actively in activities sponsored by the church.

Member-A person who is a baptized member of the Church.

Survivor-Centred Approach: An approach aimed to put the rights of each survivor at the forefront of all actions and ensure that each survivor is treated with dignity and respect.

4.0 SCOPE

This policy is mandatory for all Church Members.

5.0 POLICY STATEMENT

- ICOC-K has zero tolerance against abuse and exploitation of vulnerable people. The church also recognises that safeguarding is everyone's responsibility and that it has an obligation to put in place reasonable measures to ensure, as far as possible, the safety and wellbeing of vulnerable people with whom we serve and interact. The Church commits to instituting safeguarding measures through prevention, reporting, and response.

5.1 Responsibilities

All members are obliged to follow this policy and maintain an environment that safeguards all children, young people and vulnerable adults, and which encourages reporting of breaches of this policy using the appropriate procedures.

5.1.1 ICOC-K

The Church will:

- Design and implement all its activities in ways that protect people from risk of harm arising from contact with us. This includes how personal information about others is collected and shared. This will include developing church-specific strategies to prevent and respond to sexual exploitation, abuse, and harassment ("SEAH").
- Ensure all members have access to, are familiar with, and know their responsibilities in relation to this policy.
- Incorporate the Church's standards on SEAH in relevant documentation and materials, including codes of conduct, on-boarding materials, training courses for personnel, and legal employment agreements and documentation.
- Implement stringent safeguarding procedures when assigning people to different roles including those who would work with children and vulnerable people.
- Take swift and appropriate action, including legal action when required, against members who commit SEAH. This includes expulsion from the church, and referral to the relevant authorities for appropriate action.
- Take appropriate actions to the best of the Church's abilities to protect complainants from retaliation where allegations of SEAH are reported.
- Investigate and respond to reports of safeguarding concerns promptly.
- Maintain documentation of allegations, investigations, and responses
- Provide support and assistance to SEAH survivors.
- The Church will map service providers and referral Centers for these services in its operating areas.

5.1.2 ICOC-K Members

All members of ICOC-K will:

- Be sensitized on the Safeguarding Policy

- Strive to promote a zero-tolerance approach to sexual harassment and abuse in all environments.
- Place the safety and welfare of children and vulnerable people above all other considerations.
- Anyone who would work with children, young adults or vulnerable people will be required to also read and sign a Code of Conduct (Annex 1) detailing their commitment to ensuring adherence to this policy's requirements during the course of their service
- Report any concerns they may have about the welfare of a child or vulnerable person (see section 5.2: Duty to Report any Suspected Safeguarding Concerns)
- Report any concerns they may have about the behaviour of any other member in relation to safeguarding.

All members will not:

- Behave with children and vulnerable persons in a manner that is sexually provocative.
- Expose children and vulnerable persons to pornography or other sexually explicit images or media.
- Suggest that an alleged survivor of sexual abuse has any responsibility for the abuse or that the he or she behaved in a "seductive" manner.
- Touch, molest, and/or have sexual intercourse with any children or vulnerable person under their charge.
- Hit or physically assault children and vulnerable persons, even if it is acceptable in local culture.
- Act in ways that shame, humiliate, or belittle, children and vulnerable persons.
- Take, produce, or create images of children and vulnerable persons that are humiliating, degrading, shameful, or otherwise offensive.
- Use offensive language, suggestions, or advice.
- Dress in a culturally inappropriate way where bodies are exposed to children and vulnerable persons.

5.1.3 Bible Talk, Sector leaders, ministers, and Region leaders

- The Church leaders are responsible for ensuring all members are aware of the provisions of this policy.
- They must ensure that they are responsive, act immediately by ensuring the matters are reported to the Safeguarding Point Persons if they become aware of any safeguarding concerns and be supportive towards members who complain about breaches in this policy.

5.1.4 Designated Safeguarding Point Persons

- There shall be designated at any time "Safeguarding Point Persons" to whom reports of any Safeguarding Concerns will be sent with an option of doing so anonymously.
- The Safeguarding Point Persons will record any safeguarding concerns reported to them and ensure that the same are referred to the Lead Couple or Lead Safeguarding Point Person who will form a committee to conduct further investigations and recommend action.

- The Church will strive to have adequate number of Safeguarding Point Persons assigned church regions and trained on how to conduct rudimentary safeguarding type of investigations.

5.2 Duty to Report any Suspected Safeguarding Concerns and Prohibition of Retaliation

- All members are encouraged to immediately report, verbally or in writing, any suspicion, or allegation of a policy breach.
- Members are to report suspected or alleged safeguarding issues and not follow-up or investigate on their own.
- If a member learns of potential safeguarding issues, he/she needs to report even if the alleged survivor does not want it investigated.
- While the church will strive to respect the alleged survivor's wishes, in some situations the church may need to investigate to ensure protection and prevention of future mistreatment. In some situations, the church leaders may be needed to report the potential misconduct to local authorities for investigation.
- Part of disseminating this policy will include communicating to the members about not reporting cases out of malice or vengefulness.
- Reporting out of malice is subject to disciplinary action from the Church

The reporting options are:

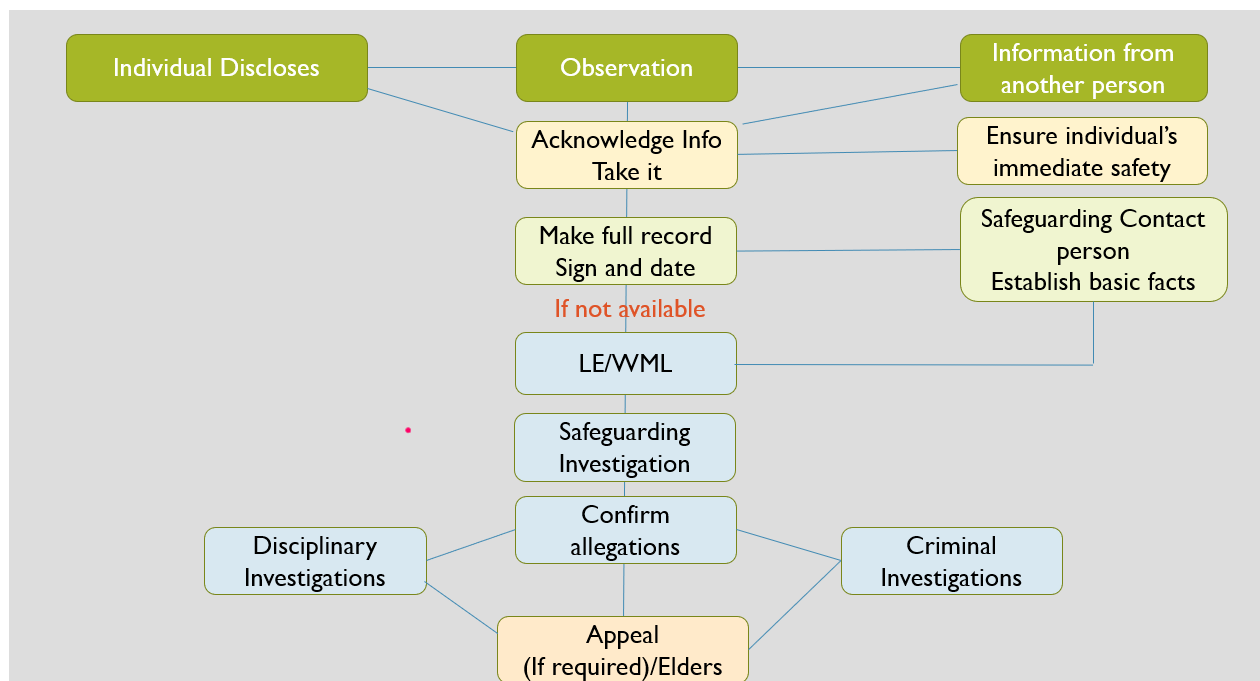
- i. Confidential, anonymous reporting through the email address:
firmibi@icocea.org
Through the ministry leader (who must then forward the allegation or suspicion to the reporting site at: firmibi@icocea.org immediately
 - ii. A link in the church website (**Firimbi**) through which members can also report anonymously.
 - iii. As a last resort, making use of the suggestion box at the church office -enveloped and addressed clearly "for the attention of Safeguarding Point Persons"
- The Church leadership will address firmly any retaliation against anyone who reports in good faith any suspected abuse of a child or vulnerable persons.
 - Anyone who believes that he/she has been retaliated against should promptly report in the same way ie through the channels mentioned above.

5.3 Process of Reporting, Investigation and Action

The process of reporting to action by the Church for cases of SEAH is summarized in the diagram below.

- i) The report is submitted to the Safeguarding point person(s) in any of the ways described in 5.2, above.
- ii) The Safeguarding Point persons conduct rudimentary investigations into the matter including interviewing the survivors/victims.
- iii) The Point Persons ensure that evidence into the matter including statements, communication (e.g. phone and email messages etc) are obtained and secured.
- iv) Once convinced that the case has validity, the Point Persons will forward the matter to the Lead Evangelist/Women Ministry leader/ Lead Safeguarding Point Person who will form a committee to do further investigations.

- v) The Committee thus formed should comprise people of good standing in the church, have gender parity, and be bound to be confidential by signing Non-Disclosure Agreement (NDA) about the proceedings of the investigations.
- vi) Upon investigations, the Committee will summon the suspected perpetrator and inform him/her of the case against him/her. If the perpetrator agrees with the charges, the committee will write a report recommending action to the church leadership.
- vii) If the perpetrator denies the charges, the committee will deliberate and make a decision. Then the Committee will summon the suspected perpetrator and inform him/her of their decision
- viii) The perpetrator can appeal on this decision to the lead couple and the body of elders, who will then form an appellate committee whose decision, upon hearing the matter, shall be final.
- ix) In a case where the victims/survivor is a minor ie below the age of 18 years, the church shall invoke the parallel system where the matter is also reported to the relevant government agencies, Department of Children’s services, and the Kenya Police



CODES OF CONDUCT DOCUMENTS FOR SIGNING

Annex 1: Google Form Document for all Members attending the Dissemination Forum

I, [Name]of bloc/church confirm that I on, 23rd March 2025 I attended the ICOC-K Prevention of Sexual Exploitation, Abuse and Harassment (Safeguarding) Policy and pledge to do my best to adhere to it.

Annex 2: Code of Conduct for Church Staff

I [Name]..... , being an employee of the ICOC, confirm that I have read the Prevention of Sexual Exploitation, Abuse and Harassment (Safeguarding) Policy, understand its contents and pledge to adhere with its requirements.

Signed:

Date:

Annex 2: Code of Conduct for Kids Kingdom Teachers, Camp Counsellors, Teen Mentors, and any other persons dealing with Children and Vulnerable People

I, [Name]..... , currently having the role of Kids Kingdom Teacher, Teens Mentor, Camp Counsellor, or other (.....) , confirm that I have read the Prevention of Sexual Exploitation, Abuse and Harassment (Safeguarding) Policy, understand its contents and pledge to adhere with its requirements.

Signed:

Date: