**GivitBack Foundation (GBF)**
"Unlocking Potential, Transforming Lives"
**Website:** givitbackfoundation.org
**Address:** 259-90119, Matuu, Machakos, Kenya
**Email:** info@givitbackfoundation.org / givitbackfoundation@gmail.com
**Mobile:** +254790279747 / +254723635885 / +254723928976

# CHILD PROTECTION POLICY

## DOCUMENT CONTROL

| Document Information | Details |
|---|---|
| ***Document Title*** | Child Protection Policy |
| ***Organization*** | GivitBack Foundation (GBF) |
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| ***Policy Owner*** | Governing Body (Board of Trustees) |
| ***Policy Custodian*** | Chairperson |
| ***Applies To*** | Trustees, Employees, Volunteers, Consultants, Interns, Contractors, Partners and any person representing GBF |

## POLICY APPROVAL

This Child Protection Policy is adopted by the Governing Body of GivitBack Foundation (GBF) in fulfilment of the Foundation's commitment to safeguarding children and complying with the Constitution of Kenya, the Public Benefit Organizations Act, Cap. 134, the Children Act, 2022, and international child protection standards.
All persons acting on behalf of the Foundation are required to read, understand and comply with this Policy.

## 1. INTRODUCTION

Children have the right to survive, develop, participate and grow in environments that are safe, supportive and free from abuse, neglect, exploitation and violence.

GivitBack Foundation (GBF) recognizes that safeguarding children is a fundamental responsibility that applies to every person associated with the Foundation. Because GBF works directly with children, adolescents, schools, families and communities through sports, mentorship, education support, nutrition, health promotion and community empowerment programmes, it is committed to ensuring that all activities are planned and implemented in ways that protect children from harm.

This Policy establishes the Foundation's commitment, standards and procedures for preventing, identifying, reporting and responding to child protection concerns across all programmes and operations.

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## 2. ABOUT GIVITBACK FOUNDATION

GivitBack Foundation (GBF) is a non-membership Public Benefit Organization established under the Public Benefit Organizations Act, Cap. 134 of the Laws of Kenya. The Foundation is a voluntary, autonomous, non-partisan and non-profit organization dedicated to improving the lives of children and young people through sustainable community development initiatives.

### *Main Objective*

The primary purpose of GivitBack Foundation is to identify, nurture and develop talent among children and youth through sports, mentorship, education support and strategic partnerships that create opportunities for personal growth, leadership and socio-economic empowerment.

### *Programme Areas*

The Foundation implements programmes including:

- Sports and talent identification.
- Talent development and coaching.
- Education support.
- Mentorship and leadership development.
- Health promotion.
- Nutrition interventions.
- Psychosocial wellbeing.
- Community empowerment.
- Training camps.
- Sports academies.
- GBF Talent Hub.
- School-based programmes.
- Community outreach.
- Strategic partnerships.

***Beneficiaries***

The Foundation primarily serves:

- Children
- Orphans
- Vulnerable Children (OVCs)
- Adolescents
- Youth

while working closely with parents, caregivers, schools, health facilities and communities.

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## 3. POLICY STATEMENT

GivitBack Foundation adopts a zero tolerance approach to all forms of child abuse, neglect, exploitation, violence and harmful practices.

The Foundation is committed to ensuring that every child participating in its programmes is treated with dignity, respect and fairness, and is protected from physical, emotional, psychological and sexual harm.

GBF shall:

- Place the best interests of the child at the centre of all decisions.
- Promote safe organisational practices.
- Prevent abuse through effective safeguarding systems.
- Take every allegation seriously.
- Respond promptly to concerns.
- Maintain confidential reporting systems.
- Work collaboratively with relevant government authorities and community structures.
- Continuously strengthen safeguarding through monitoring, learning and training.

No Trustee, employee, volunteer, consultant, contractor, intern or partner shall engage in, encourage, tolerate or ignore any form of child abuse.

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## 4. PURPOSE

The purpose of this Policy is to establish a comprehensive framework that enables GivitBack Foundation to prevent, identify, report and respond appropriately to child protection concerns.

Specifically, this Policy seeks to:

- Protect children from abuse and exploitation.
- Promote child-safe programming.
- Guide acceptable conduct for all representatives.
- Strengthen accountability.
- Ensure compliance with Kenyan law.
- Meet safeguarding requirements of donors and development partners.

- Promote public confidence in the Foundation.

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**5. OBJECTIVES**

The objectives of this Policy are to:

- Create a child-safe organizational culture.
- Prevent abuse through strong recruitment and supervision practices.
- Promote children's rights and wellbeing.
- Build staff and volunteer safeguarding capacity.
- Establish accessible reporting mechanisms.
- Ensure prompt response to safeguarding concerns.
- Strengthen organizational accountability.
- Promote continuous learning and improvement.

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**6. SCOPE**

This Policy applies to:

- Board Members.
- Executive Director.
- Employees.
- Volunteers.
- Consultants.
- Interns.
- Coaches.
- Mentors.
- Nutritionists.
- Contractors.
- Community facilitators.
- Partner organizations.
- Visitors.
- Any other individual representing GBF.

This Policy applies during:

- School programmes.
- Sports activities.
- Training camps.
- Community outreach.
- Mentorship sessions.
- Nutrition programmes.
- Health programmes.
- Home visits.
- Conferences.
- Digital engagement.

- Social media communication.
- Official travel.
- Any activity organized or supported by GBF.

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## 7. GUIDING PRINCIPLES

GBF shall be guided by the following principles:

***Best Interests of the Child***

Every decision affecting children shall prioritize their safety, dignity, rights and wellbeing.

***Zero Tolerance***

GBF will not tolerate abuse, exploitation, neglect or violence against children.

***Do No Harm***

All programmes shall be designed and implemented in ways that minimize risks to children.

***Non-Discrimination***

Every child shall be treated fairly regardless of age, gender, disability, ethnicity, religion, nationality or socio-economic background.

***Participation***

Children shall be listened to and encouraged to express their views in matters affecting them, in accordance with their age and maturity.

***Accountability***

Everyone representing GBF is personally responsible for safeguarding children.

***Confidentiality***

Information concerning child protection cases shall only be shared with authorized persons who require the information to protect the child or fulfil legal obligations.

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## 8. LEGAL AND POLICY FRAMEWORK

This Policy is guided by:

- Constitution of Kenya, 2010.
- Public Benefit Organizations Act, Cap. 134.
- Children Act, 2022.
- Sexual Offences Act, 2006.
- Employment Act, 2007.
- Data Protection Act, 2019.
- Basic Education Act.
- United Nations Convention on the Rights of the Child (UNCRC).
- African Charter on the Rights and Welfare of the Child.
- Other applicable national and international safeguarding standards.

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## 9. DEFINITIONS

For the purposes of this Policy:
***Child*** means any person below the age of eighteen (18) years.
***Child Abuse*** means any action or omission that results in actual or potential harm to a child, including physical, emotional, psychological or sexual abuse, neglect or exploitation.
***Physical Abuse*** means the intentional use of physical force that causes or is likely to cause injury.
***Emotional Abuse*** means persistent behaviour that harms a child's emotional development, self-esteem or mental wellbeing.
***Sexual Abuse*** means involving a child in sexual activity that the child cannot understand, consent to or is legally prohibited from engaging in.
***Neglect*** means the persistent failure to provide for a child's basic physical, emotional, educational or medical needs.
***Exploitation*** means the abuse of a position of trust, vulnerability or power for personal or financial benefit.
***Safeguarding*** means the policies, procedures and practices implemented to prevent harm and protect children from abuse, exploitation and neglect.

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## 10. ROLES AND RESPONSIBILITIES

***Governing Body (Board of Trustees)***

The Governing Body shall:

- Approve safeguarding policies.
- Provide strategic oversight.
- Ensure adequate safeguarding resources.
- Monitor safeguarding compliance.
- Review serious safeguarding incidents.
- Promote a culture of child safety.

***Executive Director***

The Executive Director shall:

- Implement this Policy.
- Promote compliance throughout the Foundation.
- Ensure safeguarding risks are assessed.
- Designate a Safeguarding Focal Person.
- Report serious safeguarding matters to the Governing Body.
- Coordinate investigations and corrective actions.

***Employees and Volunteers***

Every employee and volunteer shall:

- Read and comply with this Policy.
- Complete safeguarding training.
- Maintain professional boundaries with children.

- Report concerns immediately.
- Promote child-safe environments.
- Respect children's dignity, privacy and rights.

***Partners and Contractors***

Partners and contractors engaged by GBF shall:

- Comply with this Policy or demonstrate equivalent safeguarding standards.
- Ensure their personnel understand safeguarding responsibilities.
- Cooperate fully in safeguarding investigations.

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## 11. SAFE RECRUITMENT AND SCREENING

GivitBack Foundation recognizes that effective safeguarding begins with recruiting suitable individuals who demonstrate integrity, professionalism and a commitment to protecting children.

The Foundation shall implement child-safe recruitment procedures for all Trustees, employees, volunteers, consultants, interns, contractors and any person who may have direct or indirect contact with children.

### *11.1 Recruitment Standards*

GBF shall:

- Advertise positions fairly and transparently.
- Clearly communicate safeguarding responsibilities in all job descriptions.
- Inform applicants that safeguarding screening forms part of the recruitment process.
- Conduct competency-based interviews that assess suitability to work with children.
- Verify qualifications, professional memberships and relevant experience.
- Obtain at least two satisfactory professional or character references.
- Conduct identity verification before engagement.
- Require successful candidates to sign the GBF Child Protection Code of Conduct.
- Require all staff and volunteers to declare any previous convictions or disciplinary actions relating to child abuse, exploitation or violence.
- Require a Certificate of Good Conduct or other legally recognized background screening where appropriate and permitted by law.

### *11.2 Induction*

Before commencing duties, every representative of GBF shall receive orientation covering:

- This Child Protection Policy.
- The PSEAH Policy.
- The Code of Conduct.
- Reporting procedures.
- Professional boundaries.

- Confidentiality obligations.
- Safe communication with children.
- Responsibilities under Kenyan law.

***11.3 Ongoing Suitability***

Safeguarding responsibilities continue throughout an individual's engagement with GBF. The Foundation may conduct additional assessments, supervision or disciplinary reviews where concerns arise regarding a person's suitability to work with children.

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## 12. CHILD PROTECTION CODE OF CONDUCT

Every representative of GBF shall conduct themselves in a manner that protects the safety, dignity and rights of children.

***12.1 Expected Behaviour***

Representatives shall:

- Treat every child with dignity and respect.
- Promote inclusion and equality.
- Listen to children respectfully.
- Encourage children's participation.
- Use appropriate language at all times.
- Maintain professional boundaries.
- Respect children's privacy.
- Obtain informed consent from parents or guardians where required.
- Follow all safeguarding procedures.
- Immediately report concerns or suspected abuse.
- Promote safe and inclusive environments.

***12.2 Prohibited Behaviour***

No representative of GBF shall:

- Physically assault, hit or intentionally harm a child.
- Engage in any form of sexual activity with a child.
- Groom or exploit a child.
- Use humiliating, degrading or discriminatory language.
- Bully, intimidate or threaten a child.
- Spend unnecessary time alone with a child in isolated locations.
- Invite children to private residences without organizational approval.
- Exchange money, gifts or favours for inappropriate relationships.
- Use alcohol or illegal drugs while supervising children.
- Share or access inappropriate images involving children.
- Communicate privately with children through personal social media accounts except where authorized and safeguarded.
- Photograph or record children without appropriate consent.

- Encourage children to keep secrets from parents, guardians or authorized GBF personnel.

Any breach of this Code of Conduct may result in disciplinary action, termination of engagement and referral to the relevant authorities.

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## 13. SAFE PROGRAMMING STANDARDS

Child safeguarding shall be integrated into every GBF programme from planning through implementation and evaluation.

### *13.1 Risk Assessment*

Every programme involving children shall include a safeguarding risk assessment before implementation.

Risk assessments shall consider:

- Nature of activities.
- Venue safety.
- Adult-to-child ratios.
- Transportation arrangements.
- Medical emergencies.
- Accessibility for children with disabilities.
- Online safeguarding risks.
- Cultural considerations.

Appropriate mitigation measures shall be implemented before activities commence.

### *13.2 Sports and Talent Development*

During sports activities:

- At least two responsible adults shall supervise activities involving children.
- Coaches shall avoid situations where they are alone with a child in secluded areas.
- Physical contact shall only occur where necessary, appropriate and explained to the child.
- Training venues shall be safe and regularly inspected.
- Emergency medical procedures shall be available.
- Children shall not be subjected to abusive coaching practices or degrading punishment.

### *13.3 Mentorship Programmes*

Mentors shall:

- Maintain professional relationships.
- Meet children only within approved GBF programmes.
- Avoid favouritism.
- Avoid dependence or inappropriate emotional relationships.
- Report safeguarding concerns immediately.

### *13.4 Education Support*

During school programmes:

- Activities shall be conducted in collaboration with school management.
- School safeguarding procedures shall be respected.
- Parents or guardians shall provide consent where necessary.
- Children shall never be withdrawn from school activities without authorization.

***13.5 Nutrition and Health Programmes***

Nutrition and health interventions shall:

- Respect children's dignity.
- Maintain privacy during assessments.
- Protect confidential medical information.
- Obtain informed consent where appropriate.
- Ensure children are accompanied where necessary.
- Follow Ministry of Health professional standards.

***13.6 Community Outreach***

During outreach activities:

- Child-friendly spaces shall be established where appropriate.
- Lost child procedures shall be in place.
- Children shall not be left unattended.
- Attendance registers shall be maintained where practical.
- Emergency contacts shall be available.

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## 14. PHOTOGRAPHY, MEDIA AND DIGITAL COMMUNICATION

GBF recognizes that photographs, videos and digital communications can expose children to safeguarding risks if not properly managed.

***14.1 Photography***

Before photographing or recording children:

- Appropriate consent shall be obtained from parents, guardians or other authorized persons where required.
- The child's dignity shall always be protected.
- Images shall portray children respectfully.
- Images shall never be sexually suggestive, degrading or exploitative.

***14.2 Use of Images***

GBF shall:

- Use photographs only for legitimate programme, communication and fundraising purposes.
- Avoid publishing unnecessary personal information.
- Store digital files securely.
- Remove content where safeguarding concerns arise.

***14.3 Social Media***

Representatives shall not:

- Share confidential information about children.

- Post images that expose children to harm.
- Tag children's personal accounts without authorization.
- Communicate inappropriately with children using personal social media platforms.

Official communication with children shall only occur through approved channels and in accordance with safeguarding procedures.

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## 15. REPORTING CHILD PROTECTION CONCERNS

Every safeguarding concern shall be taken seriously.

Failure to report suspected abuse may place children at further risk.

### *15.1 What Should Be Reported*

Reports may include:

- Physical abuse.
- Emotional abuse.
- Sexual abuse.
- Neglect.
- Exploitation.
- Grooming.
- Bullying.
- Online abuse.
- Suspicious behaviour.
- Policy breaches.

### *15.2 Who May Report*

Reports may be made by:

- Children.
- Parents or guardians.
- Staff.
- Volunteers.
- Trustees.
- Community members.
- Partners.
- Visitors.
- Anonymous whistleblowers.

### *15.3 Reporting Process*

Any person who becomes aware of a safeguarding concern shall:

1. Ensure the immediate safety of the child where possible.
2. Report the concern immediately to their supervisor or the designated Safeguarding Focal Person.
3. Record factual information only.
4. Maintain confidentiality.

5. Cooperate with any investigation.

Where required by law, GBF shall report matters to the relevant government authorities, including child protection agencies and law enforcement.

No person shall suffer retaliation for reporting a genuine safeguarding concern in good faith.

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## 16. INCIDENT RESPONSE

Upon receiving a safeguarding report, GBF shall:

- Prioritize the safety and wellbeing of the child.
- Assess immediate risks.
- Arrange emergency medical care where required.
- Provide referrals for psychosocial support where appropriate.
- Secure evidence where legally appropriate.
- Conduct an impartial internal review where applicable.
- Cooperate fully with competent authorities.
- Implement measures to prevent recurrence.

All actions shall be guided by the best interests of the child and applicable law.

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## 17. CONFIDENTIALITY AND DATA PROTECTION

GivitBack Foundation is committed to protecting the privacy, dignity and rights of every child involved in its programmes. Information relating to child protection concerns shall be managed with the highest level of confidentiality and only disclosed where necessary to protect a child, comply with legal obligations or facilitate an appropriate response.

### *17.1 Confidentiality Principles*

GBF shall:

- Treat all child protection information as confidential.
- Share information only on a strict need-to-know basis.
- Protect the identity of children, complainants, witnesses and alleged perpetrators during investigations.
- Maintain secure storage of safeguarding records.
- Prevent unauthorized access to safeguarding information.
- Comply with the Data Protection Act, 2019 and other applicable laws.

Confidentiality shall never prevent the Foundation from reporting concerns where disclosure is required to protect a child or comply with legal obligations.

### *17.2 Records Management*

The Foundation shall maintain secure records of:

- Child protection reports.
- Incident investigations.
- Risk assessments.
- Referrals made.

- Outcomes of investigations.
- Training records.
- Signed Codes of Conduct.
- Safeguarding declarations.

Safeguarding records shall be retained and disposed of in accordance with applicable legal requirements and the Foundation's records management procedures.

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## 18. TRAINING, AWARENESS AND CAPACITY BUILDING

Effective safeguarding requires continuous learning and awareness across the Foundation.

### *18.1 Mandatory Training*

All Trustees, employees, volunteers, consultants, interns and other representatives shall receive safeguarding training appropriate to their roles.

Training shall include:

- Child rights.
- Child protection principles.
- GBF Child Protection Policy.
- Protection from Sexual Exploitation, Abuse and Harassment (PSEAH).
- Code of Conduct.
- Reporting procedures.
- Professional boundaries.
- Safe communication with children.
- Digital safeguarding.
- Responding to disclosures.
- Confidentiality obligations.

### *18.2 Refresher Training*

The Foundation shall organize periodic refresher training to ensure continued awareness of safeguarding responsibilities.

Additional training may be provided where:

- New safeguarding risks emerge.
- Policies are revised.
- New programmes are introduced.
- Lessons are learned from safeguarding incidents.

### *18.3 Awareness for Children and Communities*

Where appropriate, GBF shall provide age-appropriate information to children, parents, caregivers, schools and community members on:

- Children's rights.
- Expected standards of behaviour.
- How to report concerns.
- Available support services.

## 19. MONITORING, COMPLIANCE AND REVIEW

The Foundation shall continuously monitor implementation of this Policy to ensure it remains effective and responsive to emerging safeguarding risks.

### *19.1 Monitoring*

Monitoring activities may include:

- Programme supervision.
- Safeguarding compliance checks.
- Internal audits.
- Review of incident reports.
- Feedback from children and communities.
- Staff performance reviews.
- Risk assessments.

### *19.2 Compliance*

All persons acting on behalf of GBF are expected to comply fully with this Policy.
Failure to comply may result in:

- Verbal or written warnings.
- Mandatory retraining.
- Suspension.
- Termination of employment or engagement.
- Removal from volunteer duties.
- Removal from the Governing Body where applicable and in accordance with the Constitution.
- Reporting to regulatory or law enforcement authorities.

### *19.3 Policy Review*

This Policy shall be reviewed:

- Every two (2) years.
- Following significant legislative changes.
- Following major safeguarding incidents.
- Where organizational or programme changes require updates.
- At the direction of the Governing Body.

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## 20. POLICY BREACHES

Any breach of this Policy shall be treated seriously.
Where an allegation is made against a Trustee, employee, volunteer, consultant, contractor or partner, GBF shall:

- Ensure the immediate safety of the child.
- Conduct a fair and impartial assessment.
- Respect the rights of all parties.

- Take appropriate disciplinary or contractual action where misconduct is established.
- Report criminal conduct to the appropriate authorities.

Knowingly making false allegations may also constitute misconduct and may result in disciplinary action, provided that no person shall be penalized for reporting a concern in good faith that is not ultimately substantiated.

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## 21. IMPLEMENTATION

The Executive Director shall be responsible for the day-to-day implementation of this Policy under the strategic oversight of the Governing Body.

To support implementation, GBF shall:

- Integrate safeguarding into all programmes and operations.
- Allocate appropriate resources for safeguarding activities.
- Designate a Safeguarding Focal Person.
- Ensure all representatives sign the Child Protection Code of Conduct.
- Conduct safeguarding risk assessments for all child-related activities.
- Promote a culture of openness, accountability and continuous improvement.

Safeguarding shall be considered in programme planning, budgeting, partnerships, procurement, communications and monitoring and evaluation.

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## 22. POLICY APPROVAL

This Child Protection Policy was approved by the Governing Body of GivitBack Foundation (GBF) and takes effect from the date of approval.

It shall remain in force until amended or replaced by resolution of the Governing Body.

| Item | Details |
|---|---|
| ***Organization*** | GivitBack Foundation (GBF) |
| ***Policy*** | Child Protection Policy |
| ***Version*** | 1.0 |
| ***Effective Date*** | August 2026 |
| ***Review Date*** | August 2028 |
| ***Approved By*** | Governing Body (Board of Trustees) |

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## APPENDIX A: CHILD PROTECTION DECLARATION

I acknowledge that I have received, read and understood the GivitBack Foundation Child Protection Policy.

I understand my responsibility to protect children from abuse, neglect, exploitation and all forms of harm.

I agree to:

- Comply with this Policy.

- Comply with the GBF Code of Conduct.
- Report any safeguarding concerns immediately.
- Cooperate with safeguarding investigations.
- Promote the best interests of every child.

☐ I understand that failure to comply with this Policy may result in disciplinary action, termination of my engagement and/or referral to the relevant authorities.

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**APPENDIX B: CHILD PROTECTION INCIDENT REPORT FORM**

***1. Reporting Person***

- Name:
- Position:
- Contact Information:

***2. Child's Details***

- Name (or unique identifier if confidentiality requires):
- Age:
- Sex:
- Programme/Location:

***3. Nature of Concern***

☐ Physical Abuse

☐ Emotional Abuse

☐ Sexual Abuse

☐ Neglect

☐ Exploitation

☐ Bullying

☐ Online Abuse

☐ Policy Breach

☐ Other

***4. Description of Incident***

Provide a factual description of what was observed, reported or disclosed. Avoid opinions or assumptions.

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***5. Immediate Actions Taken***

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***6. Persons Notified***

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***7. Additional Information***

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***Signature:*** _____

***Date:*** _____

## APPENDIX C: CHILD PROTECTION CODE OF CONDUCT ACKNOWLEDGEMENT

I confirm that I have read and understood the GivitBack Foundation Child Protection Code of Conduct and agree to comply with its requirements throughout my engagement with the Foundation.

| | |
|---|---|
| ***Name*** | |
| ***Role*** | |
| ***Signature*** | |
| ***Date*** | |

**WITNESSES**

*For GivitBack Foundation*

| | |
|---|---|
| ***Name*** | |
| ***Position*** | |
| ***Signature*** | |
| ***Date*** | |

*For Partner Organization/School*

| | |
|---|---|
| ***Name*** | |
| ***Position*** | |
| ***Signature*** | |
| ***Date*** | |

## APPENDIX D: REPORTING FLOW

Concern Identified

↓

Ensure Immediate Safety of the Child

↓

Report Immediately to Supervisor or Safeguarding Focal Person

↓

Document the Concern Using the Incident Report Form

↓

Risk Assessment and Initial Response

↓

Referral to Executive Director

↓

Notification of the Governing Body (where appropriate)

↓

Referral to Relevant Government Authorities if Required by Law

↓

Investigation and Case Management

↓

Support to the Child and Family

↓

Case Closure, Lessons Learned and Policy Review

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