Safeguarding and Protection Policy

ADOPTED POLICY

The Board of Indigenous Women Leaders of Feiyah Action Network adopted this policy at its emergency meeting on 3 November 2026, and it is in force from that date. It is reviewed every two years, and sooner if the law changes, FAN's programmes change, or a serious incident shows a weakness.

1. Why FAN has this policy

Feiyah Action Network works directly with girls, young women and children in Laisamis and across Marsabit County. Our work on female genital mutilation and cutting, child marriage and child beading brings staff and volunteers into contact with children who may already be at risk, and sometimes into contact with the people causing that harm.

This is FAN's policy, adopted for FAN's own reasons. We would hold it if no funder ever asked for it. It happens also to meet the safeguarding standards required by the coalitions and funders FAN works with, including Girls Not Brides, but that is a consequence rather than the purpose.

FAN does not tolerate any form of abuse, exploitation, neglect or harassment of children or adults at risk by its staff, volunteers, board members, consultants, partners or visitors.

2. Scope

This policy applies to:

- All board and management committee members.
- All paid staff, full time and part time.
- All volunteers, including members of youth groups FAN works with or funds.
- All consultants, contractors, suppliers and their personnel when working on FAN activities.
- Visitors, researchers, journalists and photographers attending FAN activities.
- Partner organisations and any organisation receiving a sub grant from FAN.

It covers all FAN activities, in person and online, including school forums, community dialogues, reflect circles, drama performances, nursery and livelihood work, rescues and referrals, and any activity where FAN funds or organises the gathering.

3. Definitions

Term	Meaning in this policy
Child	Any person under the age of 18 years, as defined by the Children Act 2022 of Kenya and the UN Convention on the Rights of the Child.
Adult at risk	Any person aged 18 or over who, because of disability, illness, displacement, destitution or other circumstance, is less able to protect themselves from harm.
Safeguarding	The responsibility FAN takes to make sure its staff, operations and programmes do no

Term	Meaning in this policy
	harm, and that it responds properly when harm is reported or suspected.
Abuse	Physical, sexual, emotional or economic harm, neglect, or exploitation. It includes harmful practices such as FGM, child marriage and child beading.
Sexual exploitation	Any actual or attempted abuse of a position of vulnerability, power or trust for sexual purposes, including profiting financially or socially from the sexual exploitation of another.
Sexual abuse	Actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.
Survivor	A person who has experienced abuse or exploitation. FAN uses this word rather than victim, because it reflects how the person is treated in our response.
Safeguarding concern	Any worry, allegation, disclosure or observation suggesting a person has been harmed, is being harmed, or is at risk of harm.

4. Principles

1. The welfare of the child is the first consideration in every decision.
2. Our response is survivor centred. The survivor's safety, wishes, dignity and right to decide guide what happens next, so far as the law and the duty to protect others allow. We do not take a course of action simply because it is easier for FAN.
3. Every person has an equal right to protection, regardless of sex, age, disability, ethnicity, religion, clan, language or family circumstance.
4. Children have a right to be heard, to be told what will happen next, and to have their views taken seriously according to their age and understanding.
5. FAN does not promise confidentiality it cannot keep. Staff explain, before a disclosure, that information may have to be shared to keep someone safe.
6. Reporting a concern in good faith never results in disadvantage to the person who reported it, even if the concern turns out to be unfounded.
7. FAN acts on concerns about its own staff and volunteers with the same seriousness as concerns about anyone else.

5. Protection from sexual exploitation and abuse

FAN adopts the six core principles on protection from sexual exploitation and abuse set out by the Inter Agency Standing Committee. They apply to everyone within the scope of this policy, at all times, including outside working hours.

1. Sexual exploitation and abuse by personnel constitute acts of gross misconduct and are grounds for termination of employment or engagement.
2. Sexual activity with children, meaning persons under the age of 18, is prohibited regardless of the age of majority or age of consent locally. Mistaken belief in the age of a child is not a defence.
3. Exchange of money, employment, goods or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour, is prohibited. This includes any exchange of assistance that is due to the people FAN works with.
4. Any sexual relationship between those providing humanitarian or development assistance and a person benefiting from that assistance undermines the credibility and integrity of the work and is strongly discouraged, since such relationships are based on inherently unequal power dynamics.
5. Where a member of personnel develops concerns or suspicions regarding sexual abuse or exploitation by a fellow worker, whether in the same organisation or not, they must report such concerns through established reporting mechanisms.

6. FAN is required to create and maintain an environment that prevents sexual exploitation and abuse, and promotes the implementation of these principles. Managers at all levels have particular responsibility to support and develop systems that maintain this environment.

Verify the current wording of the principles against the Inter Agency Standing Committee source before adoption, since the wording has been revised over time. Source to check: interagencystandingcommittee.org.

6. Who is responsible

Role	Responsibility
Safeguarding focal person: Dorcas Choyah, board member, active in FAN's day to day work, info@feiyahactionnetwork.org	Receives all concerns. Decides on immediate action and referral. Keeps the register of concerns. Briefs the board. Named to funders and partners on request.
Deputy focal person: Rose Orguba, Executive Director, info@feiyahactionnetwork.org	Acts when the focal person is unreachable, which matters given travel and network coverage across the county. Receives any concern that is about the focal person.
Executive Director	Accountable for safeguarding overall. Ensures resourcing, training and that this policy is followed. Reports serious incidents to the board within 24 hours.
Board or management committee	Adopts and reviews this policy. Handles concerns about the Executive Director. Receives a safeguarding report at every meeting.
All staff and volunteers	Follow this policy and the Code of Conduct. Report concerns the same day. Never investigate on their own.

Both the focal person and the deputy are women. That is deliberate, because the disclosures FAN receives concern FGM, child beading and forced marriage, and a girl may not take those to a man.

A concern about the focal person goes to the Executive Director. A concern about the Executive Director goes to the board chairperson. A concern about any other board member goes to the full board excluding that member.

The focal person is also a board member. A concern about her goes to the Executive Director, not to the board, so that the board is never reviewing one of its own members through its own safeguarding report.

7. Safe behaviour and conduct

All personnel sign the Code of Conduct at Annex A before starting work and once a year after that. The Code is explained orally in Rendille, Samburu or Swahili where needed, and a signature is taken only after the person confirms they understand it. A signature on a document a person cannot read is not consent to anything.

7.1 Safer recruitment

- Every role working with children includes safeguarding responsibilities in its description.
- Interviews for such roles include at least one question on safeguarding.
- Two references are taken and verified before engagement, including the most recent employer where there is one.
- A certificate of good conduct from the Directorate of Criminal Investigations is required for every staff member and volunteer who will be in contact with children, including those helping at a single event. FAN pays the fee, so that cost is never a reason to skip the check.
- Any gap in employment history is asked about and recorded.
- A person who has been dismissed for a safeguarding breach is not re engaged, and FAN answers reference requests about such a person truthfully.

7.2 Never

- Never be alone and out of sight with a child who is not your own.
- Never offer a lift, money, airtime, food or any benefit to a child outside an agreed programme activity.
- Never contact a participating child privately by phone, SMS, WhatsApp or social media.
- Never use physical punishment, humiliation or abusive language.
- Never engage in sexual activity with anyone under 18, whatever local custom or the age of marriage practised locally.
- Never exchange money, employment, goods, services or assistance for sex or sexual favours, with anyone, at any age.

8. Inclusion and non discrimination

Protection is not equal if some people cannot reach it. FAN takes the following practical steps rather than stating a principle alone.

- Venues are chosen so that a person using a stick, a crutch or a wheelchair can reach and enter them, and this is recorded in the risk assessment.
- Any participant may ask for an adjustment, for example a seat near the front, a quieter space, a companion, or longer time. The request is granted where FAN reasonably can, and recorded.
- Information about reporting and complaints is given orally as well as in writing, because many participants do not read.
- Materials are explained in Rendille, Samburu or Swahili as needed.
- Activities are planned so that girls, women with young children, and people with disabilities can take part, including the timing and the distance to travel.
- No person is excluded from a FAN activity on the basis of sex, disability, ethnicity, clan, religion, marital status, pregnancy, or whether they have undergone FGM.

9. Risk assessment

A written risk assessment is completed before every activity involving children or young people, using the template at Annex B. It is approved by the safeguarding focal person. An activity does not go ahead without it.

Risks that must be considered in the Marsabit context include:

- Distance and transport. Participants travelling long distances on foot or by motorbike, and the risk of a child travelling home alone after dark. Activities end in time for participants to reach home in daylight.
- Venue. Whether there is shade, water, a latrine, step free access, and a private space where a child can speak to a female facilitator without being overheard.
- Sex and language of facilitators. At least one female facilitator who speaks Rendille or Samburu is present at any activity with girls.
- Risk to the girl after the activity. Whether a girl speaking openly about FGM, beading or marriage could face reprisal at home, and what support is available if she does.
- Drought and displacement. Whether families are moving, which affects follow up and the reliability of contact details.
- Network coverage. Whether the focal person can be reached by phone from the venue, and who holds the fallback number if not.
- Men and morans present. How the activity manages mixed groups so that girls can speak freely.

10. Reporting and responding

10.1 Everyone must report

Anyone who sees, hears or suspects harm must report it the same day. This includes concerns about FAN personnel. Failing to report is itself a breach of this policy.

10.2 Immediate safety first

If a person is in immediate danger, the first step is to make them safe, by contacting the police, the Children's Officer or a health facility as the situation requires. Paperwork follows afterwards and never delays protection.

10.3 The reporting route

Step	Who	What happens
1	Anyone	Report by phone or in person to the safeguarding focal person the same day. Do not wait for a form, and do not rely on email, since network coverage is unreliable in parts of the county.
2	Reporter	Write it down within 24 hours using Annex C, or dictate it to the focal person if writing is difficult. Record what was seen or said, not opinion about who is to blame.
3	Focal person	Decide within 24 hours whether the concern requires referral to the Children's Officer, police or health facility, and whether it also requires an internal investigation under section 10.6. Record the decision and the reason.
4	Focal person	Refer to the statutory authority where the concern involves a crime or a person at risk.
5	Executive Director	Inform the board chairperson within 24 hours for any serious incident, and the funder where a grant agreement requires it, within the time that agreement specifies.
6	Focal person	Follow up, record the outcome, and close the entry in the register only when action is complete.

10.4 What staff must not do

- Do not investigate a possible crime, question the person repeatedly, or try to establish proof. Asking a child to repeat a disclosure causes further harm and can damage a later case.
- Do not promise to keep a secret.
- Do not confront the person alleged to have caused harm.
- Do not discuss the concern with anyone who does not need to know, including family, colleagues or community leaders.
- Do not delete or alter any record.

10.5 Receiving a disclosure

- Listen. Do not interrupt or lead.
- Tell the person they were right to speak.
- Explain, in a language they understand, that you will have to tell one named person in order to keep them safe.
- Ask what they want to happen, and record it. Their wishes guide the response so far as safety and the law allow.
- Write down their own words as soon as possible afterwards.

10.6 Internal investigation of staff or volunteer misconduct

Where a concern is about the conduct of a FAN staff member, volunteer, board member or contractor, FAN investigates the employment and conduct question itself, separately from any police or Children's Office process. FAN never substitutes its own process for a criminal referral.

1. The person is suspended from all contact with children and from handling funds while the matter is examined. Suspension is a neutral protective step and is not a finding of guilt.
2. The Executive Director appoints an investigator who has had no involvement in the matter and no family, clan or reporting relationship with the person concerned. Where no suitable person inside FAN meets that test, which in a small organisation working in one community will often be the case, the Executive Director appoints an investigator from outside FAN and approves the cost.
3. The person is told, in writing and in a language they understand, what is alleged and that they may respond.
4. Records of the evidence considered and the reasoning are kept with the register entry.
5. The outcome is decided by the Executive Director, or by the board where the person is the Executive Director or a board member.
6. The survivor is told the outcome so far as the law and the rights of others allow, and is not left to wonder what happened.
7. Where the outcome is dismissal for a safeguarding breach, this is recorded and disclosed honestly in any future reference.

10.7 Register of concerns

The focal person keeps a register of every concern and the response to it, using Annex C. It is kept locked and separate from programme files, with access limited to the focal person, the Executive Director and the board chairperson. It is reviewed at every board meeting in anonymised form. The register is opened and dated even when there is nothing yet to record.

11. Referral contacts

These contacts are displayed at the FAN office, carried by facilitators at every activity, and read aloud to participants at the start of community activities. They are checked every six months and after any change of officer.

Contact	Details
Childline Kenya	116. Free, 24 hours, from any phone. Works without airtime.
Police emergency	999 or 112.
Laisamis Referral Hospital	+254 712 914 270.
FAN safeguarding focal person	Dorcas Choyah, board member, info@feiyahactionnetwork.org.
FAN deputy focal person	Rose Orguba, Executive Director, info@feiyahactionnetwork.org.
FAN reporting and complaints line	0706594510, by call or SMS.
Sub County Children's Officer, Laisamis	Current name and mobile number are held at the FAN office and are given to staff, volunteers and partners on request. Officers are posted and transferred, so FAN keeps the office copy current rather than printing a name here.
Police gender desk	Current station, officer name and mobile number are held at the FAN office and are given to staff, volunteers and partners on request.

Where a referral requires travel to Marsabit town or another centre, the focal person records the delay and the reason, and keeps the person safe in the meantime. Distance is never a reason not to refer.

12. Community complaints and feedback

Not every complaint is a safeguarding concern. A person may think a selection was unfair, that a facilitator was rude, that a payment did not arrive, or that FAN promised something it did not deliver. Those complaints matter, and they need a route that does not depend on calling the same person who caused the problem.

- At the start of every community activity, a facilitator explains aloud how to complain, in the local language, and that complaining will not affect anyone's participation.
- Complaints can be made in person to any FAN staff member, by phone or SMS to 0706594510, by email to info@feiyahactionnetwork.org, through a community representative, or by placing a note in the complaints box at the FAN office.
- A complaint may be made anonymously. An anonymous complaint is still recorded and still acted on, as far as it can be without knowing the source.
- Complaints are logged in a complaints register, acknowledged within five working days, and answered within twenty working days.
- A complaint that turns out to be a safeguarding concern is moved immediately to the process in section 10, and the person is told that has happened.
- A summary of complaints received and how they were resolved goes to the board quarterly.
- No one is excluded from a FAN activity, or treated differently, because they complained.

13. Data, images and consent

FAN's full obligations on personal data are set out in the FAN Data Protection Policy. This section covers what applies directly to safeguarding work.

13.1 Consent

- Informed consent is obtained before any photograph, film, recording, case story or quotation is taken or used.
- For anyone under 18, consent is obtained from a parent or guardian and assent from the child. A child who does not want to be photographed is not photographed, whatever the parent says.
- Consent is explained orally in the person's own language. A thumbprint is accepted where a person does not write, witnessed by someone who is not a FAN facilitator.
- Consent states what the image will be used for, where it may appear, and that it may appear online and cannot then be fully withdrawn from circulation.
- Consent can be withdrawn at any time for future use, and FAN removes the image from its own channels on request.

13.2 Using images and stories

- People are shown clothed, in a dignified way, and are not posed to look helpless or distressed.
- No image or caption identifies a child's full name together with their location or school.
- No image or story identifies a person as having undergone FGM, as having been married as a child, as having been beaded, or as a survivor of any form of abuse, even with consent.
- Case stories use a changed name and say that the name has been changed.

13.3 Keeping safeguarding records safe

- Paper records are kept locked. Digital records are kept on a password protected device.
- Personal data about children is not shared over WhatsApp or personal email.
- Safeguarding records are retained for seven years, or until the child reaches the age of 25 where the concern relates to a child, whichever is later.

14. Training and awareness

- Every new staff member, volunteer and board member receives a safeguarding induction before they begin, and signs the Code of Conduct.
- All personnel receive a refresher briefing at least once a year.
- The briefing is delivered in Rendille, Samburu or Swahili where that is the language people understand best.
- Facilitators working directly with girls receive additional guidance on receiving disclosures.
- Training and briefings are delivered in house by the safeguarding focal person and the Operations and Programme Officer, in Rendille or Samburu where that is the language people understand.
- Training is recorded in a register showing who attended, when and in what language.

15. Partners and sub grantees

Where FAN sub grants to a youth group or partner, FAN satisfies itself that the partner has safeguarding arrangements appropriate to its size, includes safeguarding terms in the written agreement, and offers the partner access to FAN's briefing. FAN does not require a small youth group to hold an identical policy, but it does require the same standards of behaviour, and it requires concerns to be reported to FAN.

FAN shares anonymised safeguarding learning with the networks it belongs to. Nothing shared identifies a person, a family or a location in a way that could expose anyone.

16. Breaches

A breach of this policy or the Code of Conduct is a disciplinary matter and may amount to gross misconduct. Where a breach may also be a criminal offence, FAN reports it to the police or the Children's Officer. FAN does not handle a suspected crime as an internal matter alone, and does not settle such a matter through family or clan mediation in place of reporting.

17. Review

This policy is reviewed every two years, and sooner after any serious incident, any change in the law, or any change in FAN's programmes.

Adoption

Completed by the adopting body. The board adopted this policy at the meeting recorded below.

Field	Entry
Adopted by	The Board of Indigenous Women Leaders of Feiyah Action Network, at its emergency meeting
Date of meeting	3 November 2026
Resolution number	Min Res 6/2026
Date this version takes effect	3 November 2026
Review due	3 November 2028
Policy owner	Safeguarding focal person
Supersedes	The safeguarding policy read and updated in December 2025
Date this file was issued	4 November 2026. This file was produced after the meeting, to record the

Field	Entry
	decisions taken at it. The text was not altered in any other way.

Chairperson	Policy owner
Name: Signature: Date:	Name: Signature: Date:

Annex A: Code of Conduct

I understand that I represent Feiyah Action Network and that children and families judge FAN by how I behave. I agree that while working or volunteering with FAN, and in my contact with any person FAN works with, I will:

1. Treat every person with respect, whatever their sex, age, disability, ethnicity, clan, religion or language.
2. Follow the FAN Safeguarding and Protection Policy and report any concern to the safeguarding focal person the same day.
3. Avoid being alone and out of sight with a child who is not my own.
4. Keep my contact with participating children to programme activities, and not contact them privately.
5. Not use physical punishment, humiliating language or threats.
6. Not engage in any sexual activity with a person under 18, whatever local practice may be, and whatever I believe their age to be.
7. Not exchange money, goods, employment or assistance for sex or sexual favours with anyone.
8. Not enter into a sexual relationship with a person benefiting from FAN's assistance, and to declare any existing relationship of that kind to the Executive Director.
9. Not offer gifts, money, airtime or transport to a child outside an agreed activity.
10. Take photographs or recordings only with consent, and use them only as the consent allows.
11. Not attend an activity under the influence of alcohol or khat, and not offer either to a participant.
12. Keep what I learn about a person or family private, except where I must report it to keep someone safe.
13. Declare any relationship, by family, clan or otherwise, that could affect how I handle a case or a decision.

I understand that breaking this Code may lead to disciplinary action, the end of my engagement with FAN, and where a crime may have been committed, a report to the police.

Signed	Witnessed
Name: Role: Signature or thumbprint: Date: Language this was explained in:	Name: Role: Signature: Date:

Annex B: Activity risk assessment template

Field	Entry
Activity and date	

Field	Entry
Location and venue	
Number and ages of participants, girls and boys	
Facilitators, including at least one female facilitator speaking Rendille or Samburu	
How participants travel, and time the activity ends	
Private space available for a disclosure	
Water, shade, latrine and step free access	
Adjustments requested by any participant	
Phone coverage at the venue, and fallback contact	
How complaints will be explained to participants	
Consent arrangements for any photography	
Specific risks identified	
Action taken to reduce each risk	
Residual risk, and whether the activity proceeds	
Assessed by, date	
Approved by focal person, date	

Annex C: Register of concerns

Kept locked by the safeguarding focal person. One entry per concern. Reviewed in anonymised form at every board meeting.

Reference and date received	Reported by, and how	Summary in the words used, no names in this column	Action taken, referral made, date	Outcome and date closed

Names and identifying details are recorded on a separate sheet held with the entry reference, so the register can be reviewed without exposing identities.

Annex D: Complaints register

Reference and date	Received how, anonymous or named	Nature of complaint	Action taken and by whom	Outcome, date closed, complainant informed

Annex E: Consent forms

E1. Parent or guardian consent, English

Feiyah Action Network would like to take photographs or recordings at this activity, and may use them to describe its work to supporters, partners and funders, including on its website and social media.

- I understand what the photographs or recordings may be used for.
- I understand they may appear online, and that once online they cannot be fully withdrawn from circulation.
- I understand my child will not be named together with our location, and will not be identified as having experienced any form of harm.
- I understand I can say no, and that my child will still take part in the activity.
- I understand I can withdraw consent for future use at any time by contacting FAN.

Child's name: _____ Age: _____ Activity and date: _____

Parent or guardian name: _____ Signature or thumbprint: _____

Language this was explained in: _____ Witness, not a FAN facilitator: _____

Does the child agree? Yes / No. Asked by: _____ Date: _____

E2. Idhini ya mzazi au mlezi, Kiswahili

Feiyah Action Network inaomba kupiga picha au kurekodi katika shughuli hii, na inaweza kutumia picha hizo kueleza kazi yake kwa wafadhili, washirika na wadau, ikiwa ni pamoja na kwenye tovuti yake na mitandao ya kijamii.

- Ninaelewa matumizi yanayokusudiwa ya picha au rekodi hizi.
- Ninaelewa kwamba zinaweza kuonekana mtandaoni, na kwamba zikishawekwa mtandaoni haziwezi kuondolewa kabisa.
- Ninaelewa kwamba jina la mtoto wangu halitatajwa pamoja na mahali tunapoishi, na hatatambulishwa kama mtu aliyepitia madhara yoyote.
- Ninaelewa kwamba ninaweza kukataa, na mtoto wangu bado atashiriki katika shughuli hii.
- Ninaelewa kwamba ninaweza kuondoa idhini yangu kwa matumizi ya baadaye wakati wowote kwa kuwasiliana na FAN.

Jina la mtoto: _____ Umri: _____ Shughuli na tarehe: _____

Jina la mzazi au mlezi: _____ Sahihi au alama ya kidole: _____

Lugha iliyotumika kueleza: _____ Shahidi, asiwe mwezeshaji wa FAN: _____

Je, mtoto anakubali? Ndiyo / Hapana. Aliyeuliza: _____ Tarehe: _____

E3. Participant consent, 18 and over, English and Swahili

I agree that Feiyah Action Network may take photographs or recordings of me at this activity and use them to describe its work, including online. I understand I can refuse and still take part, and that I can withdraw consent for future use at any time.

Nakubali Feiyah Action Network kupiga picha au kunirekodi katika shughuli hii na kutumia picha hizo kuelezea kazi yake, ikiwa ni pamoja na mtandaoni. Ninaelewa ninaweza kukataa na bado nikashiriki, na ninaweza kuondoa idhini kwa matumizi ya baadaye wakati wowote.

Name or Jina: _____ Signature or thumbprint: _____ Date or Tarehe: _____