

Transforming Teaching, Education and Learning (T-TEL)

Child and Youth Safeguarding Policy

Introduction

Transforming Teaching, Education and Learning (T-TEL) is a Ghanaian-owned organization which works with government, the private sector, international and national funding partners, charitable organisations, and research institutions to support educational improvements in Ghana. T-TEL's focus includes early childhood, primary, secondary, and tertiary and technical & vocational education. In line with this, T-TEL needs a safeguarding policy that ensures that children and the youth are well protected from harm. That is the rationale for this Child and Youth Safeguarding Policy¹.

Policy Statement and Purpose

The purpose of T-TEL's Child and Youth Safeguarding Policy is to ensure that the organization has a framework that guarantees that children are protected from deliberate or unintended actions that place them at risk of abuse, sexual exploitation, injury, discrimination, and all other forms of harm. For the purposes of this Policy, 'children' also includes 'at risk adults' who are defined as all people up to the age of 18 and those still in full-time education over the age of 18 in Secondary Education Institutions, Colleges of Education, Universities, or other tertiary institutions.

In T-TEL, safeguarding means *"protecting children and young people who come into contact with our organisation, programmes and projects from all forms of harm, be it directly or indirectly"*.

T-TEL will have a zero-tolerance approach to all forms of physical, sexual, social, verbal and emotional violence and abuse, including bullying and harassment.

T-TEL's commitment to safeguarding is in line with our Gender Equality and Social Inclusion (GESI) Policy (2022) which outlines T-TEL's commitment to advancing inclusivity and equality towards achieving a truly transformed education system for development in Ghana. The policy is also in line with our Sexual Harassment Policy (2023) that seeks to enforce zero-tolerance against sexual harassment and all forms of sexual abuse.

To achieve this, T-TEL will put measures in place to ensure that children and young people who encounter the organization, programmes and projects will be well protected. This will be achieved through a system of continuous awareness creation and accountability measures with emphasis on prevention and an effective policy implementation process. This policy will be implemented alongside other T-TEL organisational documents and policies including *Human Resource Management Manual August 2022, Operations Manual – August 2022, Code of Conduct, Conflict of Interest Statement* etc.

Scope of Policy

The policy is applicable to all T-TEL staff, key advisors, (permanent and casual) volunteers, interns, national service personnel, individual contractors and consultants (including School Improvement Advisors), subscribers, board members and all other stakeholders involved in the development, implementation and management of T-TEL's programmes and activities.² This also includes partners, donors, supporters, and service providers such as researchers, journalists, photographers, videographers, film crews, translators etc. Ultimately, this policy serves as a guide to all actors to be consistent in their engagement with children, at risk adults and young people and to shape programme design and implementation in ways that prevent abuse and harm.

This policy is based on the following international child rights instruments and national laws and policies:

- International Standards for Keeping Children Safe
- Convention of the Rights of the Child
- United Nations General Assembly Resolution S-27/2

¹ Please refer to Annex for definitions of Children and Youth etc.

² It should be noted that volunteers and interns, particularly those from the Colleges of Education and Universities, may also fall under this Policy's definition of 'at risk adults' and are therefore required to be afforded the same level of protection and care as all learners in full-time education.

- Core Humanitarian Standards
- International Labour Organisation Minimum Age Convention 138 of 1973
- UN Convention on the Rights for Persons with Disabilities
- The Children’s Act, 1998 (Act 560)
- Juvenile Justice Act, 2003 (Act 653)
- Child and Family Welfare Policy (CFWP) (2015)
- Justice for Children Policy (J4CP) (2016)
- Ghana National Youth Policy (2010)
- Ghana Labour Laws

Recognising Types of Abuse

Abuse, in terms of this Policy, is defined as (please note that these definitions are not exhaustive):

1. Physical Abuse:

- a. **Physical Assault** - Inflicting physical harm such as hitting, slapping, kicking or using objects to hurt someone.
- b. **Force-Feeding or Restraining** - Forcing an individual to eat or using restraints excessively and inappropriately.
- c. **Deprivation of Food or Water** - Withholding food, water, or necessary medical care to harm or control someone.

2. Emotional or Psychological Abuse:

- a. **Verbal Abuse** - Using derogatory language, insults or threats to demean, intimidate or frighten someone.
- b. **Isolation** - Preventing social contact or intentionally excluding an individual, leading to loneliness and emotional distress.
- c. **Gaslighting** - Manipulating someone into questioning their own reality, memory, or sanity.
- d. **Bullying or Harassment** - Repeatedly targeting an individual with harmful behavior in person or online.

3. Sexual Abuse:

- a. **Non-Consensual Sexual Acts** - Forcing or coercing someone into sexual acts without their consent.
- b. **Child Sexual Abuse** - Involves any sexual activity with a minor, as minors cannot legally give informed consent.
- c. **Sexual Harassment** - Unwanted sexual advances, comments, or behavior that creates a hostile or intimidating environment.

4. Financial or Material Abuse:

- a. **Financial Exploitation** - Misusing or stealing an individual's money, property, or assets, often by someone in a position of trust.
- b. **Fraud or Scams** - Deceiving individuals into making financial transactions or investments against their best interests.
- c. **Coercion to Sign Documents** - Forcing someone to sign contracts, wills, or other legal documents without understanding the implications.
- d. **Withholding of financial support or material assistance provided through programmes and projects** - Not providing scholarships or similar assistance to individuals unless they comply with personal demands or threats.

5. Neglect:

- a. **Physical Neglect** - Failing to provide essential care, such as food, clothing, shelter, or medical attention.
- b. **Emotional Neglect** - Ignoring an individual's emotional needs, leading to feelings of abandonment or isolation.
- c. **Medical Neglect** - Withholding necessary medical treatment or medication.
- d. **Educational Neglect** - Failing to ensure that a child receives adequate education.

6. Online/Digital Abuse:

- a. **Cyberbullying** - Using digital platforms to harass, intimidate, or harm someone.
- b. **Online Grooming** - Manipulating and exploiting individuals, typically minors, through online communication for sexual or other abusive purposes.

Good Practice and Minimum Standards for Child and Youth Safeguarding

All stakeholders and staff are required to demonstrate exemplary behaviour in engaging children and at-risk adults in order to promote children's welfare and reduce the likelihood of abuse or allegations of abuse. The following guide must be adhered to at all times:

- a. Work in an open environment (e.g., avoid private or unobserved situations and encourage open communication with no secrets).
- b. Treat all children and at-risk adults with respect and dignity.
- c. Prioritise the interests and welfare of every child and at-risk adult.
- d. Maintain a safe and appropriate distance with children (e.g., it is not appropriate to have an intimate relationship with a child).
- e. Secure parental/guardian consent to act in loco parentis, if the need arises, before engaging a child in the production or reproduction of videos, photographs, audios etc.
- f. Ensure everyone associated with the delivery of programmes, projects and activities of T-TEL adhere to behaviour standards that promote the rights and welfare of children. Including adhering to provisions outlined in the Constitution of Ghana and the Children's Act 1998 (Act 560) when working with or in contact with children.
- g. Ensure that all staff, consultants, and contractors who work at T-TEL are equipped with safeguarding knowledge and skills to keep children and youth safe through the provision of appropriate training on issues of domestic violence, forced marriage, female genital mutilation, child sexual exploitation, cyber abuse, child trafficking, and extremism of all forms.
- h. All staff, consultants and contractors of T-TEL must annually sign a Safeguarding Declaration Form and a Self-Declaration and Disclosure Form on History of Abuse of Children and the Youth.
- i. Setup a child-friendly reporting procedure for responding to concerns, suspicions or allegations of child abuse, and breaches of the T-TEL Child and Youth Safeguarding Policy.
- j. Ensure that this Policy is clearly communicated and adhered to by all stakeholders involved in the delivery of services and support.
- k. In cases of collection, storage and use of children's stories, interviews, photos, videos and images, T-TEL must ensure ethical procedures, protocols and processes are established and followed.

Examples of Professional Boundaries

- The staff, key advisors and consultants of T-TEL will demonstrate appropriate professional boundaries when working with learners and dealing with safeguarding concerns.
- All staff, key advisors and consultants should remain professional at all times and remember they represent T-TEL as a professional and all-inclusive organisation.
- Staff, key advisors and consultants should never contact learners or service users on social media, except where being done in a professional capacity.
- Staff, key advisors and consultants should never provide any personal details to young people or service users. All correspondence should be professional and go through professional channels only.
- Staff, key advisors and consultants should never meet learners or service users outside of working environment, unless explicitly directed to do so by their line manager or the organisation. In these circumstances there must be a reasonable justification to do so and will need to be an identified public safe space.
- Staff, key advisors and consultants must not require young people they work with or who encounter the organization or projects render personal service to them, such as taking up domestic chores, marketing, or babysitting.

Safeguarding Measures

Prevention

T-TEL is committed to ensuring a rigorous staff recruitment process to prevent the recruitment of a person who poses a known risk. This includes:

- A person who has been convicted of or has received a formal police caution concerning an offence against children or vulnerable adults.
- A person who has been convicted of or has received a formal police caution concerning sexual offences against any individual.
- A person who is a repeat offender, including offences concerning sexual offences against children and vulnerable adults.
- A person who has been flagged to the organisation as a safeguarding concern by a former employer or a creditable whistle-blower.

T-TEL is committed to ensuring that all staff and representatives are appointed and supervised in accordance with the organization's HR and other relevant policies. This includes:

- Adding questions about safeguarding in job interviews.
- Having a written job description for the post that includes a commitment to safeguarding.
- Ensuring all new staff complete a self-declaration disclosure.
- Obtaining references including one from a most recent employer.
- Verifying qualifications where relevant.
- Sharing the safeguarding policy including the code of conduct with all new staff.
- Ensuring that new staff sign the code of conduct, and a signed copy is safely stored for future reference.

Awareness and Capacity Building

T-TEL is committed to providing induction and training to all staff, board members, volunteers, contractors, consultants (including Key Advisors and School Improvement Advisors), partners and stakeholders to raise awareness of safeguarding. T-TEL recognises the importance of building the capacity of all those working in or for the organisation, and an understanding of safeguarding commitments. For the Safeguarding Policy to be effective it is important that everyone is aware of the process for raising a concern or a complaint. Whistleblowing or the process of escalating concerns is a key element of operationalising the policy. In order to do this, T-TEL will:

- Disseminate relevant policies, including the Safeguarding Policy and Code of Conduct, to all staff, partners and other associates. Policies will be shared in hard copy and via email. It will also be discussed in relevant meetings with staff and partners.
- Build safeguarding awareness and whistleblowing into all new staff and consultant inductions.
- Conduct regular internal team training and monitoring on safeguarding.
- Include information about safeguarding and reporting mechanisms in agreements, contracts and Memorandum of Understanding (MoUs).
- Collaborate with relevant institutions to promote a culture of safeguarding across the education sector.

T-TEL expects its partners to instil a culture of safeguarding in their own organisations. Where necessary, T-TEL will support partner organisations to develop their own safeguarding capacity and ensure that their policies and practices are aligned.

Reporting

T-TEL is committed to responding effectively, sensitively and swiftly to *all* allegations and suspicions of breaches of this Safeguarding Policy. Actual potential or suspected incidents should be reported immediately. T-TEL places a mandatory obligation and responsibility on all staff, volunteers, consultants, or contractors to

report concerns, allegations and incidents in a confidential manner and with the appropriate people. Under no circumstances should any individual attempt to deal with the problem directly. Failure to report safeguarding concerns is grounds for disciplinary procedures. T-TEL will respond to allegations and suspicions of violence and harassment in accordance with relevant national instruments and laws.

The following channels have been set up so that safeguarding concerns and breaches can be channelled through a clear, accessible and confidential reporting process. A list of contact details for all safeguarding focal persons, and all those who have access to safeguarding concerns, will be kept and updated regularly.

– **Reporting via email:**

Dedicated Safeguarding email address monitored and overseen confidentially by the General Manager, Commercial and HR:

Email: safeguarding@t-tel.org

The safeguarding email account is only accessible to the safeguarding focal person who has been trained on the requirement to keep information confidential.

– **Reporting in person** - To the Safeguarding focal person (General Manager, Commercial and HR):

Allegations concerning T-TEL staff, board members, volunteers, consultants, contractors or partners will be investigated by the organisation through the HR function. Investigations may also be referred to relevant local or national law enforcement institutions, in addition to relevant national commissions, such as the Commission on Human Rights and Administrative Justice where need be.

Confidentiality must be maintained at all stages when dealing with a safeguarding concern. Information given should be written in a report as soon as possible after the concern is raised (within 24 hours if possible). All information relating to a report or a concern and subsequent case management should be shared on a need to know basis only, and all related information securely stored (in a secure, locked location or a confidential electronic folder).

Responsibilities and Accountability

T-TEL is deliberate in creating a safe environment for everyone. It is therefore mandatory for everyone working with T-TEL to act on concerns or disclosures relating to child abuse.

T-TEL's **Operations Director and General Manager – Commercial and HR**, are accountable for this policy and its implementation. They are responsible for increasing awareness and ensuring that the capacity of the various teams is well strengthened. They are also responsible for setting systems in place to respond to child/youth safeguarding and related issues. Both personnel account to the Executive Director of T-TEL and can demand support from the Gender Equality and Social Inclusion Team.

Safeguarding Officer

T-TEL's Safeguarding Officers (Operations Director and General Manager- Commercial and HR) are tasked with receiving and handling any reports or issues related to children and youth. They are specifically responsible for the following:

1. Receiving and recording reports or issues/allegations concerning children and youth.
2. Conducting investigations into reported allegations
3. Advising management on preventive and response strategies on issues related to children and youth.
4. Conducting safeguarding training for staff
5. Working with T-TEL management to ensure the full implementation of the policy

T-TEL's Safeguarding Officers will receive specific training on child, at-risk adult and youth safeguarding and should demonstrate a good understanding of how to relate with children, at-risk adults, and youth.

Risk Assessments

T-TEL will undertake risk assessments for all activities and programs involving children and youth, both directly and indirectly. The purpose of the assessment is to identify any potential risks that may result from the program or activity, and to come up with measures to mitigate such risks. Risk assessments are to be undertaken at the program design stages. When activities, projects, and programs are completed, reports should capture any risks that emerged, and measures adopted to address them. The Safeguarding Officer shall provide support to project teams in conducting risk assessments.

Safeguarding Training

Safeguarding training shall be organized for all staff and consultants of T-TEL at least once every year. This includes training on creating and maintaining a safe working space for all, the prevention of abuse and harassment towards all especially children and youth, as well as procedures for reporting and addressing allegations if they arise. This training is mandatory for all staff. All new staff are to receive separate training prior to commencing work. T-TEL's Youth Safeguarding Officers are responsible for planning and conducting these trainings with the support of management.

Reporting Procedures

All concerns, reports or allegations involving youth and children shall be reported to T-TEL's Safeguarding Officer either in writing or orally. The Youth Safeguarding Officers shall reduce all oral reports into writing for purposes of records keeping and investigation. A form for anonymous reporting will be made available online and in hardcopy in order to facilitate whistle blowing and anonymous reporting. A specific deposit box shall be set aside where anonymous forms can be placed.

External stakeholders can also report concerns directly to the Safeguarding Officers or through the anonymous reporting procedure. All who work with T-TEL or come into contact with the organization are to be notified of these reporting procedures.

Response Mechanisms

All incidents/allegations concerning children shall be thoroughly investigated. This includes reports made by external stakeholders. The investigation shall be conducted by the Safeguarding Officers. When the investigation is concluded, the Safeguarding Officers shall present the investigative report to management for consideration and sanctions.

Breaches of the Child and Youth Safeguarding Policy

Given that T-TEL is dedicated to ensuring that children and young adults who come into contact with the organization are truly protected, T-TEL will ensure a full enforcement of this policy and all other related laws on child rights in Ghana. Breaches of this Policy will therefore not be tolerated and will result in disciplinary procedures, including suspension and termination. Similarly, retaliatory actions, intimidation, false witnessing, and false accusations shall be treated with zero tolerance.

1. **Disciplinary Actions:** These can range from warnings and retraining to suspension, termination of employment, or volunteer status. The severity of the action depends on the seriousness of the breach and can be clearly detailed in the policy.
2. **Legal Action:** In cases of serious breaches or criminal behavior, the policy may indicate that legal action will be pursued, which could lead to civil or criminal charges.
3. **Restrictions or Bans:** Individuals found in violation of the safeguarding policy might be restricted from certain activities or interactions within the organization. For example, they might be prohibited from working with vulnerable individuals or participating in certain programs or events.
4. **Loss of Privileges:** This could involve loss of certain rights or privileges within the organization, such as access to specific areas, responsibilities, or participation in certain activities.

Governance and Oversight

Position	Responsibility
GESI Team	- Advise management on policy implementation and review. - Recommends actions on safeguarding concerns to management.
Operations Director and HR Manager	- Oversight for staff induction on safeguarding policy and code of conduct. - Ensures staff have signed the code of conduct and uphold it. - Ensures associates of T-TEL have endorsed the policy and code of conduct. - Ensures staff have undergone induction on safeguarding policy and code of conduct. - Ensures staff have signed code of conduct (annually) and uphold it. - Reviews safeguarding register regularly and supervises implementation of mitigation strategies. - Files reports on safeguarding register to the board, donors and statutory agencies.
Safeguarding Focal Person (General Manager- Commercial and HR)	- Ensures that clear investigation and disciplinary procedures are used when allegations and complaints are made. - Receives all complaints/allegations on safeguarding and leads on case management. - Records cases and is responsible for updating and managing the safeguarding register. - Reports on a quarterly basis to the management - Communicates to the programme team around safeguarding concerns. - Monitors and reports on a quarterly basis to the management. - Initiates swift action in collaboration with relevant stakeholders/actors regarding safeguarding concerns
All staff, board members, volunteers, interns, consultants, contractors etc	- Read the safeguarding policy and the code of conduct. - Sign the code of conduct. - Escalate concerns immediately as per this policy (including concerns about their own staff/colleagues).
Partners	- Read the safeguarding policy and the code of conduct. - Sign the code of conduct. - Provide assurance to develop and implement safeguarding policies. - Develop, implement and monitor their safeguarding policies. - Uphold the safeguarding values. - Endorse policy and code of conduct. - Keep partners and donors informed of any safeguarding issues related to partnership.

Implementation and Monitoring

- Annual re-signing of the code of conduct by staff/stakeholders
- Review of organizational assessment tools to reflect safeguarding e.g., GESI scans
- Annual review of relevant policies
- Annual training for staff on safeguarding
- Monitor partners' implementation of their safeguarding policies and code of conduct

Declaration and Consent

I have read carefully and understand the T-TEL Child and Youth Safeguarding Policy. I hereby agree to abide by its requirements and commit to upholding the standards required. I undertake to discharge my duties and to regulate my conduct in accordance with the requirements of the policy.

Name: _____

Role: _____

Signature: _____

Date: _____

ANNEX 1

DEFINITIONS

Children:	All children under 18 years of age as defined by UN Convention on the Rights of the Child are protected by this policy.
Youth and Young Adults:	According to Ghana's national youth policy (2010), youth is defined as those between 15-35 years. Often referred to a person between the ages of leaving compulsory education and finding their first job.
Child Abuse:	Defined by the World Health Organisation (WHO) as: 'all forms of physical and/or emotional ill-treatment, sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the child's health, survival, development or dignity in the context of a relationship of responsibility, trust or power.'
Child Protection:	The prevention of and response to significant harm, abuse, neglect, exploitation, and violence against children. Child Protection programming is an activity or initiative designed to protect children from all forms of violence. This includes the integration of child protection into all thematic areas of programming to enhance the protective environments for children in the community.
Child Abuse:	Child abuse involves the abuse of children's rights and includes all forms of violence against children: physical, emotional, and sexual abuse, neglect, family violence, sexual exploitation, abduction, and trafficking, including for sexual purposes, involvement of a child in online child sexual exploitation and child labour as defined below.
Child Marriage:	A formal marriage or informal union before age 18, is a reality for both boys and girls, although girls are disproportionately the most affected. Child marriage is widespread and can lead to a lifetime of disadvantage and deprivation.