



Safeguarding Policy

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Presented by

18twenty8[®]



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1. INTRODUCTION

Established in May 2009, 18twenty8° is an award-winning, women-led, non-profit organisation that empowers young women, between the ages of 18 and 28, by developing strategies for their higher educational and personal development. Our vision is a South African in which girls are educated and empowered to lead.

Our approach is empathetic, skills-enhancing and relevant to the young women we serve since we have experienced some of our beneficiaries' challenges first-hand.

This policy document sets out our approach on the safeguarding of our beneficiaries and volunteers. In our mission to develop the next generation of female leaders in South Africa, our commitment to their safety and security is paramount. This document includes our principles and practical guidance for all our staff, volunteers and stakeholders to adhere to in the case where a girl or young woman's safety is at risk.

1.1 APPROACH, PRINCIPLES, OBJECTIVES

18twenty8° needs a safeguarding policy in order to protect the data, identity, person and integrity of the young girls and women we serve, and ensure we always provide a safe, supportive and empowering environment in which they thrive.

In drafting this policy, we have sought guidance from our funding partners, notably the Global Fund for Children, and referred to various policies and templates from other South African and global organisations working with girls and young women.

Firstly, the strategies in this policy document propose **an approach** that will:

- i) Increase girls' awareness regarding safety issues
- ii) Increase key stakeholders' knowledge of roles and responsibilities in protecting and promoting girls
- iii) Ensure robust safety strategies are adopted within programmes.

This means that this policy will be lived in our daily work through adhering to the following **principles**:



1. The best interests of the girl are at the centre of all decisions
2. Girls shall be asked what makes them feel safe/unsafe
3. Safety strategies shall be implemented to reduce risks for girls
4. Safety strategies shall enable girls to participate in programmes and activities in order to reach their full potential
5. Everyone working with girls shall become skilled and confident in designing and implementing girl-safe programmes and activities
6. Learning shall take place throughout the programme to enable adjustments to be made at any point
7. Efforts to keep girls safe shall involve the wider community to create an enabling environment and contribute to girls' long-term safety
8. A multi-sectoral approach shall be adopted so that all services within a programme are safe for girls

To abide by these principles, we have outlined the following **objectives**:

- i) root out bullying, harassment and ensure that no abuse of power is tolerated through addressing the gender, race and other inequalities that drive these behaviours
- ii) ensure all the people we serve, our staff and partner organisations are aware of their safeguarding rights and obligations through mandatory and regular training and a code of conduct that is championed by senior management and linked to performance management
- iii) take swift action in response to any safeguarding breaches
- iv) work with communities, staff and beneficiaries to build systems that are well understood and give people the confidence to come forward and report concerns
- v) take all necessary action to prevent perpetrators from entering our organisation, ensuring that all staff members are subject to appropriate background checks that are regularly refreshed
- vi) cooperate with partner organisations to root out perpetrators of abuse from the sector, implementing a new referencing approach that allows us to share information and concerns
- vii) develop systems and approaches that effectively detect abuse and exploitation, so we do not wait for a beneficiary, vulnerable person or a member of our own staff to report infractions



- viii) ensure that all cases involving beneficiaries, and any alleged crimes, are reported to the appropriate authorities, where this will not expose them to further harm
- ix) ensure dedicated follow-up on all complaints or concerns even if a person under investigation leaves our organisation. While we may not always have the in-house skills to investigate some cases appropriately and safely, we will ensure that sector-wide referral mechanisms, which deliver a collective survivor-centred response, are in place
- x) ensure this policy is owned by our Board of Directors and senior management by guaranteeing: direct access to our leadership; that behaviours and zero tolerance are modelled from the top-down; and that leaders are held accountable to strong performance on safeguarding
- xi) The Board of Directors will also report any concerns directly, and in a timely manner, to donors and regulators, and publish our reporting data, so that survivors and communities are confident that their concerns will be taken seriously and so that perpetrators know that there will be consequences for their actions.

2. SITUATION ASSESSMENT

2.1 RISKS TO GIRLS' AND WOMEN'S SAFETY

Before setting out our safeguarding policy and practical steps, we need to establish the risks to safety which our beneficiaries and volunteers may face. These include:

Institutional/Social attitudes such as:

- Discrimination against girls and favouring of sons
- Gender bias on what is appropriate for girls to engage in e.g. type of work, schooling, extra-curricular activities
- Harmful practices for girls e.g. early marriage, dowry, Female Genital Mutilation (FGM) and being prepared to challenge these practices
- Restrictions on girls' mobility and participation in family and community life
- Managing distressing discussions/situations



Formal Institutions (with legal responsibilities)

- Lack of, or discriminatory, legislation or effective implementation of structures that protect girls e.g. no national child protection system, lack of birth registration
- Poor or harmful service provision e.g. abuse in schools, poor health provision, limited information on sexual reproductive health, unsympathetic police services and judiciary, lack of access to financial and vocational services

Physical Environment

- Fragile physical environment e.g. prone to environmental disasters that lead to migration, displacement or risky exchange practices for food or goods
- Inequities in economic development e.g. where investments are made in construction or infrastructure that lead to risky exchange practices amongst the poor for goods and services
- Girls living without parental care e.g. girls who are at an age where they should still have parental care but have lost one or both parental care givers
- Risk of teenage pregnancy and peer pressure to be sexually active at a very young age.
- Risk of contracting sexually-transmitted diseases
- Risk of sexual or gender-based violence (domestic violence/psychological violence)

The above risks will be regularly updated as we continuously consult the girls and young women we work with, to understand the ongoing and contemporary risks they face.

2.2 SAFETY FRAMEWORK FOR SITUATION ASSESSMENT

National considerations

South African unemployment is disproportionately young and female which leaves young women socio-economically compromised and more susceptible to exploitation of all kinds. Another consequence of female youth unemployment is susceptibility to depression and social ills including promiscuity, transactional sexual relationships, alcohol and drug addiction.

For years South African women – under the social and even legal control of their fathers or husbands – were second-class citizens and it was not until the introduction of the Bill of Rights that all women received formal recognition as equal citizens. In spite of this Bill, the dignity and bodily integrity of women are constantly undermined by violence, prejudice and persecution.



Despite women being the majority in South Africa, gender representivity is still below the 50% mark. The lack of participation in, and outright exclusion of, women from leadership, economic opportunities and positions of influence reinforce gender inequality. At a macro level, this results in women being less able to contribute to socio-political and economic reform and, at micro level, from investing in their own health, education and safety and from making these investments in their children.

WHO IS OUR SAFETY FRAMEWORK FOR?

High school girls in grade 11 and 12 through the life-skills workshops that we conduct for them at high schools in disadvantaged communities; young, undergraduate women in our financial assistance and leadership programmes; early and mid-career female professionals who mentor beneficiaries through our Big Sister Network as well as volunteers.

Indirect beneficiaries are individuals with whom our beneficiaries interact and influence. Indirect beneficiaries include, but are not limited to:

- Families and relations of our beneficiaries: biological, extended; neighbours, community leaders; friends and peers
- Employers; Service providers e.g. teachers/ health workers/outreach workers
- Girls from displaced families and/or with few physical or economic assets
- Girls from discriminated or marginalised families or groups
- Girls who are mothers
- Out of school girls
- Our stakeholders; partners, funders, volunteers, the media

WHAT DOES OUR SAFETY FRAMEWORK ADDRESS?

- The key issues that impact girls' safety include exposure to outsiders, risk of GBV, sexual assault or abuse and peer pressure
- Girls discriminated against due to traditional beliefs - discriminatory family codes favour sons with asset endowments and opportunities and disadvantage daughters, opening up new economic opportunities for adolescent girls threatens traditional power relations which can lead to violent behaviour.



- Identify the key laws and policies that can be used to protect girls: Bill of Rights; Violence Against Women Reauthorization Act of 2013; The Family Violence Prevention and Services Act (FVPSA); Protection from Harassment Bill, The Choice on Termination of Pregnancy Act of 1996; The Domestic Violence Act of 1998; [The Promotion of Equality and Prevention of Unfair Discrimination Act of 2000](#)
- Sexual exploitation of girls in schools (and getting there/back) – as above and significant adverse impact on girls' lives
- Migration – can often lead to trafficking
- Poor families offer girls to those benefiting from economic development initiatives for exploitation
- High rates of harm in families and communities – compromise school attendance, compromise girls' mobility in communities at different times of the day and may lead to their engaging in risky practices
- Identify existing child protection systems and mechanisms (and their effectiveness) at national, local and community level. Such policies include the Children Protection and Children's Act, The Criminal Law (Sexual Offences and Related Matters) Amendment Act and the Child Justice Act, which have been developed through constructive engagement with a diverse range of civil society stakeholders and organisations such as Child Care & Protection Forum, Children's Bill Working Group, and Child Justice Alliance
- Identify forms of existing healthcare and protections for girls and women in South Africa: National media campaigns promoting awareness of HIV/AIDS among youth, e.g. Soul City, Soul Buddyz and LoveLife programme, peer education programmes, youth SRH service provision programmes like the National Adolescent Friendly Clinic Initiative (NAFCI) launched in 2001 and the roll-out of youth mobile clinics for the National Health Insurance

HOW DOES OUR SAFETY FRAMEWORK ACHIEVE ITS OBJECTIVES?

- Assess family and community means of protecting girls and providing girls with support through, for instance, parent-teacher groups or community justice groups
- Physical harm to children dealt with by community leaders, tendency to discuss abuse with perpetrator but no formal action taken
- Sexual abuse reported to the police but cases usually dropped if influential people within the community intervene



WHEN DOES OUR SAFETY FRAMEWORK TAKE EFFECT?

- We have identified the times of the year when girls are safe and unsafe e.g. Girls have disproportionately high household responsibilities in comparison to boys. The former have daily difficulties in completing household chores and school homework. Being alone with younger siblings or elderly relatives after school, raises risks to girls’ security.
- We have identified appropriate after-school sessions and holiday breaks for girls’ engagement in our programmes

WHERE IS OUR SAFETY FRAMEWORK APPLICABLE?

We have identified where girls and young women travel to and from in communities e.g. school, university, home. Most of our beneficiaries live a considerable distance from public transport routes and walk in unlit areas, with overgrown vegetation, or take short cuts through deserted fields very early in the morning or late in the evenings. This makes girls and young women more susceptible to crimes like rape, armed robbery, physical assault and murder.

To help identify the specifics of our Safety Framework, we will conduct a workshop using the following tools, the **Safety chart** below and the **Understanding Harm** exercise detailed in the addendum to this policy.

2.3 SAFETY CHART

Place		Date		
	People	Safety	Harm	Specific Risks
Focus Group	With whom I have contact or a relationship at this place	<ul style="list-style-type: none"> • Never feel safe • Sometimes feel safe • Always feel safe 	<ul style="list-style-type: none"> • Psychological • Physical • Sexual • Other 	



Life skills workshops	Teacher, friends,	Sometimes feel safe	<ul style="list-style-type: none"> • Psychological • Physical • Sexual 	Life skills workshop finishes late. Walking home is frightening, groups of men loiter the route
On the street	Boyfriend, other boys and men on the street	Never feel safe		Regularly heckled and beaten by boys and men within my family and the community

**Adapted from Girl Hub and Women's Refugee Commission Preventing Gender-Based Violence, Building Livelihoods (2011), Safety Mapping Tool.*



3 CODE OF CONDUCT

This code of conduct shall be adhered to by all staff, volunteers and anyone operating or interacting with our programmes. It is simple and universal, regardless of identity.

3.1 Code of Conduct for girls/women and for staff/volunteers

GIRLS ARE EXPECTED TO:

- Follow this code of conduct
- Respect each other's differences
- Cooperate with each other
- Listen to each other
- Report any worries or concerns
- Behave towards each other with good manners
- Be friendly
- Be helpful
- Be active participants in our programmes and complete all assigned tasks, whether individually or in teams

GIRLS SHALL NOT:

- Tease, ridicule or insult one another
- Bully one another
- Stare at others
- Shout at others
- Be abusive

STAFF/VOLUNTEERS:

- Follow the above **WHO, WHAT, WHEN** and **WHERE** safety framework ahead of programme/events with beneficiaries to assess risks and prepare to combat them



- Ensure there is a safe and secure space and environment for the girls to confide about their experiences and concerns
- Make sure girls are aware that they can approach you to talk, privately, about any risks they may be facing
- If one of the beneficiaries makes a disclosure to you about being at risk, immediately follow the Disclosure Procedure detailed below

3.2 DISCLOSURE PROCEDURE: STEP-BY-STEP

1. **Receive:** Listen and accept what is being said without judgment, shock, disbelief or denial. If you show any of these emotions, the young girl or woman may be afraid, or disinclined, to continue. Take it seriously.
2. **Reassure:** Reassure the girl or young woman, but be honest and reliable. Don't make promises that you can't be sure to keep, such as "everything will be all right now". Reassure the girl or woman that they have done nothing wrong and that you take what is said seriously. Don't promise confidentiality – never agree to keep secrets. You have a duty to report your concerns. Tell the girl or young woman that you will need to tell only those whose job it is to protect them. Acknowledge how difficult it must have been to talk because it takes a lot for a girl or young woman to come forward about any circumstances where her safety was compromised.
3. **React:** Listen quietly, carefully and patiently. Do not assume anything – don't speculate or jump to conclusions. Do not investigate, interrogate or decide if the girl or young woman is telling the truth. Remember that an allegation of abuse may lead to a criminal investigation, so do not do anything that may jeopardise a police investigation. Let the girl or young woman explain to you, in her own words and preferred language, what happened. Have an interpreter present, if need be. Don't ask leading questions, such as "Is there anything else that you want to tell me?"

Communicate with them in a way that is appropriate to their age, understanding and preference. This is especially important for those with disabilities or for whom may be speaking another language than English. Do not ask the girl or woman to repeat what they have told you to another member of staff.



Explain what you have to do next and whom you have to talk to. Refer directly to the named child protection officer or designated person within 18twenty8°. Do not discuss the case with anyone outside of the 18twenty8° beneficiary protection team.

4. **Record:** Make brief notes at the time and write them up in detail as soon as possible. Do not destroy your original notes in case they are required by authorities. Record the date, time, place, words used by the beneficiary and how she appeared to you – be specific.

Record the actual words used; including swear words or slang. Record statements and observable things, not your interpretations or assumptions – keep it factual.

3.3 SAFE PROGRAMME DESIGN

- **Risk assessment for programmes and activities** – helps key stakeholders to understand the risks to girls' safety and how significant they are
- **Assign roles and responsibilities for Girl Safety** – key stakeholders' role must be clarified at the outset
- **Design girl safe programmes** – and, where possible, use them to create safer environments for girls
- **Flexible funding** – requires funders to ensure safety has been included in programme design and that programmes are piloted before going to scale where appropriate.

Having analysed the context for girls, identified the potential risks in our current programmes, and considered the appropriate roles and responsibilities for girls in our Girl Safety Exercise, we will audit our programmes, to ensure they both achieve our organisation's overall objectives and keep our girls safe. This requires four areas of activity:

- i) **Policy** – turning this document into an active tool that
- ii) **People** – Sharing the policy with all staff, volunteers and stakeholders and workshoping the exercises and issues to make sure they understand the risks we need to identify and how to implement our code of conduct and safeguarding mechanisms. This will involve simulations of potentially risky situations.



- iii) **Procedures** – testing and tightening our safeguarding procedures. For example, making sure our risk assessment is carried out effectively before starting any of our programme activities, and ensuring beneficiaries are aware of the safety mechanisms in place.
- iv) **Accountability** – Implementing an accountability mechanism, meaning ensuring there is a responsible person or group for assessing our safeguarding of each programme and partnership and reporting back to the Board of Directors and funding partners. This could either be a staff or volunteer member trained in safeguarding issues or an external partner

4 CONCLUSION, NEXT STEPS AND TIMELINE

This policy document provides our approach, principles and objectives to safeguarding effectively for our beneficiaries.

It has made a preliminary assessment of the risks faced by our beneficiaries and outlined tools so that we can gain improved understanding of these risks and potential harms, by addressing the issues with our beneficiaries and relevant partners.

It has identified a code of conduct that is simple and adaptable to different contexts, as well as a step-by-step disclosure guide for staff and volunteers.

It has set out the ways that we can make sure our programmes are designed safely, with the protection of our beneficiaries foremost in our minds. This is a working document both so that it can be used and shaped by our stakeholders and because we need to workshop it with partners before a final document can be put in place.

4.1 NEXT STEPS AND TIMEFRAMES

The next steps are to validate this document with our staff, volunteers, beneficiaries and partners, using the tools outlined herein. Thereafter we will update the document accordingly.



This will be carried out over the next six months to allow us to test it with all partners and in all our scheduled programmes at the start of our financial year in March. An updated version of the document will be available at our mid-year review in September 2019.

Approved and signed on 22 February 2019 by the members of the Board of Directors.

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Natasha Dyer

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Refiloe Seseane



Addendum to Safeguarding Policy

V1.022019

Suggested exercises to foster understanding of Girl Safety

Presented by

18twenty8[®]



1. EXERCISES WITH BENEFICIARIES

1.1 ASSESSING ROLES AND RESPONSIBILITIES FOR GIRLS SAFETY

One of the best ways to ensure that the safeguarding systems in our programme work in the best interests of beneficiaries, and to help them see their roles in safeguarding, is to play a game that helps them understand why we need these systems. The exercise below will help us achieve this.

Aim

To highlight the different roles and responsibilities for Girl Safety

Objectives

- To create an understanding of Girl Safety and who is responsible.

Materials

- Balloons, pieces of material or stickers
- Paper and pens
- Post-it notes (if necessary)

Time

- 45 minutes

Process

- Divide participants into four groups, two larger groups with the same number of people (they will be groups 1 and 2), and two smaller groups (groups 3 and 4). Number each group 1, 2, 3 or 4. Tell them you are going to play a game
- **Group 1:** Give this group a balloon each and ask them to tie them tightly to their ankles. Tell them nothing else



(If using pieces of material or stickers instead of balloons, give these to Group 3 and ask Group 1 to wait with no information until game starts)

- **Group 2:** Tell the second group of participants that when the game starts they must each stand by one person in Group 1 and protect that person. They must not talk at all
 - **Group 3:** Tell this group that their task is to: Pop all the balloons as quickly as possible by stamping on them – they can plan how to do this together if they want to Tie pieces of material to the wrists or put stickers onto the arms of those in Group 1
 - **Group 4:** Ask this group to stand and watch
 - Do not inform Group 1 or 2 or 4 what the aim of the game is – Only Group 3 should know. The Game (5 minutes)
 - Ask the group to be silent
 - Ask each person from Group 2 to stand next to one person from Group 1
 - Shout: 'Start the game!'
 - Allow one or two minutes for the game – usually enough time to pop the balloons, tie the material or stick the stickers. 45 Debrief (15 minutes) Bring the participants back together and ask them to sit in a circle
 - Ask Group 1: How did you feel during the game?
Typical comments include: didn't know what was going on, frightened, attacked, frustrated
 - Ask Group 2: How did you feel during the game?
Typical comments include: Frustrated because I didn't know what the game was, didn't have time to prepare, couldn't protect the person well because the attackers seemed to have a plan, thought I could protect at the beginning then had no chance
 - Ask Group 3: How did you feel?
Typical comments include: Great, easy to pop the balloons, tie material or stick stickers – they were in more control and the other groups were not prepared
 - Ask Group 4: How did you feel?
Typical comments include: Wanted to do something but didn't know what when we were only allowed to watch.
- Explain to all participants the objective of the game:
Group 3 had to try and burst the balloons, tie the material or stick the stickers
- Repeat the game again with the same groups but this time let each group discuss beforehand how they want to play the game
 - Group 3 should do the same as before
 - Group 2 should assign specific roles to one another – parent, staff of organisation, local police, teacher, community elder. Group 2 can discuss tactics for protecting Group 1
 - Group 2 should write their role on a piece of paper and pin to their clothing so that all can see whether they are police, teacher, parent etc
 - Group 1 discuss tactics for protecting themselves and each other



- Group 4 to observe once more but can suggest actions to Group 1 and 2 during the game to increase protection
- Finally lead a discussion on what this exercise has demonstrated on the required roles and responsibilities for Girl Safety in the group with whom you are working
- Who are the key stakeholders
- What safety mechanisms exist already with the key stakeholders
- What further actions should they be taking
- Record outcomes in column 3 Key Stakeholders for Girl Safety and column 4 Existing Safety Mechanisms

1.2. UNDERSTANDING HARM EXERCISE – ‘STOP’ ‘GO’

Aim

To create awareness of the different forms of harm so that participants are able to discuss the situation of Girl Safety in their own context and design appropriate safe programmes.

Objectives

- To determine and agree the different types of harm
- To exchange perspectives on harm
- To understand what type of harm is common and in what context

Materials

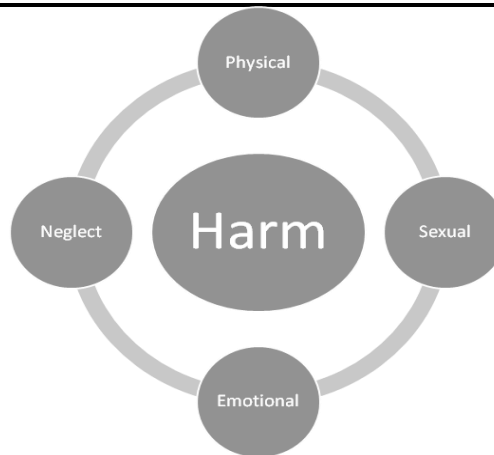
- Traffic light cards – cards with a red or green tick on them – one of each colour for each girl/community member
- Flipchart paper and markers

Time

- 55 minutes

Process

- Explain to the group that we are having these discussions so they can help to design programme interventions that are safe for girls. This means first understanding what is meant by harm
- Draw the following chart onto paper



- Write the following six scenarios onto separate pieces of paper. Ensure they are relevant for the group of girls or community members or adapt them if they are not.
1. A girl has not been attending school regularly. One of her friends asked her why and she replied that she feels the teacher is picking on her by telling her that she is not doing well in front of the class
 2. A girl has been growing vegetables and selling them from her home. She has been saving money by giving the savings to her father. Her father gives her some of the savings if he thinks it's for a good purpose.
 3. A girl in the group is worried about another girl who lives next door. The girl rarely comes to school and is alone with different men during the day whilst her mother is at work.
 4. One of the girls in the group lives with her grandmother who is sick and five brothers and sisters. She works during the day to provide income for the family as the grandmother and siblings are all surviving on a government grant. She would like to return to school.
 5. A girl in the community has been staying out late with her friends. Her older siblings have told her not to. One day she appears with a black eye. She says her older siblings disciplined her because she ignored their requests not to go out late.
- Ask the girls/community members to put their hands up if they know what harm is. Ask them to say in turn what they think it is. Record their ideas (10 minutes)
 - Explain each of the four elements in the diagram above to the girls/community members (5 minutes)
 - Divide the group into smaller groups
 - Give each girl/community member one red card and one green card and one of the six scenarios above



- Ask the girls/community members in their smaller groups to decide whether their given scenario could be harm and why they think this. Ask them to be ready to present their scenario and their decision to the others in their group. Remind the group that they must listen to one another telling their scenario
 - One girl/community member in turn in each group describes their scenario and says whether s/he thinks it is harm, or not, and why. The rest of the group hold up their green or red cards to show what they think about the scenario. The girls/community members then discuss why they reached their decision (15 minutes)
 - Bring the groups back together. Ask them whether they think there are other examples of harm (10 minutes)
 - Following discussion, girls/community members pair up and share what they learned from the whole session. They then feed this back to the larger group (5 minutes)
-
- Discuss outputs with the group, highlight issues which have not been identified, describe what 18twenty8 means by harm and how we will use the information from the exercise (5 minutes).

Approved and signed on 22 February 2019 by the members of the Board of Directors.

Natasha Dyer

Nthabiseng Molefe

Refiloe Seseane