

# TWOGERE SAFEGUARDING POLICY

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## 1. INTRODUCTION

Twogere is committed to closing the youth mental healthcare gap through interventions that prioritize the dignity, welfare, and safety of our beneficiaries. We recognize that mental health support involves high levels of vulnerability and requires a heightened standard of trust and protection. This policy outlines our zero-tolerance approach toward any form of abuse, exploitation, or neglect. It serves as a binding agreement for all internal and external stakeholders to ensure a safe environment for those we serve.

## 2. SCOPE & DEFINITIONS

This policy applies to all Twogere staff, board members, volunteers, consultants, and partner organizations.

- 2.1. Children:** Any person under the age of 18.
- 2.2. Vulnerable Adults:** Persons over 18 who, due to disability, illness, mental health crisis, or social context, may be unable to protect themselves from harm or exploitation.
- 2.3. Affiliated Educators:** Teachers and school staff trained by Twogere. While bound by the Ministry of Education and Sports (MoES) code of conduct, they must adhere to Twogere's safeguarding principles during any Twogere-supported mental health interventions.

## 3. CORE PRINCIPLES

Our safeguarding strategy is built on six international pillars:

- 3.1. Prevention:** Robust recruitment, school-level risk assessments, and continuous risk mitigation.
- 3.2. Proportionality:** Ensuring responses are appropriate to the risk presented.
- 3.3. Protection:** Providing immediate psychosocial and physical support to those in need.
- 3.4. Accountability:** Transparency in all safeguarding processes.
- 3.5. Partnership:** Seamless coordination with school management, district local governments, and legal authorities.
- 3.6. Empowerment:** Educating youth on their rights to mental well-being, safety, and self-advocacy.

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### 4. SAFE RECRUITMENT & TRAINING

- 4.1. **Background Checks:** All prospective Twogere personnel must undergo criminal record checks (Interpol/Certificate of Good Conduct) and multi-source reference verification.
- 4.2. **Mandatory Induction:** No staff, volunteer, or partner educator may conduct mental health screenings or interventions until they have completed the Twogere Safeguarding Induction.

### 5. OPERATIONAL CODE OF CONDUCT

All team members and trained school focal persons must adhere to strict professional boundaries:

- 5.1. **Supervision:** No one-on-one unsupervised contact with minors in locked, non-public, or non-transparent spaces. Counseling or peer-support sessions must take place in visible, designated school spaces.
- 5.2. **Physical Contact:** Maintain professional boundaries; physical contact must be strictly non-suggestive and culturally appropriate.
- 5.3. **Gifts & Personal Ties:** Personnel must not exchange personal money, gifts, or private personal contact details (personal social media/WhatsApp) with student beneficiaries.
- 5.4. **Communication:** All digital interaction regarding project updates or scheduling must happen through official school channels or approved Twogere platforms.

### 6. DIGITAL SAFETY & DATA PRIVACY

Given the sensitive nature of youth mental health work:

- 6.1. **Consent:** Written or verified institutional consent must be obtained before taking any photographs or videos of students.
- 6.2. **Dignity in Media:** Images must represent beneficiaries with dignity and never disclose their names, locations, or sensitive mental health status in public marketing without explicit, specialized consent.
- 6.3. **Data Security:** Beneficiary case files and mental health records are stored securely, encrypted, and accessed only by authorized personnel, in strict compliance with Uganda's Data Protection and Privacy Act.

### 7. REPORTING PROCEDURES

Twogere maintains a "Speak-Out" culture with full Whistleblower Protection. No person will be penalized for reporting a concern in good faith.

#### How to Report:

**Email:** [safeguarding@twogereug.org](mailto:safeguarding@twogereug.org)

**Phone/Hotline:** +256 754128149

**In-Person:** Contact the designated Twogere Safeguarding Lead or School Project Focal Person.

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### Our Response Process:

1. **Safety First:** Immediate action is taken to remove the individual from risk.
2. **Acknowledgment:** Reports are formally acknowledged within 24 hours.
3. **Institutional Alignment:** If the incident occurs within a partner school, the School Administration/Headteacher is notified immediately, provided they are not the subject of the report.
4. **Investigation:** A confidential inquiry is launched immediately by the Safeguarding Committee.
5. **Legal Action:** If a crime is suspected (under the Children Act or Penal Code), the matter will be referred immediately to the Uganda Police Force (CFPU) and relevant District Child Protection Services/Probation Officers.

### 8. GOVERNANCE & OVERSIGHT

- 8.1. **Focal Persons:** Twogere appoints Safeguarding Focal Persons to monitor compliance across all school projects.
- 8.2. **Board Review:** The Board of Directors reviews an anonymized safeguarding audit annually to improve safety measures and maintain compliance with international donor standards.

### 9. DECLARATION OF COMMITMENT

By working with or partnering with Twogere, I acknowledge that safeguarding is a shared responsibility. I commit to being vigilant, proactive, and dedicated to the safety and mental well-being of every young person we serve.