

## **CEDSI NIGERIA**

*Centre for Environmental, Development and Social Impact*

# **CHILD SAFEGUARDING POLICY**

*Protecting Every Child, Everywhere, Every Time*

### **Document Control**

<b>Policy Title</b>	Child Safeguarding Policy
<b>Applicable To</b>	All CEDSI Nigeria staff, consultants, board members, volunteers, interns, partners and affiliated projects
<b>Effective Date</b>	Upon Board Approval
<b>Review Cycle</b>	Every 2 years, or sooner if required by law or incident review
<b>Policy Owner</b>	Lead Policy Consultant, Office of the Executive Director
<b>Version</b>	1.0

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## 1. INTRODUCTION AND RATIONALE

CEDSI Nigeria (Centre for Environmental, Development and Social Impact) is a registered not-for-profit organisation working at the intersection of environmental justice, social development, gender equity, and community resilience across the Niger Delta and beyond. In the course of its programmes — including community engagement, field research, training delivery, clinical and psychosocial services, and policy advocacy — staff, consultants, volunteers, partners and associates regularly come into contact with children and young people, whether as direct beneficiaries, as members of communities where CEDSI operates, or incidentally in the course of fieldwork.

Children are among the most vulnerable members of any community, and their vulnerability is often heightened in contexts marked by environmental degradation, extractive-industry activity, poverty, displacement, and weak institutional protection — precisely the contexts in which CEDSI Nigeria works most intensively. The organisation recognises that its presence in communities, however well-intentioned, creates both an opportunity and a responsibility: an opportunity to model and reinforce good child protection practice, and a responsibility to ensure that no child is exposed to harm, exploitation, or abuse as a result of contact with CEDSI staff, programmes, or partners.

This Child Safeguarding Policy sets out CEDSI Nigeria's unequivocal commitment to preventing harm to children, to responding appropriately when harm is suspected or disclosed, and to embedding a culture of safeguarding throughout the organisation's structures, recruitment practices, programme design, and partnership arrangements. It is grounded in international standards, including the UN Convention on the Rights of the Child (UNCRC), and in Nigerian law, including the Child Rights Act 2003 and its adoption in Rivers State, and reflects CEDSI's broader institutional commitment to human rights, gender justice, and ethical practice in social work and development.

## 2. PURPOSE AND OBJECTIVES

The purpose of this policy is to provide clear, practical, and legally grounded guidance to every person who works for, with, or on behalf of CEDSI Nigeria on how to prevent, recognise, and respond to child abuse, exploitation, and neglect. Specifically, this policy aims to:

1. Establish CEDSI Nigeria's zero-tolerance position on all forms of child abuse, exploitation, and neglect, whether committed by staff, volunteers, partners, community members, or any other party connected to the organisation's work.
2. Define clear standards of behaviour expected of all personnel and associates in any context involving contact with children.
3. Set out safe recruitment, induction, and supervision procedures that reduce the risk of individuals who pose a risk to children gaining access to them through CEDSI programmes.
4. Provide a clear, accessible, and child-friendly mechanism for reporting concerns, disclosures, or allegations of abuse.
5. Ensure a consistent, competent, and child-centred response to any safeguarding concern that is raised, including appropriate referral to statutory authorities.
6. Build the capacity of staff, volunteers, and partners to understand their safeguarding responsibilities through induction, training, and ongoing support.
7. Ensure that safeguarding is embedded in programme design, monitoring and evaluation, communications, and research involving children.
8. Comply with applicable Nigerian and international legal and regulatory frameworks on child protection.

## 3. SCOPE AND APPLICATION

This policy applies to all individuals engaged in any capacity with CEDSI Nigeria, without exception. This includes:

- Full-time and part-time employees of CEDSI Nigeria, at every level of seniority, including the Executive Director, Board members, and management staff.
- Consultants, contractors, and technical advisers engaged on a short-term or project basis, including the Lead Policy Consultant and thematic experts.
- Volunteers, interns, and national or international youth corps members placed with CEDSI.
- Research assistants, enumerators, and field officers engaged in data collection, community engagement, or monitoring and evaluation activities.
- Partner organisations, sub-grantees, and community-based structures implementing activities funded, supervised, or co-branded with CEDSI Nigeria, including those engaged under programmes such as the UNDP GEF Small Grants Programme initiatives and related community development portfolios.
- Visitors, donors, journalists, and any third party accompanying CEDSI staff into communities, schools, clinics, or project sites where children may be present.

This policy applies in all settings where CEDSI operates or has influence, including but not limited to community outreach and mobilisation activities, the RSU Social Work Clinic and any affiliated psychosocial or clinical services, training and capacity-building events, field research and data collection, digital and social media communications, and any residential, transport, or accommodation arrangements made in connection with CEDSI activities.

For the purposes of this policy, a 'child' is defined, consistent with the UN Convention on the Rights of the Child and the Nigerian Child Rights Act 2003, as any person under the age of 18 years, regardless of local custom, marital status, or perceived maturity.

## **4. DEFINITIONS AND KEY TERMS**

### ***4.1 Child Abuse***

Child abuse refers to any act, or failure to act, by a parent, caregiver, staff member, or any other person that results in harm, potential harm, or threat of harm to a child. Abuse may be physical, sexual, emotional, or psychological in nature, and may occur through a single incident or a pattern of behaviour over time.

### ***4.2 Physical Abuse***

The deliberate infliction of physical harm on a child, including hitting, shaking, burning, or any other action that causes injury or physical suffering, as well as the use of excessive or inappropriate physical force in the guise of discipline.

### ***4.3 Sexual Abuse and Exploitation***

Any involvement of a child in sexual activity that they do not fully comprehend, cannot give informed consent to, or that violates the laws or social taboos of society. This includes contact and non-contact abuse, exposure to sexual material or acts, grooming, and sexual exploitation in exchange for money, goods, services, or favours.

### ***4.4 Emotional and Psychological Abuse***

Persistent emotional maltreatment that causes severe and lasting adverse effects on a child's emotional development, including humiliation, threats, isolation, rejection, or exposure to domestic or community violence.

### ***4.5 Neglect***

The persistent failure to meet a child's basic physical, emotional, medical, or educational needs, likely to result in serious impairment of the child's health or development.

### ***4.6 Grooming***

A process by which an individual builds a relationship, trust, and emotional connection with a child, and sometimes their family, with the intention of manipulating, exploiting, or abusing the child, including through digital or online platforms.

#### **4.7 Safeguarding**

The proactive steps taken by an organisation to prevent harm to children and vulnerable persons, promote their welfare, and ensure that any concerns are identified and responded to promptly and appropriately, as distinct from child protection, which refers specifically to activity undertaken to protect children who are suffering, or are at risk of suffering, significant harm.

#### **4.8 Duty Bearer**

Any individual within the scope of this policy who, by virtue of their role, has a responsibility to uphold the standards set out herein and to act on any safeguarding concern they become aware of.

## **5. GUIDING PRINCIPLES**

CEDSI Nigeria's approach to child safeguarding is anchored in the following principles, which inform every provision of this policy and every safeguarding decision taken by the organisation:

9. The best interests of the child are always the primary consideration in any decision or action affecting them.
10. Every child has an equal right to protection from harm, regardless of gender, ethnicity, disability, religion, socio-economic status, or any other characteristic.
11. Prevention is better than cure: CEDSI prioritises proactive measures — safe recruitment, training, supervision, and safe programme design — over reactive responses.
12. Safeguarding is everyone's responsibility. No single individual or department carries sole responsibility for child protection; every person connected with CEDSI is a duty bearer.
13. Children have a right to be heard, and their views, feelings, and wishes will be given due weight in accordance with their age and maturity in any safeguarding process concerning them.
14. Confidentiality will be maintained to the greatest extent possible, while recognising that information must be shared with relevant authorities where a child's safety is at risk.
15. All allegations and concerns will be taken seriously, responded to promptly, and handled without victimisation of the person raising the concern.
16. No individual is presumed guilty pending investigation, but the safety of the child takes precedence over the interests of any accused adult during that process.
17. Safeguarding practice will be non-discriminatory, culturally sensitive, and adapted to the realities of the Niger Delta communities in which CEDSI operates, without compromising on the rights of the child.

## **6. LEGAL AND POLICY FRAMEWORK**

This policy operates within, and is subordinate to, the following legal and normative frameworks, which CEDSI Nigeria commits to upholding in full:

- The United Nations Convention on the Rights of the Child (UNCRC), 1989, and its Optional Protocols.
- The African Charter on the Rights and Welfare of the Child (ACRWC), 1990.
- The Child Rights Act, 2003 (Federal Republic of Nigeria) and its domestication in Rivers State.
- The Trafficking in Persons (Prohibition) Enforcement and Administration Act, and the mandate of the National Agency for the Prohibition of Trafficking in Persons (NAPTIP).
- The Violence Against Persons (Prohibition) Act, 2015, and corresponding Rivers State legislation.

- Relevant provisions of the Nigerian Criminal and Penal Codes concerning offences against children.
- Institutional codes of ethics of relevant professional bodies, including the Nigerian Association of Social Workers (NASOW) and international social work bodies such as IFSW and IASSW, whose ethical standards CEDSI's leadership and technical staff subscribe to.
- Donor-specific safeguarding requirements attached to grants and programmes, including those of UNDP and other multilateral and bilateral partners, which will be read alongside and, where more stringent, will take precedence over the minimum standards in this document.

## **7. ROLES AND RESPONSIBILITIES**

### **7.1 The Board of Trustees**

The Board holds ultimate oversight responsibility for child safeguarding within CEDSI Nigeria. It is responsible for approving this policy and any subsequent revisions, ensuring adequate resourcing for its implementation, and receiving an annual safeguarding report summarising concerns raised, actions taken, and lessons learned, presented in a manner that preserves the confidentiality and dignity of all parties involved.

### **7.2 The Executive Director**

The Executive Director bears overall executive responsibility for embedding safeguarding across the organisation's operations, ensuring that adequate systems, training, and resources are in place, and that this policy is applied consistently across all programmes and partnerships. The Executive Director is the final point of escalation for the most serious concerns, including those involving senior staff.

### **7.3 The Designated Safeguarding Lead (DSL)**

CEDSI Nigeria will appoint a Designated Safeguarding Lead, a suitably experienced and trained member of staff, who will serve as the first point of contact for all safeguarding concerns. The DSL's responsibilities include: receiving and logging all reports and concerns; coordinating the organisation's response to disclosures and allegations; liaising with statutory child protection authorities, law enforcement, and NAPTIP where required; maintaining a confidential safeguarding case file separate from general personnel or programme files; providing guidance and support to staff on safeguarding matters; and ensuring the timely delivery of safeguarding induction and refresher training. A Deputy Designated Safeguarding Lead will also be appointed to ensure continuity when the DSL is unavailable or is themselves the subject of a concern.

### **7.4 Programme and Project Staff**

All programme staff, including those engaged in field research, community mobilisation, and clinical or psychosocial service delivery, are responsible for adhering to the Code of Conduct set out in this policy, for remaining alert to signs of harm, and for reporting any concern promptly through the channels described in Section 11.

### **7.5 Human Resources**

Human Resources is responsible for ensuring that safe recruitment procedures set out in Section 9 are applied consistently to every new employee, consultant, and volunteer, for maintaining accurate records of safeguarding training completion, and for ensuring that safeguarding commitments are incorporated into contracts, terms of reference, and partnership agreements.

### **7.6 All Personnel and Associates**

Every individual within the scope of this policy is personally responsible for understanding and complying with this policy, for behaving at all times in a manner consistent with the Code of Conduct, and for reporting any concern about the safety or wellbeing of a child without delay, regardless of who the concern relates to.

## 8. CODE OF CONDUCT

All persons within the scope of this policy must observe the following standards of behaviour whenever they are in contact with children, or in any setting where children are present, whether during working hours or otherwise in a capacity connected to CEDSI Nigeria.

### 8.1 Expected Behaviour

- Treat all children with respect, dignity, and fairness, regardless of their background.
- Ensure, wherever practicable, that interactions with children take place in open, visible settings, and avoid being alone with a single child in a closed or private space.
- Obtain informed consent from a parent, guardian, or legal caregiver, and age-appropriate assent from the child, before involving a child in any activity, interview, photograph, or research process.
- Listen to children and take their views and concerns seriously, using language and methods appropriate to their age and developmental stage.
- Report any concern, suspicion, or disclosure of harm immediately in accordance with Section 11 of this policy.
- Model respectful, non-violent, and non-discriminatory behaviour at all times, including in interactions with community members and colleagues that children may observe.
- Ensure that any physical contact with a child is appropriate, necessary, and in keeping with cultural norms and the child's own comfort, such as a comforting gesture in response to distress, and never of a nature that could be misinterpreted.

### 8.2 Prohibited Behaviour

- Engaging in any form of sexual activity or sexual relationship with a person under the age of 18, regardless of the local age of consent or majority, or of any claimed consent by the child.
- Developing relationships with children that could be deemed exploitative or abusive in any culture or context, including through gifts, favouritism, or inappropriate communication.
- Using language, making suggestions, or offering advice that is inappropriate, offensive, or abusive toward a child.
- Physically punishing, striking, or humiliating a child under any circumstance.
- Being alone with a child unnecessarily, or spending excessive or unexplained time alone with a specific child away from others.
- Sleeping in the same room or bed as a child while on CEDSI-related travel or activities.
- Inviting a child to one's private residence unaccompanied by a parent, guardian, or another adult.
- Taking or sharing photographs, videos, or recordings of children without documented parental or guardian consent, or in a manner that could be sexualised, exploitative, or that reveals identifying or location details that could compromise a child's safety.
- Using CEDSI resources, position, or programmes to access children for purposes unrelated to legitimate organisational activity.
- Doing anything for or with a child that is secretive, or that involves an inappropriate level of intimacy or favouritism.
- Consuming alcohol, or using any prohibited substance, while directly responsible for the supervision of children.

## 9. SAFE RECRUITMENT AND VETTING

CEDSI Nigeria will apply rigorous, consistent safeguards throughout the recruitment, engagement, and induction of all staff, consultants, volunteers, interns, and partner personnel who may have contact with children, in order to deter and prevent individuals who pose a risk to children from gaining access to them through the organisation.

18. Every vacancy announcement, consultancy terms of reference, and volunteer call will state clearly that the position involves contact with children and that CEDSI operates a zero-tolerance safeguarding policy.
19. All shortlisted candidates will be required to disclose any prior convictions, ongoing investigations, or disciplinary findings related to child abuse or exploitation, and will be required to sign this Code of Conduct as a condition of engagement.
20. Wherever feasible, at least two independent references will be obtained for every prospective staff member, consultant, or long-term volunteer, with specific questions asked about the candidate's conduct with children and suitability for child-related work.
21. Police character certificates, or their nearest available equivalent, will be requested for roles involving substantial or unsupervised contact with children, recognising the practical limitations of formal background-check infrastructure in parts of Nigeria, and supplemented by community-level reference checks where formal checks are unavailable.
22. All new personnel will complete a mandatory safeguarding induction before commencing any activity involving contact with children, covering this policy, the Code of Conduct, and reporting procedures.
23. Partner organisations and sub-grantees engaged in activities involving children will be required to demonstrate that they have an equivalent safeguarding policy in place, or to formally adopt CEDSI's policy, as a condition of the partnership agreement.
24. Probationary or introductory periods for new staff will include specific supervision and observation relevant to safeguarding conduct.

## 10. PREVENTION, AWARENESS, AND CAPACITY BUILDING

Prevention lies at the heart of CEDSI Nigeria's safeguarding approach. The organisation will invest in ongoing awareness-raising and capacity building so that safeguarding becomes embedded in the culture and daily practice of the organisation, rather than treated as a compliance exercise.

### *10.1 Induction and Training*

All personnel will receive safeguarding induction training within their first month of engagement, and refresher training at least once every two years. Training will cover the content of this policy, recognising signs of abuse, reporting procedures, appropriate behaviour, and the specific risks associated with the communities and contexts in which CEDSI operates, including the heightened vulnerabilities linked to environmental displacement, extractive-industry activity, and economic hardship in the Niger Delta.

### *10.2 Community and Beneficiary Awareness*

CEDSI will make reasonable efforts to inform the children, families, and communities it works with about this policy, their right to raise concerns, and how to do so, using accessible language, local dialects where appropriate, and child-friendly formats such as illustrated materials or community dialogue sessions.

### *10.3 Safe Programme Design*

Safeguarding risk assessments will be incorporated into the design of all new programmes and activities involving contact with children, including field research, training events, and clinical or psychosocial services delivered through the RSU Social Work Clinic and affiliated initiatives, with mitigation measures built into activity planning, budgeting, and staffing arrangements from the outset.

## **11. RECOGNISING SIGNS OF ABUSE, EXPLOITATION, AND NEGLECT**

All personnel are expected to remain alert to indicators that a child may be experiencing harm. No single indicator is conclusive proof of abuse, and staff are not expected to diagnose or investigate; their responsibility is to notice, record, and report. Indicators that may warrant attention include, but are not limited to:

- Unexplained or repeated physical injuries, bruising, or burns, particularly in patterns inconsistent with the explanation given.
- Sudden changes in behaviour, including withdrawal, aggression, fearfulness, or regression to younger behaviours.
- Age-inappropriate sexual knowledge, language, or behaviour.
- Signs of malnutrition, poor hygiene, or inadequate clothing not attributable to poverty alone.
- A child appearing frightened of, or unusually eager to please, a particular adult.
- Disclosures, whether direct or indirect, made by a child themselves, a sibling, peer, or community member.
- Unexplained absence from school, community activities, or programme sessions.
- Evidence of a child being engaged in exploitative labour, transactional relationships, or activity inconsistent with their age.

Where any such indicator is observed, personnel must not attempt to independently investigate, confront the alleged perpetrator, or promise the child confidentiality, but must instead follow the reporting procedure set out in Section 12 as a matter of urgency.

## 12. REPORTING PROCEDURES

CEDSI Nigeria is committed to ensuring that any person — whether a staff member, child, parent, or community member — can raise a safeguarding concern easily, safely, and without fear of retaliation.

### 12.1 Who Should Report

Every duty bearer within the scope of this policy has an individual and non-delegable responsibility to report any concern, suspicion, or disclosure relating to the safety of a child, regardless of their role or seniority, and regardless of whether they are directly responsible for the child in question.

### 12.2 How to Report

25. Any person who witnesses harm, receives a disclosure, or forms a reasonable suspicion that a child is at risk must report this to the Designated Safeguarding Lead (DSL), or the Deputy DSL if the DSL is unavailable or is implicated in the concern, as soon as possible and in any event within 24 hours.
26. Reports may be made verbally in the first instance, but must be followed up in writing using the Safeguarding Incident Report Form (Appendix A) within 48 hours.
27. Where the concern involves the Executive Director or another member of senior leadership, the report must be made directly to the Chair of the Board of Trustees.
28. Where a child is in immediate danger, the reporting person must first ensure the child's immediate safety and contact the relevant emergency or statutory authority (police, NAPTIP, or child welfare services) without waiting for internal processes to conclude, and inform the DSL as soon as practicable thereafter.
29. Concerns may also be reported through a dedicated, confidential CEDSI safeguarding phone line and email address, which will be publicised to staff, partners, and communities, and monitored by the DSL.

### 12.3 Recording

All reports will be documented factually, using the child's own words where a disclosure is involved, avoiding leading questions, speculation, or interpretation. Records will note the date, time, and place of the incident or disclosure, the persons involved, and any immediate action taken, and will be stored securely and confidentially as set out in Section 14.

### 12.4 Protection for Those Who Report

CEDSI Nigeria will not tolerate any form of retaliation, victimisation, or adverse treatment against any person who raises a safeguarding concern in good faith, even where the concern is not subsequently substantiated. Deliberately false or malicious reports will, however, be treated as a serious disciplinary matter.

## 13. RESPONDING TO DISCLOSURES AND ALLEGATIONS

### 13.1 Immediate Response to a Child's Disclosure

Any staff member who receives a disclosure directly from a child must remain calm, listen carefully without expressing shock or disbelief, reassure the child that they have done the right thing in speaking up, avoid making promises of complete confidentiality that cannot be kept, avoid asking leading or probing questions, and explain in age-appropriate language what will happen next. The staff member must record the disclosure as soon as possible afterward, using the child's own words, and report it immediately to the DSL.

### 13.2 Internal Assessment

On receipt of a report, the DSL will conduct an initial assessment within 24 hours to determine the level of risk and the appropriate course of action, which may include immediate referral to statutory authorities, suspension of the individual concerned from duties involving contact with children pending investigation, and any interim measures necessary to protect the child or other children who may be at risk.

### **13.3 Referral to Statutory Authorities**

Where a concern meets the threshold of suspected abuse, exploitation, or neglect, the DSL will refer the matter to the appropriate statutory body, which may include the Nigeria Police Force, the National Agency for the Prohibition of Trafficking in Persons (NAPTIP), the Rivers State Ministry of Women Affairs or its child welfare department, or other designated child protection services. CEDSI will cooperate fully with any resulting investigation.

### **13.4 Internal Disciplinary Process**

Where the person alleged to have caused harm is a CEDSI staff member, consultant, volunteer, or associate, an internal disciplinary process will run in parallel with, but will not obstruct or pre-empt, any statutory investigation. The individual will be suspended from any role involving contact with children while the matter is investigated. The organisation will apply the principle of proportionality and due process, while treating the protection of the child as paramount at every stage.

### **13.5 Support for the Child**

CEDSI will ensure that any child involved in a safeguarding concern is offered access to appropriate psychosocial support, including through referral to the RSU Social Work Clinic or other qualified services, and that the child's ongoing safety is monitored until the concern is fully resolved.

### **13.6 Support for Staff**

Staff members involved in responding to a disclosure, including as the person who received it, may themselves experience distress, and will be offered access to appropriate debriefing and psychosocial support.

## **14. CONFIDENTIALITY AND INFORMATION SHARING**

Information relating to a safeguarding concern will be shared strictly on a need-to-know basis. Safeguarding records will be kept separate from general personnel and programme files, stored in a locked physical location or a password-protected digital system accessible only to the DSL, Deputy DSL, and Executive Director. Information will be shared with statutory authorities where required by law, or where necessary to protect a child from harm, even where this requires overriding an assurance of confidentiality previously given to an adult, though never to a child unless the child's own safety requires it. Under no circumstances will the identity of a child involved in a safeguarding concern be disclosed publicly, to the media, or in any organisational communication without explicit, informed consent from the child's parent or guardian and, where age-appropriate, the child themselves.

## **15. IMAGES, DATA PROTECTION, AND DIGITAL SAFEGUARDING**

Given CEDSI's extensive use of documentation, photography, and digital platforms in its research, training, and advocacy work, particular care will be taken to protect children in all digital and published materials.

- Written, informed consent must be obtained from a parent or guardian, and age-appropriate assent from the child, before any photograph, video, audio recording, or personal story involving a child is captured or used.

- Images and case stories must never include identifying details — such as full name, exact address, or school — that could enable a child to be traced, particularly where the material relates to sensitive circumstances such as trauma, abuse, displacement, or poverty.
- Children must never be depicted in a state of undress, in a sexualised manner, or in any way that compromises their dignity.
- Digital tools developed or deployed by CEDSI, including platforms such as the MindBridge mental health application and Project SWEEP's professional development platform, will incorporate data protection safeguards consistent with the Nigeria Data Protection Act and, where children may access or be referenced within such platforms, additional safeguards appropriate to their age and vulnerability.
- All data collected on children through field research, monitoring, or clinical activity will be anonymised or pseudonymised wherever possible, stored securely, and retained only for as long as necessary for the stated purpose.

## 16. SAFEGUARDING IN FIELD RESEARCH AND COMMUNITY ENGAGEMENT

CEDSI Nigeria's programmatic work frequently involves direct engagement with communities, including participatory research, community mobilisation, and the collection of qualitative and quantitative data — activities that may bring researchers, enumerators, and field officers into close and sometimes unsupervised contact with children.

30. All research protocols involving children, whether as direct research subjects or as household members encountered during data collection, must include a specific safeguarding risk assessment and be reviewed for ethical clearance prior to fieldwork.
31. Interviews, focus group discussions, or consultations involving children must, wherever possible, be conducted in the presence of a parent, guardian, or another trusted adult, or by researchers who have undergone safeguarding training and background checks.
32. Where children disclose sensitive or distressing information during research activities — including in relation to the Ecosocial Resilience Theory (ERT), the Participatory Community Engagement and Inclusion Model (PCEI-Model), or SW-EMHEC-related studies concerning extraction, environmental contamination, and mental health — researchers must follow the disclosure and reporting procedures in Sections 12 and 13, in addition to fulfilling their research obligations.
33. Field teams travelling to remote or riverine communities will be briefed on local safeguarding risks and reporting contacts specific to that locality prior to deployment.
34. Community entry protocols will include engagement with local leaders, women's groups, and youth structures to build shared ownership of child protection standards for the duration of CEDSI's presence.

## 17. PARTNERSHIPS AND THIRD PARTIES

Where CEDSI Nigeria works with implementing partners, sub-grantees, consultants, or contracted service providers on programmes involving children — including community development portfolios, small grants initiatives, and training programmes — the partner will be required to sign a written commitment to abide by this policy or an equivalent standard, and CEDSI reserves the right to terminate any partnership agreement where a partner fails to meet these standards or fails to respond appropriately to a safeguarding concern within its own operations.

## 18. MONITORING, EVALUATION, AND REVIEW

The Designated Safeguarding Lead will maintain an anonymised log of all safeguarding concerns raised, actions taken, and outcomes, which will be reviewed quarterly by the Executive Director and reported annually, in aggregate and

non-identifying form, to the Board of Trustees. This policy will be formally reviewed at least once every two years, or sooner in the event of a significant safeguarding incident, a change in applicable law, or feedback from staff, partners, or communities indicating that revision is necessary. Every review will include consultation with staff and, where appropriate, with children and community representatives.

## **19. BREACHES OF THIS POLICY**

Any breach of this policy, including a failure to report a known or suspected safeguarding concern, will be treated as a serious disciplinary matter and may result in disciplinary action up to and including summary dismissal, termination of a consultancy or partnership agreement, and referral to law enforcement authorities, independent of any other legal consequence the individual may face.

## **20. DECLARATION OF COMMITMENT**

CEDSI Nigeria's leadership affirms that the protection of children is a non-negotiable institutional value, inseparable from the organisation's broader mission of environmental justice, social development, and gender equity in the Niger Delta and beyond. Every member of staff, every consultant, every volunteer, and every partner is expected to internalise, uphold, and champion the standards set out in this policy in every aspect of their engagement with CEDSI Nigeria.

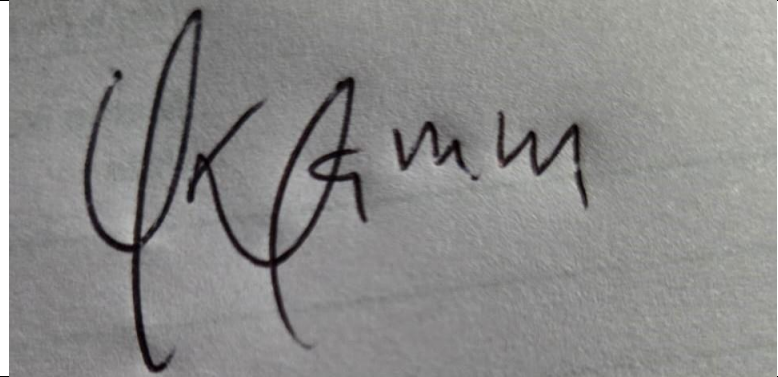
# APPENDIX A: SAFEGUARDING INCIDENT REPORT FORM

(To be completed by the person receiving a disclosure or observing a concern, and submitted to the Designated Safeguarding Lead within 48 hours.)

<b>Date and time of incident/disclosure</b>	
<b>Name of person reporting</b>	
<b>Role/position</b>	
<b>Name/initials of child (if known)</b>	
<b>Age and sex of child</b>	
<b>Location of incident</b>	
<b>Description of concern (factual, child's own words if applicable)</b>	
<b>Immediate action taken</b>	
<b>Referral made (if any)</b>	
<b>Signature and date</b>	

## APPENDIX B: CODE OF CONDUCT DECLARATION

I confirm that I have read, understood, and agree to abide by the CEDSI Nigeria Child Safeguarding Policy and Code of Conduct in full. I understand that any breach of this policy may result in disciplinary action, termination of my engagement with CEDSI Nigeria, and referral to statutory authorities.

<b>Name</b>	Professor Mina Ogbanga
<b>Role</b>	Founding Executive Director
<b>Signature</b>	
<b>Date</b>	July 2025

## APPENDIX C: KEY SAFEGUARDING CONTACTS

<b>Designated Safeguarding Lead (DSL)</b>	Ayodeji Alaba 8100535550
<b>Deputy DSL</b>	Janet Ejo 08137552950
<b>Chair, Board of Trustees</b>	Abiye Altraide
<b>Nigeria Police Force (Child Protection Desk)</b>	112 / nearest divisional police station
<b>NAPTIP</b>	+2348035445308
<b>Rivers State Ministry of Women Affairs</b>	No. 4 Eastern By-Pass, Marine Base, Port Harcourt, Rivers State, Nigeria