KENYA SOCIETY FOR THE BLIND

SAFEGUARDING POLICY 2025

Document owner	KSB Governing Council
Document administrator	Executive Director
Document status	Operational Policy
Date of last review	December 2025
Review period	3 years
Version no.	II
Version	March 2022
Version Owner	Chair of the Safeguarding committee KSB
Key Users	KSB staff, Council members, Partners, stakeholders, service providers, suppliers & Beneficiaries

1.0 INTRODUCTION

1.1 About Kenya Society for the Blind (KSB):

The Kenya Society for the Blind (KSB) was established in 1956 through an Act of Parliament Cap 251 of the Laws of Kenya (Revised 2012). Our Vision is to ensure a society in which no one is needlessly blind and the Rights of the persons with visual impairment are ensured. Our Mission; We exist to promote an enabling environment for persons with visual impairments and those at risk of visual impairment through Prevention, Education, Rehabilitation and Habilitation initiatives by working with persons with visual impairments, communities, Development Partners and Government agencies at all levels. The organizational objective is to create an environment that encourages the inclusion of the visually impaired persons in our society and promotes the prevention of avoidable blindness. The KSB functions provided by the Act include; promote the welfare, education, training, and employment of the blind; assist in the prevention and alleviation of blindness; assist the Government of Kenya, societies, institutions and organizations, society or person in all matters related to the blind; and awaken public interest in the welfare of the blind and in all matters relating to blindness.

1.2 Introduction & Purpose of the Policy

Safeguarding is a broad term that KSB uses to describe the Societies' policies, procedures and practices designed to prevent and protect those who come into contact with our programmes, persons with visual impairment/ Blind, other people, and operations from all forms of harm and abuse, including child abuse, sexual exploitation, abuse and harassment (SEAH) caused by our staff, stakeholders partners, volunteers, interns, Council members, associated personnel, operations or programmes.

This policy is informed by and committed to the principles laid out in the UN Convention on the Rights of the Child (CRC), the UN Convention on the Rights of Persons with Disabilities (CRPD), the 1993 UN Declaration on the Elimination of Violence against Women and the UN Humanitarian Principles and 1957 Abolition

of Forced Labour Convention (No. 105). The Policy also speaks to the Kenya Legislative and policy framework of Constitution of Kenya 2010, Children Act 2022, Disability Act 2025, and the National Disability Policy 2024 among other relevant legislative and policies.

Kenya Society for the Blind affirms to advocate for the best practice in preventing and addressing safeguarding concerns of its benefactors and communities and works to build the capacities of its representatives, persons with visual impairment, blind, caregivers, and organizations and groups of persons with disabilities, stakeholders, development partners and communities while strengthening accountability in the sector. It is the responsibility of all KSB staff, and its governing Council to promote good safeguarding practices in our work and to share the safeguarding principles as appropriate with its benefactors and external stakeholders. KSB has zero tolerance approach to any forms of harm, exploitation and abuse. This comprehensive Safeguarding Policy provides very clear and explicit definitions on harm, sets standards across the Society, and gives guidance on how to apply and implement the policy throughout the Society and across our programmes. All KSB representatives must adhere to this policy and the Code of Conduct, both within and outside working hours.

The purpose of this policy:

- Sets out the position of KSB on the prevention of and protection from all forms of harm and abuse, including child abuse, sexual exploitation, abuse and harassment (SEAH)
- Sets out responsibilities and procedures to be followed in order to prevent abuse happening and proactively capacity of the staff, stakeholders, partners and other target audience.
- Sets out responsibilities and procedures to be followed where suspicion, allegation or actual harm has happened including the incident management procedures and protocols.

1.3 Policy Statement

KSB believes that anyone who comes into contact with its staff and representatives, programmes and operations should be protected from harm, exploitation, abuse or harassment regardless of their age, gender identity, disability, belief, sexual orientation, ethnic origin among other status.

KSB is committed to keep everyone connected with its work safe by embedding disability inclusive safeguarding principles and practices in all its work. This means that the following are strictly adhered to:

- Ensure that where employees of KSB, and/or members of the Council commit a safeguarding violation or fail to report knowledge of a safeguarding violation disciplinary action will be taken up to and including termination of employment or Council membership.
- Take proactive steps to consult with members of the Society, the Council members, patients, and programme participants, including persons with disability, marginalized and underrepresented groups in order to prevent exploitation, abuse and harassment happening.
- Respond to every reported concern and where there is an indication of a possible violation of this policy, investigate.
- Ensure that our suppliers, consultants, tenderers, our tenants, development partners, among other stakeholders interacting with KSB commit to adhere to safeguarding not only in our website but also in our procurement, job advertisement, applications and other related opportunities by signing the code of conduct.
- Terminate the contract and/or agreement of stakeholders, partners among other third parties who fail to comply with this policy.
- Where required and if it is safe to do so we will refer safeguarding violations to law enforcement and other authorities in line with survivor centered principles

1.4 Scope of this Policy

The compliance with this policy is mandatory for all KSB staff, Council members, KSB members and beneficiaries, development partners, service providers, suppliers, stakeholders, tenants' volunteers, interns, journalists and related third

parties. This includes Members of the society, consultants, contractors and among other programme visitors.

This policy covers:

- Any safeguarding concern, suspicion or incident in a project implemented by KSB or its implementing downstream partners.
- Any safeguarding concern, suspicion or incident involving a KSB staff, Council members or representative.
- Any safeguarding concern, suspicion or incident involving a KSB tenant, supplier, contractor or partner / stakeholder working with KSB programmes or related interventions.

1.4.1 All Children including children with Disabilities - Visual Impairment & Blind

All Children, over the world and in Kenya are at risk of encountering harm and abuse in their lives. The dependency of children on adults increases the likelihood of/or exposure to harm and abuse. Children with disabilities are at greater risk than their children without disabilities peers. KSB believes that all children should never experience abuse of any kind and that we have a responsibility to promote their welfare, to keep them safe and to protect them from harm.

KSB will ensure that the particular risks of exploitation, abuse and harassment facing all children who come into contact with our programmes will be properly assessed, addressed and monitored. Where programmes are aimed at children with visual impairment/ blind, KSB will ensure with its partners that the welfare of the child is paramount in all decisions taken and that safeguarding measures are designed with and for children as enshrined in the Kenya Children Act 2022.

1.4.2 Persons with disability and other vulnerable individuals / Adults

KSB is committed to an inclusive safe space in which all persons with disabilities enjoy their human rights and achieve their full potential. This policy mandates us to proactively protect and promote the rights of persons with disabilities and at-risk adults through our safeguarding approach. Deep routed stigma and

discriminatory attitudes around disability increase the likelihood that persons with disabilities and adults at risk will encounter exploitation, abuse and harassment. Other factors that increase vulnerability include communication barriers, dependence on families and careers, isolation, lack of access to sexual reproductive health information and education, difficulty in protecting oneself.

KSB will ensure that the risks of exploitation, abuse and harassment facing persons with disability who come into contact with our programmes will be properly assessed, addressed and monitored and that safeguarding measures are designed with and for persons with disability and adults at risk and in line with the provisions of UNCRPD.

1.4.3 Commitment to Protection from Sexual Exploitation, Abuse and Harassment (PSEAH)

- KSB is committed to zero tolerance of SEAH and to tackling all harmful and unwanted sexual behavior perpetrated by anyone associated with our programmes, our workplace or online in the Society.
- KSB shall ensure that any Knowledge, concerns or suspicions of SEAH, whether at KSB or not, shall be reported in line with organisational policies, guidance and reporting mechanisms.
- KSB shall hold those found to have committed SEAH accountable and take appropriate action in line with relevant due processes.
- KSB shall ensure those involved in an allegation with no proof shall be protected against retaliation, have their confidentiality and dignity respected and receive appropriate support. This includes Victims-survivors, complainants, witnesses, whistle-blowers and the subject (s) of complaint.
- KSB shall ensure **PSEAH principles** and standards of behaviour are embedded in our Human resource manual and codes of conduct with clear prohibition of SEAH.
- KSB shall ensure all staff, volunteers and partners are made aware of, sign up to and strive to comply with PSEAH and Code of conduct.

2.0 PREVENTATIVE ACTION

This section of the Safeguarding Policy details measures KSB shall take to reduce such harm to children and adults and include:

- **Safeguarding & PSEAH Trainings:** KSB will ensure Safeguarding trainings are mandatory for all staff, and at least one full safeguarding training with complemented refresher sessions.
- **Safer programming and risk assessments**: KSB Programme managers, HODs and project team leads shall ensure safeguarding risk assessments are conducted in a participatory and comprehensive way when designing and implementing projects and activities that involve (contact, work with or impact on) children and adults-at-risk.
- **Budgets/finances:** KSB will ensure develop and integrate budgetary application for safeguarding needs within its programmes and project. This will ensure available resources for trainings among other specific safeguarding needs in the Society.
- **Working with partners**: KSB shall ensure Safeguarding incorporated to all partnership commitment expects its partners to have a safeguarding policy or have similar arrangements, in line with the UN Convention on the Rights of the Child (CRC) and UN Convention on the Rights of Persons with Disabilities (CRPD).
- **Guidelines on Photographs & Videos:** KSB shall ensure as a mandatory directive, Images, stories and messages about boys, girls, women, and men shall be presented in a dignified, respectful manner, portraying them as equal partners and clearly **consented.** KSB shall ensure publishing of the materials, the identity and traceability of all children and vulnerable adults will be protected and in line with Data Protection Act 2019.
- **Safer Recruitment and Contracting**: KSB shall ensure job Advertisements, comply with safeguarding Policy provisions and protocols, during Shortlisting, interviews, checks for due diligence and, rechecks from previous employer and signing of the KSB Code of Conduct and Safeguarding Policy upon appointment.
- **Research, Media and Communications:** KSB shall ensure ethical and protective principles in research, media and communications are followed to ensure that all children and adults are represented in a dignified way, and not

exploitative. **T**hose involved in gathering the stories or information on behalf of KSB and its affiliate partners shall be briefed on KSB Safeguarding Policy and sign a commitment to adhere to it as well as Code of Conduct.

- **Safeguarding in Humanitarian Action:** KSB shall ensure protection and safety of persons with disabilities in situations of risk, including armed conflict, natural disasters, or other humanitarian emergencies. This includes mainstreaming safeguarding in all KSB humanitarian action - disaster preparedness, response, and early recovery, in line with the Article 11 of the Convention of the Rights of Persons with Disabilities (CRPD).
- **Consultants, suppliers, and contractors:** KSB shall ensure all consultants, suppliers, contractors, and tenants shall be provided with Safeguarding policy briefing and KSB Code of conduct and their obligations under it. All contracts shall include a clause stating that the party being hired will adhere to KSB Safeguarding Policy and Code of Conduct.
- **Prevention of Sexual Exploitation, Abuse and Harassment (PSEAH):** KSB shall ensure all staff will be trained on PSEAH and align with the Code of conduct. Any form of sexual abuse, sexual exploitation or sexual harassment is considered unacceptable behavior for any KSB staff or representative and is classified as gross misconduct shall follow the KSB HR Manual provisions.

3.0 RESPONSIVE ACTION & REPORTING

KSB refers to safeguarding concern as any concern of harm, exploitation or abuse that has occurred or shall occur if no action is taken. KSB shall ensure that reporting and incident management procedures to handle safeguarding concerns are in place and effectively used to enable safe and effective response.

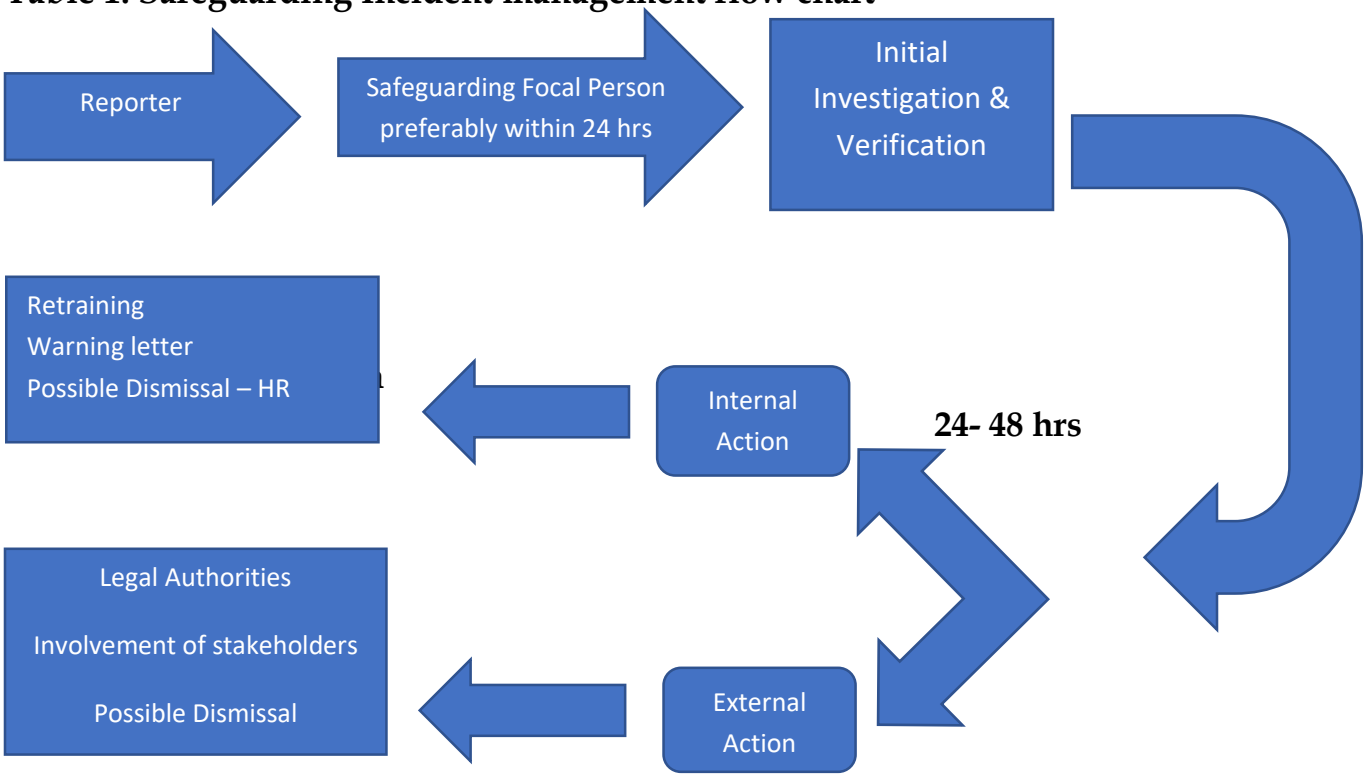
KSB shall adhere to Survivor Centered principles of safety, confidentiality, dignity and non-discrimination in its response to a safeguarding report. This includes reporting and incident management procedures put in place for effectively, safe and effective response.

3.1.0 Reporting Concerns and Allegations of Abuse

All concerns shall be reported via the following mechanisms:

- Immediately notify the **Safeguarding Focal Person** appointed by the management at KSB **preferably within 24 hours**
- The focal person to report to the Executive Director within **24 - 48 Hours**
- Safeguarding incidents may be reported via, but not limited to, the following mechanisms provided and supported by the management: **Suggestion Box**, **website**, **anonymous email**, **toll-free lines, phone calls, walk-in or face-to-face reporting** among others**.**

Table 1: Safeguarding Incident management flow chart



3.1.1 Warning on Malicious Reporting:

- All safeguarding notifications and reports shall be treated and managed with confidentiality to protect the identity of those concerned, in accordance with Kenya Data Protection Act 2019 and national laws as applicable.

- There will be no action taken against anyone who reports a concern in good faith that, following investigation, proves unfounded; however malicious intent, shall lead to disciplinary action as ascribed in KSB HR Policy.

3.1.2 Managing disclosures by children or adults

In the event that a KSB staff member or representative may witness or become aware of an abuse, neglect and or exploitation, he or she shall;

- Always take the allegation seriously and pay attention to the details reported.
- Not promise to keep the information they provide secret because you will need to inform the safeguarding focal person and those involved with investigating the incident if an investigation is instigated.
- Under no circumstances, try to investigate the allegation by him or herself. Instead, pass this information on to the Safeguarding Focal Person or Executive Director as soon as possible.

3.1.3 The role of Safeguarding Committee & Incidence management

Below are the steps to facilitate timely and appropriate incident management once a safeguarding notification has reached KSB.

- On receiving an incident notification, the Safeguarding Focal Person (or whichever safeguarding committee member gets this information) shall convene a meeting of the Safeguarding Committee within **24 hours.** Note that sexual and physical abuse (SEAH) incidents need immediate action due to specific medical and legal procedures needed.
- The Safeguarding Committee shall be guided by the following questions:
  1) Does the matter breach KSB policy or local laws?
  2) Does it require further enquiry? If yes, KSB shall appoint and delegate an administrative investigation team with clear terms of reference (TOR)
  3) With more information, complaints or allegations substantiated, refuted or unsubstantiated resulting relevant outcomes may include **retraining** and/or disciplinary action for substantiated complaints depending on the seriousness of the offence.
  4) Does this require reporting to the police or any other authority?

5) What 'victim support services' do the survivor(s) and their family need? Can these services be provided directly or through referral?
6) Is the incident management process accessible for those involved to participate?
7) What lessons does KSB learn from this incident?

- The safeguarding focal person shall work closely with relevant offices to keep written records of the incidents and share this information with the Executive Director, who shall inform the relevant corresponding Partners, and stakeholders informed.
- In cases of serious or complex incidents, KSB's multi-disciplinary Crisis Management Team shall be called upon by the Safeguarding Manager. At resolution of the incident, key stakeholders shall be informed of the appropriate outcome.
- The safeguarding committee shall ensure adequate and comprehensive documentation of safeguarding incidences, procedures and action taken.

3.1.4. Whistle-blower and Survivor Support

It is acknowledged that individuals or groups of survivors of safeguarding violations may need specific interventions to facilitate their well-being and KSB is committed to ensure:

- To take the necessary steps within the resources available to promote their welfare and safety. This may include facilitation of or referrals to competent service providers in the area of medical, psychosocial, legal or other support services required by the survivor(s) and, if needed, their caregiver(s).
- To receive appropriate information regarding the outcomes of any incident management procedures.

3.1.5. Care for incident managers

- KSB shall provide confidential telephone-based care support services for staff in case of psychological or emotional issues such as stress, anxiety and depression, pressure, work performance or any other challenges.
- In case of high stress incidents, KSB staff involved are encouraged to utilize the above service, which are accessible to the staff. For serious incidents, regular debriefs by the incident management team shall be encouraged.

- If the above-mentioned services are insufficient/inadequate, the incident manager shall seek the intervention and support of the Human Resources office or person responsible for the functions of human resource.

4.0 GOVERNANCE AND ACCOUNTABILITY

The following Governance and accountability procedures are intended to support the effective implementation of this policy in order to deliver tangible outcomes for minority and vulnerable groups including boys, girls, women and men who come into contact with KSB services.

4.1.0. Governance and management policy implementation actions:

- KSB shall integrate safeguarding measures into relevant core internal processes such as planning and programme design, partner agreements, risk management, monitoring and accountability mechanisms and recruitment processes.
- While safeguarding is everyone's responsibility, managers are accountable to ensure that this safeguarding policy and its provisions are implemented in their respective work domains in both operations and programme departments and that safeguarding risks are identified and reduced.
- Safeguarding trainings shall be compulsory and shall be made accessible to all KSB staff periodically and where applicable at programme intervention level.
- The Council and management shall ensure local implementation of the provisions of this policy in the following ways:

    1. That a Safeguarding Focal Person and Safeguarding Committee are appointed and accountable for safeguarding policy implementation and follow-up.
    2. That all staff, representatives and partners are informed about this policy provisions and their obligations towards it. This shall involve translation to accessible formats and sensitization sessions.
    3. That, the Committee shall develop a one **to-three-year safeguarding action plan** that is reviewed annually. Where needed, safeguarding

action plans shall factor in collaboration with partners with regard to strengthening safeguarding systems and practices.

4.1.1. General policy implementation actions:

- KSB Safeguarding Focal person shall collaborate with various programmes, County offices, stakeholders, OPDs and development partners to monitor practice and ensure safeguarding assessments and interventions are supported.
- All KSB representatives shall be required to sign a **code of conduct** and acknowledge through consent to the behavior code in this policy prior to their appointment and during employment.
- The KSB Website (www.ksblind.org) and every workplace will display information stating that 'KSB is committed to the safeguarding of children and vulnerable adults' and display contact details of the Safeguarding Focal Person and safeguarding committee.
- The Safeguarding focal person shall submit **quarterly** and **annual reports** of trainings provided to staff and stakeholders, registered safeguarding concerns and development to KSB's Programmes committee & the Council members.

5.0. Policy review

- This Safeguarding Policy replaces the 2022 policy edition and shall be aligned to KSB policies, sector lessons learned, and consultation with staff and partners. This policy shall be reviewed and, if necessary, revised every **three years (3),** or earlier if needed.
- This policy has been developed with the widest scope to ensure safeguarding and "**do no harm principle"** is upheld.
- KSB recognizes its responsibility to be ever vigilant and responsive to ensure effective and robust safeguarding practices are in place.

6.0 APPENDIXES:

6.1.0 KSB SAFEGUARDING CODE OF CONDUCT

The safeguarding behavior code described below is designed primarily to protect children and adults at risk who come into contact with KBS's representatives. However, it also serves to safeguard KSB and KSB representatives from false accusations or committing safeguarding violations. The adherence to this behavior code is mandatory for all KSB representatives. Any violation of this will result in disciplinary procedures that may include legal action or termination of contracts, where the severity warrants it.

KSB Safeguarding Code OF CONDUCT

I _____, acknowledge that I have read and understand KSB's Safeguarding Policy 2025. By signing this document, I agree to:

1. Comply with the Child and Adults-at-risk Safeguarding Policy of KSB.
2. Be responsible for observing the Safeguarding Code of Conduct in my work environment.

In this respect, I will:

1. Be committed to creating a culture of openness and mutual accountability at the workplace.
2. Adhere to the general principles of the UNCRPD21 by respecting the inherent dignity, individual autonomy and independence of persons; non-discrimination, promoting full and effective participation and inclusion of persons in society; respect for differences and acceptance of persons with disabilities as part of human diversity and humanity, promoting equality of opportunity and equality between men and women, promoting accessibility and respect for the evolving capacities of children with disabilities.
3. Apply the 'two adult rules' when conducting any activity with children. This means that another adult (a colleague or child's caregiver) should be present or easily reachable/nearby. In cases when this is not possible, I will inform my

supervisor in the interests of transparency and accountability. Adults should also have the option of having an adult support person if they request.

4. Ensure physical contact is at all times appropriate. (It is the responsibility of KSB representatives to understand the cultural contexts in which they work, and to know what culturally appropriate behavior is).
5. Use positive, non-violent methods to communicate and role-model good behavior to children.
6. Adhere to children and adults' consent decisions for taking photographs, filming or writing reports for reporting or public relations work.
7. Protect and handle personal data of children and adults with care and ensure that this is also respected by third parties who receive information about children from KSB or its partner Organizations.
8. Notify my Safeguarding Focal Person or the Executive Director as soon as possible (no later than 48 hours after receiving a complaint/witnessing an incident) about any concerns, allegations and incidents of abuse, neglect and exploitation regarding KSB staff, representatives, programmes and operations.
9. Comply with any safeguarding investigation (including interviews) and make available any necessary information.

I will NOT:

1. Hold, fondle, kiss, cuddle or touch children or adults in an inappropriate and/or culturally insensitive way or engage in activities involving close body contact with children or adults beyond the professional requirements.
2. Act in ways that may be abusive or place an adult or child at risk of abuse.
3. Spend excessive time alone with a child, away from others, behind closed doors or in a secluded area (see 'two adult rules' above). This does not apply to children to whom one has legal or cultural care responsibility.
4. Develop relationships with children or adults-at-risk that could in any way be deemed exploitative or abusive.
5. Marry a person below the age of 18, regardless of consent and local custom.
6. Make sexually suggestive comments or actions to a child even as a joke.
7. Engage in sexual activity or have a sexual relationship with a child, regardless of consent or local custom. Mistaken belief in the age of a child is not a defense.

8. Engage in sexual activity or have a sexual relationship with an adult beneficiary of KSB or KSB's partner programmes because of the inherently unequal power dynamics.
9. Assist a child in intimate tasks that he or she can do unaided, unless requested (such as taking them to the toilet, bathing or changing clothes).
10. Hit or otherwise physically assault or physically abuse children or adults.
11. Act in ways intended to shame, humiliate, harass, belittle or degrade children or adults (perpetrate any form of emotional abuse).
12. Discriminate against or favour particular children or adults to the exclusion of others with whom I am working.
13. Take a child engaged with KSB programmes alone in a vehicle or other means of transportation unless it is absolutely necessary and with parent/guardian and managerial consent.
14. Invite adults with whom I am in a professional relationship or unaccompanied children into private residences, unless they are at immediate risk of injury or in physical danger.
15. Sleep in the same room or bed with children unless necessary (for example, in crisis situations or emergency shelter situations), in which case I must inform my supervisor, and it should be ensured that another adult is present if possible. (Note that this does not apply to an individual's own children or children for whom they have legal or cultural care responsibility).
16. Condone, or participate in behavior with children or adults that is illegal, unsafe or abusive, including being part of harmful traditional practices (like female genital mutilation).
17. Exploit children or adults for labour, voluntarily or involuntarily (for example, domestic servants, casual laborers) or for sexual purposes (for example, prostitution) or trafficking. (Note that the definition of child domestic work (house help) does not include occasional babysitting, gardening, or help with house chores during out-of-school time).
18. Use any device, computers, mobile phones, video cameras, cameras or social media to exploit or harass children or adults, or access child exploitation material through any medium.
19. Give or allow children to use illegal drugs, alcohol or restricted substances or encourage their use.

Name: _____

Department: _____

Position: _____

Station: _____

Signature: _____Date: _____

NOTE:

If you are unsure whether an action, activity or behavior may violate the Safeguarding Policy or Code of Conduct, please seek guidance from the Head of Human Resources, the Executive Director or the Head of Department/Supervisor

Details of person reporting concern (unless they want to remain anonymous)			
Name:		**Contact telephone:**	
Location:		**Relationship to child(ren) or adult(s)-at-risk:**	
Administrative information related to the incident			
Applicable KSB Office:		**Project Number:**	
Partner name if applicable:		**Funding MA(s):**	
Type of safeguarding concern or abuse (Please circle appropriate box (es)			
Physical	Sexual	Emotional	Neglect/Negligence
Economic and other exploitation	Breach of KSB policy and Code of Conduct		
Victim's details			
Name (no need for victim's name if the case is at a KSB partner):		Age range if known:	
Gender:		Health issue or impairment if known and applicable:	
Location of incident			
Further details of concern or incident:(including victim's direct words if possible):			
If emergency medical care is required, has it been accessed?			
Have any referrals or external entities/stakeholders been informed of this incident?			
What action (if any) has already been taken and by who?			

6.1.1 : KSB SAFEGUARDING INCIDENT REPORTING FORM

Send your email to: your Safeguarding Focal Person or the Executive Director

E-mail Subject: ATTENTION: Confidential!'

Note: The information contained in this form is confidential.

This form is for reporting concerns about potential violations of KSB's Child and Adults-at-risk Safeguarding Policy and Code of Conduct.

It should only be sent to your local Safeguarding Focal Person or Executive Director. Please try to provide as much information as possible in the form. Areas where you have nothing to report can be left blank.

Details of the person reporting concern (unless they want to remain anonymous)

Approved by

Samson Waweru S.Waweru Date: 9th December 2025
Executive Director