



SAFEGUARDING OF VULNERABLE PERSONS AND CHILDREN POLICY AND PROCEDURE

RLC SERVICES LTD

1.0 DEFINITIONS

- 1.1. Safeguarding:** According to UNICEF, Safeguarding is more than an organizational commitment. It's an individual responsibility to abide by practices that minimize risk, and to speak up against suspected wrongdoing or threats. All UNICEF personnel play a role in making UNICEF a safe organization for the people we serve
- 1.2. A child:** The Constitution of Kenya, 2010, defines a child in Article 260, as an individual who has not attained the age of 18 years
- 1.3. Vulnerable person:** According to the Kenya social protection bill 2024, "vulnerable person" means a person who needs special care, support or protection, including the orphaned and vulnerable children, widows or widowers, persons with disabilities, older members of society or at risk of abuse or neglect and who has been identified as such by the relevant government body.
- 1.4. Abuse:** is a violation of an individual's human and civil rights by any other person or person. It can take the form of physical, psychological, financial or sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the health, survival, development or dignity of a child or vulnerable adult. Abuse can be a single act or repeated act and can be unintentional or deliberate. Abuse often involves criminal acts.

2.0. INTRODUCTION

RLC Service Limited is committed to protecting the rights, dignity, and welfare of vulnerable persons and children.

2.1. Policy has been developed applying universal best practice and standards in safeguarding children and vulnerable people. It is the responsibility of everyone in the company to prevent the physical, sexual, emotional abuse or neglect of every member of our community, and particularly the abuse of those most vulnerable among us, including children, young people and adults at risk. The welfare of these individuals is paramount. All children and adults at risk without exception have the right to protection from abuse regardless of gender, ethnicity, disability, sexuality or belief.

2.2. All company staff, contractors, volunteers, interns and partners will be made aware of this policy and of what to do if they have any concerns. There is guidance for those responding to concerns so that they are properly dealt with, including sharing information about concerns with agencies that need to know and involve children, young people and families appropriately.

2.3. It is our policy that no one shall work with the company children, if convicted concerning sexual offences against children, young people or adults at risk.

2.4. All children and vulnerable people have equal rights to protection from harm.

2.5. Everybody has a responsibility to support the protection of children and vulnerable people

2.6. The company has a duty of care to children and vulnerable people at risk with whom they work, are in contact with, or who are affected by their work and operations.

2.7. When the company works with partners, they have a responsibility to help partners meet the minimum requirements on protection.

2.8. All actions on child protection are taken in the best interests of the child.

2.9. All actions on vulnerable adult protection are taken in the best interests of the adults at risk which are paramount

3.0. PURPOSE

3.1. This policy aims to:

3.1.1. Establish clear guidelines for safeguarding vulnerable people and children in RLC Service

Limited.

- 3.1.2. Ensure compliance with relevant national and international legal frameworks for protecting vulnerable people in society
- 3.1.3. Promote a culture of respect, inclusion, and protection in all business operations in the company
- 3.1.4. Ensure that any vulnerable person experiencing abuse caused by the company or company stakeholders is supported

3.2. **Scope** This policy applies to all employees, contractors, consultants, suppliers, and partners associated with RLC Service Limited. It covers all business operations, events, and interactions with vulnerable people and children.

3.3. Broad kinds of abuse can be identified as follows:

- 3.3.1. Financial/economical or material abuse is any theft or misuse of a Vulnerable Persons money, property or resources. Common forms of financial abuse are misuse by others of a Vulnerable Persons property or other financial benefits or undue pressure to change wills (e.g. the elderly). It is also financial abuse to incite a Vulnerable Person to carry out any of these things on another individual's behalf.
- 3.3.2. Physical abuse or physical injury to a child /vulnerable person, such as evidence of hitting, kicking or shaking, where there is definite knowledge or reasonable suspicion, that the injury was inflicted or knowingly not prevented.
- 3.3.3. Emotional abuse where harm is done by persistent or severe emotional ill treatment or rejection, such as degrading punishments, threats and not giving care and affection, resulting in adverse effects on behaviour and emotional developments of a child, young person or vulnerable adult.
- 3.3.4. Sexual abuse where exploitation of a child, young person or vulnerable person occurs. This includes rape, incest and all forms of sexual activities including pornography.
- 3.3.5. Neglect, where basic needs such as food, warmth and medical care are not met, or when there is a failure to protect a child from exposure to any kind of danger, resulting in serious impairment of a child, young person or vulnerable adult's health or development.
- 3.3.6. Exchanging benefits, for example goods, food and money in exchange for sexual favours.
- 3.3.7. Bullying, which could include physical intimidation. This includes verbal intimidation,

including racist and sexist remarks; emotional intimidation for example, excluding or isolating someone.

All Vulnerable Persons are entitled to equal treatment and shall not be discriminated (treated less favorably) upon by Staff and Partners on the basis of their race, sex, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status.

4.0. KEY PRINCIPLES

- 4.1. **Equity, Social Justice, and Inclusiveness:** Every child and vulnerable person, regardless of their background, gender, disability, ethnicity, or socio-economic status, has the right to protection from abuse, exploitation, and neglect. The company is committed to creating an inclusive environment where all individuals receive fair treatment and equitable access to support services.
- 4.2. **Integrity, Transparency, and Accountability:** The company upholds the highest ethical standards in safeguarding the rights of children and vulnerable people.
- 4.3. **Promotion of a Rights-Based Approach to safeguarding:** Safeguarding measures will be rooted in human rights principles, ensuring children and vulnerable individuals are protected in line with national and international legal frameworks (e.g., The constitution of Kenya, the UN Convention on the Rights of the Child).
- 4.4. **Gender-Responsive Social Protection:** Safeguarding strategies will be gender-sensitive, acknowledging that girls and women often face unique risks, such as gender-based violence, early marriage, and exploitation.
- 4.5. **Collaboration with Relevant Stakeholders, Including Governments:** Effective safeguarding requires strong partnerships with governments, civil society, law enforcement, and community organizations.
- 4.6. **Use of data to Scale Up Evidence-Informed Interventions:** Safeguarding efforts will be guided by best practices, data, and research on the welfare of vulnerable people

5.0. IMPLEMENTATION

The protection from abuse and the rights of children and vulnerable people will be addressed through the following steps: —

- 5.1. **Risk assessment/risk mitigation:** The company recognizes that there are several potential risks to children and vulnerable people in our work and within the environment we operate in, particularly in those work streams where staff or company representatives are in contact with these groups. In

recognizing these risks, staff and others should proactively assess and manage risks to children and adults at risk to reduce the risk of harm.

- 5.2. Company management will ensure that safeguarding is mainstreamed throughout projects and operations
- 5.3. The company will implement a robust recruitment process to prevent hiring individuals who pose a risk to children or vulnerable adults.
- 5.4. Background checks, reference verification, and specific safeguarding questions will be part of the hiring process
- 5.5. Safeguarding training will be provided to all staff during induction and at regular intervals.
- 5.6. Employees must sign a Code of Conduct that includes commitments to safeguarding principles.
- 5.7. There shall be more than one staff or company representatives during activities in environments with children.
- 5.8. The company will obtain consent from the child, young person or vulnerable person and/or their parents guardian to take photographs and publish
- 5.9. Maintain a risk and incidences register. The register will be reviewed by the management to ensure that measures in place are effective
- 5.10. Any staff members who raise concerns of serious malpractice should be protected as far as possible from victimization or any other detrimental treatment if they come forward with serious concerns, if concerns are raised in good faith with the company
- 5.11. The company will designate a safeguarding officer to receive and register all reports of abuse of Vulnerable Persons. The register shall also set out how the complaints are dealt with.
- 5.12. The company will establish a mechanism as how community members, including children, can raise concerns over inappropriate behaviour by staff, ensuring the
- 5.13. Safeguarding Code of Conduct is translated into all relevant languages and available in illustrative, low-literacy and/or a child-friendly format.
- 5.14. Ensuring that in the information to the communities, names, e-mail addresses and phone numbers to access are correct and immediately updated when changes take place.
- 5.15. The company will collaborate with government authorities to ensure protection of vulnerable people, and that action is taken against perpetrators.
- 5.16. Support will be offered to survivors and victims, regardless of whether formal internal investigations have been carried out. Support may include specialist psycho-social counselling, and/or access to other specialist and appropriate support as needed.

6.0. POLICY REVIEW

This policy will be reviewed annually to ensure effectiveness and alignment with past experiences, best practices and legal requirements. The company will engage the leadership, staff and other participants to provide feedback to strengthen the safeguarding commitments.

Approved by

Name: RACHEAL CHIBUYI

Signed:



Date: 11/06/2026