KARAMOJA TUMAINI NETWORK · KTN

PSEA Policy

Protection from sexual exploitation and abuse of the people KTN serves

Policy Category Safeguarding Policy · Classification: Public
Adopted by the Board of Directors March 2026
Status Version 2.0 · Effective March 2026 · Next review March 2028

OUR COMMITMENT

KTN's help is free. No one acting for this organisation may ever ask for money, work, a favour or a sexual act in return for assistance, a place on a programme, a job or a referral. There is no version of our work in which that is acceptable.

This policy is how the Board makes that promise enforceable. It sets out what is prohibited, who is accountable, how a concern reaches a trained person quickly, and how the person harmed is supported first, ahead of the organisation's own name.

WHY IT MATTERS

Sexual exploitation and abuse happen where power meets need. KTN works with children and families who have very little and who depend on the people we send to them, which is exactly the imbalance that abuse exploits. Assuming it could not happen here is how organisations fail the people they serve.

WHERE IT APPLIES

Every person who works for or with KTN: board members, staff, volunteers, peer educators, interns, consultants, contractors, partners and visitors. On duty and off duty, at every office, activity and site, and in every contact with the children, families and communities KTN serves.

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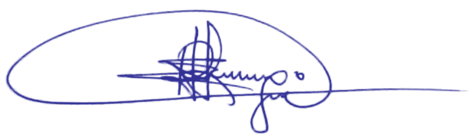
Policy Approval

This Protection from Sexual Exploitation and Abuse (PSEA) Policy was considered and approved by the Board of Directors of Karamoja Tumaini Network in March 2026 and takes effect from that date as a governance instrument of the organisation. Compliance with it is mandatory for everyone within its scope. KTN's help is free, and no one acting for KTN may ever demand anything in return for it. The resolution reference and the signatures below complete the formal record of adoption.

Field	Detail
Policy status	Approved
Approval authority	Board of Directors
Approval date	March 2026
Effective date	March 2026
Version	2.0
Board resolution reference	KTN/BRD/RES/2026/____

The Board Secretary enters the resolution number from the minutes of the approving meeting before the signed copy is filed.

Approval signatures



Chairperson, Board of Directors
Karamoja Tumaini Network · March 2026

A Statement of Commitment from the Board

The people KTN works with depend on us. A child resting in a drop-in centre, a mother joining a savings group, a young woman in training, a family waiting for a missing child to be traced and brought home: each of them places trust in KTN, and many rely on the help we provide to get through the day. That dependence puts a measure of power in the hands of our people. This policy exists to make sure that power is never turned into a means of sexual exploitation or abuse.

The help KTN offers is given freely. It is never to be paid for with sex, with a sexual favour, or with anything of that kind. No member of staff, no volunteer, no partner and no visitor may ever use a position with KTN, or the assistance KTN provides, to obtain sex or to exploit any person sexually. This protects children above all, and it protects every adult we serve as well.

KTN holds a position of **zero tolerance** towards sexual exploitation and abuse by anyone connected to the organisation. Zero tolerance means three things in practice: we act on every concern, we never ignore or minimise a report because of who is involved, and we never allow a person who has harmed someone to move on quietly. Where exploitation or abuse happens, or where there is good reason to believe it may have happened, we will act, we will stand by the person who has been harmed, we will report as the law and our donors require, and we will not shield a wrongdoer to spare the organisation embarrassment.

We commit the organisation to safe programming: every activity KTN designs is assessed for the risk it could create, and the safeguards are built in before the activity begins, not after something goes wrong. We commit to a survivor-centred response: the safety, dignity and wishes of the person harmed guide every decision we take. And we commit to accountability: the Board will receive reports on every concern and how it was handled, and will answer for this policy to the communities we serve, to our donors, and to the law of Uganda.

The Board has approved this policy and will answer for it. We expect every person who works with KTN to understand it, to sign the standards it sets out, and to live by them, in their work and in their private conduct.

Chairperson, Board of Directors
Karamoja Tumaini Network

Adopted by resolution of the Board of Directors, March 2026.

Document Control

Field	Detail
Policy title	Protection from Sexual Exploitation and Abuse (PSEA) Policy
Registered name	Karamoja Tumaini Network Limited, a company limited by guarantee without share capital, Reg. No. 80034272074698, incorporated on 1 July 2025 under the Companies Act, 2012 (Cap. 106)
Version	2.0
Status	Approved and adopted by the Board of Directors
Approval date	March 2026
Effective date	March 2026
Policy owner	Karamoja Tumaini Network, acting through its Board of Directors
Policy custodian	The Executive Director, supported by the PSEA Focal Person
Applies to	All board members, staff, volunteers, peer educators, interns, consultants, researchers, community facilitators, partners, contractors, suppliers and visitors, at every KTN office, activity and site, and in every contact with the children, families and communities KTN serves
Reads alongside	The Strategic Plan 2026 to 2030; the Child Safeguarding Policy; the Code of Conduct; the Human Resources Policy Manual; the Complaints and Community Feedback Procedure; the Whistleblowing and Protected Disclosure Policy; the Data Protection and Privacy Policy; the Gender Equality and Social Inclusion Policy; and the Research and Evaluation Ethics Policy
Definitions	Key terms, including sexual exploitation, sexual abuse and sexual harassment, are defined in the body of this policy; acronyms and abbreviations are used as spelled out at first mention
Review frequency	Every two years, or earlier where required by a change in law, a donor requirement, organisational restructuring, a revision of the Strategic Plan, a serious incident, an emerging risk, or the direction of the Board
Next scheduled review	March 2028
Date of last review	March 2026
Classification	Public. This policy is shared openly with staff, partners, donors, communities and authorities.

Version Control Register

Version	Date	Description of change	Approved by
1.0	July 2026	First PSEA Policy adopted, superseded by version 2.0	Board of Directors
2.0	March 2026	Revised and expanded edition: expanded prohibited conduct, responsibility matrix, prevention systems, seven-stage case process, survivor support framework, partner requirements, training plan, monitoring framework, implementation roadmap and eight annexes. Restructured to the KTN governance document standard and adopted as a governance instrument of Karamoja Tumaini Network. Prepared by the Executive Director and the PSEA Focal Person.	Board of Directors

Amendment History Register

No.	Date	Section(s) affected	Summary of amendment	Approved by

Completed by the policy custodian as amendments are approved under Section 9.3. Until an amendment is made, this register intentionally remains blank.

Distribution List

Recipient	Format	Date issued
Board of Directors	Electronic copy and one signed print copy for the corporate record	March 2026
Executive Director and all staff	Electronic copy; included in the staff induction pack; signed acknowledgement of the PSEA commitments kept on file	March 2026
Volunteers, peer educators and interns	Induction briefing and the PSEA commitments, in English and Nga'Karamojong as needed	At induction
Children, families and communities KTN works with	Plain-language summary explaining that KTN's help is free and how to report a concern, in Nga'Karamojong	On contact
Partners, contractors and suppliers	Relevant extracts and PSEA clauses issued with their agreements	With each agreement
Donors	Full copy in due diligence and assessment packs	On request
Public	Published on the KTN website, www.karamojatumaini.org	From adoption

The policy custodian keeps this list current. The authoritative version of this policy is the signed copy held by the custodian; numbered electronic copies carry the same text.

Contact Information

Field	Detail
Policy owner	Karamoja Tumaini Network
Policy custodian	The Executive Director, supported by the PSEA Focal Person
Report a PSEA concern	The PSEA Focal Person is the first point of contact for any concern about sexual exploitation or abuse. Reports may be made in person, by telephone or in writing. Current names and numbers are given in the reporting and referral directory in the annexes.
Kampala office	Da Joy House, Room JS05A, Waliggo Road, Komamboga, P.O. Box 10066, Kampala
Napak office	C/o Matany Trading Centre, Matany Town Council, Napak District
Email	info@karamojatumaini.org
Website	www.karamojatumaini.org

Acronyms and Abbreviations

Acronym	Meaning
ACRWC	African Charter on the Rights and Welfare of the Child
CRC	Convention on the Rights of the Child (United Nations)
DPA	Data Protection and Privacy Act, 2019 (Cap. 97)
DSL	Designated Safeguarding Lead
GBV	Gender-Based Violence
HIV	Human Immunodeficiency Virus
HR	Human Resources
IASC	Inter-Agency Standing Committee
KTN	Karamoja Tumaini Network
MOGLSD	Ministry of Gender, Labour and Social Development
NGO	Non-Governmental Organisation
PEP	Post-Exposure Prophylaxis
PSEA	Protection from Sexual Exploitation and Abuse
PSWO	Probation and Social Welfare Officer (District)
PTIP	Prevention of Trafficking in Persons Act, 2009
SEA	Sexual Exploitation and Abuse
SHIELD	Safeguard, Heal, Integrate, Empower, Lead, Data: the framework of the KTN Strategic Plan
ST/SGB/2003/13	United Nations Secretary-General's Bulletin on Special Measures for Protection from Sexual Exploitation and Sexual Abuse
UN	United Nations
UNICEF	United Nations Children's Fund

Key terms used in this policy are defined in Section 3.1.

Executive Summary

This is Karamoja Tumaini Network's standard for protecting the people it serves from sexual exploitation and abuse by anyone acting in KTN's name. It was considered and approved by the Board of Directors in March 2026 and binds every person who works for or with KTN, paid or unpaid, in every place KTN operates and in every contact with the children, families and communities it serves.

Exploitation happens where power meets need, and KTN works at that meeting point every day. The children and families it reaches have, in many cases, already survived trafficking, forced begging, sexual exploitation and violence before they ever meet KTN. They come for food, medical help, a route back to school, a child to be traced and brought home. That need, and the trust it carries, places KTN's people in a position of real power over those they serve. This policy exists so that the power is never turned into a means of sexual exploitation or abuse.

KTN's position is zero tolerance. The help KTN provides is free and unconditional. No person acting for KTN may exchange assistance for sex, engage in any sexual activity with a child, abuse a position of power for sexual purposes, or sexually harass any person. Every concern is acted on, every survivor is supported, and every breach carries consequences, whoever is involved. Zero tolerance does not mean zero reports: an organisation that receives none is more likely one where people cannot speak than one where nothing happens, so KTN treats silence as a risk to investigate rather than a result to celebrate.

The policy does six things. It defines the conduct that is prohibited and adopts, in plain language, the IASC Six Core Principles and the standards of ST/SGB/2003/13 alongside the requirements of Ugandan law. It assigns every responsibility to a named role, from the Board to the newest volunteer. It builds prevention into recruitment, training, programme design and partnership. It gives anyone, including a child and including someone who cannot read, a way to report that does not depend on the person the concern may be about. It sets out a seven-stage case process with a survivor-centred response and honest timeframes. And it establishes the monitoring, records, audit trail and reporting that let the Board see whether the policy works in practice rather than assume it does.

The policy is proportionate to what KTN is: a young, Karamojong-led organisation working in the hardest districts in Uganda. Where specialist help is needed, in a complex investigation or in clinical, psychosocial or legal support for a survivor, KTN refers and stays alongside rather than pretending to a capacity it does not have. Where something is not yet in place, Section 9.2 says so and sets a date. Eight annexes carry the working tools: the signed Code of Conduct, the reporting form, the investigation flowchart and referral directory, the staff declaration, the partner checklist, the risk assessment tool, the training register and the monitoring dashboard.

1

CHAPTER ONE

INTRODUCTION

Why this policy exists and the context it serves.

1 Introduction

Why this policy exists and the context it serves.

1.1 Introduction and Organisational Context

1.1.1 Who we are

Karamoja Tumaini Network (KTN) is a Karamojong-led, child-focused organisation registered in Uganda. *Tumaini* is Swahili for hope; the name joins our home region to that hope on purpose. Nine in ten of our staff and leaders are Karamojong and we work in Nga'Karamojong, at both ends of the road children travel: the villages of Karamoja that children leave, and the urban streets of Kampala and other towns where they arrive. We follow each child for up to two years after they return home.

Our vision is a Karamoja where every child is safe, educated, and thriving within their community. Our mission is to prevent, respond to, and resolve the migration of Karamojong children to urban streets through a culturally grounded, evidence-led, corridor-wide model. That model, SHIELD, makes six connected promises that travel with a child from the manyatta to the street and back home: Safeguard, Heal, Integrate, Empower, Lead, Data. The first of those promises, Safeguard, is where this policy lives.

1.1.2 Why PSEA is critical in our operating environment

The children and families KTN serves are among the most vulnerable anywhere in Uganda. Many have already survived trafficking, forced begging, sexual exploitation and violence before they ever meet us. They come to KTN for food, medical help, a route back to school, a child to be traced and brought home, and the chance to rebuild a livelihood. That need, and the trust it carries, places our people in a position of real power over those we serve.

Sexual exploitation and abuse (SEA) is the misuse of that power for sexual purposes by the very people meant to provide help. It is one of the gravest betrayals possible in this work, because it turns an act of assistance into an act of harm and destroys the trust on which everything else depends. The risk is not theoretical. Across the humanitarian and development sector, exploitation has most often happened exactly where KTN works every day: at distributions, in one-to-one outreach, in decisions about who receives support, and in contact with children who have no adult looking out for them.

> *Exploitation happens where power meets need. KTN works at that meeting point every day, which is why this policy is operational, not decorative.*

1.1.3 How PSEA connects to everything else KTN holds

Protection from sexual exploitation and abuse is not a stand-alone compliance exercise. It is one expression of commitments KTN has already made:

- **Child safeguarding. Where the person harmed or at risk is a child, this policy and the KTN Child Safeguarding Policy apply together. Section 7.1 explains how.**
- **Human rights.** Freedom from sexual violence and exploitation is a right under the Convention on the Rights of the Child, the African Charter on the Rights and Welfare of the Child, and the Constitution and laws of Uganda. This policy puts those rights into operating procedure.
- **Accountability to communities.** KTN publishes its budget, its results, and its setbacks. The same honesty applies here: communities are told their rights, reporting channels are visible, and the Board receives and answers for every concern.
- **Our values.** Grounded, dignified, honest, rooted, steady. A policy that protected the organisation instead of the person harmed would contradict all five.

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CHAPTER TWO

PURPOSE, OBJECTIVES AND SCOPE

What the policy is for, who it binds, and the zero tolerance commitment behind it.

2 Purpose, Objectives and Scope

What the policy is for, who it binds, and the zero tolerance commitment behind it.

2.1 Purpose of the Policy

This policy exists for five reasons.

- **To set the standard.** It states plainly the conduct KTN requires of everyone who acts for or on its behalf, so that no one can claim not to have known what was expected.
- **To prevent harm.** It establishes the practical systems that reduce the risk of sexual exploitation and abuse before it can occur: safer recruitment, training, risk assessment, community awareness and partner due diligence.
- **To make reporting possible.** It gives every person, including the children and adults we serve, clear and accessible ways to report a concern, and describes honestly what happens next.
- **To put the survivor at the centre.** It guarantees that the safety, dignity and wishes of the person harmed guide the response, with support offered regardless of whether an investigation proceeds.
- **To assign accountability.** It makes plain who is responsible for protection at every level of KTN, and how the organisation checks that the policy works in practice rather than assuming it does.

2.1.1 The risks this policy addresses

The policy is built around the specific situations in KTN's work where power and need meet, because that is where exploitation happens:

- Distribution of food, supplies, and material support, where a person controls access to something a family needs.
- One-to-one contact with children and adults during outreach, at drop-in centres, in family tracing and during home visits.
- Selection decisions: who joins a livelihood programme, who receives school support, whose child's case moves forward.
- Recruitment itself, where a job or a volunteer place can be traded for sexual favours.
- Digital contact with children and community members through phones and social media.
- Partner and contractor activity carried out in KTN's name, where KTN's standards must still hold.

2.1.2 The standards it establishes

The policy adopts, in plain language, the Inter-Agency Standing Committee (IASC) Six Core Principles Relating to Sexual Exploitation and Abuse (2019), the United Nations Secretary-General's Bulletin on Special Measures for Protection from Sexual Exploitation and Sexual Abuse (ST/SGB/2003/13), and the requirements of Ugandan law. These are the same standards used by UNICEF, Save the Children, World Vision, Plan International and the International Rescue Committee. The Ugandan and international legal sources these standards rest on are set out in Section 4.1.5.

2.2 Policy Scope

2.2.1 Who this policy applies to

This policy applies to every person who acts for or on behalf of KTN, whether paid or unpaid, full-time or occasional. There are no exceptions by seniority, length of service, or type of engagement. Specifically, it binds:

Category	Includes
Governance	Board members and members of any board committee
Leadership	The Executive Director and all senior managers
Employees	All staff on any form of employment contract
Volunteers and interns	Volunteers, peer educators, interns, and students on placement
Consultants and temporary workers	Consultants, researchers, casual and temporary workers, and their assistants
Community facilitators	Community-based facilitators, mobilisers and para-social workers engaged by KTN
Partners	Partner organisations and every member of their personnel working on KTN activities
Contractors and suppliers	Contractors, suppliers, vendors and their staff, where their work brings them into contact with the people KTN serves
Visitors	Donors, journalists, evaluators and any visitor whom KTN brings into contact with the people it serves

2.2.2 When and where it applies

The policy covers conduct in both professional and private life, because a person who works with vulnerable people does not stop being a KTN representative at the end of the working day. It applies wherever KTN works: in the Karamoja source communities, in the towns and cities across Uganda where children and families go, in neighbouring countries where they also end up, and everywhere along the routes between them. It applies to conduct in person and conduct online.

2.2.3 Expectations of partners and third parties

Partners, contractors and suppliers must either hold PSEA standards equivalent to this policy or agree in writing to work under KTN's standards for the joint activity. These obligations are written into every agreement and contract, and Section 7.2 sets out the minimum requirements, the due-diligence process, and the consequences of non-compliance. A partner's failure to meet these standards is grounds for suspending or ending the partnership.

2.2.4 Relationship to workplace sexual harassment

This policy is concerned chiefly with sexual exploitation and abuse committed against the people KTN serves and the communities KTN works in. Unwelcome sexual conduct between members of staff, which is workplace sexual harassment, is handled through KTN's human resources and anti-harassment procedures. The two differ in who is harmed, but KTN holds the same zero tolerance towards both, and Section 4.1.4 defines harassment so that everyone can recognise it.

2.3 Policy Statement and Zero Tolerance Commitment

> **KTN's policy statement.**
>
> Karamoja Tumaini Network has zero tolerance for sexual exploitation and abuse. The help KTN provides is free and unconditional. No person acting for or on behalf of KTN may ever exchange assistance for sex, engage in any sexual activity with a child, abuse a position of power for sexual purposes, or sexually harass any person. Every concern will be acted on. Every survivor will be supported. Every breach will carry consequences, whoever is involved.

In adopting this statement, KTN's leadership commits the organisation to five things:

- **Zero tolerance for sexual exploitation and abuse.** No concern is ignored, no report minimised, and no perpetrator protected, whatever their position or value to the organisation.
- **No acceptance of abuse of power.** The relationship between a helper and a person in need is never equal. KTN treats that imbalance as real and holds anyone who uses it for sexual advantage to account.
- **Safe programming.** Every programme and activity is designed and risk-assessed so that it does not create opportunities for exploitation, with safeguards in place before work begins.
- **A survivor-centred approach.** The safety, dignity, wishes and recovery of the person harmed come before the reputation, convenience or interests of the organisation or any individual.
- **Accountability.** Responsibilities are assigned by name and role, performance is monitored and reported to the Board annually, and KTN reports to authorities and donors as the law and funding agreements require.

Zero tolerance does not mean zero reports. An organisation that receives no reports is more likely one where people cannot speak than one where nothing happens. KTN treats a working, trusted reporting system as evidence the policy is alive, and treats silence as a risk to investigate.

3

CHAPTER THREE

GOVERNANCE FRAMEWORK

The definitions and principles through which KTN governs protection from sexual exploitation and abuse.

3 Governance Framework

The definitions and principles through which KTN governs protection from sexual exploitation and abuse.

3.1 Definitions and Key Concepts

The terms below carry the meaning given here throughout this policy. They follow the definitions used in the UN Secretary-General's Bulletin ST/SGB/2003/13, the IASC Six Core Principles, and Ugandan law.

Sexual exploitation. Any actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes. This includes, but is not limited to, profiting monetarily, socially or politically from the sexual exploitation of another, and any exchange of money, employment, goods, assistance or services for sex.

Sexual abuse. Any actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. It includes sexual assault and all sexual activity with a child.

Sexual exploitation and abuse (SEA). The combined term used in this policy for the above, when committed by a person covered by this policy against a person KTN serves or a member of the community.

Sexual harassment. Unwelcome conduct of a sexual nature, whether comments, advances, requests for sexual favours, or physical or digital behaviour, that a reasonable person would find offensive, humiliating or intimidating. Where it occurs between co-workers it is handled under KTN's human resources procedures; where it is directed at a person KTN serves it is treated under this policy.

Child. Any person below eighteen years of age, regardless of the age of majority or marriage in any local custom or law.

Child sexual abuse. Any sexual activity with a child, contact or non-contact, including exposure, grooming, exploitation through images, and online sexual contact. Under Uganda's Penal Code Act, sexual activity with a person below eighteen is the crime of defilement. A mistaken belief about a child's age is never a defence.

Child safeguarding. The responsibility KTN holds to make sure its staff, operations and programmes do no harm to children and that any concern about a child's safety is reported and acted on. Set out fully in the KTN Child Safeguarding Policy.

Protection. All measures taken to prevent, mitigate and respond to violence, exploitation, abuse and neglect against the people KTN serves.

Survivor. A person who has experienced sexual exploitation or abuse. KTN uses this term to recognise the person's strength and right to recovery.

Victim. The same person, in the language of the legal process. KTN uses "victim" where the law requires it and "survivor" everywhere else.

Perpetrator. A person who commits, or attempts to commit, sexual exploitation or abuse. Until an investigation concludes, KTN refers to a "subject of complaint," because fairness to the accused is part of a credible system.

Person we serve. Any child, adult, family or community member who receives, seeks, or could receive assistance or services from KTN, or who comes into contact with KTN through its work. Some organisations use "beneficiary"; KTN avoids that word where a person is meant, but the protections are identical.

Abuse of power. Using a position, role, or control over assistance, information or access to obtain anything, sexual or otherwise, from a person who depends on it. All SEA involves abuse of power; not all abuse of power is sexual, and the non-sexual forms are handled under the Code of Conduct.

Conflict of interest. A situation where a personal relationship or interest could affect, or appear to affect, a person's judgment in their KTN role. An example is a personal relationship with a person whose case the staff member manages. Conflicts must be declared to a line manager as soon as they arise.

Consent. Free, informed and ongoing agreement. A person below eighteen cannot consent to sexual activity with an adult. Where there is a serious imbalance of power, or where assistance is at stake, the conditions for genuine consent do not exist, and apparent agreement is never a defence.

Retaliation. Any threat, punishment, disadvantage or harm directed at a person because they reported a concern, supported a survivor, or took part in an investigation. Retaliation is itself a serious breach of this policy.

Whistleblowing. The good-faith reporting of suspected wrongdoing, including SEA, through internal or recognised external channels. Whistleblowers are protected under this policy, the KTN Whistleblowing Policy, and Uganda's Whistleblowers Protection Act, 2010.

Confidentiality. The duty to share information about a concern only with those who must know in order to keep people safe and to act, never as gossip. Confidentiality is not secrecy: no one promises total secrecy, because protecting people may require informing others.

3.2 Guiding Principles

Ten principles shape how every part of this policy is read and applied. Where two appear to conflict, the safety of the person harmed decides.

3.2.1 Do no harm

Every KTN action, including the response to a concern, is tested against one question: could this make things worse for the person harmed or for others at risk? Clumsy investigation, broken confidentiality, or visible special treatment can each cause new harm. Where action and inaction both carry risk, KTN chooses the path that best protects people, and documents why.

3.2.2 Best interests of the child

In any matter touching a child, the child's best interests are the primary consideration, above the interests of the organisation, the family, the donor, or any adult involved. This follows Article 3 of the Convention on the Rights of the Child and the Children Act of Uganda.

3.2.3 Survivor-centred approach

The survivor's safety, dignity, wishes and recovery guide the response. The survivor decides, as far as the law allows, what support to accept, what process to take part in, and who is told. KTN informs honestly where the law removes choice, for example where a crime against a child must be reported, rather than pretending the choice exists.

3.2.4 Confidentiality

Information moves on a need-to-know basis only. Records are factual, stored securely, and kept separate from general files. Breaching confidentiality is a disciplinary matter in its own right.

3.2.5 Respect and dignity

Survivors are believed enough to be acted on, listened to without judgment, and never blamed, interrogated, or made to repeat their account unnecessarily. Children are people with names, not cases.

3.2.6 Non-discrimination

Every person is protected and every report is taken seriously regardless of age, sex, disability, ethnicity, language, religion, or status. KTN pays particular attention to those most at risk in its operating context: children on the streets, girls in domestic work, young mothers, survivors of trafficking, and people with disabilities.

3.2.7 Accountability

Named roles carry named responsibilities (Section 5.1). Performance against this policy is measured (Section 8.2) and reported to the Board every year. Failure to act is treated as seriously as the act itself.

3.2.8 Transparency

Communities are told plainly, in Nga'Karamojong and in formats that do not require reading, that KTN's help is free and how to report if anyone demands otherwise. KTN reports honestly to its Board, donors and authorities, including when something has gone wrong.

3.2.9 Mandatory reporting

Every person covered by this policy must report any SEA concern within twenty-four hours. Reporting is a duty, not a choice, and it is not for the person reporting to decide whether the concern is true. Failing to report a known concern is itself a breach.

3.2.10 Need-to-know information sharing

Each person involved in a response learns only what they need to do their part. The full picture is held by the PSEA Focal Person and, where required, the Executive Director and Board Chairperson. Names are removed from statistics, lessons and reports wherever possible.

4

CHAPTER FOUR

POLICY REQUIREMENTS

The binding standards of conduct, and the behaviour required of everyone connected with KTN.

4 Policy Requirements

The binding standards of conduct, and the behaviour required of everyone connected with KTN.

4.1 Prohibited Conduct

The conduct below is prohibited for everyone covered by this policy, at all times, in professional and private life. The lists give examples; they are not exhaustive, and conduct of a similar character is equally prohibited. The six numbered standards in the box are the IASC core standards, restated in KTN's words, and they are reproduced as a personal commitment in Annex 1 and Annex 4, which each representative signs.

The six standards, in brief.

1. Sexual exploitation and abuse is serious misconduct and grounds for dismissal and criminal referral.
2. Sexual activity with anyone below eighteen is prohibited, whatever the local age of majority and whatever is claimed about consent or belief about age.
3. Exchanging money, employment, goods, assistance, protection or services for sex or sexual favours is prohibited, including using any of KTN's help to obtain sex.
4. Sexual relationships between KTN representatives and the people KTN serves are prohibited, because the imbalance of power makes genuine consent impossible.
5. Anyone with a concern or suspicion of SEA by a colleague, partner or anyone else connected to the work must report it.
6. Everyone must help create and maintain an environment that prevents SEA, and managers at every level must model and uphold these standards.

4.1.1 Sexual exploitation

- Demanding, requesting or accepting sex or any sexual act in exchange for food, supplies, medical or school support, a place in a programme, livelihood assistance, money, employment, protection, or a decision about a child's case.
- Using influence over a selection list, a distribution, a referral or a registration to obtain sexual benefit, including hinting that help would come faster, or go further, in return for sexual attention.
- Withholding or threatening to withhold assistance because sexual attention was refused.
- Profiting in any way from the sexual exploitation of another person, including facilitating, arranging or looking away from someone else's exploitation.
- *Field example: a facilitator tells a mother that her daughter's school bursary "depends on cooperation" and suggests meeting alone in the evening. This is sexual exploitation even if nothing further happens: the attempt itself is a breach.*

4.1.2 Sexual abuse

- Sexual assault or any sexual contact obtained by force, threat, or coercion.
- Any sexual contact without free and informed consent, including where a person is asleep, intoxicated, or unable to refuse.
- Any sexual act involving a child, with or without contact, including touching, exposure, and making or sharing sexual images of a child.
- Sexual contact or sexual communication with a child through phones, social media, or any digital channel, including requesting images, sending sexual content, or grooming a child online.
- *Field example: a volunteer exchanges phone numbers with a fifteen-year-old at a drop-in centre and begins sending late-night messages that turn personal and then sexual. This is child sexual abuse through digital communication and must be reported the same day.*

4.1.3 Abuse of power

- Using a KTN position, vehicle, badge, or access to pressure any person KTN serves, or any colleague, towards a sexual relationship or act.
- Entering a sexual relationship with any person KTN serves. The imbalance of power makes genuine consent impossible, and the relationship is prohibited even where the person is an adult and appears willing.
- Using the recruitment process, whether a job, a volunteer place or an internship, to obtain sexual favours from a candidate.
- *Field example: a staff member offers a young woman a casual job at a distribution "if she is friendly." Whether or not she agrees, this is abuse of power and exploitation.*

4.1.4 Sexual harassment

- Unwanted sexual comments, jokes, gestures, or remarks about a person's body, made in person or through messages.
- Unwelcome sexual advances or repeated requests for dates or sexual favours after refusal.
- Displaying or sending sexual images, or any physical behaviour of a sexual nature that a reasonable person would find offensive, humiliating or intimidating.

Where harassment is directed at a person KTN serves, it is handled under this policy. Where it occurs between co-workers, it is handled under KTN's human resources procedures, with the same zero tolerance and the same protection from retaliation.

4.1.5 The law these prohibitions restate

These rules are not invented by KTN. The Penal Code Act of Uganda makes sexual activity with a person below eighteen the crime of defilement, with severe penalties. The Children Act, Cap. 59, as amended in 2016, and the Prevention of Trafficking in Persons Act, 2009, protect children from sexual abuse and exploitation. The Anti-Pornography Act, 2014, prohibits producing and sharing sexual images, including of children. The Data Protection and Privacy Act, 2019 (Cap. 97), governs how KTN handles the information of those involved. Internationally, the prohibitions follow ST/SGB/2003/13, the IASC Six Core Principles (2019), the Convention on the Rights of the Child, and the African Charter on the Rights and Welfare of the Child.

4.2 Code of Conduct

The PSEA Code of Conduct is the personal, signed form of this policy. Every person covered by Section 2.2 signs it before starting work and re-affirms it at each annual refresher. The full signable version, with the declaration page, is Annex 1. Its substance is set out here so that it is read as part of the policy, not filed as an attachment.

4.2.1 I must

- Treat every child and adult KTN serves with respect and dignity, in person and online, whatever their age, sex, disability, ethnicity or circumstances.
- Maintain professional boundaries: keep contact with the people we serve within my role, conduct meetings in open and visible settings, and declare to my manager any personal relationship or conflict of interest that touches my work.
- Make sure another adult is present or within sight when working with children, wherever feasible.
- Use only authorised, work-related and transparent channels for any communication with children, with no private or hidden contact.
- Report any concern, suspicion or disclosure of sexual exploitation, abuse or harassment to the PSEA Focal Person within twenty-four hours, and cooperate fully and honestly with any investigation.

- Complete every required training and keep my knowledge of this policy current.

4.2.2 I must not

- Engage in any sexual activity with a person below eighteen years, whatever the local age of majority and whatever is claimed about consent. A mistaken belief about age is no defence.
- Exchange money, employment, goods, assistance, protection or services for sex or any sexual favour, or use any of KTN's help to obtain sex.
- Enter into a sexual relationship with any person KTN serves, or use my position, authority or access to pressure any person towards one.
- Engage in inappropriate communication with a child by any means, in person, by phone, by message or on social media, including sexual comments, requests for images, or contact hidden from KTN and the child's caregivers.
- Sexually harass any person, whether a colleague or a person we serve.
- Hire any person under eighteen for domestic or other work in conditions that are exploitative or hazardous.
- Conceal a concern, investigate one on my own, retaliate against anyone who reports, or pressure anyone into silence.

Signing the Code.

The Code binds me in professional and private life, for as long as I am connected to KTN. Breaching it is serious misconduct and may lead to dismissal, the end of my engagement or contract, and referral to the Uganda Police. The signature page is in Annex 1; the staff self-declaration is Annex 4. Human Resources holds the signed originals.

5

CHAPTER FIVE

ROLES, RESPONSIBILITIES AND ACCOUNTABILITIES

Who is responsible and accountable for prevention, reporting and response.

5 Roles, Responsibilities and Accountabilities

Who is responsible and accountable for prevention, reporting and response.

5.1 Roles and Responsibilities

Accountability only works when it is attached to named roles. The matrix below assigns every PSEA responsibility. Where a concern involves the person who would normally receive it, it moves one level up: a concern about the PSEA Focal Person goes to the Executive Director; a concern about the Executive Director goes to the Chairperson of the Board.

Role	PSEA responsibilities
Board of Directors	Holds ultimate accountability for PSEA. Approves and reviews this policy. Ensures the organisation has the people and budget to apply it. Receives an annual safeguarding and PSEA report and a report on every serious concern. Commissions independent review of serious matters. Never allows concern for reputation to override the safety of a person harmed.
Executive Director	Accountable to the Board for day-to-day operation of the policy. Builds PSEA into recruitment, training, programme design, budgets and partnership agreements. Appoints, supports and resources the PSEA Focal Person. Decides, with the Focal Person, on referral to authorities. Ensures serious concerns reach the Board within seventy-two hours. Reports to donors as funding agreements require.
PSEA Focal Person	Receives, records and assesses every concern. Coordinates immediate safety steps, survivor support and referrals. Manages the case process in Section 6.3 and keeps confidential records. Delivers and tracks training. Maintains the referral directory (Annex 3) and reporting channels. Reports quarterly to the Executive Director on the indicators in Section 8.2. Is supported by at least one trained deputy of a different gender, so that anyone reporting can choose whom to speak to.
Human Resources	Runs safer recruitment: verified identity, gap-checked history, two references with direct misconduct questions, police or criminal record checks where available, and signed declarations before any offer. Holds signed Codes of Conduct and declarations. Tracks training completion. Manages disciplinary processes arising from breaches, fairly and on time.
Programme teams and managers	Carry out a safeguarding risk assessment (Annex 6) for every activity before it begins, and apply the safeguards. Run community awareness so the people we serve know help is free and how to report. Watch for warning signs in their teams and locations. Make sure every team member is trained and has signed the standards. Support anyone in their team who raises a concern.
All personnel	Read and understand this policy. Sign the Code of Conduct (Annex 1) and the declaration (Annex 4). Complete induction and annual refresher training. Behave at all times in a way that protects the people we serve. Report any concern within twenty-four hours, and never handle a concern quietly, investigate alone, or pressure anyone into silence.
Partners, contractors and suppliers	Meet the minimum requirements in Section 7.2. Report any SEA concern touching KTN's work to the KTN PSEA Focal Person within twenty-four hours. Cooperate with assessment, investigation and corrective action.

Succession note: in KTN's current size, the PSEA Focal Person role may be held by the Designated Safeguarding Lead so that safeguarding and PSEA are coordinated. The roles separate as KTN grows. Whoever holds the role, the name, phone number and email of the Focal Person and deputy are displayed at every operating site and listed in Annex 3.

6

CHAPTER SIX

PROCEDURES AND OPERATIONAL REQUIREMENTS

How prevention, reporting, case management and survivor support work in practice.

6 Procedures and Operational Requirements

How prevention, reporting, case management and survivor support work in practice.

6.1 Prevention and Risk Reduction Systems

Prevention is the strongest protection. KTN reduces the risk of sexual exploitation and abuse before it can occur through four systems: safer recruitment, training, safe programme design, and partner management. Each has an owner and each is checked, not assumed.

6.1.1 Recruitment and onboarding

Every appointment that involves contact with the people we serve, whether staff, volunteer, intern, consultant or community facilitator, follows the safer recruitment sequence below. No one begins work with children or communities until every step is complete.

Step	Requirement	Owner
1	Advertisements and interviews state KTN's zero-tolerance commitment, and interviews include at least one values and conduct question.	Human Resources
2	Identity is verified and gaps in employment history are explained and checked.	Human Resources
3	At least two references are taken up, and referees are asked directly whether they have any concern about the candidate's conduct towards children or vulnerable adults, including any history of sexual misconduct.	Human Resources
4	A police or criminal record check (Certificate of Good Conduct from Interpol/Uganda Police) is obtained where available; where it is not, the reasons are recorded and references carry the weight.	Human Resources
5	The candidate signs a safeguarding self-declaration (Annex 4) disclosing any past investigation, discipline or conviction relating to sexual misconduct or harm to children. A false declaration is grounds for immediate dismissal.	Candidate / HR
6	Before starting, the person signs the PSEA Code of Conduct (Annex 1) and completes induction training.	HR / PSEA Focal Person

6.1.2 Training

Training is how the policy moves from paper to practice. The full plan, with audiences and frequencies, is in Section 8.1. The minimum is: induction PSEA training before any contact with the people we serve; an annual refresher for everyone; and deeper, role-specific training for those in higher-risk roles, namely distributions, outreach, drop-in centres, family tracing and case management, and for everyone who might receive a disclosure.

6.1.3 Programme design and safe programming

- **Risk assessment first.** Every new programme, activity or location is assessed using the Safeguarding Risk Assessment Tool (Annex 6) before it begins. The assessment names the SEA risks, the safeguards, and the person responsible for each safeguard, and is reviewed when anything significant changes.
- **Safe engagement with children.** Two-adult rule for activities with children wherever feasible; no unnecessary time alone with a child; meetings with children in visible, open settings; no child in a staff member's home or vehicle except in a documented emergency; and the digital contact rules in Annex 1.

- **Designing out opportunity.** Distributions are run by mixed-gender teams with more than one person controlling the list; selection criteria for support are written, public and verifiable; and home visits are logged in advance.
- **Community participation. Communities help design the reporting channels that serve them (Section 6.2.1), are told their rights at the start of every programme, and are asked in feedback exercises whether anyone has ever demanded anything in return for KTN's help.**

6.1.4 Partner management

Due diligence before partnership, PSEA clauses in every agreement, and compliance monitoring during the work. Section 7.2 sets out the requirements and Annex 5 provides the checklist.

6.2 Reporting and Complaint Mechanisms

A reporting system is only real if a frightened person can actually use it. KTN therefore keeps several channels open at once, in Nga'Karamojong and other languages people use, including routes that do not require reading or writing, and routes that bypass any person the concern may be about.

6.2.1 Reporting channels

Channel	How it works	Best for
PSEA Focal Person and deputy	In person, by phone or in writing. Names, numbers and photos displayed at every site (Annex 3).	Any concern, from anyone
Dedicated email	A confidential address, e.g. report@karamojatumaini.org, read only by the Focal Person.	Staff, partners, written reports
Phone hotline	A dedicated KTN number answered in Nga'Karamojong and English; calls may be anonymous. The national Sauti Child Helpline 116 (toll-free) is also displayed everywhere KTN works.	Communities, children, anyone without literacy
Suggestion and complaint boxes	Lockable boxes at drop-in centres and activity sites, opened weekly by the Focal Person with a witness.	Anonymous or written community complaints
Community mechanisms	Trusted contact points agreed with each community: named elders, women's group leaders and child protection committee members, trained to pass concerns to KTN safely.	People who would not approach KTN directly
Through a partner	Partner staff report to their own focal point, who must inform the KTN PSEA Focal Person within twenty-four hours.	Concerns arising in partner-delivered activities
Upward routes	Concerns about the Focal Person go to the Executive Director; concerns about the Executive Director go to the Chairperson of the Board, whose contact is in Annex 3.	Concerns involving senior people

6.2.2 Confidentiality, anonymity and non-retaliation

- **Confidential.** Every report is handled on a need-to-know basis. The identity of the reporter and the survivor is protected throughout.
- **Anonymous if wished.** Reports may be made without giving a name, through the hotline, the boxes, or a community contact. KTN acts on anonymous reports as far as the information allows, and treats them as seriously as named ones.

- **No retaliation.** No one who reports in good faith will be penalised, even if the concern turns out to be mistaken. Any threat or punishment of a reporter, a survivor, a witness or a supporter is itself a serious breach. A complaint not upheld is never treated as a false complaint; only a knowingly false and malicious report is a breach.

6.2.3 Reporting principles for everyone

- **Report immediately.** Within twenty-four hours, and sooner if anyone is in danger. It is not your job to decide whether the concern is true; that is the system's job.
- **Safety first.** If a person is in immediate danger, make them safe and get urgent medical help before anything else.
- **Receive a disclosure well.** Listen calmly. Do not promise secrecy. Do not press with questions or express doubt or judgment. Tell the person what you will do next.
- **Protect evidence.** Write down what was seen or heard as soon as possible, in the words actually used, with date, time and place. Keep any messages, photos or items untouched. Do not interview anyone or visit the scene to "check."
- **Protect the survivor.** Tell no one else. Do not discuss the matter with colleagues or with the person the concern is about. Do not attempt to investigate.

The reporting form is Annex 2. If completing a form would cause delay while someone is in danger, report by telephone first and complete the form afterwards.

6.3 Case Management and Investigation Process

Every concern moves through the same seven stages, whoever it involves. The PSEA Focal Person coordinates the process; the Executive Director and Board are engaged at the points shown; and at every stage the survivor's safety comes before the organisation's convenience. Target timeframes are maximums, not targets to fill.

6.3.1 The seven stages

STAGE 1	**Receiving the complaint · within 24 hours of the concern arising** The Focal Person records the concern on the reporting form (Annex 2), acknowledges receipt to the reporter, and opens a confidential case file with a case number. Anonymous reports are logged the same way.
STAGE 2	**Immediate safety assessment · same day** Is anyone in danger now? The Focal Person assesses immediate risk to the survivor, the reporter, other children or adults, and takes any step needed to make people safe, including suspending the subject of complaint from contact with the people we serve while the matter is examined. Suspension is a protective step, not a finding of guilt.
STAGE 3	**Survivor support and referrals · starting within 72 hours** Support is offered under Section 6.4, covering medical care (urgently where assault may have occurred, because some treatment is time-critical), psychosocial support, child protection services, legal information and safety planning, in line with the survivor's wishes and regardless of whether any investigation proceeds.
STAGE 4	**Assessment and decision-making · within 5 working days** The Focal Person, with the Executive Director where needed, decides: Is this SEA within the policy? Must it be referred to the Uganda Police or probation and social welfare authorities (any possible crime against a child always is)? Does a donor or authority have to be notified? Is an internal investigation required, and should it be conducted by trained internal investigators or independent external ones? Decisions and reasons are recorded.

STAGE 5	**Investigation · normally concluded within 30 working days** A fair, confidential, documented investigation by people trained for it, never by the subject's friends or line management acting alone. The subject of complaint is informed of the allegation, heard, and presumed innocent until the process concludes. Where the police investigate a crime, KTN's internal process is sequenced so as not to interfere, but disciplinary action does not wait for a criminal verdict: the internal standard of proof is the balance of probabilities.
STAGE 6	**Findings and actions · within 10 working days of the investigation report** The Executive Director (or the Board, where the Executive Director is involved) decides on action: disciplinary measures up to dismissal (Section 9.1), contract or partnership consequences, referral or further referral to authorities, and any changes needed to keep people safe. The survivor and, as appropriate, the reporter are told the outcome in suitable terms.
STAGE 7	**Closure and learning · within 20 working days of the decision** The case file is completed and stored securely. Donors and authorities are notified where required. The Focal Person extracts lessons on what allowed this to happen and what slowed the response, and the Executive Director assigns corrective actions with deadlines. Anonymised learning feeds the annual safeguarding report to the Board.

A one-page version of this process appears as the flowchart in Annex 3 (investigation flowchart), for display and training.

6.3.2 Safeguards on the process itself

- A concern involving the Focal Person is handled by the Executive Director; one involving the Executive Director is handled by the Chairperson of the Board, who may commission an external investigation directly.
- No one with a conflict of interest takes any part in assessing or investigating a case.
- The survivor is never made to confront the subject of complaint, and is interviewed the minimum number of times by trained people.
- Records use case numbers, not names, wherever possible, and are stored under Section 3.2.4 and the Data Protection and Privacy Act, 2019 (Cap. 97).
- No person is permitted to resign quietly to avoid scrutiny. Where a person leaves mid-process, the investigation is completed, the finding recorded, and information shared with other organisations and authorities within the law where needed to stop further harm.

6.4 Survivor Support Framework

Support is offered to every survivor from the first hours, regardless of whether they wish to make a formal complaint, whether an investigation proceeds, or what its outcome is. The survivor's own wishes guide what support is taken up and how; KTN explains the options honestly, including the few choices the law makes for them, and never pressures anyone into a process they do not want. KTN is not a medical or legal provider: its role is to connect the survivor quickly and safely to specialist services, and to stay alongside them.

Area of support	What KTN does	Timeframe
Immediate protection	Makes the survivor safe: removes the subject of complaint from contact, changes activity arrangements, and where needed arranges a safe place to stay through child protection or GBV shelter partners.	Same day
Medical care	Accompanies or refers the survivor to the nearest appropriate health facility. Where sexual assault may have occurred, referral is urgent: post-exposure prophylaxis for HIV must begin within 72 hours, and	Immediately; within 72 hours at the latest

Area of support	What KTN does	Timeframe
	emergency contraception within 120 hours. KTN covers or arranges transport and treatment costs so that cost is never the barrier.	
Psychosocial support	Refers to trained counsellors and psychosocial services, including child-appropriate support, in a language the survivor speaks. Follow-up continues for as long as the survivor wants it.	Within one week, then ongoing
Child protection services	Where the survivor is a child: immediate referral to the District Probation and Social Welfare Officer and the Uganda Police Child and Family Protection Unit, joint safety planning, and the appointment of a consistent, trusted KTN contact person for the child.	Same day
Legal support	Provides clear information about the survivor's legal options, refers to legal aid providers, and supports the survivor through any police or court process they choose, or that the law requires, including accompaniment.	As the survivor decides
Safety planning	Builds a practical safety plan with the survivor (and caregiver, for a child): who they can call, where they can go, what happens if the subject of complaint approaches them, and how KTN will check in.	Within one week, reviewed monthly

6.4.1 Dignity and informed consent in support

- The survivor (and, for a child, the child in line with their evolving capacity together with a non-implicated caregiver) is asked before each referral, told what the service involves, and free to decline.
- Information about the survivor moves only with their consent, except where the law requires reporting of a crime against a child; in that case they are told honestly what will be shared and with whom.
- Support is never conditional on participating in an investigation.
- Where the survivor is a child, the best-interests principle in Section 3.2.2 governs every support decision.

The referral directory in Annex 3 lists the current named contacts for health, police, probation, psychosocial and legal services at each operating site, and is checked every six months.

7

CHAPTER SEVEN

RISK MANAGEMENT AND INTERNAL CONTROLS

The controls over child safeguarding linkages, partners and contractors.

7 Risk Management and Internal Controls

The controls over child safeguarding linkages, partners and contractors.

7.1 Child Safeguarding Linkages

Almost everyone KTN serves is a child or the family of a child, so in practice most PSEA concerns at KTN will also be child safeguarding concerns. The two policies are designed to work as one system.

7.1.1 How the two policies fit together

- **One report, both policies. A concern about a child is reported once, to the PSEA Focal Person (who in KTN's current structure may also be the Designated Safeguarding Lead). The response then follows the child protection steps of the Child Safeguarding Policy and the case process in Section 6.3 together; they do not compete.**
- **PSEA covers who; safeguarding covers what.** This policy governs the conduct of KTN's own people and partners. The Child Safeguarding Policy covers all harm to children, whoever causes it, including harm by family or community members, which KTN refers to the authorities rather than investigates itself.
- **Shared spine.** Both policies share the same focal person structure, the same reporting channels, the same referral directory, and the same principles: best interests, do no harm, confidentiality, mandatory reporting.

7.1.2 Child participation

Children have the right to be heard in decisions that affect them. KTN tells children, in Nga'Karamojong and in ways suited to their age, that its help is free, what adults may never ask of them, and how to tell someone if anything feels wrong. Reporting channels are tested with children to make sure a child can actually use them. A suggestion box a child cannot reach, or a hotline a child has never heard of, protects nobody.

7.1.3 Safe programming with street-connected children

Street-connected children carry specific risks this policy must answer. They are often alone, outside family protection, already exposed to exploitation, and conditioned to exchange something for survival. KTN therefore applies extra safeguards in street outreach and drop-in work:

- Outreach is done in pairs at minimum, with movements logged; no worker takes a child anywhere alone except in a documented emergency, and then reports it the same day.
- Food, care and shelter at drop-in centres are unconditional. No child is ever asked for anything, whether work, errands, favours or affection, in exchange for help.
- Family tracing and reintegration decisions are made by more than one person and recorded, because decisions about a child's case are a known point of leverage.
- During the up-to-two-year follow-up after a child returns home, the child and family are reminded at each visit that KTN's help remains free and how to report any demand.

> *A child who has learned that everything on the street has a price must learn from KTN that help does not.*

7.2 Partner and Contractor Requirements

KTN's corridor-wide model depends on partnership, and these standards travel with every partnership. A partner's personnel hold the same power over the people we serve as KTN's own, so the protections must be the same. KTN does not place the people it serves in the care of a partner that cannot meet the minimum requirements below.

7.2.1 Minimum requirements for all partners

#	Requirement	Evidence
1	A signed PSEA commitment: either the partner's own PSEA policy meeting equivalent standards, or written agreement to work under this policy for the joint activity.	Policy document or signed PSEA clause in the agreement
2	PSEA clauses in the partnership agreement or contract, including the right of KTN to assess compliance, to require corrective action, and to suspend or terminate for breach.	Signed agreement
3	All partner personnel working on KTN activities are trained on PSEA and have signed a code of conduct covering the six standards in Section 4.1.	Training records and signed codes
4	Safer recruitment practices for personnel in contact with the people we serve, including references and criminal record checks where available.	Recruitment procedure or written confirmation
5	A working reporting mechanism, and a named focal point who reports any SEA concern touching KTN's work to the KTN PSEA Focal Person within twenty-four hours.	Named focal point in the agreement
6	Cooperation with any KTN or joint assessment, investigation or corrective action plan.	Agreement clause; conduct in practice

7.2.2 Due diligence, monitoring and consequences

- **Before partnership.** KTN assesses each prospective partner against the checklist in Annex 5. Where a partner falls short on capacity rather than willingness, KTN may proceed with a time-bound capacity-building plan, but activities involving direct contact with the people we serve wait until the basic standard is met.
- **During partnership.** Compliance is reviewed at least annually using Annex 5, and PSEA is a standing item in partner review meetings. Spot checks are made during joint activities.
- **On breach. A concern involving partner personnel is handled under Section 6.3, with the partner's cooperation. Depending on findings and the partner's response, consequences range from a corrective action plan to suspension of activities, termination of the agreement, recovery of funds where donor rules require it, and referral of individuals to the authorities.**

Contractors and suppliers whose work brings them into contact with the people KTN serves sign the PSEA Code of Conduct (Annex 1) as a condition of contract. Those without such contact, a stationery supplier for example, receive the policy and a PSEA clause in their contract.

8

CHAPTER EIGHT

COMPLIANCE, MONITORING AND REPORTING

How the policy is trained, monitored, audited and reported.

8 Compliance, Monitoring and Reporting

How the policy is trained, monitored, audited and reported.

8.1 Training and Capacity Building Plan

Everyone covered by this policy is trained to the depth their role requires. Training is in plain language, in Nga'Karamojong and English as needed, uses examples from KTN's actual work, and always covers the same core: what SEA is, the six standards, how to report, and what happens after a report. Attendance is recorded on the register in Annex 7, and completion rates are an indicator the Board sees every year.

Audience	Training	Frequency	Responsibility
All new staff, volunteers, interns, consultants and community facilitators	PSEA induction: the policy, the six standards, the Code of Conduct, recognising SEA, how to report, receiving a disclosure. Completed before any contact with the people we serve.	Once, before starting; signed Code at completion	PSEA Focal Person with HR
All personnel	Annual refresher: changes to the policy, lessons from the year (anonymised), practice on realistic scenarios, re-signing of the Code.	Annually	PSEA Focal Person
Higher-risk roles: outreach, drop-in centres, distributions, family tracing, case management	Role-specific training: power and leverage in their specific tasks, the two-adult and digital contact rules, safe distribution practice, handling disclosures from children.	Annually, in addition to the refresher	PSEA Focal Person with programme managers
PSEA Focal Person and deputy	External specialist training: survivor-centred case management, investigation basics, referral coordination, data protection.	On appointment, then refreshed every two years	Executive Director (resourcing)
Managers and the Executive Director	Leadership module: their duties under Section 5.1, handling concerns that reach them, protecting reporters, deciding on referral.	On appointment, then every two years	PSEA Focal Person / external trainer
Board of Directors	Governance briefing: the Board's accountability, the annual report, handling concerns involving senior leadership.	On joining the Board, then annually with the safeguarding report	Executive Director and PSEA Focal Person
Partner personnel on KTN activities	Joint PSEA orientation covering the six standards, KTN's reporting channels, and the partner focal point's duties.	At the start of each partnership, then annually	PSEA Focal Person with the partner focal point
Community structures: child protection committees, elders, women's groups, peer educators	Community awareness sessions: KTN's help is free, what no one may ever ask, how to report, what happens next. Delivered in Nga'Karamojong without requiring literacy.	At programme start in each community, refreshed annually	Programme teams with the PSEA Focal Person
Children KTN serves	Age-appropriate sessions: your rights, what adults may never ask of you, whom to tell and how. Channels tested with children.	At programme start, refreshed annually	Programme teams

8.2 Monitoring, Audit and Accountability

KTN checks whether this policy works in practice rather than assuming that it does. The Data pillar of the SHIELD model applies to safeguarding as much as to programmes: measure honestly, publish what the measurement shows, and act on it.

8.2.1 Monitoring indicators

The PSEA Focal Person maintains the dashboard in Annex 8 and reports quarterly to the Executive Director on these indicators:

Indicator	Target	Frequency
Percentage of current personnel (staff, volunteers, interns, consultants, community facilitators) with a signed Code of Conduct on file	100%	Quarterly
Percentage of personnel who completed PSEA induction before starting work with the people we serve	100%	Quarterly
Percentage of personnel current on the annual refresher	At least 95%	Quarterly
Number of SEA concerns received, by channel	Tracked, with silence investigated, not celebrated	Quarterly
Percentage of concerns acknowledged and risk-assessed within 24 hours of receipt	100%	Quarterly
Percentage of survivors offered support within 72 hours	100%	Quarterly
Number of concerns resolved (Stage 7 reached), and average days from report to closure	Closure within the Section 6.3 timeframes	Quarterly
Percentage of active partners assessed against Annex 5 in the last 12 months	100%	Annually
Percentage of operating sites with reporting channels displayed and a current referral directory	100%	Quarterly
Number of community awareness sessions held, and communities reached	Every active community, every year	Annually

8.2.2 Reviews, audit and reporting

- **Management review.** The Executive Director reviews the dashboard quarterly with the PSEA Focal Person and assigns corrective actions where indicators slip.
- **Internal audit.** Once a year, a person not involved in case handling checks a sample of files, training records, partner assessments and site displays against this policy, and reports findings to the Executive Director and Board.
- **Annual safeguarding report.** The Board receives a written safeguarding and PSEA report each year: indicators, anonymised case summaries and outcomes, lessons, audit findings, and the actions taken. The Board minutes its response.
- **Independent review.** The Board commissions an independent review of the safeguarding and PSEA system at least every three years, and after any substantiated serious incident.
- **External reporting.** KTN reports to donors as funding agreements require and to Ugandan authorities as the law requires, and answers community questions about the system honestly.

8.3 Records, Audit Trail and Retention

A policy that cannot be audited cannot be relied on. Every step this policy requires leaves a record, and those records are created at the time, protected from alteration, and disposed of on a schedule rather than at anyone's discretion. This section sets the audit trail, the retention periods and the disposal rule that apply to everything done under this policy.

8.3.1 The audit trail

- **Recorded when it happens.** Every SEA concern is entered on the Annex 2 form under a case number at the moment it is received, whether or not it proceeds. No concern exists only in a person's memory, a private message or a notebook.
- **Every decision, with its reason.** Each decision in the Section 6.3 process is recorded with its date, the person who took it and the reason for it. This includes a decision not to investigate and a decision not to refer, which are the decisions an auditor will ask about first.
- **One controlled register.** Case records are held in a single register maintained by the PSEA Focal Person, kept separate from personnel and programme files, with access limited to the roles named in Section 3.2.10.
- **No silent edits.** Records are not altered after the fact. A correction is made as a dated addition that leaves the original entry legible, so that what was known, and when, can be reconstructed.
- **Systems keep their own log.** Where case information is held electronically, the system records who opened, added to or changed each record and when. That access log is retained and reviewed under this section in the same way as the records themselves.

8.3.2 Retention periods

The periods below are minimums. Where a donor agreement, an open investigation, a police or court process, or a direction of the Board requires a record to be kept longer, the longer period applies. Nothing is destroyed while a matter it relates to is live.

Record	Minimum retention	Held by
SEA case file where the survivor was a child	Until the survivor's 25th birthday, or 10 years from closure, whichever is later	PSEA Focal Person
SEA case file where the survivor was an adult	10 years from closure	PSEA Focal Person
Substantiated finding against a person, and the record of any reference given	25 years from the date of the finding	Executive Director
Signed Codes of Conduct and safeguarding declarations (Annexes 1 and 4)	7 years after the engagement ends	Human Resources
Safer recruitment records: references, identity and criminal record checks	7 years after the engagement ends	Human Resources
Training registers (Annex 7) and training records	7 years	PSEA Focal Person
Partner assessments (Annex 5) and signed agreements	7 years after the agreement ends	Executive Director
Safeguarding risk assessments (Annex 6)	7 years from the end of the activity	Programme managers
Quarterly dashboards (Annex 8), annual reports to the Board and audit reports	Permanent	Board Secretary
System access and change logs for any system holding case data	12 months, with the most recent 3 months immediately retrievable	Executive Director
Anonymised statistics, lessons and corrective actions	Permanent	PSEA Focal Person

These periods follow the purpose-limitation rule of the Data Protection and Privacy Act, 2019 (Cap. 97), the seven-year record-keeping period in the Companies Act, 2012 (Cap. 106), the twelve-month audit-log standard used in ISO/IEC 27001:2022 (A.8.15) and in PCI DSS, and the child protection sector's practice of holding a case record until a survivor who was a child has had the chance to raise the matter as an adult.

8.3.3 Protection, review and disposal

- **Held securely.** Paper records are kept in a locked cabinet to which only the Focal Person and the Executive Director hold keys. Electronic records are held under individual login, are encrypted at rest, and are never stored on a personal device or a personal account.
- **Logs protected from those they record.** Access and change logs are configured so that a person cannot alter or delete the record of their own activity. Where the software cannot enforce this, a monthly copy is exported and held by the Executive Director.
- **Reviewed, not just kept.** The annual internal audit under Section 8.2.2 tests a sample of case files, training records, partner assessments and access logs against this section, and reports what it finds to the Executive Director and the Board.
- **Destroyed deliberately.** At the end of the retention period, records are destroyed securely: paper shredded, electronic records deleted from live systems and from backups at the next backup cycle. The destruction is itself logged, recording what was destroyed, when, and on whose authority.

9

CHAPTER NINE

ENFORCEMENT, IMPROVEMENT AND REVIEW

How breaches are enforced and how the policy is implemented and reviewed.

9 Enforcement, Improvement and Review

How breaches are enforced and how the policy is implemented and reviewed.

9.1 Breaches and Disciplinary Action

Sexual exploitation or abuse of a person we serve is serious misconduct. So is failing to report a known concern, obstructing a response, retaliating against a reporter, or knowingly making a false and malicious complaint. The same standard applies to everyone, whatever their role, seniority, or value to the organisation.

9.1.1 Possible actions

Action	When it applies
Written warning and mandatory retraining	Breaches of procedure without harm, for example a late report made in good faith or a boundary lapse without exploitative intent, where retraining credibly fixes the gap
Suspension	A protective measure while a concern is assessed or investigated, removing the subject of complaint from contact with the people we serve. Suspension is not a finding of guilt.
Dismissal or termination of engagement	Substantiated SEA, breach of the six standards, retaliation, concealment of a concern, or a false safeguarding declaration. Volunteers, interns and consultants have their engagement ended on the same grounds.
Referral to authorities	Any conduct that may be a crime, always including any sexual act involving a child, is referred to the Uganda Police regardless of any internal process, and KTN cooperates fully with investigation and prosecution.
Partner and contractor sanctions	Corrective action plans, suspension of activities, termination of agreements and contracts, and recovery of funds where donor rules require it (Section 7.2.2).

9.1.2 Principles of fair process

- The subject of complaint is told the substance of the allegation, given a genuine opportunity to respond, and presumed innocent until the process concludes.
- Investigation is carried out by trained or independent people without a conflict of interest, on the balance of probabilities, within the timeframes in Section 6.3.
- Disciplinary action follows KTN's human resources procedures and Ugandan employment law, and is proportionate to the findings.
- Internal action does not wait for the outcome of any criminal case; the two proceed on their own standards.
- No quiet exits: a person who resigns during a process does not stop the process. The finding is recorded, and KTN shares information with other organisations and authorities, within the law, where needed to stop a person from going on to harm others. KTN provides no reference that conceals a substantiated finding.

9.2 Policy Implementation Plan

Approval is the beginning, not the end. The roadmap below covers the first year after Board approval, with Month 0 being March 2026, the month of adoption. The Executive Director owns the plan; the Board checks progress at each meeting against the outputs column.

Activity	Responsible	Timeline	Output
Board approval; policy signed, stamped and version-controlled	Board of Directors	Month 0	Approved Policy v2.0 on file
Appoint or confirm the PSEA Focal Person and a deputy of a different gender; publish their contacts	Executive Director	Month 1	Appointment letters; contacts displayed at all sites
Complete the referral directory (Annex 3) for every operating site, with named contacts verified	PSEA Focal Person	Months 1–2	Directory displayed at each site
All current personnel trained on the revised policy and re-sign the Code of Conduct (Annex 1) and declaration (Annex 4)	PSEA Focal Person with HR	Months 1–3	100% signed codes and training records
Set up reporting channels: dedicated email, hotline arrangements, suggestion boxes installed and keyed; display Sauti 116 at all sites	PSEA Focal Person	Months 2–3	All channels live and displayed
Integrate safer recruitment steps (Section 6.1.1) into HR procedures and templates	Human Resources	Months 2–4	Updated recruitment procedure and forms
Safeguarding risk assessments (Annex 6) completed for every current programme and site	Programme managers	Months 3–5	Signed risk assessments on file
Community awareness sessions in every active community; channels tested with children	Programme teams	Months 3–6	Session records; channel test notes
Assess all current partners and contractors against Annex 5; agreements updated with PSEA clauses	Executive Director with PSEA Focal Person	Months 4–6	Completed checklists; signed amended agreements
Specialist training for the Focal Person and deputy (case management, investigation basics)	Executive Director	By Month 6	Training certificates
First quarterly dashboard (Annex 8) to the Executive Director	PSEA Focal Person	Month 3, then quarterly	Dashboard and minutes of review
Internal audit of the system (Section 8.2.2)	Executive Director (assigning a non-involved auditor)	Months 10–11	Audit report with actions
First annual safeguarding and PSEA report to the Board	PSEA Focal Person and Executive Director	Month 12	Board paper and minuted response

9.2.1 Related policies and documents

This policy is read together with the KTN Child Safeguarding Policy, Code of Conduct, Whistleblowing and Protected Disclosure Policy, Human Resources Policy and anti-harassment procedures, Safer Recruitment Procedures, Data Protection and Privacy Policy, and the Complaints and Community Feedback Procedure. Where any of these documents conflicts with this policy on a matter of sexual exploitation and abuse, this policy prevails.

9.3 Policy Review and Amendment

This policy is reviewed in full every two years, and earlier whenever the law, a donor requirement, an organisational change, a substantiated incident or the direction of the Board makes review necessary. The PSEA Focal Person prepares the review; the Board approves every amendment and the amendment is entered in the Amendment History Register at the front of this policy. Annexes are amended through the same route as the policy itself.

Review Schedule

Review point	Responsible person	Approval authority
Full review every two years; next full review March 2028	PSEA Focal Person, with the Executive Director	Board of Directors
Early review after any substantiated SEA incident, change in law, or donor requirement	Executive Director	Board of Directors
Annual check of referral directory and reporting channels (Annex 3 contacts)	PSEA Focal Person	Executive Director

10

CHAPTER TEN

ANNEXES

The working tools: codes, forms, checklists and registers.

10 Annexes

The working tools: codes, forms, checklists and registers.

The annexes are the working tools of this policy. They may be printed and used separately, but each carries the version number of the policy it belongs to, and changes to an annex follow the same review process as changes to the policy.

Annex	Tool	Used by
1	PSEA Code of Conduct (signable)	Everyone covered by Section 2.2
2	SEA Incident Reporting Form	Anyone reporting; PSEA Focal Person
3	SEA Investigation Flowchart and Referral Directory	PSEA Focal Person; all sites (display)
4	Staff PSEA Declaration Form	All candidates and personnel; HR
5	Partner PSEA Compliance Checklist	Executive Director; PSEA Focal Person
6	Safeguarding Risk Assessment Tool	Programme managers
7	Training Attendance Register	PSEA Focal Person
8	PSEA Monitoring Dashboard Template	PSEA Focal Person; Executive Director

ANNEX 1

Annex 1: PSEA Code of Conduct

I confirm that I have read and understood the Karamoja Tumaini Network Protection from Sexual Exploitation and Abuse (PSEA) Policy. I understand that the help KTN provides is free and may never be exchanged for sex or any sexual favour, and that the people we serve have a right to be safe from sexual exploitation and abuse. I agree to be bound by the standards below at all times, in both my professional and private life, for as long as I am connected to KTN.

I will

- Treat every child and adult KTN serves with respect and dignity, in person and online.
- Maintain professional boundaries, conduct meetings in open and visible settings, and declare any personal relationship or conflict of interest that touches my work.
- Make sure another adult is present or within sight when working with children, wherever feasible, and never take a child anywhere alone except in a documented emergency.
- Use only authorised, work-related and transparent channels for any communication with children.
- Report any concern about sexual exploitation, abuse or harassment to the PSEA Focal Person within twenty-four hours, and cooperate fully and honestly with any investigation.
- Complete every required PSEA training.

I will never

- Sexually exploit or abuse any person KTN serves or any member of the community.
- Engage in sexual activity with any person below eighteen years, whatever the local age of majority and whatever the circumstances. I understand a mistaken belief about age is no defence.
- Exchange money, work, goods, assistance, protection or services for sex or any sexual favour, or use KTN's help to obtain sex.
- Enter into a sexual relationship with any person KTN serves, or use my position to pressure anyone towards one.
- Communicate inappropriately with a child by any means, including private or hidden digital contact, or sexually harass any person.
- Conceal a concern, investigate one alone, retaliate against anyone who reports, or pressure anyone into silence.

I understand that breaching this Code is serious misconduct and may lead to dismissal or the end of my engagement or contract, and to referral to the Uganda Police where the conduct may be a crime.

Declaration

Full name
Role at KTN
Organisation (if partner/contractor)
Signature
Date
Witness (HR / Focal Person)

ANNEX 2

Annex 2: SEA Incident Reporting Form

Complete this form as fully as you can, using facts and the words actually used. Pass it to the PSEA Focal Person within twenty-four hours. If completing the form would cause delay while a person is in danger, report by telephone first and complete the form afterwards. Leave blank anything you do not know; do not investigate to fill the gaps.

Part A · Completed by the person reporting

Your name and role (or write "anonymous")	
Date and time of this report	
Who has been or may be harmed (name or description, age, sex)	
Is the person a child (below eighteen)? ☐ Yes ☐ No ☐ Unsure	
Where and when the concern arose	
What you saw, heard or were told (facts only, in the words used)	
Is the person safe now? Any immediate action taken?	
Person the concern is about, if known (name, role, organisation)	
Who else, if anyone, is aware?	
Your signature (optional if anonymous)	

Part B · For office use by the PSEA Focal Person

Case number assigned	
Date and time received; channel used	
Immediate risk assessment and protective steps taken (Stage 2)	
Support offered and referrals made: medical, psychosocial, child protection, legal, safety plan (Stage 3)	
Referred to Uganda Police / Probation and Social Welfare? (date, reference)	
Reported to Executive Director / Board Chairperson (date)	

Donor or authority notified, if required (which, date)	
Investigation: internal / external / not required, and why (Stage 4 decision)	
Outcome, actions taken, and date closed (Stages 6–7)	
Lessons recorded and corrective actions assigned	

ANNEX 3

Annex 3: SEA Investigation Flowchart and Referral Directory

A. Investigation flowchart for display and training

REPORT	**A concern is raised through any channel, by any person, within 24 hours** Reporter makes the person safe first if there is danger, then reports to the PSEA Focal Person. No one investigates alone or promises secrecy.
▼	
RECORD	**Stage 1 · Receive and record (within 24 hours)** Focal Person logs the concern on the Annex 2 form, assigns a case number, opens a confidential file.
▼	
PROTECT	**Stage 2 · Immediate safety (same day)** Risk to survivor, reporter and others assessed; protective steps taken, including suspension of the subject of complaint from contact where needed.
▼	
SUPPORT	**Stage 3 · Survivor support (within 72 hours)** Medical (urgent after assault: PEP within 72 hours), psychosocial, child protection, legal information, safety plan. Support does not depend on an investigation.
▼	
DECIDE	**Stage 4 · Assessment and decisions (within 5 working days)** Is it SEA? Must police / probation be involved (crimes against children: always)? Donor notification? Internal or external investigation? Reasons recorded.
▼	
INVESTIGATE	**Stage 5 · Fair investigation (normally within 30 working days)** Trained, conflict-free investigators. Subject heard and presumed innocent. Balance of probabilities. Sequenced with, not blocked by, any police process.
▼	
ACT	**Stage 6 · Findings and action (within 10 working days of the investigation report)** Discipline up to dismissal; partner sanctions; referral to authorities; survivor and reporter informed of the outcome in suitable terms.
▼	
LEARN	**Stage 7 · Closure and learning (within 20 working days of the decision)** File completed and secured; required notifications made; lessons and corrective actions assigned; anonymised learning to the annual Board report.

B. Reporting and referral directory

Completed with current names and numbers, displayed at each operating site, and reviewed at least every six months. The version at each site carries the local contacts for that district.

Contact	Name and details	When to use
PSEA Focal Person		First point of contact for any SEA concern
Deputy Focal Person		When the Focal Person is unavailable or involved
Executive Director		Serious concerns, or concerns involving the Focal Person
Chairperson, Board of Directors		Concerns involving the Executive Director
Dedicated reporting email		Written or confidential reports
KTN reporting hotline		Phone reports, including anonymous
Sauti Child Helpline	116 (toll-free, national)	Any child, anyone reporting for a child
Uganda Police, Child and Family Protection Unit		Suspected crimes, including any sexual act involving a child
District Probation and Social Welfare Officer		Statutory child protection referral and coordination
Ministry of Gender, Labour and Social Development		Statutory referral and national coordination
Nearest health facility		Medical care, urgent after assault (PEP within 72 hours)
Specialist survivor support partner		Psychosocial, legal and recovery support
Relevant donor focal point(s)		Notification where a funding agreement requires it

ANNEX 4

Annex 4: Staff PSEA Declaration Form

Completed by every candidate before an offer is confirmed, and by every current member of personnel at adoption of this policy. A false declaration is grounds for withdrawal of an offer or immediate dismissal. The information is held confidentially by Human Resources and used only for safeguarding purposes, in line with the Data Protection and Privacy Act, 2019 (Cap. 97).

Declaration

I declare, to the best of my knowledge, the following. (Tick one box per line.)

Statement	Yes	No
I have never been convicted of, or cautioned for, any offence of a sexual nature or any offence against a child.	☐	☐
I have never been dismissed, asked to resign, or subjected to disciplinary action in connection with sexual misconduct or harm to a child or vulnerable adult.	☐	☐
I am not aware of any past or ongoing investigation into my conduct relating to sexual misconduct or harm to a child or vulnerable adult.	☐	☐
There is no other matter in my history that would make me unsuitable to work with children or vulnerable adults.	☐	☐

If you answered "No" to any statement, give details on a separate sheet and hand it directly to the Head of Human Resources. A disclosure does not automatically end a candidacy; concealment does.

I consent to KTN verifying this declaration, taking up references that ask directly about my conduct, and obtaining a police or criminal record check where available. I undertake to inform Human Resources immediately if any of the statements above stops being true during my engagement.

Full name
Role applied for / held
Signature
Date
Received by (HR)

ANNEX 5

Annex 5: Partner PSEA Compliance Checklist

Used before entering a partnership and at least annually during it. Scoring: Met / Partially met / Not met. Any “Not met” on items 1–5 must be resolved before partner personnel have contact with the people KTN serves.

Partner organisation	
Assessed by / date / type	☐ Pre-partnership ☐ Annual review ☐ Spot check

#	Requirement	Met	Partial	Not met	Evidence seen / notes
1	PSEA policy of equivalent standard, or signed agreement to work under KTN’s policy	☐	☐	☐	
2	PSEA clauses in the signed agreement (assess, correct, suspend, terminate)	☐	☐	☐	
3	All personnel on KTN activities trained on PSEA and holding signed codes of conduct	☐	☐	☐	
4	Safer recruitment practised for roles in contact with the people we serve	☐	☐	☐	
5	Named PSEA focal point; commits to report concerns to KTN within 24 hours	☐	☐	☐	
6	Working reporting mechanism accessible to communities	☐	☐	☐	
7	Survivor referral arrangements in place for its operating areas	☐	☐	☐	
8	No unresolved SEA concerns from previous periods	☐	☐	☐	

Overall outcome	☐ Compliant ☐ Compliant with corrective action plan ☐ Not compliant: activities paused
Corrective actions, deadlines, next review date	
Signed (KTN) / Signed (Partner) / Date	

ANNEX 6

Annex 6: Safeguarding Risk Assessment Tool

Completed by the responsible programme manager before any new programme, activity or location begins, and reviewed when anything significant changes. The question to keep asking: where in this activity does power meet need, and what stops that meeting being exploited?

Programme / activity	
Location(s)	
Completed by / date	
Reviewed by (PSEA Focal Person) / date	

For each risk area below, rate the risk before safeguards (High / Medium / Low), name the safeguards, and assign an owner.

Risk area	Prompts	Risk (H/M/L)	Safeguards in place	Owner
Contact with children	One-to-one contact? Out of sight? Overnight or transport involved?			
Distribution of assistance	Who controls the list? Single gatekeeper? Visible criteria?			
Selection decisions	Who decides who benefits? Is the decision recorded and checkable?			
Home visits and outreach	Workers alone? Movements logged? Pairs possible?			
Digital contact	Will staff hold phone numbers of children or community members? Channels authorised?			
Partner / contractor involvement	Annex 5 completed? Personnel trained and signed up?			
Community awareness	Do participants know help is free and how to report?			
Reporting access	Can a child or non-literate adult at this site actually report?			
Other risks specific to this activity				

Overall risk after safeguards	☐ Low: proceed ☐ Medium: proceed with monitoring ☐ High: do not proceed until reduced
Approval (programme manager)	

Approval (PSEA Focal Person, for medium/high)	

ANNEX 7

Annex 7: Training Attendance Register

Training title	
Type	☐ Induction ☐ Annual refresher ☐ Role-specific ☐ Partner orientation ☐ Community session
Facilitator(s)	
Date and venue	
Language(s) used	

#	Name	Role / organisation	Code of Conduct signed? (Y/N)	Signature
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				

After the session, the facilitator forwards this register to the PSEA Focal Person, who updates the training records and the Annex 8 dashboard.

ANNEX 8

Annex 8: PSEA Monitoring Dashboard Template

Maintained by the PSEA Focal Person, reviewed quarterly with the Executive Director, and summarised in the annual safeguarding report to the Board. Case information is entered by case number only.

Reporting period
Prepared by / date
Reviewed by Executive Director / date

A. Prevention indicators

Indicator	Target	This quarter	Last quarter	Notes / actions
Personnel with signed Code of Conduct	100%			
Induction completed before contact with the people we serve	100%			
Personnel current on annual refresher	≥ 95%			
Sites with channels displayed and current referral directory	100%			
Active partners assessed in last 12 months	100%			
Risk assessments current for all activities	100%			
Community awareness sessions held (number / communities)	Per plan			

B. Response indicators

Indicator	Target	This quarter	Last quarter	Notes / actions
SEA concerns received (by channel)	Tracked			
Concerns acknowledged and risk-assessed within 24 hours	100%			
Survivors offered support within 72 hours	100%			
Cases referred to police / probation	All that the law requires			
Cases closed (Stage 7) this period	Within Section 6.3 timeframes			
Average days from report to closure	Per Section 6.3			
Open cases at period end (by stage)	Tracked			

Indicator	Target	This quarter	Last quarter	Notes / actions
Retaliation concerns received	0, and any acted on			

C. Narrative

Patterns or lessons this period (anonymised)	
Corrective actions assigned, owners and deadlines	
Items for escalation to the Board	

SHIELDING PASTORALIST CHILDREN · BUILDING FUTURES · LEADING CHANGE

Behind every number is a child with a name.

There is no version of this work in which exploitation by KTN's own people is survivable. This policy sets one standard, applies it to everyone KTN engages, and makes reporting a duty, not a decision.

Karamoja Tumaini Network

Hope · Heal · Empower

info@karamojatumaini.org · www.karamojatumaini.org

PSEA POLICY · VERSION 2.0 · EFFECTIVE MARCH 2026

A KARAMOJONG-LED CHILD PROTECTION ORGANISATION · KAMPALA & NAPAK, UGANDA