

ACK SAFEGUARDING POLICY - 2025 EDITION

‘That None May Suffer Harm’

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Welcome

As the Provincial Secretary of the Anglican Church of Kenya (ACK), I am honoured to welcome you to our Safeguarding Policy. This important document underscores our commitment to making the Church a safe place for everyone – especially children and vulnerable members. Safeguarding is at the heart of our Christian calling: it reflects our duty to protect the vulnerable, uphold the dignity of every person made in God's image, and ensure that our churches are sanctuaries free from abuse or harm. The purpose of this policy is to provide clear guidelines that prevent misconduct, promote transparency, and establish trust in all our ministries.

Our Church's leadership is fully committed to the implementation of this Safeguarding Policy at every level. From the Archbishop and House of Bishops to each parish and institution, we affirm that these standards are not optional. They will be actively applied, monitored, and upheld. Every clergyperson, lay reader, and staff member is expected to comply with the policy's requirements. We have put in place structures for training, reporting, and accountability to ensure that safeguarding is more than just words on paper. By holding ourselves accountable to these standards, we demonstrate integrity and follow Christ's example of protecting the "least of these" in our midst.

It is important to note that this policy is the result of extensive collaboration and careful development. Over the past months, we engaged a wide range of stakeholders in its formulation. Their insights and feedback have enriched this document. We have also ensured that the policy aligns with both ecclesiastical and legal standards. It reflects the guiding principles of the Anglican Communion's safeguarding guidelines and adheres to the laws of Kenya, so that our Church's practices meet both our theological commitments and national legal requirements. This rigorous process has produced a policy we can all have confidence in, one that is both faithful to our Christian values and compliant with professional best practices.

I warmly invite all readers – our bishops, clergy, laity, partner organizations, and every stakeholder – to engage with this Safeguarding Policy as a living document. In these pages you will find not just rules, but a shared vision for a safer church community. I

encourage you to study the policy, discuss it in your teams and parishes, and embrace it in spirit and action. We consider this a *living* document in the sense that it will be reviewed and refined over time as we learn from implementation and adapt to new insights. Your ongoing feedback and commitment are vital to keeping our safeguarding measures effective and relevant. Together, let us foster a culture in which everyone—especially the most vulnerable—feels respected, protected, and heard.

Finally, I urge every church leader and institution within ACK to integrate these safeguarding practices into all aspects of ministry and administration. Safeguarding should become part of the DNA of our dioceses, parishes, schools, and programs. This means proactively incorporating the policy's principles into daily decisions – from Sunday school classes and youth groups, to pastoral counselling, outreach activities, and management of church resources. By doing so, we actively demonstrate the love of Christ and make our churches true havens of safety. Our prayer is that every congregation will be a place where people can worship and serve God without fear, knowing that the Church will protect them and respond justly if any harm occurs.

In conclusion, on behalf of the Anglican Church of Kenya, I welcome you to this Safeguarding Policy and thank you for your partnership in making our Church safer for all. Let us each take ownership of these guidelines with a spirit of humility and determination. With God's help, and through our collective resolve, we will ensure that safeguarding is embedded in our church's culture – so that the light of Christ's care and justice shines brightly in every community we serve.

Yours in Christ's service,

Rt. Rev. Prof. Joseph Galgalo
Provincial Secretary, Anglican Church of Kenya
(Nairobi, 2025)

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Foreword

Scripture enjoins us, *“Open your mouth for the mute, for the rights of all who are destitute. Open your mouth, judge righteously, defend the rights of the poor and needy”* (Proverbs 31:8–9). This divine mandate formed the cornerstone of my reflection at the Safe Church Conference 2025 held at PCEA Milele Hotel, between 30 April – 4 May 2025, which bore the theme “Breaking the Silence, Restoring Dignity.” In that address, delivered to Anglican Provinces in East Africa (EA), we were reminded that safeguarding the vulnerable is not merely a procedural concern but a theological imperative. Proverbs 31:8–9 calls us to use our voice and authority to protect those who cannot speak for themselves—a call that lies at the very heart of what this Safeguarding Policy of the Anglican Church of Kenya seeks to uphold.

In recent times, the Church—both globally and in our own communities—has been shaken by painful revelations of abuse, cover-ups, and failures of leadership. The resignation of Archbishop Justin Welby in 2024, arising not from personal wrongdoing but from a failure to act decisively against known abuse, sent shockwaves through the Anglican Communion. Closer to home, we have had our own heartbreaking instances where the cries of victims went unheard, and perpetrators were left unchecked. These events have underscored why we cannot remain complacent or silent. Indeed, we dare not wait until scandal forces our hand; we must act now out of conviction rather than under compulsion.

As followers of Christ, we have a sacred responsibility to protect the vulnerable and to reflect our Lord’s justice and mercy in all we do. Jesus Himself welcomed the little children and championed the cause of the least and the lost; in the same way, His Church must be a safe haven for all, especially those at risk. Safeguarding, therefore, is not an optional protocol but an expression of the Church’s very mission. We cannot protect our structures while our children suffer, nor can we guard our pulpits while the vulnerable remain unheard. Rather, we are called to be the voice for the voiceless and guardians of the dignity of every person made in God’s image.

The formulation of this Safeguarding Policy has been a journey of collaborative effort and deep reflection. I wish to express my profound gratitude to all who have contributed to its development. I thank our Church’s leadership—my fellow bishops

and clergy—who recognized the urgency of this cause and offered unwavering support. I am also grateful to our partners, advisors, and legal experts whose guidance has helped align this document with both the gospel mandate and the highest standards of practice. Most importantly, I acknowledge the survivors of abuse, whose courage in sharing their pain and hope has guided and informed this work. Their voices have been instrumental in shaping a policy that truly seeks to listen, to protect, and to restore what was broken.

Now, with this foundation laid, I officially commend and present the ACK Safeguarding Policy to the Church. I urge every bishop, priest, deacon, lay reader, and all our ministry partners to embrace and diligently implement its provisions. This is a solemn charge to each of us—in every diocese, parish, and church institution—to prioritize the safety and dignity of everyone under our care. Let us ensure that the commitments on these pages translate into concrete actions: transparent procedures, accountability at all levels, and a culture of vigilance and compassion. As we undertake this task, let our common resolve be to break the silence before it breaks others, and to restore dignity, knowing that every soul matters to God. By the grace of God, may our Church become a beacon of safety, justice, and healing for all.

The Most Rev. Dr. Jackson Ole Sapit
Archbishop, Anglican Church of Kenya.
Bishop, All Saints Cathedral Diocese.
Bishop in Ordinary, Kenya Defence Forces
(*Nairobi, 2025*)

PROVINCIAL SYNOD RESOLUTION ON SAFEGUARDING POLICY

Resolution No. ACK/SYNOD/2025/XXX

Date: ____/____/2025

Venue: All Saints Cathedral, Nairobi, Kenya

Subject: Approval and Adoption of the Anglican Church of Kenya Safeguarding Policy

WHEREAS, the Church is called to be a sanctuary of safety, dignity, and healing for all God's people, and especially for children, the vulnerable, and the marginalized.

AND WHEREAS, the Church acknowledges the global and local failures in safeguarding that have caused pain, mistrust, and spiritual harm to victims and survivors.

AND WHEREAS, the Provincial Synod recognizes the urgent and theological imperative, rooted in Scripture and Anglican tradition, to implement a comprehensive safeguarding framework within all dioceses, parishes, institutions, and ministries of the Church.

AND WHEREAS, the Anglican Church of Kenya has developed a Safeguarding Policy through an inclusive, consultative, and professionally guided process involving church leaders, legal and safeguarding experts, survivors, and stakeholders.

NOW THEREFORE BE IT RESOLVED THAT:

1. The Provincial Synod formally approves and adopts the Anglican Church of Kenya Safeguarding Policy as the official policy of the Church on matters of protection, safety, and response to abuse or harm.
2. The Safeguarding Policy shall be binding upon all dioceses, parishes, church institutions, clergy, lay leaders, and staff operating under the authority and auspices of the Anglican Church of Kenya.
3. Each Diocese shall establish or strengthen Safeguarding Desks and appoint relevant personnel to oversee implementation, training, awareness, and compliance with the Policy.

4. The Provincial Office, through the office of Provincial Secretary, shall provide oversight, capacity-building, monitoring, and review of the implementation of this Policy.
5. The Policy shall be reviewed periodically to align with evolving legal, pastoral, and theological developments, and ensure continued effectiveness and relevance.
6. The Provincial Synod commits to fostering a culture of safeguarding that is proactive, transparent, trauma-informed, and consistent with the Gospel of Jesus Christ.

FURTHERMORE, the Provincial Synod extends its gratitude to the Archbishop, Provincial Secretary, the Safeguarding Policy Working Group, all diocesan representatives, and partners whose dedication and contributions made this policy possible.

Dated and passed by the Provincial Synod of the Anglican Church of Kenya this ____/____/2025.

Signed:

The Most Rev. Dr. Jackson Ole Sapit
Archbishop

Rt. Rev. Prof. Joseph Galgalo
Provincial Secretary

Preamble and Theological Basis

1.1 Introduction

The Anglican Church of Kenya (ACK) exists to draw people to our Lord and Saviour Jesus Christ through worship, pastoral care, service (diakonia), teaching, and evangelism. In this sacred mission, all who serve – both clergy and laity – are called to reflect Christ’s compassion and holiness. *“When he saw the crowds, he had compassion on them, because they were harassed and helpless, like sheep without a shepherd”* (Matthew 9:36). Jesus responded to vulnerability with deliberate care and action, calling for *“more workers”* to join in the ministry of compassion. In the same way, the Church today must ensure that our ministry does no harm and provides a refuge for the vulnerable. By protecting those in our care, we honour God’s call to be *“light”* and *“salt”* in the world, fulfilling the mandate of true religion *“to give of oneself to the hungry and meet the needs of the afflicted”* (Isaiah 58:10).

1.2 Purpose of this Policy:

This Safeguarding Policy establishes ACK’s commitment to prevent abuse, harm, or exploitation of all people we serve or engage with in ministry. The phrase *“That None May Suffer Harm”* encapsulates our goal of a Church environment in which every child, youth, and adult is respected and protected from abuse and neglect. The policy provides standards and procedures to ensure the safety of all, especially those most vulnerable, in line with the law of God and the law of the land. It reinforces our Christian conviction that every person is made in the image of God and deserving of dignity, love, and care. Ensuring a safe church is not only a legal duty but a gospel imperative.

1.3 Scope of Commitment:

The ACK is a province of the worldwide Anglican Communion with dioceses across Kenya, led by bishops and governed by synods. Safeguarding is a shared responsibility at all these levels. This Policy applies to all clergy, professional lay staff, lay leaders, volunteers, and representatives of the ACK, as well as our partner organizations when operating in collaboration with us. It covers all ministries, institutions (ADS Secretariates, schools, children's homes, clinics, etc.), parishes, and community programs under the ACK. It also extends to all who interact with the Church – congregants, service beneficiaries, students, clients of social programs, visitors – so that anyone who encounters ACK activities is safe and protected. In essence, everyone within our church community has a role in safeguarding, and the Policy seeks to ingrain a culture of awareness, prevention, and accountability at every level.

1.4 Theological Foundation:

Safeguarding is grounded in our faith. Scripture calls us to care for “the least of these” (Matthew 25:40) and warns that whoever causes a little one to stumble faces severe judgment (Matthew 18:6). We therefore approach safeguarding as an expression of Christ-like love and justice. The Church must be a sanctuary. Any form of abuse or exploitation is a sin and an affront to the Gospel. All ACK personnel are expected to serve with humility and integrity, seeking God's glory rather than personal gain. Misuse of authority, manipulation, or neglect of duty to protect will not be tolerated. By implementing this Policy, ACK affirms that safeguarding is ministry: it is how we love our neighbour and witness to Christ's compassion in a broken world. We pray that as we uphold these standards, God's name will be honoured and His people blessed.

1.5 Authority and Approval:

This Policy was approved by the Provincial Synod of the Anglican Church of Kenya (the highest governing body of ACK) and is issued under the authority of the Archbishop and the Provincial Administration. It applies uniformly across all dioceses and parishes, which are required to adopt and implement it in full.

It complements existing ACK policies – notably the Children’s Ministry Protection Policy and the Vulnerable Persons Policy – by filling gaps regarding youth and those who serve in ministry. It should also be read alongside the ACK Constitution and Human Resource Policy, which address aspects of staff conduct and disciplinary procedures. This document supersedes any prior safeguarding guidelines in ACK and is the definitive policy for ensuring safety in ministry. All clergy, employees, and volunteers of ACK must familiarize themselves with this Policy and commit to its implementation. At the start of their service, they will be required to sign an acknowledgment of having read and understood the Policy, symbolizing our collective commitment to safeguarding as a non-negotiable priority.

Legal and Policy Framework

2.1 Introduction

This Policy is firmly grounded in the laws of Kenya and aligned with international standards for safeguarding and protection. The Anglican Church of Kenya recognizes its moral *and legal* duty to protect children and vulnerable adults from harm. We therefore commit to compliance with all relevant Kenyan legislation and to upholding global best practices, as outlined below.

2.2 Kenyan National Laws and the Constitution:

2.3.1 Constitution of Kenya, 2010:

The Constitution's Bill of Rights provides the overarching framework for protection of all people. Notably, Article 53 of the Constitution guarantees every child the right *"to be protected from abuse, neglect, harmful cultural practices, all forms of violence, inhuman treatment and punishment, and hazardous or exploitative labour."*

This constitutional mandate underpins our child safeguarding obligations. Additionally, Article 29 of the Constitution affirms that every person – child or adult – has the right to freedom and security of the person, which includes the right *not to be subjected to any form of violence from either public or private sources*. These provisions make it clear that abuse and exploitation have no place in Kenyan society or the Church. The ACK, as a registered society in Kenya, is bound by these constitutional rights and is committed to upholding them rigorously.

2.3.2 Children Act, 2022 (No. 29 of 2022):

This is the primary statute giving effect to Article 53's child rights. It comprehensively addresses the care and protection of children. Under the Children Act, a child is defined as any person under 18 years. The Act reinforces that *"every child has the right to be protected from all forms of violence and abuse"*. Importantly, the law establishes mechanisms for child

protection and imposes duties on individuals and institutions: Any person who has reasonable cause to believe a child needs care and protection may report the matter to authorities, and authorized officers (such as police or children's officers) must act to safeguard the child. The Act provides for children's rescue centres and mandates that no child in danger be denied shelter or help ([Children Act

In alignment with this, ACK policy requires mandatory reporting of any suspected child abuse to the government authorities. The Act also outlines offences related to child abuse, neglect, child labour, child trafficking, and other harms, which the Church must be vigilant against. ACK will cooperate fully with the National Council for Children's Services and child protection officers as required by this law. All clergy, staff and volunteers must be aware that failure to report a child at risk could not only endanger the child but also be a breach of Kenyan law. We are committed to working together with Kenya's child protection system as required under the Children Act 2022.

2.3.3 Sexual Offences Act, 2006 (No. 3 of 2006):

This law criminalizes various forms of sexual abuse and exploitation. It was enacted to combat the alarming incidence of sexual violence in Kenya and provides stringent penalties for offenders. Relevant provisions include Rape and sexual assault (with heavy imprisonment terms), defilement (sexual intercourse with a minor, which carries penalties up to life imprisonment depending on the child's age), indecent acts with children or adults, child pornography, incest, and sexual exploitation of vulnerable persons. Crucially, the Act addresses abuse of power: Section 23 creates the offence of sexual harassment – if a person in authority (for example, a supervisor, teacher, pastor or any position of trust) requests or pressures any person for sexual favours, or uses their position to demand sexual activity, they are guilty of an offence punishable by at least 3 years in prison or a fine. Likewise, Section 24 targets sexual offences by persons in positions of authority or trust, recognizing that those who hold power over others (such as caregivers, church workers, or leaders) can commit grave abuses. Under this Policy, any such act by ACK personnel is not only a serious violation of trust but also a crime under Kenyan

law. The Sexual Offences Act also introduced a Sexual Offenders Register and mandates reporting of sexual offences. The ACK will ensure that anyone with known convictions for sexual offences is not hired or allowed to volunteer in positions of trust, especially involving children. We will also promptly report any incident that may constitute a sexual offence to the police, as required by law. The Church is committed to the principle that *no one – no matter their status or position – is above the law*.

2.3.4 Employment Act, 2007 (No. 11 of 2007):

As an employer, ACK abides by the Employment Act, which among other things, prohibits sexual harassment in the workplace. Section 6 of the Act requires employers with more than 20 employees to have measures to prevent sexual harassment. The ACK will maintain a workplace free of harassment, intimidation or exploitation. Any form of harassment of employees, interns or volunteers – whether sexual harassment, bullying or discrimination – is misconduct that will lead to disciplinary action in line with this Policy and the HR Policy. Church institutions are expected to promote gender equality and non-discrimination as enshrined in the Constitution (Article 27) and to ensure fair and safe working conditions for all staff. Additionally, the Employment Act forbids child labour (employment of under-18s in hazardous work) which aligns with our commitment to protect children from economic exploitation.

2.3.5 Other Relevant Kenyan Laws:

The ACK will also be guided by the Protection Against Domestic Violence Act, 2015 (which covers domestic abuse, including within families that our clergy may counsel), the Trafficking in Persons Act, 2010 (which criminalizes human trafficking – relevant to safeguard against child trafficking or exploitation), and any other legislation that advances the safety and welfare of vulnerable people. The Church will strive not only to obey the letter of these laws but also to model best practice in child protection and the prevention of gender-based violence. All allegations of criminal conduct under these laws will be reported to civil authorities – the Church's internal processes will complement, not substitute, the justice system.

2.3 International Standards and Commitments:

The Anglican Church of Kenya is part of the global community and is committed to upholding international human rights standards for safeguarding. We explicitly draw on the following key instruments and frameworks:

2.3.1 United Nations Convention on Rights of the Child (UNCRC), 1989:

Kenya is a signatory to the UNCRC, and this Policy is informed by the Convention's principles. Article 19 of the UNCRC obligates that *"States Parties shall take all appropriate legislative, administrative, social and educational measures to protect the child from all forms of physical or mental violence, injury or abuse, neglect or negligent treatment, maltreatment or exploitation, including sexual abuse, while in the care of parent(s), legal guardian(s) or any other person who has care of the child."* ([Article 19: Protection from abuse and neglect | CRIN](#)). Although the UNCRC speaks to state obligations, the Anglican Church, in its sphere of influence, strives to meet these same responsibilities. This means ACK will take all appropriate measures – policy, procedures, training, etc. – to protect children from *"all forms of physical or mental violence"*, abuse, neglect or exploitation in our care ([Article 19: Protection from abuse and neglect | CRIN](#)). Article 3 of the UNCRC asserts that the best interests of the child must be a primary consideration in all actions concerning children, a principle we fully embrace. Our child safeguarding measures are designed with the child's welfare as paramount. We also acknowledge other relevant UNCRC provisions, such as Article 34 (protection from all forms of sexual exploitation and sexual abuse) and Article 39 (rehabilitation of child victims). By implementing this Policy, ACK contributes to Kenya's fulfillment of its international commitments under the UNCRC.

2.3.2 Core Humanitarian Standard (CHS) on Quality and Accountability, 2014 (revised 2024):

The CHS is a global benchmark for organizations working with vulnerable communities, emphasizing accountability to those we serve. Several CHS commitments relate directly to safeguarding. CHS Commitment 5 requires organizations to have safe and accessible mechanisms for reporting

complaints, including safeguarding concerns, and to address them appropriately. CHS Commitment 8 stresses that staff are supported to do their job effectively and are managed in a way that promotes a safe environment (which includes preventing abuse). The ACK endeavours to meet these commitments by establishing clear reporting channels and fostering an open, responsive culture. Moreover, Protection from Sexual Exploitation, Abuse and Harassment (PSEAH) is woven throughout the CHS commitments ([PSEAH | CHS Alliance](#)). We align with the CHS principle that communities and people affected by our ministry should “*not be negatively affected and are safer*” because of our actions. As a faith-based organization often involved in relief and development, ACK will act in accordance with humanitarian safeguarding standards, ensuring that aid or services are never conditioned on sexual favours and that power imbalances are not misused.

2.3.3 Inter-Agency Standing Committee (IASC) Guidelines on Protection from Sexual Exploitation and Abuse (PSEA):

ACK adopts the **IASC Six Core Principles Relating to Sexual Exploitation and Abuse** as organizational policy. These principles (originally developed by the UN for humanitarian workers) are applicable to any context where power dynamics can be exploited. In summary: **(1)** Sexual exploitation and abuse by our workers constitute gross misconduct and are grounds for immediate disciplinary action, including dismissal. **(2)** Sexual activity with children (persons under the age of 18) is prohibited regardless of local definitions of adulthood – mistaken belief of age is no defence. **(3)** Exchange of money, gifts, services or employment for sex (including sexual favours or exploitative relationships) is forbidden. **(4)** Sexual relationships between those in positions of power (such as church workers) and beneficiaries of assistance or pastoral care are strongly discouraged, as they can undermine the integrity of our ministry due to unequal power dynamics. **(5)** All ACK personnel have a duty to report any concerns or suspicions of sexual exploitation or abuse within our ministries (even if the alleged perpetrator is a colleague, senior clergy or partner staff). **(6)** We will create and maintain an environment that prevents sexual exploitation and abuse and promotes implementation of this Policy. Leadership

at all levels is especially responsible for upholding these principles. By integrating the IASC PSEA core principles, ACK ensures our safeguarding approach meets international expectations for preventing and addressing sexual misconduct. These principles also reinforce Kenya's own PSEA commitments under various UN and African Union initiatives.

2.3.4 Keeping Children Safe (KCS) – International Child Safeguarding Standards:

ACK is guided by the standards set by Keeping Children Safe, a global network dedicated to child protection. The KCS standards outline four pillars of safeguarding good practice: Policy, People, Procedures, and Accountability ([The International Child Safeguarding Standards - Keeping Children Safe](#)). We strive to meet each of these:

- *Policy*: having a comprehensive child safeguarding policy (this document) that is actively implemented.
- *People*: ensuring everyone in the organization knows their responsibilities and receives training and support to safeguard children. Everyone has a responsibility to support the protection of children ([The International Child Safeguarding Standards - Keeping Children Safe](#)).
- *Procedures*: having effective procedures for preventing and responding to safeguarding concerns – including safe recruitment, reporting and responding systems, and managing incidents. These procedures are detailed in subsequent chapters.
- *Accountability*: monitoring and reviewing safeguarding measures and ensuring continuous improvement and transparency. We will regularly audit our safeguarding practice and are open to external scrutiny to keep children safe.

The KCS principles also emphasize that *all children have equal rights to protection*, regardless of gender, ethnicity, disability, or any other characteristic ([The International Child Safeguarding Standards - Keeping Children Safe](#)). ACK fully endorses this: we will not tolerate any form of discrimination or lesser standard of care. In line with KCS and UNCRC, we affirm that in all actions

concerning children, the best interests of the child shall be the primary consideration ([The International Child Safeguarding Standards - Keeping Children Safe](#)). Moreover, as KCS notes, if we work with partners, we have a responsibility to help those partners meet minimum safeguarding requirements ([The International Child Safeguarding Standards - Keeping Children Safe](#)). This informs our approach to collaborations (see Chapter 9).

2.3.5 Other International and Church Commitments:

ACK also recognizes the principles of the UN Declaration of Human Rights, the UN Convention on the Rights of Persons with Disabilities (CRPD) – which calls for protection of persons with disabilities from exploitation and abuse (important for adult safeguarding) – and the Sustainable Development Goals (SDGs), particularly Goal 16.2 which aims to end abuse, exploitation, trafficking, and all forms of violence against and torture of children. As part of the Anglican Communion, ACK upholds the Anglican Consultative Council's commitments to safe church policies and the Charter for the Safety of People within the Churches of the Anglican Communion (2005) which calls on member churches to adopt and implement safeguarding standards. We also take guidance from the Lambeth Conference resolutions that have repeatedly urged Anglican provinces to protect children and vulnerable people from abuse. Our policy resonates with the wider Church's stance that safeguarding is integral to our mission and our public witness.

By embedding the above legal requirements and international standards, the ACK Safeguarding Policy is both locally relevant and globally informed. All citations and references serve as an authoritative reminder that our Policy is not invented in a vacuum – it is built on established laws and best practices. In any instances of ambiguity or conflict, the higher standard of protection will prevail. Where Kenyan law or international standards strengthen protections, we will follow those. Should any future legal changes occur (e.g. new Acts or amendments), this Policy will be reviewed to remain compliant and up to date. Ultimately, our guiding principle is to meet or exceed these standards out of our Christian commitment to love and protect those whom God entrusts to us.

Scope and Definitions

3.1 Chapter overview

To ensure clarity, this chapter defines the scope of application of this Safeguarding Policy and explains key terms used throughout the document. The Anglican Church of Kenya's safeguarding commitment is comprehensive, covering who is protected, who must comply, and what forms of harm are addressed.

3.2 Persons Covered by this Policy (Who is Protected):

ACK's Safeguarding Policy intends to safeguard anyone who receives services, ministry, care or support through the Church, as well as those who work or volunteer for the Church. We recognize that certain groups are particularly vulnerable to harm and abuse. In ACK contexts, the following categories of people are considered within the protective scope of this Policy:

3.2.1 Children:

All persons under 18 years of age. This includes infants, toddlers, children in Sunday school, and youth below 18 in church programs. Children are vulnerable due to their age and legal status. They are covered extensively by our Child Protection measures (see specific child-focused procedures in Chapter 5 and 7). (Legal note: Kenyan law and this Policy both define a child as anyone below 18.)

3.2.2 Youth:

Young people who are 18 or older but still in formative stages of life, often considered "youth" in church contexts (for example, ages ~18–25 or up to 35 as locally defined). The original ACK policies identified a gap in addressing the youth. Youth in church programs (e.g. college fellowship, youth groups, interns, young leaders) can be susceptible to exploitation or peer abuse and are included in safeguarding efforts. While legally adults, many youths may have limited power or experience, making them vulnerable in certain situations.

3.2.3 Vulnerable Adults:

Any adult (18 or older) who *by reason of personal circumstances* is at heightened risk of harm, abuse, or exploitation. This includes, for example: elderly persons; adults with disabilities (physical, mental, intellectual or sensory impairments); adults with serious illnesses; those with mental health challenges; adults who are dependent on others for basic needs or care; refugees or displaced persons; widows/widowers or single parents facing hardship; persons struggling with poverty or addiction; and anyone under the care of the Church or receiving aid due to crisis. Vulnerability can be situational – for instance, someone experiencing domestic abuse or a community hit by disaster. ACK adopts an inclusive understanding: “Everybody engaged with the Anglican Church...shall be considered to be vulnerable” in some measure. In practice, we focus on those most at risk of exploitation or harm in the context of church activities. The Policy’s provisions for vulnerable adults ensure respectful and safe ministry towards them (for example, pastoral counselling ethics, financial safeguards for those who receive assistance, etc.).

3.2.4 Beneficiaries of Church Programs:

This term covers children and adults who benefit from ACK’s educational, medical, relief, development, or pastoral programs. For instance: students in Anglican schools, patients at church hospitals/clinics, recipients of food aid or other humanitarian services, participants in community development projects, etc. They may not be regular church members but meet us through services. They are owed the same duty of care and protection while under our auspices. No beneficiary should ever be subjected to abuse or exploitation by anyone representing the Church.

3.2.5 Congregants and Community Members:

Those who attend worship or other church events (regular parishioners or visitors), and members of the local community who interact with Church ministries (even if not Anglican). The Policy recognizes that ministry settings

(from counselling sessions to prayer meetings) must be safe for all adults and children present. Visitors seeking assistance – e.g., someone coming to the church office for help – are also covered. Essentially, if a person is on church premises or participating in a church activity, this Policy's protections apply to them.

All these people “may be vulnerable to harm of some kind and therefore need to be safeguarded.”. The ACK is committed to zero tolerance of abuse against any of the above. Prior specialized policies (Child Protection Policy, Vulnerable Adults Policy) remain in force for specific guidance, but this Safeguarding Policy provides an overarching framework to ensure no group (such as youth or ministry volunteers) falls through gaps.

3.3 Persons Bound by this Policy (Who Must Comply):

This Policy binds *all individuals who work for or represent the Anglican Church of Kenya in any capacity*. This includes:

3.3.1 Clergy:

All ordained ministers of ACK – bishops, priests, and deacons – whether active or retired (if still engaged in ministry). Clergy are often in positions of trust and authority and thus carry a sacred responsibility to exemplify Christ-like behaviour. They must adhere strictly to this Policy in all pastorals, liturgical, counselling, teaching, and administrative functions.

3.3.2 Lay Employees:

Any person employed by ACK at provincial, diocesan, parish, or institution level. This covers administrative staff, teachers in ACK sponsored schools, medical staff in church health facilities, social workers, mission staff, office assistants, etc. If you are on the church payroll or paid by a church institution, you are a representative of ACK and are expected to comply with safeguarding procedures, regardless of your role or seniority.

3.3.3 Volunteers:

All unpaid persons serving under the church's authority. This includes catechists, evangelists, Sunday school teachers, youth leaders, choir masters, ushers, cooks for feeding programs, short-term mission teams, etc. Volunteers often have close contact with children and communities and must follow the same conduct standards. We consider volunteers as "representatives" of ACK for purposes of this Policy.

3.3.4 Church Council and Ministry Leaders:

Members of PCCs (Parish Church Councils), lay readers, group leaders (e.g., Mothers' Union, Kenya Anglican Men's Association leaders), and any person in a leadership position within church structures. They set the tone for safe environments and are equally accountable to this Policy.

3.3.5 Governing Bodies:

Members of diocesan synods, boards, and committees, including boards of ACK schools, hospitals, and development agencies and community projects. They must ensure that the organizations they oversee implement safeguarding measures. They also fall under the Policy's behaviour code in their interactions (for instance, a board member visiting a project must still uphold appropriate conduct with beneficiaries).

3.3.6 Consultants and Contractors working with ACK:

If the church engages external consultants, facilitators, or even short-term contractors who will interact with children or vulnerable people (for example, a construction contractor working at a school), the relevant personnel must be briefed on our Safeguarding Policy and agree to adhere to certain standards (at minimum, behaviour protocols and reporting of any incident). This will be built into contracts where applicable.

3.3.7 Partner Organizations:

When ACK partners with other organizations (faith-based or secular) in joint initiatives, we will actively promote compliance with safeguarding standards. Formal partners receiving funds or working under ACK auspices are expected to either have an equivalent safeguarding policy or to agree in writing to abide by ACK's Policy for the duration of the partnership. For example, if we host an event with another church or NGO, their staff and volunteers involved must follow our code of conduct at that event. The Policy thus extends to partners by agreement, recognizing that one weak link can put vulnerable people at risk.

3.3.8 Visitors and Guests in ministry settings:

This includes visiting clergy from other dioceses, foreign mission teams, donors, or any guests who may, for instance, tour a project or observe children's programs. They must be accompanied and are expected to respect our safeguarding rules (e.g., not to be left alone with children without clearance). Prior to visits involving vulnerable groups, ACK will communicate expected behaviour and boundaries to the visitors.

3.3.9 Conclusion:

It suffices to say, everyone who has a role within ACK or on behalf of ACK is required to uphold this, Policy. At the start of their involvement, everyone must sign a commitment or *Safeguarding Declaration* acknowledging the Policy (see Appendix 2). Compliance is a condition of continued employment, appointment, or volunteering. Even for those in governance (who might not sign contracts), adherence is a collective resolution of the Synod and an obligation of their office. No one is exempt. Ignorance of the Policy is not an excuse; training and awareness will be provided to ensure all understand their duties.

3.4 Key Definitions of Terms:

Understanding specific terminology is crucial for consistent application of the Policy. The following definitions apply:

3.4.1 Safeguarding:

In this context, safeguarding refers to all actions the Church takes to ensure that its clergy, staff, programs, and operations do no harm to children or vulnerable adults, that we prevent and respond to abuse and exploitation, and that the welfare of those we serve is actively promoted. It encompasses child protection but also extends to protecting at-risk adults. Safeguarding means creating an environment where everyone is safe and respected, and any suspicion or concern of harm is properly addressed. It involves preventative measures (like policies, codes of conduct, safe recruitment) and responsive measures (like reporting and responding procedures). Ultimately, safeguarding is about upholding the dignity and rights of every person in our community.

3.4.2 Abuse:

Abuse is *any act (or failure to act) that harms another person*, especially in the context of a power imbalance. Abuse can be physical, emotional, sexual, or spiritual. It includes assault, inflicting injury, bullying, harassment, humiliation, intimidation, or other maltreatment. For children, abuse also includes neglect (failing to provide for a child's basic needs or to protect a child from harm). Abuse can be a one-time incident or a pattern of behaviour. It can occur in person or through digital/online interactions. (Detailed categories of abuse are further described in Chapter 4.4 and Appendix 4 – Code of Conduct, including specific examples). In all cases, abuse is a violation of the trust placed in church personnel and is strictly prohibited. Even actions that do not constitute a crime can be abusive if they cause harm – our threshold for action is concern of harm, not just legal violation.

3.4.3 Exploitation:

Exploitation refers to taking advantage of someone's vulnerability or dependency for one's own benefit. This often has a sexual or economic dimension. Sexual exploitation is any actual or attempted abuse of a position of vulnerability or trust for sexual purposes. This includes exploiting someone through transactional sex (demanding sexual favours in exchange for something) or using a person in prostitution or pornography. Economic

exploitation might include taking a person's money or labour without fair compensation (e.g., pressuring someone to work for free beyond what volunteers do, or misusing church resources intended for beneficiaries). Child exploitation includes child labour, using children in begging, trafficking children, or sexual exploitation of children. In a church context, an example of exploitation would be a clergy or worker who asks for "favours" (of any kind) from a beneficiary in return for providing aid – which is absolutely forbidden.

3.4.4 Harm:

"Harm" is any negative impact on a person's wellbeing – physical injury, emotional trauma, psychological damage, or developmental impairment. It is a broad term that encompasses abuse and neglect. For children, harm could mean affect on their health or development (e.g., a child being fearful and unable to learn because of mistreatment). For adults, harm could be physical hurt or emotional suffering. The Policy's aim "that none may suffer harm" speaks to preventing all forms of harm, whether caused intentionally or by negligence. Sometimes even exposure to certain situations (like witnessing violence) can cause harm; our duty is to minimize foreseeable harm.

3.4.5 Vulnerable Person/Adult:

As noted, a vulnerable adult is someone 18 or over who, due to age, disability, illness, or other situation, *"is or may be unable to protect themselves against significant harm or exploitation."* We include anyone who is dependent on others for basic needs or who is under significant power imbalance in a relationship (e.g., a beneficiary reliant on aid, a person under pastoral counselling, an employee under a domineering supervisor, etc.). Vulnerability is often contextual – for example, a well-educated adult could become vulnerable when displaced by conflict and living in a relief camp, reliant on aid. ACK chooses to adopt an expansive view of vulnerability: anyone under our care or interacting with us who is at risk of being controlled or harmed by another's power misuse. This ensures we don't overlook individuals who might quietly be at risk.

3.4.6 Safeguarding Officer:

The Safeguarding Officer is the designated person (or office) responsible for coordinating and overseeing the implementation of this Policy. At the Provincial level, the ACK has a Provincial Secretary, Safeguarding Officer (or Coordinator) who is an executive staff member tasked with ensuring the Safeguarding Policy is disseminated, enforced, and periodically reviewed. Each Diocese shall also appoint a Diocesan Safeguarding Officer or “Safeguarding Focal Point” to handle safeguarding matters locally and liaise with the province. The Safeguarding Officer’s duties include receiving reports of safeguarding concerns, advising on and monitoring investigations, providing (or arranging) training on safeguarding, maintaining records of incidents, and reporting to leadership on safeguarding compliance. This role is further described in Chapter 5. They act as an independent point-of-contact for any safeguarding issues, separate from the normal line management, to allow reporting that bypasses hierarchical obstacles (especially important if the concern involves clergy or leadership).

3.4.7 Authorized Person/Authorized Officer:

In legal terms (as per Children Act), an “authorized officer” can be a police officer, Children’s Department officer, probation officer, etc., legally mandated to respond to child protection issues. In this Policy, when we say “authorized person” in the Church context, we typically mean someone given authority by ACK to handle certain tasks – e.g., those assigned to investigate a claim (Investigator), or someone allowed to take a child into temporary custody (though normally we’d rely on government officers for that). To avoid confusion, we will usually refer to secular authority figures as “statutory authorities” (police, children’s officers) and church authority figures as Safeguarding Officers or Committee members, etc.

3.4.8 Safeguarding Committee:

A body (at provincial, diocesan or institutional level) that may be established to support the Safeguarding Officer. Such a committee shall include persons from various departments – HR, legal advisor, clergy representative, lay ministry,

and a child protection or social work expert – to advise on complex cases and ensure broad ownership and two other co-opted members. If mentioned, the Safeguarding Committee works with the Safeguarding Officer to review cases and make recommendations, especially in cases involving senior figures or systemic issues.

3.4.9 Whistleblower:

In this context, a whistleblower is anyone (staff, volunteer, or even beneficiary) who reports misconduct or concerns about abuse within the church.

3.4.10 Whistleblower protection

Refers to measures to ensure this person is not victimized or retaliated against for reporting. This term is important in our Policy – essentially, we want to encourage a culture where people can raise concerns without fear, therefore the identity of reporters is kept confidential (when possible) and any attempt to punish or ostracize someone for reporting is treated as a serious violation.

3.4.11 Clients/Service Users:

The Policy sometimes uses the term “clients” or “service recipients” for those who benefit from church ministries (like beneficiaries). For example, someone receiving counselling, or a family receiving relief aid, could be called a client of that church service. They fall under the protected groups above.

3.4.12 Representative:

The term “ACK Representative” covers any person acting on behalf of the Church, whether paid or unpaid. This is a broad term intending to capture that even non-staff (like a board member or a visiting missionary) represents the church’s values and is expected to comply with safeguarding rules. In essence, if you are doing something in the name of ACK or under its auspices, you are its representative and must adhere to this Policy.

3.4.13 Partners:

An external organization or church that ACK collaborates with in ministry, often formalized by an agreement or Memorandum of Understanding. Partners might include NGOs, other denominations, or community groups. The Policy extends to partners in that we will seek agreement on mutual safeguarding standards. The definition in the original draft: a “*partner organization*” is one with a formal agreement or relationship with ACK that may be receiving funds for a project. Such partners are expected to uphold safeguarding equivalent to ACK’s.

3.4.14 Safe Custody / Place of Safety:

A term from child protection practice meaning a secure, caring environment (could be temporary shelter, foster care, or any safe placement) where a child at risk is kept for protection. If an ACK ministry encounters a child who needs immediate removal from danger, we coordinate with authorities to arrange a place of safety (e.g., a rescue centre or trusted interim caregiver).

3.4.15 Safeguarding Concern/Incident:

Any issue raised that involves potential or actual harm, abuse, or exploitation. A concern could be a suspicion, disclosure, or allegation. An incident might be an observed event or a report of something that happened. The Policy outlines how to handle concerns and incidents (Chapter 7). We treat all concerns seriously, whether they seem minor or major, until properly assessed.

3.4.16 Consent (in safeguarding context):

Often, when dealing with adults, their consent is needed to share information or act, unless they are at immediate risk or others are at risk. For children, consent of a parent/guardian is considered, but the child’s best interests can override if the parent is the source of harm. In a church context, if an adult discloses abuse, we seek their consent to report, but if it involves a criminal offence, we may still need to report to authorities for the sake of safety. Consent is also relevant in defining sexual abuse – children cannot give consent to exploitation, and any sexual activity involving a minor is abuse, period. For

adults, sexual harassment or exploitation is about lack of freely given consent (coercion, force, or inability to consent due to power imbalance or incapacity).

These definitions are provided to ensure everyone reading or using the Policy has a common understanding of terms. Whenever there is uncertainty in interpretation, the Safeguarding Officer should be consulted for clarification. In applying these definitions, we err on the side of protection – for example, if someone might or might not be considered “vulnerable,” we will proceed as if they are vulnerable and give them support rather than exclude them from safeguards. It is better to be overly cautious than to leave someone unprotected due to semantics.

3.5 Areas of Risk and Ministry Contexts:

The Policy covers all activities of the Church, but it's worth noting specific contexts that require vigilance. Abuse or harm can occur in a variety of settings, including: during worship services, youth camps, Sunday school classes, choir practice, pastoral visits to homes, confession or counselling sessions, mentoring relationships, excursions and trips, humanitarian distributions, schools and boarding facilities, clinics, orphanages/children's homes run by ACK, and even online spaces (social media groups, WhatsApp chats run by church leaders, etc.). We recognize that some ministry contexts carry heightened risk – for example, one-on-one counselling in private can be high risk for abuse if proper boundaries are not kept; similarly, overnight youth camps require strict supervision and codes of behaviour. In subsequent chapters, we will outline guidelines to mitigate risks in these situations.

This scope and terms, lay the foundation for clear and enforceable standards. All church workers must internalize these definitions as they carry out their duties. A shared vocabulary ensures that when we say, for instance, “safeguarding concern,” everyone understands it means a potential case of abuse or risk that must be reported and addressed, rather than ignoring it. Likewise, knowing who is considered “vulnerable” helps us proactively give support where needed. This chapter should be reviewed frequently, especially

in training sessions, to cement common understanding as the basis for effective safeguarding.

Guiding Principles and Safeguarding Standards

4.1 Chapter overview:

This chapter outlines the core principles that guide the Anglican Church of Kenya's approach to safeguarding. These principles flow from our Christian values, our commitment to legal and ethical standards, and the best practices identified in international safeguarding frameworks. They serve as the foundation for all policies and procedures that follow. Every member of ACK should strive to embody these principles in their ministry and conduct.

4.2 Core Safeguarding Principles:

4.2.1 Zero Tolerance for Abuse:

ACK adopts a zero-tolerance stance toward all forms of abuse, exploitation, and harassment. This means that no instance of abuse is considered acceptable or “too minor” to matter. Any allegation or suspicion of abuse will be taken seriously, no matter who is involved. We will act on all concerns and, where substantiated, we will apply appropriate sanctions (up to and including dismissal and legal action) against perpetrators. Even a single incident of sexual exploitation or serious abuse by an ACK worker constitutes gross misconduct and grounds for termination. We are committed to *ending impunity* for abusers in the Church. There will be no cover-ups or “sweeping under the rug” of problems – transparency and accountability are crucial. Victims and whistleblowers will be listened to and supported. By declaring zero tolerance, we send a clear message: abuse will not be ignored or excused due to someone's position, longevity of service, or any other reason.

4.2.2 Duty of Care:

All clergy, staff, and volunteers have a duty of care towards those we serve. This means we must act responsibly and prudently to ensure others' safety and well-being. The duty of care is both moral and legal. Practically, it involves anticipating potential risks and taking steps to prevent harm. For example, if we are organizing a youth retreat, duty of care means we plan appropriate

supervision, ensure the venue is safe, and have emergency contacts. If someone raises a concern about a child's welfare, duty of care means we respond promptly and don't wait for harm to worsen. We acknowledge that our positions (clergy-laity, teacher-student, helper-beneficiary) inherently carry power, so we must exercise that power in the best interests of the vulnerable. We are conscious that *"to whom much is given, much will be required"* (Luke 12:48). Negligence – failing to take reasonable precautions or to respond to known issues – is a breach of duty of care and, under this Policy, may be treated as misconduct. Each church worker should ask, "Is there anything more I should do to safeguard this person?" and act accordingly. Duty of care also extends to confidentiality – handling personal information with care to protect privacy (while balancing with necessary reporting).

4.2.3 Best Interests of the Child:

In all actions concerning children (anyone under 18), ACK will be guided by the principle of the best interests of the child (per Article 4 of the African Charter on the Rights and Welfare of the Child and Article 3 of the UNCRC). This means that when making decisions that affect a child – whether in daily programs or in a case of suspected abuse – the child's welfare comes first. For example, if a parent or guardian is suspected of abusing a child, the church's response will prioritize protecting the child over the relationship with the parent. The Church will also consider children's evolving capacities and voice; where appropriate, the views of the child will be considered (consistent with the child's age and maturity). If there is any conflict of interest in a situation (e.g., a valued church worker is accused of harming a child), the principle demands siding with the child's safety until the matter is resolved. *No other interest – reputational, financial, or legal – should override children's right to protection.*

4.2.4 Non-Discrimination and Inclusion:

Every person, regardless of age, gender, tribe, race, socio-economic status, disability, or any other characteristic, has equal dignity and right to protection. Safeguarding efforts will pay special attention to those who may face discrimination or barriers – e.g., children with disabilities are often more

vulnerable to abuse; women and girls may face gender-based violence; minority groups might fear reporting abuse. We commit to inclusive safeguarding: reaching everyone. We will not allow prejudice or stigma to hinder someone from getting help. Church workers must treat all individuals with respect and impartiality. Within our programs, we will strive to create environments where *all* feel safe and valued. For instance, if a child with special needs is in our Sunday School, we ensure teachers are trained on how to accommodate and protect that child from bullying. The principle of inclusion also means making reporting channels accessible (e.g., information in local languages, ability to report anonymously if literacy is an issue, etc.). By upholding non-discrimination, we echo the biblical truth that “*there is no partiality with God*” (Romans 2:11).

4.2.5 “Do No Harm” Approach:

This humanitarian principle is explicitly embraced by ACK. “Do No Harm” means that in delivering our services and ministry, we actively avoid causing further harm or suffering. It reminds us to be aware of how our actions might inadvertently create risks. For instance, publicizing a survivor’s story without consent could cause them stigma – so we avoid that. Or giving a single staff member unchecked authority in handling relief funds could tempt exploitation – so we implement checks and balances. Every program or intervention should be analysed for potential harm. Moreover, this principle guides how we treat survivors of abuse – with empathy, ensuring our response does not re-traumatize them (for example, conducting interviews in a sensitive manner, not blaming them). Similarly, we aim not to harm those who are accused by assuming guilt without due process – investigations will be fair. In principle, all procedures from recruitment to case handling are designed to minimize harm and maximize benefit.

4.2.6 Accountability and Transparency:

The Church leadership and every worker are accountable for implementing this, Policy. We will foster an environment where questions can be asked, and mistakes acknowledged. *Accountability* means we hold ourselves answerable

to those we serve, as well as to external authorities (like the government and donors) and ultimately to God. Practically, this translates to measures like regular reporting on safeguarding issues to the Diocesan Synod and Provincial Synod, allowing independent audits or reviews of our safeguarding practices, and being open with communities about what they should expect from us. If something goes wrong (e.g., a case of abuse occurs), we will review it honestly and learn lessons rather than hide it. We will also report crimes to civil authorities as required, not hiding behind the church structure. *Transparency* means clear communication – our congregation and the public should know we have this Policy, know how to raise concerns, and trust that processes are in place. While confidentiality of specific cases is maintained, the overall commitment to dealing with issues is not secret. Leaders must model accountability – for example, a bishop or vicar will support investigations even if they involve senior people and will provide information and cooperation wherever needed. We also strive to be accountable to survivors – keeping them informed of case progress, explaining actions, and listening to feedback.

4.2.7 Safeguarding as Everyone's Responsibility:

Safeguarding is not just the Safeguarding Officer's job, or the clergy's job – it's everyone's responsibility ([The International Child Safeguarding Standards - Keeping Children Safe](#)). This principle must be ingrained in our culture. All staff and volunteers should be proactive. If you see something, say something. If something is unclear, ask. This shared responsibility means *colleagues watch out for each other too*: an usher might gently remind a Sunday School teacher if they see something inappropriate, etc. It also means those at the top cannot delegate it away – leadership has to champion it, and each person must understand their role (as detailed in Chapter 5). We will include safeguarding in job descriptions, performance appraisals, and ministry evaluations to reinforce this. The Church community (including congregation members) should also be encouraged to take part – e.g., parents knowing the child protection guidelines, youth members aware of peer-to-peer conduct expectations. The broader community can also hold us accountable – we'll communicate that if they observe misconduct by our workers, they should report it, and we will act. In

short, safeguarding is woven into the fabric of our ministry responsibilities at all levels.

4.2.8 Confidentiality and Data Protection:

Safeguarding matters often involve sensitive personal information. ACK will handle all case information with the utmost confidentiality. Only those who *need to know* to respond will be informed of an incident. Gossip or unnecessary disclosure is strictly prohibited. Identities of survivors, whistleblowers, and alleged perpetrators will be protected during pending investigations. Records of cases will be stored securely (locked files or password-protected digital files). However, confidentiality does not mean secrecy to protect the institution – rather, it's to protect individuals and the integrity of the process. We will also comply with any applicable data protection regulations in Kenya when storing personal data (e.g., the Data Protection Act 2019, which governs how we manage personal information). When we must share information (for example, reporting to police or cooperating with a statutory investigation), we will do so in line with legal requirements, while still respecting the privacy and safety of those involved as much as possible. Church personnel are trained that breaching confidentiality can jeopardize safety and trust – for instance, revealing a reporter's identity could lead to retaliation. Therefore, confidentiality is a key principle in maintaining trust in our safeguarding system.

4.2.9 Survivor-Centred Approach:

In responding to any allegation or incident, our approach will be survivor centred. This means the needs and wishes of the person who experienced harm are given priority (to the extent possible within legal and safety constraints). We will treat survivors with compassion, respect, and without judgment or blame. They will be offered support (emotional, psychological, medical, spiritual, legal as needed – see Chapter 8) and kept informed. We recognize the courage it takes to speak up, and we will not subject them to unnecessary burdens (e.g. we will try to limit the number of times they must recount their story, and ensure any interviews are done in a considerate manner). A survivor-centred approach also means acknowledging and

validating the trauma and feelings they have and adjusting help them participate in the process (for example, if a survivor prefers to have a certain person present for moral support while giving a statement, we try to accommodate that). Importantly, no retaliation or disadvantage will happen to someone who reports abuse they suffered – for instance, a beneficiary who reports abuse by a staff will not be cut off from aid as a result; an employee who reports harassment will not lose their job because of reporting. This principle aligns with our Christian duty to care for the wounded and “bind up the broken hearted” (Isaiah 61:1).

4.2.10 Fair Process (Procedural Fairness):

While we are survivor-centred, we also commit to fairness towards all parties. Alleged perpetrators will be given an opportunity to respond to allegations; investigations will be impartial and based on evidence, not assumption. The principle of *innocent until proven guilty* is respected, particularly to avoid false accusations causing irreparable harm. We will avoid rushing to judgment – ensuring that decisions (such as disciplinary action) are made after careful review of facts. That said, the threshold for precautionary measures (like suspension during an investigation) is lower – we may remove someone from their role temporarily if that is necessary to protect others, without it implying guilt. A fair process also means our internal inquiry will follow clear steps and timelines so that it does not drag on indefinitely or arbitrarily. Those accused can have representation or support person in the process if desired (as per HR manual guidelines or natural justice). Documentation will be kept supporting findings. Our goal is that, at the end of a case, all parties feel they were heard and that the outcome, even if not what one side wanted, was reached through a just and transparent procedure. We align this with biblical exhortations to judge rightly and not show favouritism (James 2:1). Even for the accused, we seek repentance and restoration if appropriate, or proper sanction if warranted, but in all cases handled with Christian compassion.

These guiding principles shall inform every aspect of safeguarding implementation in ACK. They are not just abstract ideals; they have practical implications in how we recruit, how we train, how we behave daily, and how we

handle concerns. We will disseminate these principles widely – posting them on notice boards, including them in training materials, and referencing them whenever we talk about safeguarding.

By adhering to these principles, the Anglican Church of Kenya commits to creating an environment where *safety and trust are paramount*. Our theological perspective underscores each principle: for example, zero tolerance for abuse reflects the call to holiness; best interests of the child reflect Jesus' special concern for children; non-discrimination reflects that all are equal before God; accountability reflects stewardship and integrity; and a survivor-centred approach reflects mercy and justice for those wronged.

In principle, Safeguarding is a manifestation of love in action. It is loving our neighbours (especially the “least of these”) as Christ loves us. These principles ensure that love is not sentimental but protective and just. All ACK workers are expected to internalize these principles and let them guide their conscience and conduct in all interactions.

4.3 Specific Safeguarding Standards Adopted by ACK:

In addition to general principles, ACK formally adopts certain standards that operationalize those principles. The following standards are to be upheld across the province:

4.3.1 Standard 1: Policy Commitment.

ACK has a written Safeguarding Policy (this document) that is approved by top leadership and is communicated to all stakeholders. The policy will be made available publicly (through church websites, offices, etc.) to demonstrate transparency. We commit to reviewing this Policy at least every three years (or sooner if required by changes in law or circumstance) to ensure it remains effective and up to date. Each Diocese and or church institution must localize implementation (like appointing officers, contextual examples in training) but not dilute or contradict the core content. Any diocesan or institutional supplementary guidelines must align with this provincial Policy.

4.3.2 Standard 2: Awareness and Training.

All clergy, staff, and volunteers will receive appropriate training on safeguarding. New personnel will get induction training on the Policy and Code of Conduct before or at the start of their engagement. Ongoing refresher training or awareness sessions will be conducted, at minimum annually, to keep knowledge fresh and address emerging issues (like online safety, new legal provisions, etc.). Specialized training will be given to those in high-responsibility roles (e.g., Safeguarding Officers, children/youth workers, investigators). We will utilize the Safeguarding Training Manual (developed by ACK in 2025) to guide these sessions, focusing on practical skills and understanding. Training will include biblical foundations as well as role-play or scenarios to practice responses. A record of who has been trained will be maintained. The aim is to equip everyone with the ability to prevent, identify, and respond to abuse. Additionally, we will raise awareness among our congregants and communities about safeguarding – through sermons, Sunday bulletins, youth group discussions, etc., promoting a shared vigilance.

4.3.3 Standard 3: Safe Recruitment and Selection.

ACK will follow stringent recruitment procedures to deter and prevent those who might abuse from entering its ranks. This includes use of application forms and interviews that ask about the candidate's motivation and experience with vulnerable groups; thorough reference checks, including at least two referees (and we will specifically ask referees about the candidate's suitability to work with children or vulnerable adults); and background checks where feasible. For staff and long-term volunteers, a police clearance (Certificate of Good Conduct) or vetting against any available sexual offender registers will be required, in line with Kenyan best practice. All candidates for positions involving direct work with children must declare any prior convictions or disciplinary measures related to abuse (see Appendix 2: Safeguarding Self-Declaration Form, which every such worker must sign). Any false declaration is grounds for non-hiring or termination. We will not hire or appoint anyone with a history of sexual offences or substantiated misconduct with children/vulnerable persons. Where a background check raises concerns or ambiguity, we will err on the side of

caution (e.g., not place them in a sensitive role while clarifying). Contracts and appointment letters will include a clause on adherence to the Safeguarding Policy. Even for internal promotions or transfers to roles with greater access to vulnerable groups, we will consider re-screening or at least a fresh declaration. Volunteers will often be church members known to us, but even so, for roles like Sunday School teacher or youth mentor, they should be vetted (pastoral reference or known character). We strive for a culture where character and safety are paramount, not just skills.

4.3.4 Standard 4: Code of Conduct.

ACK has a clear Safeguarding Code of Conduct (see Appendix 4) that outlines expected behaviours and unacceptable behaviours for all representatives. This Code is to be read and signed by all church personnel and displayed in offices. It includes positive commitments (e.g., treating everyone with respect, maintaining appropriate boundaries, obtaining informed consent for photographs, etc.) and specific prohibitions (e.g., no sexual activity with children, no physical discipline, no showing favouritism or excluding others, no touching inappropriately, no harassment, etc.). Key points from the Code of Conduct include: *never abusing the power and trust that come with your position; never sexually exploit or harass anyone; never engage in sexual or inappropriate relationships with children or youth under your care; never indulge in pornography involving minors or exploitative material; avoid actions that could be misinterpreted as abusive (such as meeting a child alone behind closed doors – use observable spaces); no corporal punishment or humiliating treatment; refrain from any form of discrimination or hate speech; do not engage in any illegal activities including those that put others at risk (drug abuse, etc.); and maintain professional boundaries even if local norms are permissive of certain behaviours – ACK’s standard may be higher.* The Code also likely includes obligations to report any breaches one witnesses. By adhering to the Code of Conduct, we create a safe, caring, and professional environment. Breaching the Code will result in disciplinary action. The Code applies both on and off duty – church workers are expected to live by these standards at all times, as their conduct even in private can affect the church’s witness and the

safety of others (for example, an off-duty teacher who abuses neighbour's children is still violating our standards and harming the community; we would address it).

4.3.5 Standard 5: Reporting Systems.

ACK will establish multiple channels for reporting safeguarding concerns. This includes at least one designated confidential reporting email/phone line at provincial level (managed by the Safeguarding or the designated Officer), and local avenues such as informing the Vicar, Head Teacher, or Diocesan Safeguarding Officer. We will ensure these reporting mechanisms are *well-publicized* – for example, posters in churches: “If you have a safeguarding concern, contact _____ (phone/email)”. For children, we will consider child-friendly reporting methods (maybe a trusted teacher or Sunday School supervisor is designated to receive from kids, suggestion boxes, etc.). Reports can be made anonymously, though that can limit investigation – still, the system should allow it to encourage those afraid of reprisal. We commit to protecting whistleblowers (no one will be penalized for raising a concern in good faith, even if it turns out to be unsubstantiated). The reporting system will cover internal and external referral: internal (so the church can act) and external (notifying authorities as required). We will also have a procedure to handle historic cases (if someone comes forward about abuse that happened years ago by a church worker, it will still be listened to and acted upon appropriately). Details of the reporting procedure are in Chapter 7 and a sample Incident Report Form is provided (Appendix 1) which guides what information to collect. In line with CHS Commitment 5, these complaint mechanisms will be safe and accessible, and we will respond promptly.

4.3.6 Standard 6: Response and Case Management.

When a report is made, ACK will follow a structured process to investigate and respond (detailed in Chapter 7). Our standard is that *every case is responded to within 24-48 hours* with initial actions (like assuring immediate safety of victim and accused person is put on leave if necessary). We will appoint trained investigators (could be internal or external depending on case) who will gather

facts fairly and confidentially. An Investigation Procedure (Appendix 3) outlines steps: planning the inquiry, conducting interviews (child-friendly approaches for child victims – e.g., no repeated traumatic questioning)), examining evidence, and reporting findings to appropriate decision-makers. For any case that may be criminal (sexual abuse, physical assault, etc.), we will coordinate with police – our internal process will not interfere with criminal investigations; rather we will complement by focusing on welfare and internal disciplinary decisions. We aim to complete internal investigations within a reasonable timeframe (e.g., 30 days) and keep the subject informed if delays. Following investigation, a Safeguarding Committee or senior panel will decide outcomes: disciplinary action (which could be warning, training requirement, suspension, termination), referral to professional bodies (if applicable, e.g., if a teacher is involved – to TSC), and lessons learned to prevent future incidents. Outcomes will be documented. If an allegation is not substantiated, we will still consider if the concern indicates any need to improve safeguards (e.g., maybe a misunderstanding occurred due to lack of guidelines). If malicious allegations are proven (rare, but if someone deliberately made a false claim), that too will be addressed through disciplinary or pastoral means, since false accusations can damage lives – though, again, raising a concern in good faith is never punished. We also emphasize survivor support in responses (see Chapter 8). Additionally, ACK will comply with any mandatory reporting laws such as informing the Department of Children’s Services in cases of child abuse, or the police in sexual offence cases. At the case conclusion, we will possibly have a case review debrief to improve.

4.3.7 Standard 7: Pastoral Care and Support.

Beyond formal investigations, the Church is committed to pastoral care of all affected. This means providing or facilitating counselling for survivors, as well as appropriate support for others impacted (the accused, family members, congregations in shock, etc., without prejudice to doing justice). We maintain that the spiritual well-being of those involved is important: offering prayers, yet without using spiritual activities to replace needed practical measures. We also ensure that those who have experienced abuse are not required to meet or

forgive their abuser as a precondition for church assistance – forgiveness is a personal journey and should not be coerced; healing is at their own pace. If the survivor desires spiritual help (like prayer or pastoral counselling), a trained clergy not involved in the case and of the survivor's choosing (if possible) will minister to them. In cases of abuse by clergy, often a community's trust is shaken; pastoral responses may include parish meetings to acknowledge what happened (maintaining confidentiality of identities as appropriate), liturgies of lament or healing, and messages that reaffirm the church's condemnation of abuse and commitment to safety. Essentially, our standard is to *be the Body of Christ in caring for those who suffer*, not abandoning them after an incident is reported.

4.3.8 Standard 8: Safe Ministry Programs.

The design and execution of all ministry programs should integrate safeguarding. For example, in children's Sunday school, there should always be at least two adults present (two-deep leadership rule) to avoid one-on-one situations that could enable abuse or accusations. For youth group outings, both male and female youth leaders should go if mixed genders are present; parental consent and emergency contacts should be secured. Any transportation of minors should be with written parent permission and ideally two adults in vehicle. Overnight events should have segregated sleeping for males/females and clear rules about not entering each other's quarters. Camps or conferences: staff must all be vetted and briefed on rules (curfews, no alcohol if youth present, etc.). Pastoral counselling: should happen in a space that is private enough for confidentiality but not so isolated as to be unsafe – e.g., use an office with a window or open door, or have another staff nearby. Counselling minors should involve parental knowledge (except in extreme circumstances like suspected parental abuse – then involve Safeguarding Officer). Sacramental Preparation: e.g., confirmation classes should follow same rules as any youth meeting. Choir rehearsals, acolyte training etc.: adult leaders must follow conduct code; older youth should not be allowed to bully younger ones. Digital communication: if staff or clergy communicate with minors (like by phone or social media), it should be done transparently (copying parents or group

chats vs private chats) and only for appropriate purposes. Taking photos of children: get consent from parents and do not share personal info of the child with images online. These are illustrative examples – each ministry should do a risk assessment to identify and mitigate risks (we might include a checklist in guidelines). By mainstreaming safeguarding in ministry activities, we ensure that caring for souls never jeopardizes physical or emotional safety.

4.3.9 Standard 9: Partnerships and External Engagement.

Whenever ACK engages in partnerships (with NGOs, government, other denominations), we will advocate for safeguarding. If ACK is the lead in a project, our standards will apply to all participants. If ACK joins a program led by others, we will ensure their safeguarding standards are acceptable; if not, we add ours or provide training. We will include clauses in MOUs requiring adherence to safeguarding protocols and reserve the right to terminate partnerships if abuses occur and are not properly addressed. In ecumenical or interfaith settings where others may not have formal policies, ACK representatives will still abide by ours and try to model best practice. We will also coordinate with government child protection structures and refer cases appropriately – building relationships with local child officers, police, gender-based violence recovery centres, etc., to have a network of support and referral. The Church does not operate in isolation; we see safeguarding as an area for collaboration and witness. By upholding strong standards, we can influence others positively and protect the reputation of the Church by association (not being complicit in others' negligence).

4.3.10 Standard 10: Monitoring and Continuous Improvement.

The ACK leadership (especially the Safeguarding Officer and committees) will continuously monitor the implementation of this Policy. This involves collecting data: number of cases reported, types of issues, training sessions held, etc., in a confidential log. Periodic audits or assessments will be done (potentially involving external experts or our development partners) to evaluate how well safeguarding is integrated. We will solicit feedback from staff and beneficiaries about the safety of our programs – e.g., anonymous surveys or suggestion

boxes asking “Do you feel safe? Do you know how to report concerns? How can we improve?” Based on findings, we will update practices. The Provincial Synod or Standing Committee will receive an annual Safeguarding Report summarizing efforts and challenges (without breaching individual confidentiality). This keeps the issue on the agenda and allows accountability at the highest level. If gaps are identified (say, volunteers in remote parishes aren’t getting training), we will devise action plans to address them (like regional training outreach). Safeguarding is an evolving field; we will stay informed about new developments (like trauma-informed care, online risks, etc.) through networks and incorporate those. The Church is committed to *learning from mistakes*. In the unfortunate event of a major incident, beyond managing it, we will commission a debrief/review to learn how to prevent similar in future. This standard ensures that our safeguarding practice does not become stagnant or merely a “paper policy,” but rather a living, improving system.

ACK provides a concrete checklist for what the organization must do to uphold the earlier principles. These standards will be disseminated as commitments the Church makes to its members and the public. They also help in evaluation – we can ask, are we meeting these standards? If not, where do we strengthen?

In implementing them, resources will be allocated – for example, budgeting for training and for the Safeguarding Officer’s operations. Also, discipline for non-compliance: if a church worker disregards these standards (even without an incident of abuse), such as refusing to attend training or flouting safe practice rules, it should be addressed by supervisors as a performance issue.

The ultimate goal is a holistic safeguarding system where policy, people, procedures, and accountability (the KCS pillars) are all functioning together. With these guiding principles and standards established, we now proceed to the operational aspects: the concrete roles, procedures, and protocols that will bring these commitments to life in ACK’s daily ministry.

Roles and Responsibilities for Safeguarding

5.1 Chapter overview

Safeguarding is a collective responsibility, but specific roles within the Anglican Church of Kenya have duties to ensure the Policy is implemented effectively. This chapter delineates the responsibilities of various positions and bodies, from the highest levels of church leadership to the grassroots. Clear accountability is crucial for turning policy into action.

5.2 Church Leadership Responsibilities:

5.3.1 The Archbishop and Provincial Synod:

The Archbishop of Kenya, as the chief shepherd of the province, holds ultimate responsibility for championing safeguarding. His office will ensure that safeguarding remains a priority agenda in provincial programs and communications. The Provincial Synod (and its Standing Committee in between Synod sessions) must oversee that this Policy is resourced and complied with across all dioceses. They are responsible for approving updates to the Policy and receiving annual safeguarding reports. The Archbishop will appoint the Provincial Safeguarding Officer and, if needed, a Provincial Safeguarding Committee to coordinate efforts. In cases of allegations against a diocesan bishop or top provincial leader, the Archbishop (or if the Archbishop is implicated, the Provincial Dean or appointed Commissary) in consultation with a small committee of independent persons will take charge of the response, ensuring impartial investigation and action. Essentially, the top leadership sets the tone: a tone of zero tolerance, transparency, and support for safeguarding initiatives. Their pastoral letters, sermons, and public statements should reinforce the importance of protecting the vulnerable, thereby influencing attitudes churchwide.

5.3.2 Diocesan Bishops and Diocesan Synods:

Each diocesan bishop is responsible for implementing the ACK Safeguarding Policy within their diocese. The bishop must appoint a Diocesan Safeguarding

Officer (DSO) and possibly form a Diocesan Safeguarding Committee that includes clergy, laity, and professionals (e.g., a lawyer or social worker) to oversee local safeguarding matters. The Diocesan Synod should adopt the provincial Policy formally and can add any diocesan-specific protocols (so long as consistent with the provincial standards). Bishops must ensure that all parishes and institutions in their diocese are informed about the Policy and that clergy under their care fulfill training and compliance requirements. They should include safeguarding in archdeaconry meetings and clergy retreats as a standing item. When a safeguarding incident arises in the diocese, the bishop (unless personally conflicted) must ensure it is handled swiftly and fairly – often by empowering the DSO to act and by cooperating with any investigations. Bishops also have a role in clergy discipline: if a member of clergy is found to have violated safeguarding rules, the bishop should invoke the Church's disciplinary canons for clergy (in parallel with any legal processes) to impose appropriate ecclesiastical penalties. Conversely, bishops should also ensure clergy who report issues are supported and not victimized by their parishes for doing the right thing.

5.3.3 Parish Incumbents/in charges (Vicars) and Church Councils:

The priest in charge of a parish has frontline responsibility to create a safe parish environment. This means making sure that parish workers and volunteers know the Policy, that the Code of Conduct is signed and posted, and that reporting procedures are known. They should integrate safeguarding into parish life – for example, at the start of Sunday School term, hold a meeting with teachers and parents to go over rules; at church council meetings, review any safeguarding issues. Vicars should encourage an open-door policy where congregants can approach them or the Parish Safeguarding Focal Person (if one designated) with concerns. The Parish Church Council (PCC) also has duties: to support the vicar in implementing the Policy (they could allocate budget for training, Sunday School materials on safety, etc.), and to exercise oversight. Many PCCs manage hiring of lay staff – they must apply safe recruitment here. They also should incorporate safeguarding into risk management for parish events. PCC Secretaries or a designated member can

serve as the liaison to the diocese on safeguarding matters, forwarding any concerns beyond the parish's capacity. In sum, at parish level, leadership must ensure active compliance – not treating safeguarding as a mere paper requirement, but something woven into ministry (like ensuring two teachers present in a class, arranging substitutes instead of leaving one adult alone with kids, etc., which the vicar/PCC can monitor).

5.3.4 Leaders of Church Organizations (Youth, Mothers' Union, etc.):

Groups within the church (like Kenya Anglican Youth Organization, Mothers' Union, Men's Fellowship, Choir, etc.) have their own elected leaders. These leaders are responsible for the members' behaviour during group activities and for any outreach the group does (e.g., Sunday School run by Mothers' Union members – the MU leader ensures they know the rules). If the youth are having a retreat, the Youth Leader must coordinate with clergy to ensure safety measures. These lay readers should attend safeguarding training and then disseminate key points to their members. They act as an extra set of eyes and ears – for instance, a Mothers' Union leader might notice if a child in the congregation appears abused and can alert clergy or safeguarding officer. They also should embody positive role modelling, calling out or correcting any inappropriate behaviour they witness among peers.

5.3 Safeguarding Officer and Committees:

5.3.1 Provincial Safeguarding Officer (PSO):

The PSO is the central coordinator of safeguarding across ACK. Typically, a senior official (or consultant) with expertise in child protection or related fields, reporting to the Provincial Secretary or Archbishop's office. Key responsibilities include: developing and updating policy/training materials; advising dioceses and institutions; receiving serious incident reports (especially those that might affect multiple dioceses or pose reputation risk); maintaining a confidential national register of cases (to prevent someone dismissed in one diocese from being hired in another, for example); liaising with external bodies (government, donors, other churches) on safeguarding matters; and preparing annual reports for the Synod. The PSO may also take the lead on investigations of senior

figures or complex cases or facilitate bringing in outside investigators if needed. They ensure each diocese has a DSO and provide them with support and networking (perhaps an annual meeting of all DSOs for training and sharing). The PSO also manages the central reporting hotline/email and ensures timely response. If resource permits, the PSO could have a small team (perhaps forming a Provincial Safeguarding Committee with representatives as mentioned, and perhaps a legal advisor or child psychologist available on call). The PSO ensures consistency – so that one diocese isn't handling things very differently from another in a way that could leave gaps.

5.3.2 Diocesan Safeguarding Officer (DSO):

The DSO is the go-to person at diocesan level for any safeguarding issues. Typically appointed by the Bishop, possibly a clergy or layperson with appropriate skills and authority. Their tasks: be available to receive reports or concerns from parishes in the diocese (some concerns might bypass parish if sensitive); assist parishes in implementing training (the DSO might organize training workshops for all Sunday School teachers annually, etc.); advise parish priests or diocesan institutions on what to do when an issue arises (for example, if a school headteacher reports a case of abuse, the DSO helps coordinate reporting to police and ensuring the child is safe, etc.); keep diocesan records of safeguarding training and signed codes; and report significant matters to the Provincial Safeguarding Officer. The DSO should ideally not be juggling roles that conflict (e.g., the Diocesan HR officer can be a DSO, but if a case involves HR issues they should recuse where needed). They should have direct access to the Bishop for escalating concerns without bureaucratic delay. Diocesan Safeguarding Committees (if established) would likely be chaired or convened by the DSO. The Committee can include: the DSO, a representative of the Mothers' Union (often active in child welfare), a youth representative, the diocesan chancellor (legal advisor), and perhaps ecumenical or external expert if useful. The committee can help review policies, promote awareness (like Safeguarding Sunday events), and possibly handle complaints about very local powerful people fairly by group decision.

5.3.3 Parish or Institutional Safeguarding Focal Persons:

While not every parish will have a paid officer, large parishes or institutions (like a theological college, a children's home, or a big school under ACK) should designate a staff member as the Safeguarding Focal Point. For example, a school will have a Child Protection Officer as per Ministry of Education guidelines – that person would liaise with ACK structures. In a parish, if the vicar is stretched, they might appoint a church teacher or warden to be the local focal point to whom any immediate concerns can be reported if people hesitate to approach clergy. These focal persons then communicate with the DSO for guidance. Having someone known in each community as the person to talk to about abuse can improve reporting. Training and support for focal persons will be provided by the DSO.

5.3.4 Safeguarding Investigators:

Not a standing role but when a case arises, the Safeguarding Officer (provincial or diocesan) will appoint an Investigating Officer or team. Investigators could be drawn from a pool of trained individuals (like maybe certain clergy or lay leaders trained in investigations, or external social workers). Their responsibility is to gather facts in an objective manner: interviewing the victim (with care), the subject of complaint, witnesses; reviewing documents or site visits if needed; and compiling a report with findings. Investigators must follow the principles (fair, child-friendly, confidential) and adhere to our Investigation Procedure. They do not make the final decision on disciplinary action, but their report informs the decision-makers (Bishop, committee, etc.). We ensure investigators have no conflict of interest in the case (e.g., not a close friend of the accused). If necessary due to complexity, the Church may hire external professional investigators (especially for serious or highly sensitive cases). Investigators have authority to access relevant information and should be given cooperation by all church personnel. Obstructing an investigation (like hiding info or intimidating witnesses) is a serious breach by any staff.

5.3.5 Human Resources (HR) Departments:

The ACK Provincial and Diocesan HR officers play a key role in safe recruitment and discipline. HR must incorporate safeguarding checks into recruitment processes (as detailed in Chapter 4: Standard 3). They keep personal files with signed Codes of Conduct and training certificates. When a concern involves an employee, HR will work with Safeguarding Officer to ensure labour laws and procedures are followed (e.g., issuing suspension letters, ensuring due process in hearings, etc.). HR also will ensure any dismissal for safeguarding reasons is properly recorded to prevent rehire inadvertently. They maintain confidentiality of records. HR policies should be aligned so that, for instance, gross misconduct includes abuse/harassment, etc., and reference this Safeguarding Policy. In cases of harassment among staff, HR might lead the investigation or co-lead with the Safeguarding person. HR also ensures that volunteer agreements and consultant contracts include appropriate safeguarding clauses (with legal's help). In short, HR operationalizes many preventive measures and post-incident actions on the administrative side.

5.3.6 Institution Heads (Schools, Hospitals, Community Centres):

These managers are responsible for implementing safeguarding in their specific contexts. For example, a Head Teacher in an ACK primary school must ensure the school's child protection policy (which should mirror ACK's) is active: teachers are trained, students have awareness (age-appropriate), and any cases are handled per ministry of education rules and ACK's. A Medical Superintendent in a church hospital must ensure patients (especially children, disabled, etc.) are safe from abuse, that staff understand boundaries (e.g., chaperones during sensitive exams), and that any allegations (like a patient accusing a staff of abuse) are reported and addressed. Heads should designate a safeguarding champion if they cannot attend to it daily. They also must cooperate with church Safeguarding Officers by reporting incidents upward and seeking guidance. Many church institutions also follow government regulations (for example, children's homes follow the Children Act standards and are

inspected by the government) – the heads ensure compliance with both state and church requirements and facilitate any external inspections.

5.4 Staff and Volunteers Responsibilities:

5.4.1 All Clergy, Staff, and Volunteers:

Every individual has the responsibility to familiarize themselves with the Safeguarding Policy and Code of Conduct, to sign the acknowledgment or declaration forms, and to attend required training. They must always act in accordance with the Code of Conduct – failure to do so is considered a breach of their duties. They should actively promote a culture of respect and safety in their daily work – for instance, intervening if they see colleagues behaving inappropriately (like teasing a youth in a way that could be harmful) or promptly reporting if they suspect abuse. Staff and volunteers are expected to be vigilant: know the signs of possible abuse (physical signs like bruises or behavioural signs like a child suddenly fearful of certain people), and if observed, to report concerns immediately to their supervisor or Safeguarding Officer. They should also comply with all procedural requests – e.g., if asked to assist in an investigation or provide a statement, they must do so truthfully. Maintaining confidentiality is part of their responsibility: they should not spread information about cases to those not involved. Furthermore, they should seek advice when in doubt – if a situation arises and they aren't sure if it's a safeguarding issue, they should consult with the Safeguarding Officer. No one should try to address serious situations on their own without involving the proper channels. Also, any staff/volunteer who is aware of misconduct and fails to report it may be subject to disciplinary action for negligence or complicity, as per our whistleblower expectation. In practice, this means, for example, a church accountant who notices odd interactions between a colleague and a teenager should not ignore it; a youth volunteer hearing a rumour of abuse must not dismiss it – they must act by informing appropriate authorities. Every member of ACK should consider themselves a “safeguarding ambassador” – modelling appropriate behaviour and speaking up for those who can't.

5.4.2 Clergy Specific Responsibilities:

Clergy have some additional responsibilities due to their pastoral role. They must ensure that sacraments and rites are conducted safely – e.g., if baptizing children, keep interactions appropriate; if doing private confession or counselling, maintain safe setting and accountability. Clergy should integrate safeguarding into preaching/teaching when appropriate (for instance, preaching against domestic abuse and encouraging victims to seek help, or teaching youth about their self-worth and right to safety). They are also usually the first point of contact for parishioners with problems, so they should be ready to respond compassionately to disclosures of abuse and then follow the Policy to report it. Clergy in charge of multiple outstations should ensure catechists or lay leaders there get training and oversight. Because clergy sometimes work in relative isolation, they need to be disciplined in self-monitoring their boundaries and seeking accountability (like spiritual direction, where they can discuss any temptations or issues safely – better to get help early than to fall into misconduct). Also, under canon law and moral duty, clergy must not abuse their spiritual authority – any exploitation (sexual or otherwise) of a parishioner by clergy is an extremely grave offense. They must be aware that sexual relations or romantic relationships with someone they are counselling or who sees them as a spiritual guide are problematic due to power imbalance. If such feelings arise, they have a duty to remove themselves from that pastoral role and seek guidance. Essentially, clergy must hold themselves to the highest standard of conduct as they represent the Church and Christ in a unique way.

5.4.3 Youth Workers and Sunday School Teachers:

Those directly involved with children and youth have a focused responsibility to ensure those young people are safe, supervised, and nurtured. They must follow all guidelines about not being alone with children, using positive discipline (no corporal punishment or yelling), and fostering an inclusive environment free from bullying. They should actively teach children about personal safety in age-appropriate ways (for example, teaching them that their body is private, how to say no, who to tell if something happens – integrating “God loves you and wants you safe” messages). They are on the front line to notice signs of abuse or kids

confiding; they should respond calmly and report. They should also coordinate with parents – building trust so parents know this person is safe with their child, and so that if a child has a special need or fear, the teacher is aware. They must never take children off premises or meet them outside of program without parental permission and another adult. In online communications or phone, they should always involve parents or maintain professionalism (no secret chats). Essentially, they're guardians during church activities and should act with the same care as a prudent parent. Many of these volunteers are young themselves; the church must ensure they're well-trained and mentored.

5.4.4 Drivers, Guards, and Support Staff:

Often overlooked, these staff also need awareness. Drivers who transport clergy or children's groups must ensure no risky situations (like being alone with a single unrelated child – avoid or have explicit permission and keep the child in backseat, etc.). They should also report if they see something (they sometimes observe things like who's visiting who). Guards might be aware if someone is hanging around the premises with ill intent; they should be briefed to alert leadership. Cleaners or cooks might overhear or notice issues (like a child always hungry might indicate neglect). So, everyone, including ancillary staff, should receive basic briefing on safeguarding and know to pass concerns to supervisors.

5.5 Role of Congregants and Community:

While the Policy is binding on ACK personnel, congregants and community members also have a role in safeguarding. We encourage a culture where church members look out for each other's well-being. For example, if a parent in the congregation suspects a child is being abused at home, they should feel able to talk to the priest or Safeguarding Officer. We will raise awareness in the congregation that safeguarding is everyone's business. Sometimes abusers are not church workers but family or community – the church can still help by being a safe place to disclose and by guiding to resources. So, part of our implementation is to educate the flock: what abuse is, that the church will listen and help, that all are entitled to protection. We will also ask for their cooperation

with rules (like understanding why we have certain procedures). Community leaders (like local chiefs or elders) will be engaged when needed, especially in addressing harmful cultural practices (like early marriage or FGM which are illegal in Kenya and harmful – the church stands against them). The Church will strive to complement community child protection mechanisms in a respectful way.

5.6 External Agencies and Referral Pathways:

Not exactly a “role,” but it’s important to note our cooperation responsibilities: We will maintain contacts with local police child protection units, children’s officers, health professionals, and NGOs that can assist survivors (like GBV centres, counsellors, safe houses). When a case goes beyond our scope, our role is to refer and then support the person through that process. For instance, if a case requires removal of a child to protection, the Safeguarding Officer will work with the Children’s Department to place the child in a government-approved place of safety ([Children Act - Kenya Law](#)). If a rape occurs, ensure the survivor gets to a hospital for treatment and evidence collection, etc. We do not need to do everything ourselves – but we must know who to call and not delay. Part of the Safeguarding Officer’s job is mapping these services and building relationships so that in crisis we act fast.

Safeguarding is integrated into the *job description* of every role in the Church. It is not an added burden, but part of our service. Each role from Archbishop to volunteer teacher has been addressed so that no one can say “I didn’t know it was my responsibility.” By clearly assigning tasks and expectations, we make accountability possible. Leaders lead by example and governance, officers coordinate and enable, workers implement and observe, and the whole community participates.

These clear roles should be communicated widely – possibly summarized in brochures or wallet cards (like “If you are a Sunday School teacher, you must: 1,2,3 etc.”). Such clarity will help when something goes wrong, to see if someone failed in their part. But mostly, it helps to prevent incidents by

everyone proactively doing their piece. When all parts of the Body work together, the vulnerable among us will be much safer.

Safe Recruitment and Personnel Management

6.1 Chapter overview

Robust safeguarding starts even before someone joins the ministry team. This chapter details procedures for safe recruitment, screening, and management of personnel (staff and volunteers) to minimize the risk of engaging individuals who might pose a safeguarding risk and to ensure that all personnel clearly understand their obligations. It also addresses how we cultivate a work environment where safeguarding is reinforced through supervision, appraisal, and, when necessary, disciplinary action.

6.2 Recruitment Planning:

Whenever the Anglican Church of Kenya (at any level: provincial, diocesan, parish, or institution) identifies the need to hire staff or enlist volunteers, we integrate safeguarding from the outset:

6.2.1 Job Advertisements and Role Descriptions:

All job postings and volunteer role descriptions will include a statement of our commitment to safeguarding and the expectation of adherence. For example: *“ACK is committed to safeguarding children and vulnerable persons. All applicants will be subject to strict vetting and reference checks.”* Additionally, roles that involve direct work with children or vulnerable groups will explicitly mention the duty to protect them and perhaps require certain qualifications (like experience in child protection or a character trait of patience and integrity). This transparency serves two purposes: it deters candidates with bad intent (who may shy away knowing we are serious), and it attracts candidates who value a safe, ethical working environment. It also sets the tone that safeguarding is a key part of the role, not an afterthought.

6.2.2 Application Process:

We will use standardized application forms that ask not just for work history and qualifications, but also probing questions related to safeguarding. For instance,

the form may ask if the candidate has ever been convicted of any crime, especially those related to abuse, or if they have any pending disciplinary proceedings for misconduct. They should sign a declaration that the information provided is true and complete. (Lying on this form can be grounds for termination later if discovered.) For clergy roles, aside from normal ecclesiastical vetting, a thorough background check via their former bishop or theological college/seminary will be done focusing on any known safeguarding issues. We may also include, for roles with children, a self-disclosure section where applicants state any past investigation or concern (even if no conviction) – acknowledging that many abusers have no convictions, we rely partly on honesty but also on thorough reference checking.

6.2.3 Shortlisting and Interviews:

At least two people (gender balanced if possible) will be involved in interviewing candidates, and at least one panel member should be trained in safer recruitment. During interviews, we will include specific safeguarding questions. These could be scenario-based (e.g., “How would you handle a situation where a child reports to you that they are being bullied by a fellow staff member?” or “Can you give an example of how you handled a challenging situation with a vulnerable person in the past?”). We are looking for attitudes that show respect, responsibility, and awareness of boundaries. We might also ask direct questions like “Have you ever had any allegation of misconduct made against you in any previous employment or volunteer position? If so, what was the outcome?” – Not to assume guilt but to see honesty and learn context. The interviewers will note any concerning attitudes (like if someone is too keen on being alone with kids “to mentor them personally” – that might raise a flag). The overall rule is, if a candidate gives any uneasy gut feeling regarding how they speak about children or power, we examine that carefully. It’s better to leave a position unfilled a bit longer than to knowingly hire someone who might be unsafe. Technical competence is important, but we will never prioritize it over character when it comes to roles involving trust with vulnerable groups.

6.3 Vetting and Background Checks:

Before confirming any appointment (employment or volunteer):

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6.3.1 References:

We require at least two professional references for staff (and at least one reference for volunteers, ideally someone who has seen them interact with children or in a church setting). One reference should be from the most recent employer or organization. We will *directly contact* referees (by phone or email) and ask specific questions. Beyond generic validation, we will inquire: *“Have you ever had any reason to be concerned about X’s behaviour with children or vulnerable adults?”*; *“Would you confidently trust X to care for your own child or a vulnerable family member?”*; *“Was X ever disciplined or investigated for any misconduct while in your organization?”*. We will document the referees’ responses. If a referee provides cryptic or concerning feedback (e.g., hesitancy or vague comments like “there were some issues, but we resolved them”), we will follow up for clarity or consider it a red flag. We recognize referees might be cautious, but any hint of concern means we either investigate more or decide not to proceed. For clergy, we require reference/clearance from their previous bishop or superior. For internal hires (promoting a volunteer to staff), we consider feedback from those who supervised them in volunteer capacity.

6.3.2 Police Clearance and Criminal Record Check:

In Kenya, individuals can obtain a Police Clearance Certificate (formerly “Certificate of Good Conduct”) from the Directorate of Criminal Investigations (DCI). ACK will require this for all new staff and volunteers who will work with children or finances or other sensitive areas. We will assist candidates in obtaining it if needed. Employment contracts can be issued conditional on receipt of a clean clearance (allowing them to start if timing is slow but with supervision). If the clearance reveals any conviction relevant to harm (e.g., assault, sexual offence, fraud if position is financial), we will reassess the hire – likely withdraw the offer unless a very minor offense that HR and Safeguarding deem irrelevant and no risk. (For example, a decades-old petty theft conviction might not bar someone from being a driver, but anything violence-related likely disqualifies for roles with vulnerable). For expatriate or mission candidates, we request similar certificates from their home countries.

We also will check them against any available sex offender registries if accessible.

6.3.3 Social Media/Online Checks:

While respecting privacy, for key positions (like youth workers), the hiring panel may do a brief scan of public social media profiles of the candidate as nowadays sometimes concerning behaviour (like inappropriate posts) can be visible. This is optional but can sometimes flag immaturity or risk behaviours. We'll ensure any such checks are lawful and proportionate.

6.3.4 Validation of Qualifications:

If someone claims credentials related to care (e.g., counselling license, teacher registration), we will verify those with issuing bodies. This is both for general due diligence and safeguarding (ensuring they are indeed qualified and not misrepresenting).

6.3.5 Probation:

All new staff appointments will include a probationary period (commonly 3-6 months). During this time, supervisors will closely observe their behaviour and interactions. For volunteers, we might have an initial supervised period before giving full responsibilities. If any safeguarding concerns arise during probation, the person should not be confirmed and should be removed if warranted. We won't just wait until probation ends; if a serious concern emerges, action is immediate. The probation review will explicitly consider whether the person has demonstrated safe and appropriate conduct.

6.3.6 Self-Declaration Form:

As mentioned, individuals in certain roles will sign a detailed *Safeguarding Self-Declaration Form* (Appendix 2) which asks if they have any criminal convictions or have been subject to disciplinary measures related to abuse, or if they have ever been denied a role working with children/vulnerable people. It clearly states that giving false information is grounds for termination. This form, which is confidential, will be reviewed by the Safeguarding Officer or HR. If someone

discloses something (e.g., “I was accused of abuse in the past, but it was not proven”), that doesn’t automatically disqualify them but triggers further inquiry. However, a disclosure of a conviction for abuse or a history of violence would normally disqualify from relevant work.

6.4 Contracts and Agreements:

All employment contracts, volunteer agreements, and even partnership MOUs will include clauses on safeguarding obligations. For staff: a clause that violation of the Safeguarding Policy or involvement in any abuse/exploitation constitutes gross misconduct and may lead to summary dismissal (as per Employment Act and HR manual). Also, a clause requiring them to cooperate with any safeguarding investigation and reporting. For volunteers: a simple written agreement or volunteer code acknowledging their responsibilities and that the church can end their service if they breach safeguarding rules. Partner agreements will include that the partner adheres to safeguarding standards and that failure to address an incident can lead to termination of cooperation.

For clergy, the ordination vows include caring for the flock; we will also have them sign the Code of Conduct and this Policy serves as a church canon/policy they are bound by. If needed, provincial canons may be amended to explicitly reference safeguarding duties of clergy.

6.5 Orientation and Training:

Once hired or brought on board, every new staff member or volunteer must undergo an orientation that includes an introduction to the Safeguarding Policy, the Code of Conduct, and reporting procedures. They should meet the Safeguarding Officer or focal person as part of induction. We will provide them with a copy of the Policy (or handbook) and require them to sign that they have read and understood it, as mentioned earlier. Within the first 3 months of joining, they must attend a formal safeguarding training session (if not done pre-service). If none is immediately scheduled, the supervisor should at least walk through key points and do some basic scenario practice.

6.6 Supervision and Performance Management:

Effective supervision is a key preventive measure. Line managers at all levels should supervise their staff in a manner that not only checks work output but also observes behaviour and interactions:

- We encourage open dialogues in one-on-one meetings where managers ask, “How are you finding working with the children? Any challenges?” to give opportunity for staff to raise minor issues or for the manager to gauge attitude.
- Managers should occasionally do unannounced observations of activities (e.g., visit the Sunday class, drop by youth event) to see that policies are being followed.
- Team meetings should periodically reinforce conduct expectations (*“Remember, never take kids off site without permission”, etc.*) – a quick safeguarding tip of the week.
- If colleagues or those we serve provide feedback (positive or negative) about a staff’s conduct, management should take note. Commend those who are doing well (to reinforce good practice) and address any minor transgressions early through coaching (e.g., *“I noticed you sometimes hug the teens. I know it’s well-intentioned but be mindful: some may be uncomfortable; maybe stick to side-hug or handshake unless the youth initiates and it’s appropriate. We must model boundaries.”*).

Performance appraisals (annual reviews) for staff will include an assessment of adherence to the Safeguarding Policy and Code. Supervisors will note if the person attended training, followed procedures, reported concerns if any arose, etc. It should be a section in the evaluation form or narrative. For clergy, bishops in their annual clergy appraisal or check-in should discuss whether the priest has implemented safeguarding in the parish, any incidents, etc., and include that in their record.

6.7 Whistleblower Protection and Staff Support:

We reiterate that staff should be able to report concerns about colleagues or practices without fear. Management must ensure that no punitive action or harassment comes to anyone for reporting in good faith. If a staff member feels pressured to stay silent, there must be alternative reporting routes (skip-level or direct to Safeguarding Officer). On the other hand, if staff are falsely accused in a malicious way, the Church will protect them as well by investigating thoroughly and clearing their name if innocent. This balance encourages people to speak but also ensures fairness.

We also consider staff support: dealing with abuse cases can be emotionally taxing. We will provide support or counselling to staff who handle traumatic cases (secondary trauma is possible for counsellors, investigators, etc.). Also, if an allegation is made against a staff, even as we suspend them during investigation, we should offer pastoral care (assign a chaplain or peer support to check on them, as the process can be very stressful while presumption of innocence is maintained). The church cares for all its members, even as it seeks truth and justice.

6.8 Managing Misconduct and Disciplinary Action:

Despite prevention, there may be instances where personnel breach the Code of Conduct or are found to have committed abuse or related misconduct. The Church's response will be decisive and in line with both canon law and employment law:

- For minor breaches (e.g., a teacher repeatedly not following the two-adult rule), initially a verbal warning and retraining would occur. If ignored, formal warning letters, etc.
- For serious breaches or substantiated abuse: immediate removal from position and termination of employment or volunteer status. Dismissal for gross misconduct can be summary (instant, without notice) under Kenyan law for things like assault, child abuse, etc., given evidence. We will

coordinate with HR/AS/PS to ensure procedural fairness (a hearing where the person can respond before final decision, unless risk too high to delay).

- For clergy, the bishop would inhibit (temporarily remove from ministry) a cleric under investigation, and if guilt is confirmed (especially in cases like sexual abuse of a child), the bishop should pursue deposition (removal from holy orders). The Province may set up a tribunal or use existing disciplinary canons for clergy to laicize or otherwise discipline. The Church will not simply move an offending priest to another parish (a practice that has caused scandal in other contexts); instead, the person will be removed from ministry.
- We will report any criminal acts to police *regardless* of internal action – e.g., even if an offending staff resigns to avoid dismissal, we still report the crime.
- If someone is cleared after investigation (allegation unsubstantiated), we will formally notify them and, if they were suspended, allow them to return, with perhaps some monitoring for a period just in case. If someone was falsely accused maliciously by another staff, that accuser faces discipline for misconduct.
- We also ensure that if the person is employed in a context requiring statutory notification (for instance, a teacher to TSC or a social worker to their council), we do that. Or if a volunteer had a professional license (like a doctor) and abused a patient, we inform their board.

6.9 Volunteer Management:

Volunteers may not have the same contractual obligations, but we manage them similarly:

- Keep a roster of active volunteers, with their signed Code of Conduct and any references on file.
- Assign each volunteer a supervisor (like the Sunday School superintendent oversees teachers) who monitors them.
- If a volunteer isn't following rules or is causing concern, the Church can end their role. Since they're not paid, some may think less oversight applies, but the opposite is often needed as volunteers sometimes operate with less scrutiny. We will treat volunteer misconduct with equal seriousness.

- Provide volunteers feedback and appreciation when they do well – motivated volunteers who feel respected are likely to adhere to guidelines, whereas disgruntled ones may go rogue. So good management includes affirming their positive contributions.

6.10 Record-Keeping:

The Safeguarding Officer or HR will maintain secure records of:

- List of all personnel who have completed background checks and training.
- Copies of signed agreements (like Code of Conduct).
- Any warnings or disciplinary actions related to safeguarding.
- These records help ensure continuity (if one leader leaves, the next still has info). They also allow cross-referencing so that if someone tries to re-apply after being let go for misconduct, the record will catch it.

6.11 Addressing Power Imbalances and Leadership Misconduct:

Special note: when the person under scrutiny is powerful (a senior clergy, donor, etc.), sometimes staff might be intimidated. That's why, as earlier noted, cases involving leadership will often be handled by someone higher or a special independent process. The Policy must be enforced *without fear or favour*. The Church might bring in external clergy from another diocese or lay church lawyers to handle a case if internal people feel conflict. It's crucial that staff see that the Policy applies to all – so if, say, a Bishop is accused, staff see that the Province took it seriously, investigated, and (if true) acted, not just quietly moved him or gave a slap on wrist. That top-down accountability will reinforce everyone else's commitment.

By diligently applying safe recruitment and management practices, ACK significantly reduces the risk of abuse and ensures that if issues do arise, they are caught and dealt with early. It helps create a team of workers who are not only qualified but also trustworthy and accountable. This chapter's processes may seem rigorous, but each step is built on hard-learned lessons from global and local experiences where lapses in vetting or oversight led to harm. We are determined not to let that happen in our ministry. As the saying goes, “*An ounce*

of prevention is worth a pound of cure.” Here we invest in prevention heavily, and in doing so, we protect our people and uphold our witness to Christ’s name.

Reporting and Responding to Safeguarding Concerns

7.1 Overview

Despite all preventive measures, situations may arise where someone is harmed or at risk. It is imperative that the Anglican Church of Kenya responds swiftly, compassionately, and effectively. This chapter details how to report concerns or incidents and the procedures for responding, including investigation, disciplinary action, and referral to authorities. The goal is to ensure every concern is taken seriously and addressed in a manner that prioritizes safety and justice.

7.2 Reporting Mechanisms:

7.3.1 Who Should Report?

Anyone who has a concern about the safety or well-being of a child or vulnerable adult in the context of ACK's ministry should report it. This includes: the victim themselves (child or adult), their parent or guardian, a fellow church member, an ACK staff or volunteer, a community member, or an external observer (e.g., a teacher noticing a problem with a child who attends our church). All ACK personnel have an explicit duty to report any suspicions or allegations of abuse or misconduct immediately – they are mandatory reporters within our system. Even if it's just a suspicion (no hard proof), it must be passed on for assessment. *When in doubt, report.* It is better to raise a false alarm than to miss a real case of abuse. There will be no penalty for a report made in good faith, even if unconfirmed.

7.3.2 What to Report?

Any of the following:

- A child or adult says they have been abused (by church personnel, by someone in their family, or by anyone else) – this is a disclosure.

- You observe signs of abuse or neglect (physical injuries, drastic behaviour change, sexualized behaviour in a child, an adult showing signs of trauma, etc.).
- You witness a violation of the Code of Conduct (e.g., a staff hitting a child, or a youth leader making sexual comments to a youth).
- You hear a rumour or allegation in the community about a church...worker or volunteer harming someone (even if it did not occur during church activities). **In** short, any concern that a person connected to the Church is experiencing or perpetrating harm should be reported. No threshold of “proof” is needed – reporting triggers proper assessment.

7.3.3 How and Where to Report:

Multiple confidential channels are available to report concerns:

a. **Local Safeguarding Officer or Church Leader:**

If comfortable, one can report directly to the Parish Safeguarding Focal Person or the priest in charge. They will assist in completing an incident report and forward it to the Safeguarding Officer.

b. **Diocesan/Provincial Safeguarding Officer:**

ACK has dedicated email addresses and phone lines for reporting. For example, an **Incident Reporting Form** (see Appendix 1) can be filled and emailed to the Safeguarding Officer. This form guides the reporter to provide details about the incident, parties involved, and any evidence or observations. Even a verbal report can be made by phone; the officer will document it.

c. **Anonymously or to a Third Party:**

If a reporter fears identification, they may report anonymously (through a suggestion box or via a trusted intermediary like another teacher, elder, or even a helpline run by a partner). While anonymous reports are accepted, we encourage reporters to at least provide a way to contact them for follow-

up, as detailed information greatly aids investigation. All reports will be handled with confidentiality – information is shared only on a need-to-know basis.

d. Direct to Authorities:

This Policy does not prevent anyone from reporting abuse directly to government authorities (police or Children’s Department). In fact, especially in emergencies (e.g., a child in immediate danger), contacting the police right away is appropriate. We request that if someone does this, they also inform the Church Safeguarding Officer as soon as possible so the Church can support the process. However, if they are uncomfortable telling church staff, ensuring the information reaches authorities is the priority.

When a church worker receives a report, their first step is to ensure the immediate safety of the victim (if the victim is present or in our care). For instance, if a child discloses abuse by a teacher after a church class, the staff should quietly ensure that the child is not left alone with that teacher, and then promptly inform the Safeguarding Officer. The worker should document the disclosure or incident as soon as possible using the Incident Reporting Form or at least written notes (noting date, time, persons involved, what was said or seen). These notes must be kept confidential and handed to the Safeguarding Officer or investigator.

Important: Under this Policy, the church is obligated to report any matter that may be criminal to the statutory authorities. This will be done regardless of whether those involved (including the victim or their family) want to “forgive and forget” or not pursue legal action. The law is clear that crimes like defilement, rape, assault, etc., must be reported. ACK will comply with Kenyan law by notifying police/children’s services in such cases, even as we handle internal procedures. (We will, of course, respect the privacy and needs of the victim in how we engage authorities, but we cannot cover up a crime.

Confidentiality in Reporting: All reports will be treated confidentially. The identity of the reporter (if known) will be kept confidential to the greatest extent possible.

It may be shared with the investigative team, but whistleblowers can request that their identity not be revealed to the subject of complaint, and we will honour that whenever feasible. The information in a report is kept in secure files. Even within the Church, details are only shared with those necessary (Safeguarding Officer, investigator, committee members, senior leadership handling the case). Gossip or unauthorized disclosure about allegations is strictly prohibited, to protect reputations and ensure fairness. Breaching confidentiality is a serious disciplinary matter.

7.3 Response Procedures:

ACK has established a step-by-step procedure to respond to any reported concern, designed to be prompt and consistent across all levels. A summarized flow is as follows:

7.3.1 Step 1: Initial Receipt and Safety Measures.

When a Safeguarding Officer (or designated church leader) receives a report, they will first address any immediate risk. This could mean providing first aid or medical care if someone is injured, finding a safe space for a victim, or removing the alleged offender from contact with others (for instance, discreetly asking a children's worker to step aside from duties pending inquiry). The Safeguarding Officer documents the report (if not already in writing). If the situation is urgent and potentially criminal, they will notify police right away (e.g., sexual abuse of a child, or if a perpetrator is on site posing an immediate threat). The officer also informs the relevant church authority of the basic facts (e.g., inform the Bishop or Vicar that "a serious safeguarding allegation has been received; we are taking protective measures now"). The guiding rule is "protect first, ask questions later." Ensuring safety and stopping any ongoing harm is paramount.

7.3.2 Step 2: Triage and Assignment of Category.

The Safeguarding Officer, in consultation with a small core team if available, will categorize the concern to determine who should handle it:

- *Category 1:*

Involves an ACK staff member or representative as the alleged perpetrator. (E.g., a Sunday School teacher or clergy accused of abuse.) – The Church has direct responsibility to investigate and act.

- *Category 2:*

Involves personnel of a partner organization or allied institution. (E.g., a staff member of an NGO we partner with, or perhaps another denomination's worker in a joint event.) – The Church has a shared duty of care; we will likely coordinate investigation with the partner or at least ensure the partner acts, and if not, we may step in or reconsider the partnership.

- *Category 3:*

Community issue not caused by ACK personnel but affecting someone in our care. (E.g., a church child is being abused at home by a relative, or a case of domestic violence comes to our attention.) – The abuse isn't by our staff, but the Church still has a duty to ensure it's reported to civil authorities and to support the victim. We may not investigate directly (that's for authorities), but we play a facilitative and supportive role.

This categorization helps decide next steps. Category 1 issues we investigate internally (while possibly also involving police). Category 2 we liaise with partner leadership and possibly conduct a joint inquiry. Category 3 we mainly report to authorities and support the survivor and possibly convene community resources.

7.3.3 Step 3: Notify Key People (Need-to-Know Basis).

The Safeguarding Officer will promptly inform the appropriate Safeguarding Committee and church authority of the case details, keeping identities limited to initials or codenames as needed for privacy until formal processes. For example, the Diocesan Safeguarding Officer informs the Diocesan Bishop and the Provincial Safeguarding Officer for a serious case. If a staff member is

accused, the HR department is informed so they can enact administrative leave. If a child is involved, the child's parents or guardians (if not implicated) should be informed immediately, and their cooperation sought (except in cases where a parent might be the abuser – then involve Children's Officer/police first).

7.3.4 Step 4: Convene Safeguarding Committee Meeting (if applicable).

For complex or serious cases (especially Category 1 and 2), the Safeguarding Committee at the relevant level (diocesan or provincial) should meet within one week of the report). The purpose is to review the initial information, ensure proper steps are underway (medical care, safety, reporting to law enforcement), and appoint an Investigator if not already done. The Committee will also decide interim measures: e.g., confirming that the alleged perpetrator should be suspended or temporarily reassigned to non-client-facing duties during the inquiry. They may also decide if external expertise is needed. Meeting minutes will be kept (with sensitive details in a confidential annex).

7.3.5 Step 5: Investigation.

A trained Safeguarding Investigator (or team) will carry out a fact-finding investigation, starting ideally within days of the report. Our guideline is that the investigator has about three weeks to gather information and submit a report (this can vary with complexity, but timeliness is stressed – “justice delayed is justice denied” and cases should ideally be concluded within 6 months maximum). The investigation procedure (Appendix 3) will be followed, which includes:

- a. Planning the investigation (what needs to be known, who to interview, evidence needed).
- b. Interviews: speaking separately with the victim (in the presence of a support person if a child or if desired by an adult survivor), the accused person (allowing them to respond to allegations), and any witnesses or others who might have relevant information. Interviews with children will be done in a child-friendly manner – in a safe, comfortable environment, using age-

appropriate language, and not repeated unnecessarily. The child may be interviewed by a professional like a children's officer or counsellor if available, to reduce trauma.

- c. Collecting any physical or documentary evidence: medical reports (if a medical exam occurred), chat logs or emails if cyber-harassment is alleged, CCTV footage if available, etc. The investigator may also visit the site of incident if helpful (with care not to disturb a possible crime scene).
- d. Maintaining confidentiality and impartiality throughout. The investigator will remind all involved to not discuss the matter publicly and will ensure both parties get a fair chance to tell their story. The rights of staff (if accused) to have a colleague or union rep with them in an interview will be respected as per HR policy. However, direct confrontation between victim and accused is avoided.
- e. After gathering facts, the Investigator writes a report detailing the allegations, the information gathered, analysis of credibility, and conclusions on whether the allegation is substantiated, inconclusive, or unfounded. They may also give recommendations (e.g., "Evidence suggests volunteer X committed the alleged abuse. Recommend disciplinary action and reporting to police (if not done). Also noted lack of supervision in program – recommend tightening procedures."). The report is submitted to the Safeguarding Committee and relevant authority.

7.3.6 Step 6: Decision and Action:

The Safeguarding Committee or appropriate Church authority will review the investigation report and decide on the outcome. If the investigation finds sufficient evidence that a staff or volunteer violated the Policy or committed abuse (substantiated case), the Church will take swift disciplinary action. This could include formal warning, mandated training (for lesser infractions), suspension, or termination/dismissal for gross misconduct. (For clergy, ecclesiastical discipline as discussed in Chapter 6 would apply – potentially deposition from ministry.) The decision should ideally occur soon after the report, often within a week or two, to avoid undue delay. If the individual is cleared (unsubstantiated or false allegation), they may be reinstated if they

were suspended, and efforts will be made to restore their reputation, while still monitoring for a time. All decisions and actions taken will be documented and signed off by the responsible officials.

Additionally, independent of employment action, the Church must consider reporting outcomes: if not already done, any criminal behaviour must be reported to police. (Many times, by this stage police are already involved from Step 1 or 2. If law enforcement is investigating, the Church will coordinate so as not to interfere – possibly pausing our internal fact-finding if police request and then resuming for our disciplinary process. We will not wait for the outcome of a criminal trial to take internal action if we have enough evidence for our part, but we will ensure our actions don't undermine the legal case.)

7.3.7 Step 7: Follow-Up and Support:

After resolution, the Safeguarding Officer will inform the victim (and/or their family) of the outcome and what actions have been taken (while respecting privacy of any personnel matters as appropriate). We will continue or adjust the support plan for the survivor (see Chapter 8). If the accused is returning to work (in case of unsubstantiated claims), measures might be taken to facilitate a smooth re-entry and prevent retaliation or awkwardness (possibly a mediated meeting if appropriate or relocating one party if needed to avoid direct contact). The Church leadership may also communicate with the congregation or relevant community about the case in a general way if rumours are widespread – ensuring misinformation is corrected while maintaining appropriate confidentiality (e.g., announcing “The church dealt with an issue, and it has been resolved according to our policies and the law; we thank those who came forward. We reaffirm our commitment to safety...” etc. – without names).

7.3.8 Step 8: Learning and Improvement:

Each case, especially serious ones, will be reviewed (after closure) by the Safeguarding Committee to see if there are any lessons on how to improve prevention or response. For example, if a case revealed that a certain program had a blind spot (like no female supervisor in a girls' hostel leading to

vulnerability), the Church will act to fix that (hire female matron etc.). Policies may be updated or training emphasized in certain areas as a result. This reflective practice helps strengthen our system continually.

Throughout the process, the well-being of the victim is paramount. Investigations and church disciplinary processes will not override or impede state justice processes. ACK will cooperate fully with government investigations or proceedings. If police decide to prosecute, the Church will support that (providing information, encouraging witnesses, etc.). Conversely, if authorities for some reason do not pursue a case (due to lack of evidence meeting criminal threshold), the Church may still take internal action if we find it more likely than not that misconduct occurred, because our standard of proof in internal discipline is based on balance of probabilities while criminal court requires beyond reasonable doubt. We will not allow someone we strongly believe harmed a child to remain in ministry simply because a court case was not possible or failed – we have an independent duty of care.

Special Cases – Handling Higher-Level Accusations: If an accusation is made against a senior leader (e.g., a Bishop, Archbishop, or senior clergy), the reporting should be made to a different authority: for instance, a report about a Bishop can go directly to the Provincial Secretary and the Archbishop. The Archbishop will then, as mentioned, form an independent panel perhaps with provincial members to handle it, possibly engaging an external investigator for transparency. If the Archbishop is accused, the report can be made to the Provincial Chancellor (legal advisor) or another primate in the region; the Provincial Synod Standing Committee would likely take leadership with external guidance. We will utilize the wider Anglican Communion or ecumenical partners to ensure impartial handling of such cases. The key is that no one is above accountability. The processes remain similar (investigation, action) but handled by those do not subordinate to the accused, to avoid conflicts of interest.

Whistleblower Protection: We reiterate that anyone who reports or participates in an investigation in good faith is protected from retaliation. If a whistleblower feels they are being targeted (for instance, a staff reporter being

shunned or penalized by a supervisor for reporting them), they should immediately inform the Safeguarding Officer or other leader. The Church will take action to stop retaliation – that itself will be treated as misconduct. This principle will be communicated clearly to all managers and in training sessions. Similarly, witnesses who cooperate must not suffer reprisals. Maintaining trust in the process is crucial, so we will visibly support those who have had the courage to speak up.

False or Malicious Allegations: While rare, the Policy also accounts for the possibility of intentional false accusations. If an investigation conclusively finds that a report was made maliciously with knowingly false information, the person who made the false report will face appropriate consequences (church discipline, or even legal action for slander in extreme cases). However, our default position is to believe that reports are made sincerely – we discourage any witch-hunt against a complainant just because evidence was not sufficient. Only in clear cases of bad faith will we consider action, to avoid deterring genuine victims.

Documentation: Every step in the reporting and response process will be documented in a confidential case file kept by the Safeguarding Officer. This includes the initial report form, notes of any meetings or risk assessments, the investigation report, records of decisions (with signatures of committee or officials), and records of referrals to police or external agencies. These files help ensure continuity (especially if personnel change) and accountability (we can audit how cases were handled). They will be stored securely (locked cabinet or encrypted digital storage) and retained per our data retention policy (generally, safeguarding case files might be kept for many years given the possibility of historical inquiries, but access is restricted).

In these reporting and response procedure, ACK seeks to ensure that no report falls through the cracks and that survivors see justice and support, while those accused are treated fairly. The process is intended to be timely – indeed, the guideline suggests aiming to conclude cases within six months at most), with initial actions much sooner. “Justice delayed is justice denied” is explicitly

recognized), so while being thorough, we avoid unnecessary delays. At the same time, we will not rush to judgment without facts. The balance of speed with diligence is key.

This procedure will be regularly tested in simulations and reviewed to iron out any difficulties. It will also be communicated to all (in appropriate detail) so that everyone knows what to expect if they report something. When people trust the system to work, they are more likely to come forward, which in turn allows the Church to address issues early and prevent further harm.

Survivor Support and Care

8.1 Chapter overview

The Anglican Church of Kenya is committed to a survivor-centred approach, meaning that the needs of those who have experienced harm come first. Beyond investigation and justice, the Church has a Gospel mandate to bind up the wounds of the broken-hearted (Luke 4:18). This chapter outlines how ACK will support and care for survivors (and, where applicable, their families) and ensure their healing and dignity are prioritized.

8.2 Immediate Support Measures:

When a disclosure or incident of abuse is first reported, the immediate well-being of the survivor is our first concern. Actions include:

8.2.1 Medical Care:

If the individual has any physical injuries or health concerns (e.g., in cases of rape, risk of HIV or other injuries), the Church will facilitate prompt medical examination and treatment. We will bring the person to a hospital or clinic (or call ambulance if needed). For sexual violence, we'll ensure they get PEP (post-exposure prophylaxis for HIV within 72 hours), emergency contraception, treatment for injuries, and forensic evidence collection (the Post Rape Care (PRC) form at a hospital) – all with consent of the survivor. ACK will cover the costs of initial medical care if the survivor or family cannot, as no one should go untreated due to financial constraints.

8.2.2 Safety and Shelter:

If the survivor is in danger of further abuse (for instance, a child abused at home or an adult woman facing domestic violence), we will help find a safe place for them. This may involve, with consent, relocating them to a church-operated or partner shelter, a safe house, or trusted relative's home temporarily. The Children Act allows taking a child to a place of safety in such circumstances, and we will work with authorities to do so lawfully. We will not return a victim to

an unsafe environment. In some cases, safety planning might include measures like getting restraining orders through legal avenues – the Church can link the survivor with pro-bono legal aid if needed for that.

8.2.3 Emotional Support and Presence:

In the immediate aftermath, a trained counsellor or pastor (not involved in the allegation) will be assigned to provide psychological first aid – basically, to listen to the survivor, reassure them that they did right to speak up, and that the Church stands with them. The person will not press for details (leave that to investigators) but will comfort, pray with (if the survivor desires), and remain a supportive presence.

8.3 Ongoing Psychosocial Support:

Recovery from abuse or trauma can be a long journey. ACK commits to facilitating ongoing support for as long as necessary:

8.3.1 Counselling Services:

We will offer professional counselling/therapy to survivors. If we have qualified counsellors in our institutions (e.g., in a counselling centre or some clergy with counselling certification), we will make them available. Often, however, an external counsellor may be preferred for expertise or neutrality. The Church will connect the survivor with a licensed counsellor or psychologist (for children, someone specializing in child therapy, possibly play therapy or trauma-focused cognitive behavioural therapy). We will subsidize or cover the fees if needed. Counselling might be individual or group (for example, if multiple survivors are part of a support group in the community).

8.3.2 Pastoral and Spiritual Care:

Recognizing the spiritual dimension of healing, clergy or lay ministers will provide pastoral care, but *only at the pace and manner the survivor is comfortable with*. Some survivors may welcome prayer and scriptural encouragement; others may feel angry at God or the Church and not want this immediately. We respect their feelings. Pastoral care could include regular

visits (just to check in and be a friend), prayer sessions if wanted, and addressing spiritual questions that arise (e.g., “Why did God let this happen?”). The message will always be that the abuse was not their fault and that God’s love and the Church’s love for them is unwavering. Importantly, we will never use spiritual care to pressure a survivor to “forgive and forget” prematurely or to silence them. Forgiveness can be a healing force but must come from the survivor’s own readiness, not imposed as an obligation. Our role is to walk alongside them in their spiritual journey post-trauma.

8.3.3 Social Reintegration:

Survivors, especially children, might withdraw or face stigma. The Church community needs to be part of their support system. We will work to ensure the survivor (and their family) do not experience blame or isolation in the church. For example, if a teenage girl was abused and becomes pregnant, the Church will not shun her but rather support her through the pregnancy and child-rearing or adoption process, treating her with compassion. The Safeguarding Officer and parish priest can sensitize the congregation (generically, without breaching confidentiality) against victim-blaming attitudes. Peers (like youth group members) can be guided on how to be supportive friends. In cases of child survivors, we might facilitate their continuing education if the abuse disrupted it – e.g., help them transfer to a different school if needed or liaise with education authorities to ensure they aren’t penalized academically. In essence, we try to remove barriers for them to lead a normal life.

8.3.4 Material and Legal Support:

Sometimes survivors (or their families) have practical needs because of abuse – medical bills, legal fees, or loss of income (e.g., a mother taking time off work to care for an affected child). The Church will endeavour to assist materially when needed, either through its own resources (discretionary funds, love offerings, etc.) or by connecting with Public Benefit Organizations (PBO’s) that offer survivor assistance. Legal support is also crucial: if a case goes to court, it can be intimidating. The Church can provide a legal companion (maybe the diocesan chancellor or a pro-bono lawyer) to explain the process, accompany

the survivor to court, and advocate for their interests. Under Kenya's Victim Protection Act, victims have certain rights – we will ensure they are aware of these. If police are not taking a case seriously, the Church can help advocate or escalate the matter. At no point will we abandon the survivor to navigate systems alone – an advocate from the church (Safeguarding Officer or other designate) will stick with them.

8.3.5 Long-term Follow-up:

Healing can take months or years. The Church will periodically check on survivors even after the case closes. Especially for child survivors, as they grow, different issues may surface (trauma can manifest later in adolescence in new ways). We aim to maintain support – for example, ensuring the child has a mentor or the family has ongoing pastoral visits. If the family moved parishes, we'll connect them with the priest in the new area for continuity (with consent, sharing necessary background). The Safeguarding Committee may schedule 3-month, 6-month, and 1-year follow-ups on major cases to review how the survivor is doing and what else might be needed.

8.4 Survivor Participation and Agency:

A key element of a survivor-centred approach is respecting the survivor's agency – their right to make choices about what happens in their life. We involve them (or their guardians when appropriate) in decisions about support: for instance, *asking* if they would like counselling, or *what kind of* counselling (some might prefer a church counsellor, others a secular one). We also consult them on aspects of the process: "Would you like us to update you weekly, or would you rather only be contacted when there's significant news?"; "Is there anything or anyone in the church that would help you feel safer during services?" etc. For child survivors, age-appropriate participation is ensured – maybe through asking their non-offending parent what the child might want or directly asking older children for their preferences (like whether they want to be relocated or stay with a certain foster, etc., as per law which also upholds child participation rights). This empowerment helps counter the powerlessness they felt during abuse.

We will also be mindful of cultural sensitivities in healing. Kenya is diverse in culture; some survivors may find comfort in certain cultural practices and others may have cultural fears (e.g., fear of stigma). The Church will navigate these lovingly – involving, say, a respected female elder (for a girl who trusts such figures) to accompany the survivor, or allowing culturally appropriate expressions of healing as long as they don't harm (maybe a cleansing ritual that the family finds healing, as long as it's in line with Christian values, we wouldn't oppose if it helps the survivor). Our own theological framework offers rich resources for healing: prayer, anointing, lamentation liturgies, and fellowship; these are offered as options for the survivor to accept or decline.

8.5 Handling Allegations against the Survivor (Counteraccusations):

Sadly, sometimes perpetrators attempt to shift blame (e.g., accusing a victim of seducing them, or in church terms, an offender might claim the victim is lying to cover her "immorality"). ACK will vigorously defend the survivor against such character attacks. We affirm that under no circumstance is a child ever to blame for abuse, and power differentials mean even adult victims cannot be blamed for "tempting" someone. We will address any victim-blaming narratives publicly if needed – for example, if gossip arises that a woman "brought rape upon herself" by how she dressed, church leaders will refute that and correct that sinful misconception. Protecting the dignity and reputation of survivors is part of support. If needed, we involve legal measures – e.g., suing for defamation if someone slanders a victim publicly (in extreme scenarios). The Church community should be a zone of compassion, not judgment, for survivors.

8.6 Supporting Families and Others Affected:

Abuse doesn't only affect the direct victim; their family and the community can also experience trauma. ACK's pastoral reach will extend to:

8.6.1 Non-offending Parents/Siblings of a Child Victim:

Provide them counselling as well, as they often feel guilt or anger. Educate them on how to best support the child (for example, not pressuring the child to talk if they're not ready, handling their own emotions so as not to further scare

the child). We may involve them in some counselling sessions (family therapy) if beneficial. Encourage them to pursue normal routines that help the child feel secure. If the abuser was a family member, this can divide families – the Church may mediate or facilitate alternative care for the child if, say, one parent supports the abuser but the other doesn't; our priority is the child's safety and having at least one supportive caregiver.

8.6.2 Congregation or Peers:

In cases where the whole church or group is impacted (for instance, their beloved youth leader was found to be an abuser – youths may feel betrayed; or a case becomes public news and the church feels shame), the Church will address the collective emotional and spiritual fallout. This may involve holding a healing service or open forum (with privacy limits) where people can express feelings. Emphasize the Church's stance and reassure them of steps taken. Encourage unity and discourage any harassment of the victim or the accused's family. In essence, facilitate healing of the community and reinforce trust in the Church's process.

8.6.3 The Accused's Family (if the accused is an ACK worker):

While our primary duty is to the survivor, we should show appropriate pastoral care to the family of an accused person, who may be in shock or distress (they are often innocent and suffering consequences too). They might need counselling or help, especially if the accused was breadwinner and is now removed – we might offer short-term assistance or referral to support agencies, without prejudice to the case's outcome. This care is done by someone not involved in investigation, to keep boundaries. It's a delicate balance: caring for them should not undermine support for the victim, but the Church's love is broad enough to care for all souls wounded by the situation.

8.7 Confidentiality and Privacy for Survivors:

Maintaining confidentiality of the survivor's identity (especially in wider circles) is a form of support, protecting them from unwanted attention or stigma. Only those necessary will know identifying details. In prayer requests, we keep it

generic (“God knows the need”). If media or others get wind, the Church leadership will shield the survivor from press, handling inquiries through official channels without exposing the survivor. If any communications are to be made, we seek the survivor’s consent and involvement. For instance, if a survivor decides to share their testimony later as part of healing, that’s their choice, but we will never force it. Records containing their info are kept secure (as noted, case files locked). Even within church, people are told not to pray. This creates an environment where the survivor can recover without feeling labelled as “that victim” – they are just a valued member of the community.

In principle, ACK’s aims is to be the Good Samaritan for survivors – not only stopping the “bleeding,” but also carrying them to a place of recovery and paying for their care (Luke 10:34-35). We acknowledge that full healing comes from God, but God works through means – professional therapy, compassionate community, and time. The Church will accompany survivors as long as it takes. Our measure of success is when someone who went through such an ordeal can say: *“The church believed me, stood by me, and helped me heal.”* If we achieve that, we truly live out Christ’s love.

Moreover, by caring well for survivors, we also encourage others who suffer in silence (perhaps from abuse outside the church) to seek help, knowing the church is a refuge. This proactive, loving support is integral to our witness and to breaking cycles of abuse (survivors well-supported are less likely to perpetuate abuse or suffer long-term effects). It also sends a clear message to would-be abusers: this Church stands with the abused, not the abuser.

Implementation, Monitoring, & Policy Review

9.1 Chapter overview:

A policy is only as effective as its implementation. The Anglican Church of Kenya will ensure that this Safeguarding Policy is not just a document on paper, but a living framework shaping our church culture. This chapter outlines how the Policy will be rolled out across the Province, how compliance will be monitored, and how the Policy will be reviewed and updated over time.

9.2 Dissemination and Communication:

After formal adoption, the ACK Safeguarding Policy will be widely disseminated to ensure everyone is aware of its provisions and their responsibilities. Key steps include:

9.2.1 Official Launch:

The Archbishop and Bishops will officially launch the Policy (e.g., at a Provincial Synod or press briefing), signalling top-level commitment. A pastoral letter may be sent to all dioceses introducing the Policy's importance.

9.2.2 Distribution of Copies:

Every diocese, parish, and church institution will receive copies of the Policy. It will be available in both English and Kiswahili (and other local languages as needed) for accessibility. A summarized pamphlet or poster highlighting main points (code of conduct, how to report, contact info) will be created for display on church notice boards, offices, and schools. Key excerpts like the Code of Conduct and reporting flowchart will be posted prominently so all members can see our commitments and processes.

9.2.3 Integration into Orientation:

Moving forward, this Policy will be part of the orientation for all new clergy, staff, and volunteers. For instance, during clergy induction courses or staff onboarding at the provincial office, a session on Safeguarding Policy will be

mandatory. Each new employee or volunteer will sign the acknowledgment (Appendix 2) that they have read and will abide by it.

9.2.4 Workshops and Trainings:

As mentioned in Chapter 4 (Standard 2), targeted workshops will be held. Initially, a Training of Trainers (ToT) approach may be used: training provincial and diocesan “Safeguarding Champions” who then train others at diocesan and parish levels. We plan an initial cascade: Provincial Champions → Diocesan Champions → Parish leaders → Local volunteers, to achieve coverage across all dioceses. These trainings will cover the theology, legal framework, reporting procedures, and practical skills. By equipping local trainers, we ensure sustainable ongoing training.

9.2.5 Community Awareness:

We will also communicate to our congregations about the Policy. For example, dedicate a Sunday sermon or seminar on safeguarding – explaining why it’s biblical to protect the vulnerable, summarizing new measures, and encouraging everyone’s cooperation. Perhaps name an annual “Safeguarding Sunday” where awareness is refreshed. We’ll also inform service recipients (like students, beneficiaries): e.g., a child-friendly leaflet in our schools/orphanages telling children their rights and who to call if they feel unsafe, reinforcing that ACK has this policy. In partners’ meetings or donor reports, we will mention this Policy to show our commitment (and invite input or support for strengthening it).

9.3 Institutional Alignment:

All existing ACK policies will be reviewed for alignment with this Safeguarding Policy. The ACK Constitution, HR Manual, Children’s Ministry Policy, and others will be cross-referenced. If necessary, amendments will be made so that, for example, the HR Manual’s disciplinary section explicitly references safeguarding misconduct as grounds for dismissal (if not already). The ACK Child Protection Policy (for children’s programs) and Vulnerable Adults Policy will effectively be merged or updated to dovetail with this comprehensive Policy,

to avoid any inconsistencies. By aligning policies, we ensure one coherent approach. Dioceses that had their own guidelines will update them to match the provincial standards.

Furthermore, every diocese and institution are expected to develop an implementation plan. This might include designating their Safeguarding Officer if not done, scheduling trainings, establishing local Safeguarding Committees, and circulating local contact info for reporting. The Provincial Safeguarding Officer will guide dioceses in preparing these plans and will collect reports on progress.

9.4 Monitoring Compliance:

Monitoring will occur at several levels:

9.4.1 Parish Level:

The parish priest and council should periodically self-audit their compliance: e.g., check that all Sunday School teachers have signed the Code and been trained, verify that reporting posters are up, review any incidents that occurred and how they were handled. They might use a simple checklist provided by the diocese.

9.4.2 Diocesan Level:

The Diocesan Safeguarding Committee (or officer) will conduct annual reviews of parishes and institutions. This could involve visits or requesting reports. They will look at indicators like number of people trained, adherence to recruitment procedures, any cases reported (and if so, were they handled per policy), any challenges. Dioceses can incorporate safeguarding into Archdeacons' supervisory visits to parishes – making it a standard item to inspect if the parish is “safeguarding compliant” just like they check financial books.

9.4.3 Provincial Level:

The Provincial Safeguarding Officer will compile an Annual Safeguarding Report based on diocesan inputs. This report (with anonymized data) will

summarize trainings conducted, cases handled (with types and outcomes), general compliance, and any notable gaps or achievements. It will be submitted to the Provincial Synod or Standing Committee. The report both celebrates progress and highlights areas needing improvement or support. The province might also conduct sample audits – e.g., randomly select a few dioceses each year for a more in-depth audit by the provincial team or external auditor to validate that procedures are truly followed (like checking a sample of hiring files to see if background checks were done, etc.). Donors or partners may also request safeguarding compliance info, which this report can satisfy.

9.4.4 External Reviews:

ACK may invite an external safeguarding expert (for example, from the Anglican Communion Safe Church network or a child protection organization) every few years to review our policy implementation. An outside perspective can identify blind spots and lend credibility. We might also pursue certifications or memberships (e.g., becoming a member of Keeping Children Safe network which involves an audit). External evaluations will be shared with leadership and used to strengthen practice.

9.4.5 Feedback Mechanisms:

As part of monitoring, we will establish ways for church members and beneficiaries to provide feedback on safeguarding. For example, periodic anonymous surveys to staff, or suggestion boxes that are checked by the Safeguarding Officer, asking “Do you feel safe in our programs? Do you know how to report concerns? Have you observed any misconduct?” etc. If these reveal issues (like people not knowing the reporting channel), we address them with more awareness. We will also track and analyse any incidents or “near misses” to identify trends (e.g., if multiple minor boundary violations are observed, that signals more training needed in that area).

9.5 Accountability and Governance:

The Safeguarding Officers (provincial and diocesan) are accountable to the respective leadership (Archbishop/Bishop) and must report on their activities

regularly. Their performance evaluations will include their effectiveness in rolling out the Policy. The Provincial Synod's standing committee may create a sub-committee specifically for safeguarding oversight, ensuring that between Synod sessions someone is keeping an eye on implementation progress. If a diocese is lagging or non-compliant, the Provincial office will follow up; persistent non-compliance could result in corrective action (for instance, the Synod could direct specific measures, or funding for certain programs might be contingent on compliance due to donor requirements). However, the approach should be supportive: identify why compliance is lacking (is it lack of resources? lack of will?) and address it via training or resourcing, rather than punitive unless there's wilful neglect.

9.6 Policy Review and Updates:

This Policy is a living document. We commit to formally reviewing it every three years (or sooner if needed) to incorporate lessons learned, changes in Kenyan law, or new best practices internationally. For example, if Parliament amends the law or if the Anglican Communion issues new safeguarding guidelines, we will update this Policy accordingly. The Provincial Safeguarding Officer will coordinate the review process, consulting dioceses for input. Survivors or survivor advocates may also be consulted to bring their perspective on what could be improved. Proposed revisions will be presented to the Provincial Synod for approval. In urgent cases (say a loophole is discovered that needs immediate fixing), the Archbishop's office can issue interim directives which will later be codified in the next update.

Any changes to the Policy will be communicated with equal importance as the original – retraining and re-distribution will occur. We will maintain version control (e.g., “2025 Edition, revised 2028”) so everyone knows if they have the latest.

9.7 Resource Allocation:

The Church acknowledges that implementing safeguarding has resource implications (time, money, personnel). We will allocate necessary resources:

for instance, budgeting for the Safeguarding Officer roles and their activities (training materials, travel for investigations, etc.), seeking donor support if needed (some partners may fund safeguarding capacity-building). Each diocese should also budget for safeguarding (maybe a small percentage of general funds or specific line items like training costs, background check fees, etc.). By investing resources, we demonstrate seriousness and ensure efforts are sustainable.

We will also leverage existing structures – e.g., use Mothers' Union volunteers who are often very engaged in child protection at grassroots – giving them a role in awareness campaigns, etc., which extends reach without huge cost.

9.8 Linking with Broader Anglican Communion:

ACK will remain engaged with the Anglican Communion's safeguarding community to stay updated and to share our own experiences. We commit to attending regional or international safe church consultations and implementing recommendations from bodies like the Anglican Consultative Council's Safe Church Commission. We will also share our progress and challenges with others, contributing to collective learning. This external linkage helps with accountability too, as our church's reputation in the Communion will hinge on how well we live up to these commitments.

9.9 Creating a Safeguarding Culture:

Beyond formal monitoring, the ultimate measure is cultural change: safeguarding becomes part of "how we do things here." Signs of success will be: people at all levels freely discuss and prioritize safety; children and youth feel confident to voice concerns; leaders automatically consider safeguarding in decisions (like planning an event, they'll ask "Have we addressed safety?"); and the Church community at large takes pride in being a safe place. We will encourage testimony and positive reinforcement – for instance, if a parish handles a difficult case well, that story (maintaining anonymity) could be shared in clergy meetings to encourage others. Good practices will be recognized.

Conversely, any cover-up or negligence will be met with corrective action and frankly examined so it's not repeated.

By embedding safeguarding into our theology (as caring for the vulnerable) and our day-to-day operations, monitoring won't feel like a chore but rather a natural accountability to our mission.

Impact Indicator: Over time, we hope to see increased reporting of issues initially (as people trust the system, reports may rise – that's a good sign of trust, not necessarily more abuse), and then a decline in incidents as prevention kicks in. We also hope to see improved well-being of members and perhaps growth in membership because people know ACK is a safe haven. We will keep track of these qualitative and quantitative indicators.

9.10 Public Accountability:

ACK may consider publishing a brief section on safeguarding in its annual reports or websites for public transparency – e.g., “This year, X number of staff were trained in safeguarding, Y cases were reported and handled (with no identifying details), and these steps were taken...”. Being open (to the extent appropriate) can build public trust and witness to secular society that the Church is proactively addressing issues often hidden. This must be balanced with confidentiality, but aggregate data and success stories can be shared.

Finally, this Policy will only be words unless every member of the Anglican Church of Kenya embraces it. Therefore, leaders will continuously champion the Policy. Safeguarding will be included in sermons, synod agendas, youth conferences, clergy retreats. It will remain a standing item in meetings from parish council to province. By constant emphasis, we avoid complacency. The Church will also pray regularly for God's guidance and protection in this work – recognizing we need spiritual vigilance (prayer, moral integrity) as well as practical steps.

Through faithful implementation, diligent monitoring, and periodic refinement, ACK seeks to ensure that this Safeguarding Policy truly fulfills its purpose: that our church environments reflect Christ's love and are safe sanctuaries for all.

We will know we have succeeded when every child can come to church with joy and without fear, every vulnerable person finds support and not exploitation, and every worker treats their role as a sacred trust to nurture, not to harm.

Conclusion

11.1 Conclusion:

In conclusion, the Anglican Church of Kenya, guided by Scripture, church tradition, and the laws of Kenya, hereby commits itself to the highest standards of safeguarding. This Policy provides a roadmap for creating a church where “none may suffer harm.” It requires dedication at all levels, but with God’s help, we will uphold the dignity and safety of every person. By implementing this Policy, ACK aligns itself with the call of Christ to protect the least and lost, and we strengthen the witness of the Gospel in our communities. Let us all remember Jesus’ words: “*Whoever welcomes one such child in my name welcomes me*” (Matthew 18:5). In welcoming and protecting children and the vulnerable, we are honouring our Lord Himself.

This document now concludes with appendices that provide practical tools to support the Policy’s implementation. These attachments are integral to the Policy and should be utilized across all ACK dioceses and institutions.

Appendices

12.1 Appendix 1: Safeguarding Incident Reporting Form (Sample)

This is the standard form to be used by any person reporting a concern or incident. It captures essential information in four parts:

Part 1: Reporter's Information	Details
Name,	-----
role or relationship to the Church (staff, volunteer, beneficiary, etc.),	-----

contact details,	-----

did you witness the incident firsthand, or you heard it from someone else.	-----

Part 2: Victim's Information	
Detailed Information about the person who was harmed	-----

Name	-----

Age	-----

Gender	-----

Contact/Address	-----

Immediate Safety or Medical Needs		
Disabilities or Special Needs		
Victim's status and urgent requirements (focus0		
Part 3: Details of the Concern/Allegation:	Details	
Category of Alleged Perpetrator	Category 1: ACK staff/rep. Category 2: partner staff; Category 3: other/community	

Nature of the Concern	What happened; dates, times, locations, and the names of those involved	
Observations	What was observed or said, and by whom	
Witnesses	Details of witnesses if available	
Action Taken	Details	
Immediate Actions	E.g.: Removed the child from class and ensured they were with a safe adult; No contact allowed between child and alleged abuser; Informed diocesan officer at 4pm.	
Referrals Made	E.g.: Referred to hospital/police at X time	

		----- -----
Part 4:		
Details of the reporter	Name	----- ----- -----
	Signature	
	Date	
Details of safeguarding officer	Name	----- ----- -----
	Signature	
	Date	

12.2 Appendix 2: Safeguarding Self-Declaration Form (Staff/Volunteers)

This is a form that all staff and volunteers working with children or vulnerable groups must complete. It is a confidential declaration that asks:

- Have you ever been convicted of a criminal offence or cautioned (warned) by authorities? Yes/No_____ If yes, give details (nature of offence, date, country, outcome)._____

- Have you ever been the subject of disciplinary action or investigation by any employer or organization for misconduct, particularly involving children or vulnerable adults? Yes/No_____ If yes, explain circumstances. _____

withholding information or giving false information will lead to disqualification or dismissal.

Full name, _____

Any other names used, _____

date of birth, _____

ID/passport, _____

Sign, _____

Date of the declaration, _____

This form is kept on file and treated with privacy.

12.3 Appendix 3: Investigation Procedure Guidelines

A step-by-step guide for investigators and Safeguarding Committees on how to investigate. It reiterates many points from Chapter 7 in a checklist format, covering:

- a. Appointing an investigator (ensuring independence, no conflict of interest).

- b. Planning the investigation (what allegations, what info needed).
- c. Conducting interviews (tips on interviewing children – child-friendly, avoid multiple interviews that could retraumatize; interviewing staff – ensure fairness; interviewing witnesses).
- d. Reminding all involved of rights (survivor's right to support, accused's right to fair hearing).
- e. Evidence handling (secure any physical evidence, maintain chain of custody if police might need it).
- f. Reporting (how to structure the investigation report: typically, sections like Allegation, Methodology, Findings (facts established), Conclusion (whether misconduct occurred, and which policy provisions breached), Recommendations).
- g. Timeline management (aim to finish within 3 weeks as per guideline), unless extension granted for good reason).
- h. Interaction with authorities (when to pause if police are investigating the same matter, ensuring not to interfere). It also lists investigator conduct rules – impartiality, confidentiality, and the importance of documenting all steps. These guidelines ensure all investigations follow a uniform, just process.

12.4 Appendix 4: Anglican Church of Kenya Safeguarding Code of Conduct

A concise code that all ACK personnel must follow, reflecting the values and specific prohibitions already discussed. It is divided into:

1. **Positive Conduct Commitments:**

“I _____
will respect the rights and dignity of every person, and treat all children, youth, and vulnerable adults with kindness and care. I will maintain appropriate boundaries in my interactions, ensuring all contact is safe and in the best interests of those in my care. I will obtain informed consent for any activities involving personal data or images. I will uphold the values of integrity, transparency, and accountability in my ministry. I will not foster any form of discrimination, and I will promote an environment free of harassment and will obey the laws of Kenya and ACK policies. Further, I will report any concerns or suspicions of abuse promptly”.

2. **Prohibited Conduct (Unacceptable Behaviour):**

Prohibited behaviours:

- a. Sexual exploitation or abuse of children or adults (including **no sexual activity with anyone under 18**, regardless of consent or local custom; no engaging in sexual acts with vulnerable adults under one’s pastoral care; no exchanging money, gifts or favours for sexual acts).
- b. Sexual harassment of any person (unwelcome sexual advances, requests for sexual favours, or verbal/physical conduct of a sexual nature that creates an intimidating environment).
- c. Physical abuse (hitting, kicking, shaking, or any corporal punishment of children, or physical assault of adults) – instead disciplinary or behavioural issues should be managed with non-violent methods.
- d. Emotional or psychological abuse (including humiliating, belittling, bullying, threatening or degrading behaviour).

- e. Spiritual abuse (using religious authority or scripture to coerce, control or shame someone in a way that is harmful – e.g., telling a victim God will punish them if they speak up).
- f. Neglect of duty of care (failing to provide necessities or supervision to those dependent on you, e.g., leaving children unattended in unsafe conditions).
- g. Exploitation in other forms: child labour, trafficking, or forcing someone to do unpaid work beyond reasonable volunteering. Also misuse of resources intended for vulnerable people for personal gain.
- h. Crossing professional boundaries: for instance, private meetings with a child or youth without parental consent and without another adult present (except in formal counselling with transparency), giving rides alone to children without permission, sharing private rooms or tents with a child, etc.
- i. Misuse of power: no favouritism or special gifts to children (to avoid grooming), no relationships that involve concealment or deceit.
- j. Inappropriate use of technology: no making or watching pornography (especially involving minors, which is illegal), no sexually suggestive communication with minors online, no sharing confidential info or images of beneficiaries without consent.
- k. Any criminal activities or other conduct that would bring harm or disrepute (the Code may state generally that all Kenya laws must be observed, e.g., no involvement with drugs, corruption, etc., as those can indirectly affect safeguarding if judgment is impaired).

I _____
 hereby acknowledge that I have been issued with a copy of the Anglican Church of Kenya (ACK) Code of Conduct. I have read and understood the contents of the Code, and I accept to be bound by its provisions. I understand that adherence to this Code is a condition of my engagement with ACK, and I commit to upholding the standards of conduct and performance outlined within it.

I recognize that if I have any questions or require further clarification regarding the Code, it is my responsibility to seek guidance from my immediate supervisor, or institutional head.

Signature: _____

Position: _____

Date: _____

Witness

Signature: _____

Name: _____

Contact: _____

Date: _____

FOR ACK OFFICIAL USE ONLY

ACK

Signature: _____

Position: _____

Date: _____

Together, these Appendices serve as practical tools to implement the Policy: the form to report, the form to vet people, the guide to investigate, and the code to govern behaviour. They should be used together with the main Policy chapters. Every ACK diocese and institution is expected to customize (where necessary) and adopt these forms. Electronic versions will be made available for ease of use, but printed copies should also be accessible in all offices.

Final Exhortation:

Let this Safeguarding Policy not be the end, but the beginning of a renewed commitment across the Anglican Church of Kenya. As we sign off this document, we call upon every bishop, priest, deacon, lay leader, and church member to take ownership of safeguarding. It is through our collective vigilance and compassion that the words on these pages will transform into a safe reality in our parishes, schools, and communities. By God's grace, may ACK be a beacon of hope, where all God's children – young and old – are protected and loved. In doing so, we live out Christ's command to "*feed my lambs... tend my sheep*" (John 21:15-16) in both body and spirit, providing not just nourishment of the Word, but safety and care for the flock.

With God's help, we commit to these standards and will continually seek His wisdom and strength to uphold them. To Him be the glory in the Church and in Christ Jesus throughout all generations, forever and ever. Amen.