



HOPE VALLEY SCHOLARS INC.

# Child Safeguarding and Protection Policy

Safety first. Dignity always. Clear action when concerns arise.

This policy establishes the minimum standards Hope Valley Scholars uses to prevent, identify, report and respond to harm involving children and other young people in its education, mentorship, leadership and community activities.

**OUR COMMITMENT:** Hope Valley Scholars applies this document to the programs, people and activities within its scope. Questions or requests for an accessible copy may be sent to the contact information below.

|                 |                                                                                                                                                                                                                                           |
|-----------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Version         | 1.0                                                                                                                                                                                                                                       |
| Policy owner    | Board of Directors and Safeguarding Lead                                                                                                                                                                                                  |
| Effective date  | 01/01/2026                                                                                                                                                                                                                                |
| Review cycle    | Annual                                                                                                                                                                                                                                    |
| Website address | <a href="https://www.hopevalleyscholars.org/Documents/pdf/Hope%20Valley%20Scholars%20Child%20Safeguarding%20Policy.pdf">https://www.hopevalleyscholars.org/Documents/pdf/Hope%20Valley%20Scholars%20Child%20Safeguarding%20Policy.pdf</a> |

**Organization:** Hope Valley Scholars Inc. | U.S. 501(c)(3) public charity | EIN 41-2924425

**Contact:** [info@hopevalleyscholars.org](mailto:info@hopevalleyscholars.org) | +1 (302) 898-6006 | <https://www.hopevalleyscholars.org>

# 1. Purpose, commitment and scope

Hope Valley Scholars Inc. is committed to the safety, dignity, rights and well-being of every scholar. The best interests of the child are the primary consideration in every decision that affects a child. Safeguarding is a shared responsibility and is not limited to responding after harm has occurred.

This policy applies to Board members, officers, employees, contractors, volunteers, mentors, interns, consultants, donors or visitors given program access, implementing partners and any person acting for or representing Hope Valley Scholars. It applies in person and online, in the United States, Kenya and any other approved location.

## Definitions

| Term              | Meaning for this policy                                                                                                                                                  |
|-------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Child             | A person under 18 years of age, regardless of local age of majority or consent.                                                                                          |
| Scholar           | A student or program participant supported by Hope Valley Scholars; some university scholars may be 18 or older and remain protected by professional-boundary standards. |
| Safeguarding      | Measures that prevent and respond to abuse, exploitation, neglect, harassment, unsafe conduct and avoidable harm.                                                        |
| Concern           | A disclosure, allegation, observation, pattern, boundary issue or other information suggesting that a child or vulnerable participant may be at risk.                    |
| Safeguarding Lead | The person formally designated by the Board to receive concerns, coordinate immediate protection and maintain restricted records.                                        |

# 2. Safeguarding principles

- **Best interests and do no harm.** Safety and welfare take priority over reputation, fundraising, program continuity or adult convenience.
- **Dignity, inclusion and nondiscrimination.** Every scholar is treated respectfully without discrimination based on race, ethnicity, nationality, sex, pregnancy, disability, religion, socioeconomic status or any other status protected by applicable law.
- **Voice and participation.** Scholars receive age-appropriate information, may raise concerns without retaliation and are heard in a manner consistent with age and maturity.
- **Accountability and transparency.** Interactions with scholars must be observable, authorized and subject to supervision.
- **Privacy with no promise of secrecy.** Information is shared only with people who need it for protection, response or legal reporting. A person must never promise to keep a safety disclosure secret.
- **Prompt action.** Reasonable suspicion is enough to report internally. The reporter does not investigate or decide whether abuse occurred.

**LEGAL ALIGNMENT:** Implementation must be reviewed against applicable law, including the Kenya Children Act, 2022 and the Kenya Data Protection Act, 2019, as well as mandatory-reporting, employment, volunteer-screening and privacy requirements in every location where Hope Valley Scholars operates.

## 3. Governance and responsibilities

### Board of Directors

- Approves this policy, appoints a primary Safeguarding Lead and backup, and receives at least annual safeguarding assurance reports that do not expose unnecessary identifying information.
- Approves a role-based screening matrix, training standards, escalation thresholds, incident-record retention schedule and partner due-diligence process.
- Ensures that allegations involving the Founder, Board Chair, a Board member or senior leader can bypass that person and reach an independent decision-maker.

### Safeguarding Lead and backup

- Receives concerns, assesses immediate safety, makes or coordinates required external reports, preserves restricted records and documents decisions.
- Provides practical guidance without delaying emergency action or replacing police, child-protection or medical professionals.
- Tracks patterns, training completion and corrective actions, and reports material risks to the Board.

### All representatives

- Read, sign and follow this policy and all role-specific codes before contact with scholars.
- Complete required screening and training; stay within the approved role, location, channel and schedule.
- Report concerns immediately and cooperate honestly with protective measures and authorized reviews.

## 4. Prevention and safer participation

### Selection, screening and onboarding

No person may begin unsupervised or direct scholar contact until Hope Valley Scholars has issued written authorization. Screening must be proportionate to role, access and jurisdiction and may include identity verification, application review, interviews, references, credential checks, conflict disclosure and lawful background or safeguarding checks. Screening information must be collected through a separate secure process, not a public website form.

### Risk assessment and activity approval

- Assess each activity for age, location, supervision, transport, digital access, photography, accommodation, emergency response and accessibility needs.
- Use at least two authorized adults or another approved observable arrangement whenever practicable. One-to-one contact must be specifically authorized, documented and supervised through the program design.
- Obtain parent or guardian permission and scholar assent where appropriate before material changes to participation, travel, media use or contact arrangements.
- Partners must agree in writing to equivalent standards, identify their safeguarding contact and report concerns involving Hope Valley scholars promptly.

## 5. Required conduct and professional boundaries

Every representative must use calm, respectful, age-appropriate conduct and maintain a relationship that serves the scholar's educational and developmental interests.

| Required                                                                                   | Prohibited                                                                                                                                                            |
|--------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Use approved communication channels and keep interactions transparent.                     | Sexual, romantic, exploitative, humiliating, discriminatory, threatening or abusive conduct.                                                                          |
| Meet only in approved settings and follow attendance, check-in and supervision procedures. | Secret, isolated or unauthorized meetings; private overnight stays; or inviting a scholar to a private residence without exceptional written approval and safeguards. |
| Use supportive, nonviolent, non-shaming guidance and respect reasonable personal space.    | Corporal punishment, degrading treatment, sexualized discussion, inappropriate touching or exposure to harmful content.                                               |
| Refer needs outside the role to the program team or qualified services.                    | Acting as a therapist, legal adviser, medical provider, parent or financial sponsor unless separately qualified and formally authorized.                              |
| Declare gifts, conflicts and pre-existing relationships.                                   | Giving or soliciting money, gifts, employment, transport, lodging, personal favors or private services without prior written approval.                                |
| Protect passwords, devices, records and scholar information.                               | Posting, downloading, forwarding or retaining scholar images, stories, locations or records for personal use.                                                         |

## 6. Digital communication, meetings and transport

- Use only organization-approved accounts, platforms and contact lists. Do not use disappearing-message features or delete required records.
- Messages must relate to the approved program purpose, be sent at reasonable times and include program oversight or guardian visibility when the approved plan requires it.
- Do not request passwords, intimate images, live location, financial credentials or unnecessary personal details from a scholar.
- Online meetings must use approved links, privacy settings and attendance practices. Recording requires prior authorization and appropriate consent.
- Transport may be provided only by an authorized, screened driver using an approved vehicle, route, passenger plan and emergency procedure. No representative may privately transport a scholar without written authorization.

## 7. Reporting a concern

**IMMEDIATE DANGER:** If a child may be in immediate danger or needs urgent medical help, contact the appropriate local emergency, police or child-protection authority first. Then notify the Hope Valley Scholars Safeguarding Lead as soon as safely possible.

- 1 Listen calmly. Thank the person for speaking. Do not blame, confront the alleged person or promise secrecy.

- 2 Ask only what is necessary to understand immediate safety. Do not conduct an interview or investigate.
- 3 Report immediately to the designated Safeguarding Lead or backup using the confidential channel provided in program materials. If that contact is unavailable, use [info@hopevalleyscholars.org](mailto:info@hopevalleyscholars.org) or +1 (302) 898-6006 and label the message 'Urgent safeguarding concern' without placing sensitive details in an unsecured subject line.
- 4 Record facts promptly: date, time, people present, the person's own words where possible, observed facts, immediate action and the recipient of the report. Separate fact from opinion.
- 5 Preserve relevant messages or records securely. Do not circulate the report or discuss it beyond authorized responders.

A person may report directly to police, child-protection, a regulator or another lawful authority. No one will be punished for a good-faith report, participation in a review or refusal to follow an unsafe instruction. Knowingly false reports may be addressed through applicable procedures, but an unsubstantiated concern is not by itself a false report.

## 8. Organizational response

- Prioritize immediate safety, urgent medical or psychosocial support and safe contact with a parent or guardian when appropriate.
- Make mandatory external reports within applicable deadlines and cooperate with lawful authorities. Internal review must not interfere with a criminal or child-protection investigation.
- Use interim measures such as pausing contact, changing access, preserving records or placing a representative on leave without treating those measures as a finding of misconduct.
- Inform affected people only to the extent safe, lawful and appropriate. Provide a fair response opportunity to an accused adult without disclosing information that would endanger a child or compromise an external investigation.
- Document the basis for decisions, actions, referrals, notifications and closure. Review whether program, supervision or training changes are needed.

### Allegations involving organizational leaders

A concern involving the Safeguarding Lead must go to the backup and Board-designated independent recipient. A concern involving the Founder, Board Chair or another Board member must be handled by disinterested directors or an external safeguarding professional. A person who is the subject of a concern must not control intake, records, communications or the outcome.

## 9. Privacy, media and recordkeeping

- Collect only information necessary for safety and response; store it in restricted systems separate from general program records.
- Use scholar photos, recordings, names or stories only under a valid consent and assent process. Consent is optional and refusal must not affect scholarship eligibility or program participation.
- Share information on a need-to-know basis, subject to lawful reporting. Do not guarantee anonymity when action or disclosure is required to protect a child.
- Retain and securely destroy records under the current Document Retention and Destruction Policy and applicable legal holds.

## 10. Training, compliance and review

Safeguarding training is required before role access and refreshed at least annually for direct-contact roles. Hope Valley Scholars may suspend or end access immediately for safety. Policy violations may result in retraining, supervision, reassignment, termination of service, partner action, reporting to authorities or other lawful measures.

The Board will review this policy at least annually and after a serious incident, material program change or relevant legal change. The review will consider feedback from scholars and families in a safe, age-appropriate manner.

## Appendix A - Safeguarding concern record

**RESTRICTED RECORD:** Complete only through the approved secure process. Do not email a completed report as an ordinary attachment. Preserve the person's own words and record facts, not conclusions.

**Date and time concern received or observed**

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**Reporter name, role and safe contact information**

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**Scholar or participant name/code and immediate location**

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**Immediate danger or urgent medical need? Action taken**

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**What was disclosed or observed, including exact words where possible**

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**People present and relevant records preserved**

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**Person notified, date/time and instructions received**

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**Reporter signature and date**

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Reporter name

Signature

Date

## Document control and related documents

The current public version of this document is maintained by Hope Valley Scholars Inc.. Printed or downloaded copies may become outdated; consult the website for the current version.

- [Mentor Code of Conduct](#)
- [Photo and Media Consent Form](#)
- [Privacy Policy](#)
- [Volunteer Agreement](#)

**Version 1.0** | Effective 01/01/2026 | Next scheduled review: 01/01/2027