



CKU Safeguarding policy

2024

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1.0 Purpose

The work of CKU is based on core Christian values, including the belief that every human being has immeasurable value and deserves to be treated with dignity and respect. The overall objective of CKU is to reduce poverty and promote human rights to improve the opportunities for people to develop the potential within themselves and in the wider community.

CKU supports collaborations between Danish members organizations and their partners in the Global South. With multiple project partners there is a need for stipulating expectations in relation to safeguarding for the project partners.

The purpose of the safeguarding policy is to:

- » Ensure that all people are treated with respect, dignity and worth.
- » Ensure that development assistance is offered to all irrespective of gender, race, ethnic origin, nationality, religion, culture, sexual orientation, mental health, disability, social status, or political affiliation etc.1.
- » Avoid negative effects and harm for project recipients and partners in project activities and work supported by CKU.
- » Foster accountability towards beneficiaries through feedback- and complaint mechanisms.
- » Encourage a survivor-centered approach where survivors experiences, rights and needs are at the center, and supported throughout the process.

The policy will protect project partners, that CKU works with, from the risks of violence, sexual exploitation and all other forms of harm and abuse, that we may cause with the presence of CKU representatives/partners.





2.0 Scope

The scope of this policy relates to safeguarding and protection of project recipients and staff including persons at risk that CKU may come into contact with while performing and engaging in national and international work and activities.

The policy applies directly to the following categories:

- » All CKU employees.
- » CKU representatives and contractors. These terms cover board members, consultants, volunteers, journalists, and other persons representing CKU.
- » CKU member organizations.
- » Grant recipients in the global south.
- » External grant recipients from the FoRB-Window.

The obligation to respect and adhere to this policy will be an integral part of and included in all agreements and contracts with partners mentioned in the above categories.

The scope of the complaint mechanism equals to a large extend that of a traditional whistleblowing scheme applying the following definition of whistleblowing from transparency international: “The disclosure of information about a perceived wrongdoing in an organization, or the risk thereof, to individuals or entities believed to be able to effect action”.



3.0 Requirements for CKU members and their partners

- » CKU members that manage grants without support from CKU must have an organizational safeguarding policy.
- » Partners in the Global South that administer grants above 500.000 DKK must have a complaint and response system in place.

In order to apply for funding for projects with CKU, it is expected that the above-mentioned obligations are in place. If the requirements are not in place in the organization or partner, an action plan with timelines for developing a policy and/or complaint mechanisms must be submitted with the project application. CKU will then follow up on the action plan during the project period.

As a minimum a complaint mechanism in the Global South must include:

- » Definition of persons at risk and abusive behavior.
- » Procedure for reporting complaints.
- » Procedure for responding to complaints.
- » Identification of a focal point/registrar in the partner organization that is responsible for receiving complaints. The focal point/registrar cannot be part of the management team of the partner organization.
- » Share information of the complaint system in an accessible manner to project recipients.

4.0 Persons at risk

CKU recognizes that some groups are more vulnerable in relation to exploitation and abuse than others. According to the Core Humanitarian Standards, people may be vulnerable because of individual factors such as age, disability or illness, or because they are caring for others who are vulnerable. Social and contextual factors also contribute to people's vulnerability. These include discrimination and marginalization because of low status, gender, ethnicity, class, caste and religious or political affiliations.

In development cooperation with faith-based organizations, there is a risk of abuse of power both inside and outside the organization since pastors, bishops and theologians are perceived as holding high status.

The policy therefore pays special attention to the following groups:

- » **Children** are considered a vulnerable group since they depend and rely on adults for protection and provision. When the trust and dependence of a child is exploited by an adult, immense damage is caused with long-term effects on the life of the child and its physical, emotional and mental health.
- » **Women:** Gender equality continues to pose a challenge in many contexts and women often do not enjoy the same rights as men. Women also continue to be a subject to violence, discrimination and abuse.
- » **Persons with disabilities** face multiple barriers that make them more vulnerable. These may include attitudinal, physical, financial barriers that hold persons with disability in an inferior position.
- » **Religious- and ethnic minorities** may be subject to discrimination and harassment and excluded from financial services and social rights.
- » **LGBTQIA+ persons** are at risk of harassment and discrimination. They may be persecuted and excluded from the local communities.

Particular attention should be given to protecting individuals that belong to a combination of these vulnerable groups, for example children with disability or female religious minorities as these will be even more at risk.



5.0 Definition of abusive behavior

CKU believes everyone regardless of age, gender, disability, ethnic origin, sexual orientation, or other diversities have a right to be protected from all forms of harm and abuse, such as:

- » Sexual abuse, exploitation and harassment (Physical, verbal and unwanted sexual attention).
- » Child abuse - all sexual activity with children under 18.
- » Threats (verbal, written or threatening behavior).
- » Physical violence.
- » Bullying, harassment and emotional harm (manipulation, unpleasant, demeaning, or negative oral or written actions or behavior, which is repeated over time).
- » Discrimination (differential treatment related to e.g. gender, age, disability, ethnicity, religion, health or sexual orientation).
- » Exchange of services and goods for money, employment or sex as well as sexual favors.
- » Exploitation of power position by giving preferential treatment or demanding payment, privilege or any other benefit.
- » Engaging in human trafficking.
- » Undertaking, supporting or causing child labor work.
- » Spiritual abuse. The misuse of the Holy Scriptures in order to reduce or deprive a person of his right or to control or influence a person's behavior.

6.0 Prevention

Through roll out of training and awareness raising sessions, CKU will make sure that the CKU's Safeguarding Policy is known by the organizations and persons covered, who engage in activities under the CKU-pooled funds, FoRB-window and GLOBUS.

The obligation to respect and adhere to this policy will be an integral part of and included in all project agreements and contracts with partners mentioned in the above categories.

CKU will offer bi-annual online courses on safeguarding and capacity build member organizations and partners to integrate safeguarding in their own organizational work.

CKU will prevent abusive behavior through recruitment screening processes that address and manage the risk of abuse and provide reasonable assurance that abuse precautions have been taken by requesting applicants' recent criminal records and collecting references from former employment.

CKU will assist the member- and partner organizations if needed in making their own safeguarding policies, and/or reporting mechanisms and in maintaining them.



7.0 Reporting safeguarding concerns

Anyone who has a suspicion of any form of abusive behavior should report this to CKU. Complaints can be filed anonymously, and it is up to the person to freely choose whether to reveal its identity or not. When filing a complaint, the person can also indicate if the person is available for the further investigation. If so, a secure and anonymous mail can be set up and CKU will endeavor to ensure confidentiality in the investigation of the complaint.

CKU will only reveal the identity during the investigation in one of the following situations:

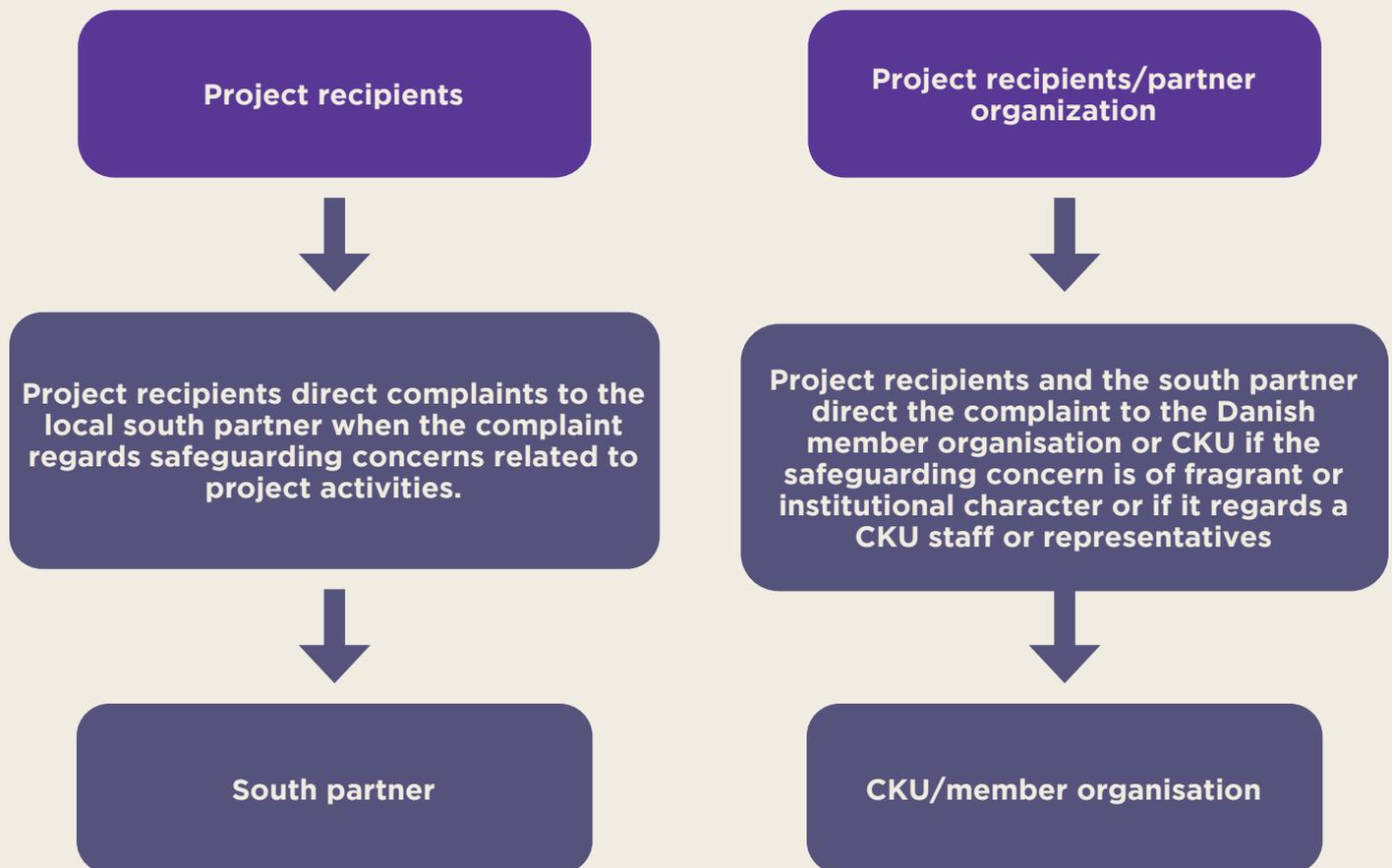
- » If a lawyer or auditor is involved in the investigation.
- » If the complaint is reported to the police or court.
- » If it is legally required.
- » If full consent is given.

As stipulated earlier, member organizations that manage CKU grants, must have a safeguarding policy and partner organizations in the Global South must have a complaint mechanism in place. It is the responsibility of the partner organization to make sure that their target groups and other relevant groups in the community are involved in the design of the complaint mechanism. In particular, they should know how they can safely report a safeguarding concern.

7.1 Submission of complaints and reporting of Critical issues to CKU

Submission of complaints occurs via our [website](#), where a guide indicating the desired minimum information and an electronic form is accessible in both Danish and English.

Complaints that regard CKU staff and CKU representatives should be directed to CKU. Complaints by project recipients that are related to project interventions supported by CKU, should be directed to the partner organization in the Global South. If the complaint is of a flagrant character or regards systematic abuse in the partner organization, the complaint should be directed to the Danish member organization when self-administering or CKU, when not self-administering, as demonstrated below:



CKU must be notified of all complaints that are connected to CKU grant recipients.

It is important to take into account that vulnerable groups, like the ones mentioned above, might not be able to use a formalized complaints system if it requires handing in the complaint in writing or electronically, for example. Depending on the target groups in question of the project or organisation, it might be relevant to include other possible means of reporting, like advertising who the contact person is to speak to, a telephone number or allowing drawings as a first step in voicing their concern.

Disclosure is the process by which the vulnerable individual starts to share their experiences of abuse, fears that they might be harmed, or concerns that another individual is being hurt. Staff and other representatives in the field therefore need to be aware of how to communicate with the vulnerable individual, when approached, in a caring, attentive and non-judgmental manner with transparency regarding the process of follow-up. Particularly for children, disclosing an abuse takes courage and might be a process that takes place over a long period of time – it is not one act or action.

It can be difficult to detect abuse of children since they might not always disclose abuse in a direct manner but might reveal it in a more indirect way. Partners engaging in project activities for or with children therefore are advised to consult child experts in the design of projects and complaints mechanism, as well as providing staff and other representatives with the skills and qualities so they are aware of signs of abuse and so that children and other vulnerable individuals can trust them and make them feel safe and confident enough to report safeguarding concerns.

7.2 Procedure for handling complaints within CKU



7.3 Handling complaints

On reception of a complaint a case will be opened, which will be handled by CKU as quickly as possible. If a case cannot be completed within 3 months, complainants will be informed of the reason. Cases are typically assessed by an intake committee consisting of the Safeguarding officer, a staff member from the secretariat and a board-appointed representative (the complaints committee). In case of situations of conflicts of interest, another designated management or board representative is involved and when relevant professional investigators, lawyers or authorities will take part in the investigation.

The complaints committee keeps a record of all complaints. Initially, the committee assesses whether the case does or does not require further action and dismisses the complaint if warranted, providing a brief explanation for this decision. The board must be informed of cases recorded for information and closed.

If the intake assessment of the case shows a need for further actions, the committee will:

- » Investigate the case and gather sufficient information to constitute the best possible decision-making basis concerning all involved parties for incoming inquiries and complaints. The purpose of the investigation is to substantiate the complaint through corroboration.
- » When relevant and based on a risk assessment ensure that a police report is filed if the complaint is deemed sufficiently serious to fall under criminal law.
- » Draft a report that describes the safeguarding case and provides recommendations regarding possible decisions and sanctions. This is only done when the complaint group deems that it is sufficiently briefed to make an informed decision. The report will be anonymous.





The report will be shared with the secretariat of CKU who decides which sanctions should be implemented. Complaints regarding the CKU management are handled and decided upon by the board. If necessary, the secretariat of CKU and the board can decide to temporarily suspend the involved employees, while the case is being investigated. Similarly, the group can temporarily suspend cooperation with external partners, grant holders (including stopping payments), suppliers, while the case is being investigated. If the complaint regards conditions in a south partner, CKU can recommend sanctions and withhold funds if the complaint is not followed up satisfactorily.

Since most complaints might not fall under criminal law, standard of proof in decision-making is based on the principle: Balance of probability and thus to what extent the investigation confirms that it is likely that the safeguarding concern has taken place.

The person whom the complaint concerns, has a right to be informed of the complaint, the legal basis of the complaint and the persons who are familiar with the complaint. If there is a high risk that the complainer's security is compromised by informing the person the complaint concerns or if there is a high risk, that it will obstruct the investigation, the notification will be postponed till the respected person is safe and all evidence is collected.

Subsequently, the complaint committee should:

- » Monitor that the decision related to the complaint is followed up.
- » Prepare a final report containing the decision in the case.
- » Ensure that reports and complaints are documented and filed.
- » Ensure that cases are correctly stored according to data protection legislation and that the data is sufficiently anonymized, and that all material in email correspondence with board members, etc., is deleted from the concerned parties.

The resources used in handling the report/complaint are aligned with its nature and severity.

Involvement of others in case handling:

- » The staff contact person (or their substitute) is always involved as a dialogue partner in reports/complaints concerning employees at the secretariat.
- » The complaint committee can request the involvement of everyone at CKU, member organizations and partner organizations in the investigation of the case to elucidate the matter.

7.4 Monitoring and implementation of the policy

All CKU employees and contractors are obliged to comply with the policy.

CKU will consult and support its members and their partners in the implementation of the policy. CKU will monitor the implementation of the policy among its member organizations and their partners through consultation and monitoring visits. Once a year CKU will make an overview of the proportion of members who have an independent safeguarding policy and the proportion of partners who have a complaint mechanism in place.

On a yearly basis, CKU will also make a status of incoming complaints directed to CKU and how the complaints have been followed up. Subsequently the policy will be adjusted if necessary.

