



## 1. Background

HEADS, a non-profit, non-political, and non-governmental organization, was established in 2013 and is registered in Pakistan under the Societies Act 1860 and in the Islamic Republic of Afghanistan with an office in Kabul. Governed by a dedicated Board of Governors (BoG) with diverse expertise, HEADS operates with transparency, accountability, and efficiency. Its programs address education, health, protection, livelihoods, community infrastructure, shelter, gender equality, legal counseling, social accountability, and governance, with cross-cutting themes of social mobilization, inclusion, and resilience.

**Vision:** Every individual, regardless of background or circumstances, enjoys equal opportunities and rights with dignity.

**Mission:** Empowering communities through strategic investment in human capital and institutional capacity development, raising sustainable development at the grassroots level.

### Objectives:

- Develop replicable models for sustainable human resource development through skills initiatives.
- Collaborate with government, NGOs, CBOs, and international donors for sustainable development.
- Support gender-sensitive community development in human and institutional development, natural resource management, water supply, sanitation, education, agriculture, health, nutrition, disaster management, and micro-enterprise.
- Create economic and recreational opportunities for youth to promote peace.
- Enable equitable access to quality education and healthcare for holistic community well-being.
- Promote social inclusion, empowerment, climate resilience, peace, human rights, and disaster preparedness.

## 2. Introduction

This Child Safeguarding Policy underscores HEADS' commitment to protecting children from all forms of harm, including physical, emotional, sexual abuse, neglect, and exploitation. It ensures effective safeguarding measures, strong accountability, and active child participation, creating a safe and nurturing environment across all programs, operations, and partnerships in Pakistan, Afghanistan, and beyond.

### 3. Purpose

#### This policy aims to:

- Create a safe environment for all children engaged in HEADS' programs.
- Ensure compliance with national and international child protection laws (e.g., UNCRC, IASC, *KCSIE 2025*).
- Promote child rights, dignity, and active participation in safeguarding efforts.
- Establish a zero-tolerance approach to child abuse, exploitation, and neglect.
- Define clear prevention, reporting, and response mechanisms.
- Strengthen vetting, training, and monitoring to protect children effectively.

### 4. Scope

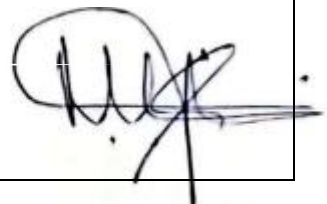
This policy applies to all HEADS staff, volunteers, visitors, sub-grantees, suppliers, contractors, consultants, interns, and implementing partners who interact directly or indirectly with children, including in online settings, offices, or community programs. It extends to accompanying dependents of international staff and organizations using HEADS' premises.

### 5. Equality & Non-Discrimination

HEADS guarantees equal rights for all children, regardless of gender, ethnicity, nationality, disability, religion, socioeconomic status, or medical history. Every child is treated with dignity, fairness, and inclusion, ensuring non-discriminatory practices across all programs.

### 6. Key Principles

1. **Best Interests of the Child:** Every decision prioritizes the child's safety and well-being.
2. **Zero Tolerance:** Any form of child abuse or exploitation is strictly prohibited.
3. **Confidentiality:** Safeguarding concerns are handled sensitively, respecting privacy and data protection laws.
4. **Accountability:** All personnel are responsible for adhering to safeguarding duties.
5. **Empowerment:** Children are informed of their rights and empowered to seek help.
6. **Prevention:** Proactive measures minimize risks of harm through training, vetting, and risk assessments.



7. Collaboration: Partnerships with families, communities, and authorities strengthen safeguarding.

## **8. Key Definitions**

- Child: Any person under 18 years, as per the UNCRC.
- Child Abuse: Any act harming a child's physical, emotional, psychological, or moral well-being.
- Sexual Harassment: Unwanted sexual conduct affecting a child's dignity and safety.
- Sexual Exploitation: Abuse of a child's vulnerability for sexual purposes.
- Sexual Abuse: Actual or threatened sexual contact with a child using coercion or power imbalance.
- Neglect: Failure to provide necessary care and protection for a child.

## **9. Roles and Responsibilities**

### **9.1 Board of Directors**

- Oversee policy implementation and annual review.
- Appoint a senior safeguarding lead to ensuring accountability.
- Allocate resources for training, reporting systems, and compliance.



### **9.2 Designated Safeguarding Lead (DSL)**

- Coordinate safeguarding activities, receive concerns, and liaise with external agencies (e.g., child protection agencies, police).
- Maintain secure, confidential records and provide annual safeguarding reports.
- Ensure staff training is current and effective.

### **9.3 Child Safeguarding Committee (CSC)**

- Comprises HR, child protection specialists, and legal advisors to conduct impartial investigations.
- Reviews concern, recommends actions, and ensures compliance with legal and policy frameworks.

### **9.4 All Staff, Volunteers, and Partners**

- Understand and adhere to this policy and the HEADS code of conduct.
- Complete mandatory safeguarding training annually.
- Report concerns immediately to the DSL or deputy.
- Maintain professional boundaries with children.

### **9.5 Program Managers & Field Coordinators**

- Integrate child protection strategies into program design and implementation.
- Conduct risk assessments for all child-related activities.

### **9.6 Monitoring & Evaluation (M&E) Teams**

- Assess safeguarding compliance through regular audits and feedback mechanisms.
- Ensure child-focused programs align with policy commitments.

### **9.7 Legal & Compliance Officers**

- Ensure alignment with national and international child protection laws.
- Facilitate legal reporting and handle compliance issues.

## **10. Procedures**

### **10.1. Safer Recruitment**

- Conduct thorough background checks (e.g., criminal records, references) for all staff, volunteers, and contractors.
- Follow local and international safer recruitment guidelines, including online checks for shortlisted candidates.
- Require all personnel to sign child protection agreements.

### **10.2. Training and Awareness**

- Provide mandatory annual safeguarding training for all staff, volunteers, and partners, covering:
  - Signs of abuse (physical, emotional, sexual, neglect) and emerging risks (e.g., online harm, child-on-child abuse, exploitation).
  - Reporting procedures and whistleblowing.
  - Trauma-informed practices, cultural sensitivity, and gender equality.
  - Educate children on personal safety, health rights, and reporting mechanisms in age-appropriate ways.
  - Conduct community awareness campaigns on child protection and rights.
  - Involve parents/guardians in safeguarding sessions.

### **10.3. Reporting Concerns**

- Channels: Confidential reporting via dedicated emails, toll-free numbers, in-person to DSL/CSC, or anonymous reporting mechanisms.
- Process: Staff must report concerns (e.g., signs of abuse, disclosures) to the DSL within 24 hours. Concerns are recorded securely, respecting data protection laws (*Data Protection Act 2018* where applicable).
- Escalation: The DSL assesses concerns and decides on actions, including referrals to local child protection agencies or police.

### **10.4. Responding to Disclosures**

- Listen calmly without judgment, avoiding leading questions.
- Explain that confidentiality cannot be promised if safety is at risk.
- Record disclosures verbatim and report to the DSL immediately.



### 10.5. Investigation Process

The CSC oversees a structured investigation process with clear timelines:

- **Receipt & Acknowledgment:** Acknowledge complaints within 3 working days.
- **Initial Review & Risk Assessment:** Conduct within 5 working days to determine immediate protective actions.
- **Formation of Investigation Panel:** Form a diverse, impartial CSC panel within 5 working days.
- **Evidence Collection & Interviews:** Gather documents and conduct confidential interviews with complainants, accused, and witnesses within 10-15 working days.
- **Analysis & Decision-Making:** Review findings based on preponderance of evidence within 5 working days post-investigation.
- **Corrective Actions & Disciplinary Measures:** Implement within 5 working days post-decision.
- **Appeals Process:** Allow appeals within 10 working days of the decision.

### 10.6. Disciplinary Actions

- **If Abuse is Proven:**
  - Immediate termination of employment or contractual engagement.
  - Referral to law enforcement and child protection authorities.
  - Permanent disqualification from working with children.
  - Public disclosure within HEADS to prevent recurrence.
  - Mandatory retraining for relevant teams.
- **If Unsubstantiated:**
  - No disciplinary action, but the case is recorded confidentially.
  - Inform complainants of appeal rights or external legal options.
  - Recommend monitoring or supportive interventions for workplace safety.
- **Severity Categorization:** Cases are classified as minor, moderate, or severe to guide actions.



### **10.7. Survivor Support Measures**

- Immediate safety planning, including removal from danger.
- Confidential counseling and psychological support services.
- Medical examination and legal support if required.
- Community and family support for reintegration and healing.
- Follow-up care plans for long-term protection and well-being.

### **10.8. Online Safety**

- Implement robust filtering and monitoring systems for online programs to protect against harmful content, grooming, or misinformation.
- Educate children and staff on safe internet use and reporting mechanisms.
- Align with *DfE Guidance on Generative Artificial Intelligence* to manage AI-related risks.

### **10.9. Specific Safeguarding Issues**

- Child-on-Child Abuse: Address sexual violence, harassment, bullying, or discrimination through sanctions and victim support.
- Mental Health: Provide counseling and referrals for children showing emotional distress.
- Child Exploitation: Train staff to recognize signs of trafficking, sexual exploitation, or criminal activities (e.g., county lines) and refer to authorities.
- Cultural Sensitivity: Address harmful cultural practices sensitively, collaborating with community leaders to prioritize child safety.

### **10.10. Partnerships**

- Include child safeguarding clauses in all partnership agreements.
- Require partners and service providers to comply with HEADS' child protection standards.
- Collaborate with government bodies, NGOs, and child welfare organizations to enhance safeguarding practices.

### **11. Monitoring and Compliance**





- Conduct quarterly safeguarding audits to assess compliance.
- Establish feedback mechanisms for children to safely express concerns.
- Maintain an independent Child Safeguarding Committee to oversee policy effectiveness.
- Review the policy annually, incorporating legal updates, beneficiary feedback, and global best practices (e.g., *KCSIE 2025*, UNICEF).
- Securely store safeguarding records in compliance with data protection laws.

## **12. Reporting Contacts**

- Designated Safeguarding Lead
- Child Safeguarding Committee
- Local Child Protection Unit (CPU)
- Emergency Services: Local Emergency Number, e.g., 1122 in Pakistan
- Child Helpline

## **13. Policy Implementation**

- Risk Assessments: Conduct for all programs, including health camps, workshops, and online activities.
- Code of Conduct: Require all personnel to sign, outlining appropriate and inappropriate behaviors.
- Parental Engagement: Communicate the policy to parents/guardians and involve them in safety discussions.
- M&E: Regularly assess safeguarding measures and program compliance.

## **References**

- *United Nations Convention on the Rights of the Child (UNCRC)*, 1989.
- *Inter-Agency Standing Committee (IASC) Six Core Principles*, 2018.
- *Child Protection Guidelines*, NSPCC Learning, 2024.
- *UNICEF Child Protection Strategy*, 2021.
- National and provincial child protection laws of Pakistan.



## BOG Meeting Minutes

Date: January 06, 2025

Participated by:

Raza Ullah Jan	Executive Director
Samina Khanam	Chairperson Board
Uzma Amin	Board Member
Nawaz Ali Shah	Board Member
Amabareen Banori	Board Member
Muhammad Jidran	Board Member
Abid Ali	Board Member
Tahira Nasreen	Board Member
Sayed Ali Shah	Director Program
Asif Ali	Director Operations
Ramsha Khan	HR Officer

### Agenda Items:

- Change in leadership position
- Formation of the Annual Report, Annual Budget, and Strategic Plan.
- Completion of the NDRMF Capacity Improvement Action Plan.
- Processing for Charity Commission in Baluchistan and Khyber Pakhtunkhwa.
- Revision of HEADS policies.
- Renewal of Society Act Registration for 2025.

### Proceedings & Outcomes:

The meeting commenced with the recitation of the Holy Quran, followed by a formal welcome note delivered by the Chairperson, Ms. Samina Khanam, and the Executive Director, Mr. Raza Ullah Jan. The discussions focused on the agenda items and organizational improvements.

- The Board decided that Mr. Raza Ullah Jan has been shifted from the position of Chairperson of the Board of Directors (BOD) to Executive Director of HEADS. This follows the resignation of Ms. Samina Khanam from the role of Executive Director and been appointed as Chairperson of the Board of Directors, effective immediately.
- The Board emphasized the importance of preparing Annual Report/ Annual Budget and Strategic Plan to assess the organization's current standing and plan strategically for the upcoming year.
- As HEADS has been conditionally accredited by the National Disaster Risk Management Fund (NDRMF) for six months, the Board reviewed the shared Capacity Improvement Action Plan. It was decided to prioritize its completion within the stipulated timeframe, recognizing this as a crucial opportunity for the organization.



# Health Education and Development Society (HEADS)




- The Board agreed to initiate the process for Charity Commission registration in Balochistan. Police verification for the Charity Commission in Khyber Pakhtunkhwa will be expedited to obtain the certification promptly.
- A comprehensive review of organizational policies was conducted. The Board proposed and approved necessary amendments to align with current needs and best practices.
- It was noted that the Society Act Registration expired in December 2024. The Board resolved to apply for its renewal for 2025 without delay.

The meeting concluded with a thorough review of the agenda items, ensuring they aligned with the organization's strategic objectives. The Board expressed optimism about the successful execution of the discussed initiatives.

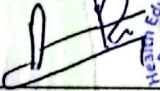
The Chairperson concluded the meeting with a vote of thanks.

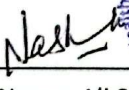
Signed on this Monday January 06, 2025 by authorized signatory.

  
Mr. Raza Ullah Jan  
Executive Director

  
Ms. Samina Khanam  
Chairperson BOG

  
Ms. Uzma Amin  
BOG Member


  
Mr. Muhammad Jidran  
BOG Member


  
Mr. Nawaz Ali Shah  
BOG Member

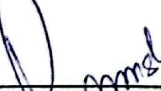
  
Ms. Ambareen Banori  
BOG Member

  
Mr. Abid Ali  
BOG Member

  
Ms. Tahira Nasreen  
BOG Member

  
Mr. Sayed Ali Shah  
Program Director HEADS

  
Mr. Asif Ali  
Director Operations HEADS

  
Miss. Ramsha Khan  
HR Officer

## Policy Review & Update Record

A Board meeting was held on January 6, 2025, with the primary agenda of reviewing organizational policies. The Board advised management to conduct a comprehensive policy review.

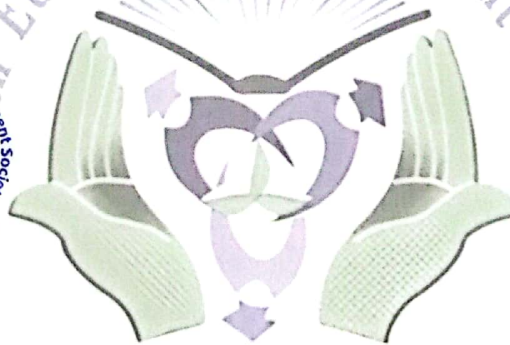
In response, the Finance & Audit Committee, under the lead authority of the Executive Director, reviewed the **Financial Policies** and **Logistics & Procurement Policies** on January 31, 2025. The review process included:

- Annual assessment of financial policies.
- Adjustments based on audit findings, best practices, and regulatory updates.
- Review and amendments in logistics & procurement policies to enhance efficiency and compliance.
- Implementation of feedback mechanisms for continuous improvement.

**Means of Verification:** Updated policies, policy review reports, and feedback records.



Raza Ullah Jan  
Executive Director



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