



# **TOMORROW WOMEN IN SPORTS FOUNDATION SAFEGUARDING POLICY**



Safeguarding means promoting and protecting people's health, well-being, and human rights, and enabling them to live free of exploitation and abuse

## CONTENTS

1. Partnership for inclusive change
2. Purpose of safeguarding
3. Reporting & responding to Incidents
4. Risk Management
5. Integrity policy
6. Zero Tolerance
7. Measures to Implement the Policy
8. Legal obligations



## INTRODUCTION

TWISF  
SAFEGUARDING  
POLICY

TWISF values the diversity of human life and believes that every person holds immense potential. We believe that freedom, dignity, mutual respect, and care for our planet are essential pillars for personal fulfillment and for building fair, progressive, and vibrant societies.



## 1. Partnerships 4 Inclusive Change

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TWISF works hand in hand with a wide range of partners at local, regional, and global levels. They include grassroots organizers, educators, legal advocates, tech innovators, artists, public servants, national sports bodies, and community-based organizations. We collaborate with those who share our commitment to advancing equality, dignity, and inclusion.

The initiatives we develop, and support vary in scale and form, ranging from long-term systemic change projects to small-scale, experimental efforts. Examples include supporting women's farmers groups, creating safe spaces for gender diverse people, co-developing digital tools for civic engagement, partnering with ethical businesses, or mobilizing communities to challenge discrimination

We are aware of the vulnerability of many of our beneficiaries and the importance of the behavior of our staff and our partners. This Safeguarding Policy provides clear definitions, sets standards across the organization, and gives clear guidance on how to apply and implement the policy throughout the organization and with partner organizations.

## **What Is Safeguarding**

*For TWISF, safeguarding means promoting and protecting people's health, well-being, and human rights, and enabling them to live free of harm, exploitation, and abuse. A safeguarding approach means identifying and minimizing the risk of harm to children and (vulnerable) adults, such as disabled people, LGBT+and any other individual that might be deemed vulnerable, from staff, representatives, and partners. It focuses on developing standards and mitigation measures to target and reduce residual risk*



## 2. PURPOSE OF SAFEGUARDING

The purpose of this policy is to ensure that TWISF's activities are implemented in a safe and protective environment where harm, exploitation, and abuse are effectively prevented as far as reasonably possible and responded to effectively.



**TWISF** is therefore also committed to the **six key principles** that should underpin all safeguarding functions, actions, and decisions as set out by the Constitution of Uganda of 1995 and other underlying policies and regulations

1. Prevention: It is better to act before harm occurs.
2. Proportionality: The least intrusive response is appropriate to the risk presented.
3. Protection: Support and representation for those in greatest need.
4. Partnership: local solutions through services, working with their communities, who have a part to play in preventing, detecting, and reporting neglect and abuse.
5. Empowerment: people being supported and encouraged to make their own decisions and give informed consent.
6. Accountability: accountability and transparency in delivering safeguarding.

**This policy has two specific objectives:**

1. Keeping our beneficiaries, including both children and adults, and keeping our staff safe.
2. Ensuring the reputation of TWISF, including guarding our representatives and staff from false allegations or from operating within an unclear framework



### *3.Reporting & Responding To Incidents*

- a. TWISF will ensure that reporting and incident management procedures to handle safeguarding concerns are in place and effectively used to enable an appropriate and swift investigation of any given case.
- b. TWISF representatives should be properly informed of the reporting and incident management procedures.
- c. Anyone who has a concern or suspicion regarding harm, exploitation, or abuse by someone representing TWISF or another organization that works in partnership with TWISF **m u s t** report such concerns to the Safeguarding focal person

### *Confidentiality*

All reports and the information they contain will be handled with the strictest confidentiality to protect the identity of the individuals concerned, the informer, and the accused, both appropriately and following the relevant national legislation.

### *Procedures To Be Followed In The Case of an Incident*

The agreed procedures to be followed are included in our Whistleblowing policy.



### *Consequences Of Harm, Exploitation, Or Abuse*

Any behavior towards children or vulnerable adults, which results in harm, exploitation, or abuse, or the failure to follow the general requirements and specific code of conduct of this policy, is grounds for the following measures:

#### *Representatives*

If an employee has been under investigation by TWISF or by official law enforcement authorities for any area of harm, exploitation, or abuse as defined under this policy, they will be subject to employee disciplinary procedures. Under these procedures, they may be suspended during the investigation. If an employee is dismissed for proven harm, exploitation, or abuse, TWISF will inform the relevant authorities, disclose this to prospective future employers, and/or refuse a reference, depending on details.

#### *Partner organizations/Membership*

Appropriate action will be taken up to and including immediate termination of a partnership, membership, or service agreement. In this case, the short or long-term impact on beneficiaries of the termination of a partnership or membership will be considered.



## 4. RISK MANAGEMENT

Safeguarding is included in how TWISF addresses risk management. Twisf risk management structure is linked to the strategy of the organization, i.e., the identified risks may affect the strategic objectives of the organization and require an answer on how we want to achieve our objectives. Risk assessment and risk management are, therefore, crucial instruments in the way we seek to implement our mission and vision.

Mitigation strategies aim at risks that are somehow within the span of control of the organization. Risks that are outside the span of control are monitored, but the energy of the management of the organization goes towards those risks that can be managed. Risks at the operational level are no less real but are very much within the span of control of the organization and are dealt with at the appropriate level. Risk assessment and risk management are best done at the lowest possible level, which is why TWISF risk assessments are differentiated per project, theme, and – if applicable per activity.

TWISF has identified five categories of risks: these are environmental, organization & strategic level risks; project management cycle risks; financial management cycle risks; and human resources and operational cycle risks. The first category is related to the overall strategy of the organization (therefore covered through our strategic plans), while the other four categories are related to the main operational cycles within the organization. TWISF defines the key risks related to each cycle, evaluates the risks, and develops mitigation measures (policies, procedures, control checks) for treating or reducing the identified risks.

Actual mitigation of risks is attained through the implementation of the various risk mitigation policies and controls, actively monitored through quarterly review of risk registers and through internal audits.

Also, for our partners, our General Terms and Conditions state in the article about Risk Management that they are responsible for all security arrangements. These include health, safety of any person employed or otherwise engaged, including those employed or engaged by any other parties contracted, attending activities or our beneficiaries. Everyone has a responsibility of reporting on risk by managing all risks with a risk register.



## 5. INTEGRITY POLICY

Our Integrity policy states:

- a) Every employee shall conduct him/herself with courtesy, respect and integrity towards all people in the course of doing their work.
- b) No employee may discriminate against any other person.
- c) No employee may abuse or deliberately intimidate any other person.



- d) No employee may make sexual advances where he/she knows or ought to know that the solicitation is unwelcome or in any other way sexually harass another person.
- e) Aggression and violence are not tolerated
- f) TWISF staff must avoid actions or behavior with children that may constitute poor practice or potentially abusive behavior.

Regarding our partners, TWISF's Social Responsibility Policy stipulates that when we initiate a relationship with a partner, we communicate what TWISF expects from them in terms of social responsibility. Sexual harassment and corruption are not tolerated; allegations should be discussed, and inadequate reactions will result in the end of the relationship with the partner. Additionally, our procurement procedures outline a zero-tolerance approach to discrimination and sexual harassment.



For the private sector, The Guiding Principles for Companies states: ensure the health, safety, and well-being of all women and men workers and establish a zero-tolerance policy towards all forms of violence at work, including verbal and/or physical abuse, and prevent sexual harassment. TWISF especially mentions to partners and suppliers that we do not tolerate the use of child labor, which could also lead to the end of the relationship with the partner.



## 6. ZERO TOLERANCE

Finally, our General Terms and Conditions clearly state that TWISF has the right to terminate contracts without giving notice or compensation if the partner does not comply with its obligations specifically in the case of;

- a. Child Labor
- b. Child abuse and sexual exploitation
- c. Tolerating discrimination or sexual harassment
- d. Supporting discrimination based on religion, gender identity, sexual orientation, physical ability, sex or age



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# MEASURES TO IMPLEMENT THE POLICY



## Five steps for implementation

### 1. Staffing

Includes the designation and training of a Safeguarding focal point person. TWISF will ensure sufficient time is given to the SFPs to acquire the necessary skills and knowledge and to undertake the above activities. Line managers will recognize the priority of SFP roles in incident reporting and response when an incident occurs and the dual reporting line required for this area of work.

### 2. Prevention measures, including raising awareness training of relevant staff, risk analysis, recruitment procedures, Induction of staff in the policy and codes of conduct for TWISF representatives, and incorporation of the policy into relevant existing systems.

### 3. Reporting and responding measures

Including steps for alerting and reporting safeguarding concerns, investigation and incident management, duties and responsibilities of assigned managers, and safeguarding focal point people.

### 4. Implementing and maintaining the policy, including training and capacity building of staff and partners, monitoring, reporting, and reviewing the policy.

### 5. Budget

A budget will be made available for training and implementation of safeguarding measures



## IMPLEMENTING AND REVIEWING THE POLICY

- a. TWISF will integrate safeguarding measures into relevant core internal processes and tools such as program technical guidelines, partner assessments and agreements, training modules, program design, monitoring and accountability systems, and recruitment procedures.
- b. TWISF will make sure that proper induction and training in safeguarding will be made available to all staff, permanent and temporary, consultants, and volunteers. The SFPs will receive additional training to manage their responsibilities for rolling out, managing, and coordinating the safeguarding policy and procedures.
- c. Where relevant, TWISF will support partner organizations by including relevant training and technical advice to build capacity in the field of safeguarding, with a particular focus on structurally silenced groups, especially children, adults with disabilities, and gender expansive people.
- d. The policy will be monitored quarterly by the designated safeguarding manager. An annual summary report, including all concerns received, will be submitted by the Safeguarding focal person to the senior management.
- e. Any findings requiring a policy change will be discussed by the Board.
- f. Each TWISF program lead will develop an annual implementation plan for the policy, including actions to be taken, details of the FSP and country safeguarding reference group, and relevant policy amendments adopted.
- g. A full policy review should take place every three years, instigated and led by the SM, to include a review of external changes to safeguarding standards that apply nationally and internationally.



## **PREVENTION**

### **STAFF RECRUITMENT**

All recruitment of staff will include a full induction to the safeguarding policy and code of conduct, including procedures to follow should any safeguarding concern arise.

### **AWARENESS**

TWISF will designate staff with the responsibility of SFP who will build internal awareness and support relevant capacity development of the organization in safeguarding.

All TWISF representatives, staff, partners, and members will be duly notified of the Safeguarding Policy and be made aware of how they will be expected to comply with it. It will be the responsibility of all TWISF staff to share the policy and approach as relevant to external stakeholders.

TWISF will provide the necessary training and support to partners and beneficiaries to enhance understanding and ensure effective implementation of the policy.

If any situation arises where national legislation conflicts with the policy, the secretariat will discuss this with the Safeguarding Focal Point person and align where necessary.

TWISF will ensure all supporters, members, and donors, sponsors, and all stakeholders' representatives involved with TWISF work have access to the Safeguarding Policy through its website and will take appropriate steps to communicate that availability.



## 8.LEGAL OBLIGATION

- a. TWISF's Safeguarding Policy is rooted in the commitment to uphold the Constitution of the Republic of Uganda, which, as the supreme law of the land, guarantees the right to dignity, equality, and protection for all persons, especially vulnerable groups such as children and women. Article 34 specifically affirms children's rights to be protected from social or economic exploitation, while Articles 24 and 44 prohibit all forms of cruel, inhuman, or degrading treatment. By embedding these constitutional principles into our operations, the policy ensures that our workplaces, programmes, and partnerships actively prevent harm, promote well-being, and create environments where safety and respect are non-negotiable.



- b. The policy further aligns with Uganda's key statutory and policy framework, including the Employment Act, the Occupational Safety and Health Act, the Children (Amendment) Act, the National Child Policy, and the Employment (Employment of Children) Regulations. Together, these laws and policies prohibit child labor, prevent workplace violence and harassment, and mandate the protection of health, safety, and welfare for all workers. In addition, the Employment regulations and the National Child Policy operationalize preventive and responsive measures to abuse and exploitation,