



**CENTRE FOR DEVELOPMENT
— IN SOCIAL JUSTICE —**
A People-Centered Development

CENTRE FOR DEVELOPMENT IN SOCIAL JUSTICE (CDSJ)

CHILD PROTECTION POLICY



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1. Title

This instrument shall be known as the **CDSJ Child Protection Policy**.

2. Effective Date

This Policy takes effect on the date of approval by the competent governance authority of CDSJ and remains in force until amended or repealed.

3. Purpose

This Policy sets the rules for how CDSJ prevents, identifies, reports, responds to, records, manages, and escalates child protection concerns in all activities, programmes, partnerships, research, advocacy, communications, events, field visits, and workplace contexts connected to the organisation.

This Policy is adopted because children require a higher level of protection than the general safeguarding standard alone. Children may be exposed to abuse, exploitation, neglect, manipulation, retaliation, trafficking, harmful discipline, unsafe participation, unsafe transport, and misuse of images or information in ways that are not always visible at first contact. CDSJ therefore requires a specific child protection framework that defines prohibited conduct, mandatory reporting duties, safe engagement rules, case-handling requirements, and leadership responsibilities. The aim is to make child protection operational, not symbolic. Every child-facing activity must therefore follow clear rules, and every concern involving a child must be treated as urgent.

4. Application

This Policy applies to:

- a. all CDSJ governance members;
- b. all staff, whether permanent, temporary, fixed-term, seconded, or part-time;
- c. all interns, fellows, volunteers, consultants, associates, contractors, and other associated personnel;
- d. all partners, sub-grantees, consortium members, and service providers where child protection obligations are included in agreements or codes of conduct;
- e. all CDSJ programmes, events, field visits, consultations, research processes, advocacy activities, training spaces, digital engagement, media work, referral work, transport arrangements, and accommodation arrangements involving or affecting children; and
- f. all CDSJ offices, branches, and future country operations.

This Policy applies wherever CDSJ personnel come into contact with children directly or indirectly through their work.

5. Definition of a Child

For purposes of this Policy, a **child** is any person below the age of 18 years unless applicable law in the country of operation sets a stricter standard for protection in a specific context.

Where age is uncertain, the person must be treated as a child for protection purposes until a reliable determination is made.

6. Policy Statement

CDSJ has zero tolerance for child abuse, child exploitation, child neglect, child sexual abuse, grooming, harmful child labour, unsafe child contact, and any conduct that exposes a child to avoidable harm in connection with CDSJ work.

No person covered by this Policy may:

- a. abuse a child;
- b. exploit a child;
- c. neglect a child in a context where CDSJ has a duty of care;
- d. expose a child to foreseeable and avoidable harm through CDSJ activity;
- e. conceal a child protection concern; or
- f. retaliate against any person who reports a child protection concern.

Every child protection concern must be reported immediately and handled through the child protection and safeguarding response process.

7. What Child Protection Means in CDSJ

For CDSJ, child protection means the specific organisational measures required to ensure that children are not harmed through:

- a. direct contact with CDSJ personnel, representatives, or partners;
- b. unsafe programme design or implementation;
- c. poor supervision of child-facing activity;
- d. unsafe transport, accommodation, venue, or event arrangements;
- e. unsafe data collection, interviews, images, or storytelling;
- f. failure to act on warning signs or disclosures; or
- g. weak referral and escalation systems when a child is at risk.

Child protection is part of safeguarding, but it requires additional rules because children are less able to protect themselves, less able to challenge authority, and more vulnerable to coercion, manipulation, and concealment of harm.

8. Prohibited Conduct Toward Children

The following conduct is prohibited in all CDSJ-related contexts:

- a. sexual activity of any kind with a child;
- b. sexual language, sexualised jokes, sexualised messaging, or sexualised attention toward a child;
- c. grooming, manipulation, gift-giving for exploitative purposes, or creation of inappropriate emotional dependency;
- d. physical assault, corporal punishment, rough handling, or violent discipline;
- e. emotional abuse, humiliation, shaming, threats, intimidation, or degrading treatment;
- f. neglect or deliberate failure to act where a child is in serious danger in a CDSJ-controlled setting;
- g. being alone with a child in a private, closed, or unobservable setting without an approved operational reason and safeguards;
- h. taking a child to a private home, hotel room, isolated vehicle, or other private setting in connection with CDSJ work without prior written authorisation except in a documented emergency;
- i. transporting a child alone in a vehicle without prior approval except in a documented emergency;
- j. photographing, filming, interviewing, recording, or publishing a child's story or image unsafely or without required approval;
- k. disclosing a child's identifying details where doing so creates risk;
- l. encouraging a child to conceal contact, communication, gifts, or meetings;

- m. using CDSJ power, resources, access, or opportunities to secure personal access to a child; and
- n. failing to report a known or suspected child protection concern.

9. Child Safe Contact Rules

Every person covered by this Policy must follow these child safe contact rules:

- a. keep interactions with children visible, professional, and related to the approved purpose;
- b. avoid one-to-one isolated contact unless operationally necessary and approved;
- c. where one-to-one engagement is necessary, ensure another responsible adult is nearby or that the space is observable;
- d. avoid unnecessary physical contact;
- e. use age-appropriate, respectful language;
- f. never ask a child to keep a meeting, communication, gift, or interaction secret; and
- g. stop any interaction immediately if a child appears distressed, unsafe, or pressured.

These rules apply whether the interaction is in person, by phone, by text, through social media, or by any digital platform.

10. Child Protection in Digital Communication

No CDSJ personnel may use private or informal digital communication with a child for non-operational reasons connected to CDSJ work.

Where digital engagement with children is part of a programme, the responsible programme lead must ensure that:

- a. the communication channel is approved;
- b. the purpose is clear;
- c. records are retained where appropriate;
- d. contact boundaries are set; and
- e. supervision or monitoring is in place where reasonably possible.

Private, secretive, flirtatious, or manipulative digital communication with a child is prohibited.

11. Child Participation Rules

Where CDSJ involves children in research, consultation, storytelling, advocacy, training, learning activities, or programme activities, the responsible staff must ensure that:

- a. the child's participation is appropriate to the purpose;
- b. the setting is safe and age-appropriate;
- c. participation is not coercive;
- d. the child is treated respectfully and listened to properly;
- e. the child is not exposed to avoidable retraumatisation, stigma, or retaliation; and
- f. the required consent, assent, authorisation, or child protection controls are in place as required by law, ethics, and CDSJ procedures.

No child may be used merely as symbolic visibility for a programme, campaign, donor visit, or public event without proper protection planning.

12. Consent, Assent, and Authorisation

Where CDSJ engages a child directly in programme, research, communication, referral, or documentation processes, the responsible staff must follow the applicable legal and ethical rules on parental, guardian, caregiver, institutional, or statutory authorisation, as well as child assent where appropriate.

The responsible staff member must not assume that consent is valid merely because an adult is present. Where there are signs of coercion, exploitation, trafficking, abuse, or control, the matter must be treated as a child protection concern and escalated.

13. Child Protection in Images, Stories, and Communications

The following rules apply whenever CDSJ uses a child's image, voice, story, case example, or identifying information:

- a. the purpose of use must be clear and legitimate;
- b. the child's dignity must be protected at all times;
- c. the material must not sexualise, sensationalise, stigmatise, expose, or exploit the child;
- d. identifying details such as school, village, home address, caregiver details, case specifics, HIV status, violence history, or other sensitive information must not be published where this creates risk;
- e. where image or story use is approved, the minimum necessary identifying information must be used; and
- f. where risk is high, images must be anonymised, blurred, substituted, or not used at all.

No staff member may keep or circulate child images from CDSJ work on personal devices, personal social media, or informal messaging groups except where strictly required for work and authorised.

14. Child Protection in Transport, Travel, and Accommodation

Where CDSJ activities involve movement of children, the responsible programme lead must ensure that:

- a. transport arrangements are planned in advance;
- b. authorised adults are identified;
- c. the route, purpose, and destination are known;
- d. no child is left alone unnecessarily;
- e. accommodation arrangements avoid unsafe room-sharing or unsupervised access; and
- f. emergency contact and referral arrangements are known.

A staff member may not share overnight accommodation with a child unless this is a documented emergency and no safer alternative exists, in which case the matter must be reported immediately.

15. Child Protection in Recruitment and Deployment

No person may be placed in a role involving direct or regular contact with children until the required screening steps are complete.

These must include, where lawful and available:

- a. identity verification;
- b. reference checks;
- c. criminal record or police clearance where required;
- d. signed Code of Conduct and Ethics acknowledgement;
- e. signed Child Protection and Safeguarding acknowledgement; and
- f. induction on reporting duties and prohibited conduct.

Where a role is clearly child-facing, any gap in the required checks must be escalated and resolved before deployment.

16. Child Protection Duties of All Personnel

All personnel covered by this Policy must:

- a. follow the child safe contact rules;
- b. report any concern involving a child immediately;
- c. not attempt to investigate child abuse by themselves unless formally assigned;
- d. preserve confidentiality;
- e. preserve any available evidence appropriately;
- f. not alert the alleged perpetrator before guidance is given where doing so may place the child at further risk; and
- g. cooperate with referrals, protective measures, and investigations.

A person who is unsure whether a concern involves child protection must still report it as a child concern. Under-reporting is more dangerous than over-reporting in child protection matters.

17. Child Protection Duties of Managers

Managers and supervisors must:

- a. ensure their teams know the child protection rules;
- b. stop unsafe child contact immediately if observed;
- c. report all child concerns on the same working day;
- d. support immediate protective action where necessary;
- e. not privately settle or suppress a child-related complaint; and
- f. ensure that child-facing activities are supervised and documented properly.

A manager who delays reporting a child concern breaches this Policy.

18. Receiving a Disclosure from a Child

Where a child discloses abuse, fear, exploitation, or harm, the first recipient must:

- a. listen calmly;
- b. take the child seriously;
- c. not blame, threaten, or pressure the child;
- d. not promise absolute secrecy;
- e. not ask leading or excessive questions;
- f. record the child's words as accurately as possible as soon as possible;
- g. explain that the concern must be shared with people who can help protect the child; and
- h. report the matter immediately through the child protection route.

The purpose of this first response is protection, not evidence testing.

19. Immediate Reporting Rule

Every child protection concern must be reported **immediately** and not later than the same working day.

Where the concern involves immediate danger, police, child protection authorities, health services, or emergency protection services must be contacted without delay, in line with applicable law and emergency practice.

20. Child Protection Reporting Channels

A child protection concern may be reported to:

- a. the Child Protection Focal Point, where designated;
- b. the Safeguarding Focal Point;
- c. the immediate line manager, if safe and appropriate;
- d. the next-level manager where the line manager is implicated or unavailable;
- e. the Co-Executive Director – Programmes and Partnerships;
- f. the Co-Executive Director – Operations and Technical Services;
- g. the Chairperson or designated governance authority where senior leadership is implicated; or
- h. external child protection or law enforcement authorities where immediate legal or protective response is required.

Where a child concern is reported to the wrong person, that person must route it immediately and not later than the same working day.

21. Minimum Child Protection Case Record

The receiving officer or focal point must record at least:

- a. date and time of report;
- b. child's name or identifying reference if known;
- c. age or approximate age;
- d. name of reporter if known;
- e. what was seen, heard, or disclosed;
- f. date and place of incident if known;
- g. immediate risk; and
- h. immediate action taken.

If not all facts are known, the report must still be opened.

22. Immediate Protective Action

Where a child may be at immediate or serious risk, CDSJ must act at once. Immediate actions may include:

- a. removing the child from immediate danger where safe and lawful;
- b. separating the alleged perpetrator from the child;
- c. stopping the relevant activity temporarily;
- d. arranging medical care, psychosocial support, emergency shelter, or child protection referral;
- e. securing relevant records or evidence; and
- f. notifying the appropriate statutory authority where required.

Protection must come before internal convenience or reputational concern.

23. Referral to Statutory or Specialist Services

Where a child protection concern may involve abuse, neglect, exploitation, trafficking, sexual violence, serious injury, serious threat, or any legally reportable situation, CDSJ must make or facilitate referral to the appropriate authority or specialist service without delay.

The referral may include:

- a. child protection authority;
- b. social worker;

- c. police;
- d. health facility;
- e. psychosocial support service;
- f. legal services; or
- g. any other competent statutory or child welfare structure.

The case file must show:

- a. what referral was made;
- b. when;
- c. to whom; and
- d. by whom.

24. Internal Case Handling

Every child protection concern that is not clearly unrelated must be opened as a child protection case.

The Child Protection Focal Point or Safeguarding Focal Point, together with the relevant Co-Executive Director, must decide within **1 working day**:

- a. whether the matter is critical, high, moderate, or low risk;
- b. whether immediate external referral is required;
- c. whether internal disciplinary or safeguarding action is also required; and
- d. who will manage the case.

A child protection response plan must be set within **2 working days** of case opening.

25. Prohibition on Internal-Only Containment

CDSJ may not keep a serious child protection matter entirely internal where law, safety, or risk clearly requires external reporting or protective referral.

This means a manager may not decide to “handle it quietly” if a child has been harmed or is at serious risk. Child protection concerns are not reputation management issues. They are safety issues.

26. Child Protection in Partnerships and Sub-Granting

Before CDSJ enters or renews a child-facing partnership or sub-grant, the responsible programme lead must consider:

- a. whether the partner has child protection rules or safeguarding systems;
- b. whether the partner knows how to report concerns;
- c. whether the partner’s staff will be in direct contact with children;
- d. whether referral pathways exist; and
- e. whether the partnership creates foreseeable child risk.

Where serious child protection weaknesses are identified, CDSJ must:

- a. require corrective action;
- b. impose conditions;
- c. increase monitoring; or
- d. decline or suspend the relationship.

27. Retaliation and Interference

No person may:

- a. threaten or blame a child for disclosing;
- b. retaliate against a parent, guardian, witness, or reporter;
- c. coach a child to withdraw or change a statement;
- d. contact the child inappropriately after a report;
- e. conceal evidence; or
- f. interfere with a child protection case.

Such conduct is a serious breach and may amount to gross misconduct.

28. False or Malicious Allegations

A child protection concern that is not substantiated is not automatically false.

However, if it is established that a person knowingly fabricated a child protection allegation or forged evidence maliciously, that conduct may be referred for disciplinary action.

This rule must never be used to discourage or punish good-faith reporting.

29. Outcome Categories

A child protection case may conclude as:

- a. referred externally and monitored;
- b. internally substantiated;
- c. partly substantiated;
- d. not substantiated;
- e. unresolved due to insufficient information;
- f. escalated for disciplinary or legal action; or
- g. closed after protective and referral action where no further internal step is required.

The outcome and reasons must be recorded in writing.

30. Time Requirements

The following minimum time requirements apply:

- a. reporting of child concern: **same working day**;
- b. routing to the correct focal point: **same working day**;
- c. risk classification: **within 1 working day**;
- d. child protection response plan: **within 2 working days**;
- e. immediate protection action: **without delay**; and
- f. statutory or specialist referral: **without delay** where required.

Where a timeline cannot be met, the reason must be recorded.

31. Child Protection Records

The Child Protection Focal Point or Safeguarding Focal Point must maintain:

- a. a secure Child Protection Case Register; and
- b. an individual case file for each child protection concern.

The register must record at least:

- a. case reference number;

- b. date received;
- c. child age or age category;
- d. type of concern;
- e. risk level;
- f. referral status;
- g. person handling the case; and
- h. case status.

Access to child protection records must be strictly limited.

32. Roles and Responsibilities

32.1 Governance Oversight

The relevant governance authority shall ensure that serious child protection incidents involving senior staff, major institutional exposure, or statutory escalation are not ignored and are handled with the required independence.

32.2 Co-Executive Director – Programmes and Partnerships

This office shall oversee child protection in programme design, field implementation, child-facing activity, community work, and partner management.

32.3 Co-Executive Director – Operations and Technical Services

This office shall oversee child protection in staffing, recruitment checks, administrative control measures, and suspension or restriction decisions where personnel are implicated.

32.4 Child Protection Focal Point / Safeguarding Focal Point

This role shall receive, log, classify, coordinate, and monitor child protection concerns and ensure that case response steps are taken on time.

32.5 Managers and Supervisors

Managers shall ensure that staff follow child safe practices and report concerns immediately.

32.6 All Staff and Associated Personnel

All covered persons must comply with this Policy, maintain boundaries, and report concerns immediately.

33. Non-Compliance with this Policy

Non-compliance includes:

- a. failure to report a child concern;
- b. unsafe one-to-one contact;
- c. unauthorised child image or data use;
- d. retaliation or interference;
- e. ignoring a child disclosure;
- f. child-facing deployment without required checks; or
- g. approving child-related activity without basic child protection planning.

Any such failure may result in immediate protective action, disciplinary action, contract termination, partner sanction, or referral to authorities.

34. Country Operations Clause

This Policy applies across all CDSJ operations.

Where a country of operation requires additional mandatory reporting, consent, child participation, criminal reporting, school access, transport, or child welfare procedures, CDSJ shall issue a country annex. The annex may add requirements but may not reduce the minimum protection standards in this Policy unless mandatory local law requires a different formulation.

35. Related Instruments

This Policy shall be read together with:

- the Constitution of CDSJ;
- the CDSJ Policy Framework;
- the Board Governance and Oversight Charter;
- Safeguarding Policy;
- Human Rights Policy;
- Code of Conduct and Ethics Policy;
- Sexual Harassment Policy;
- Whistleblower Protection Policy;
- Grievance and Complaints Handling Policy;
- Disciplinary Policy;
- Data Protection, Privacy, and Confidentiality Policy;
- Records Management and Document Retention Policy; and
- any approved child protection forms, registers, consent tools, referral maps, or country annexes.

36. Review

This Policy must be reviewed at least once every three years, or earlier if required by legal change, serious child protection incident, governance direction, external review, or country expansion.

37. Approval

Approved by: Adv. Motlatsi J Mofolo

Approving Authority: Director and Boards Ex-Officio

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