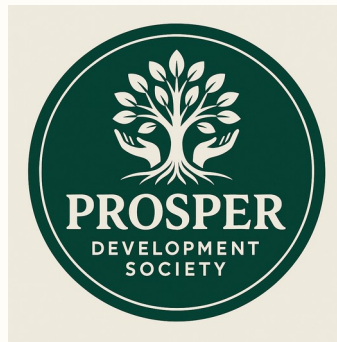




PROSPER DEVELOPMENT SOCIETY MASTER SAFEGUARDING, ETHICS & WHISTLEBLOWER POLICY

Dignity • Integrity • Safety • Accountability • Speak Up

BETTER TOGETHER ALWAYS

CONTROLLED MASTER POLICY - 2026

Adopted and Effective: 1 June 2026 | Registration No. SOCA-MOTV22M

This Policy applies to all Prosper structures, leaders, staff, volunteers, members, contractors, partners and activities and shall be read with the Master Working Constitution and other controlled policies.

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DOCUMENT CONTROL

Item	Control
Document Title	Master Safeguarding, Ethics & Whistleblower Policy
Document Code	PDS/SEW/2026/01
Version	1.0 - Master Working Edition
Approval Authority	Board of Directors
Adopted / Effective	1 June 2026
Policy Owner	Director Secretariat / Board Ethics & Safeguarding oversight
Operational Custodian	Executive Director / Executive Secretary / designated Safeguarding Focal Person
Review Cycle	At least every three years or earlier after major incident or legal change
Supremacy	Master Working Constitution and applicable law prevail
Official Channels	info@prospersociety.org +254 748 207 841 approved PIMIS reporting channels

Policy Commitment

Prosper is committed to a culture where every person is treated with dignity, abuse and exploitation are prevented, integrity is expected, concerns can be raised safely, retaliation is prohibited, and serious misconduct is investigated and acted upon fairly and promptly.

CONTROLLED SYNCHRONIZATION REVISION - 26 September 2026

This revision harmonizes terminology, cross-references, ProChama controls, digital records, field/HR stipend and incentive controls, and member-facing explanations across the Prosper controlled document suite. Original adoption/effective dates remain unchanged; any provision requiring Board, Congress, regulatory or contractual approval becomes operative only through the applicable approval process.

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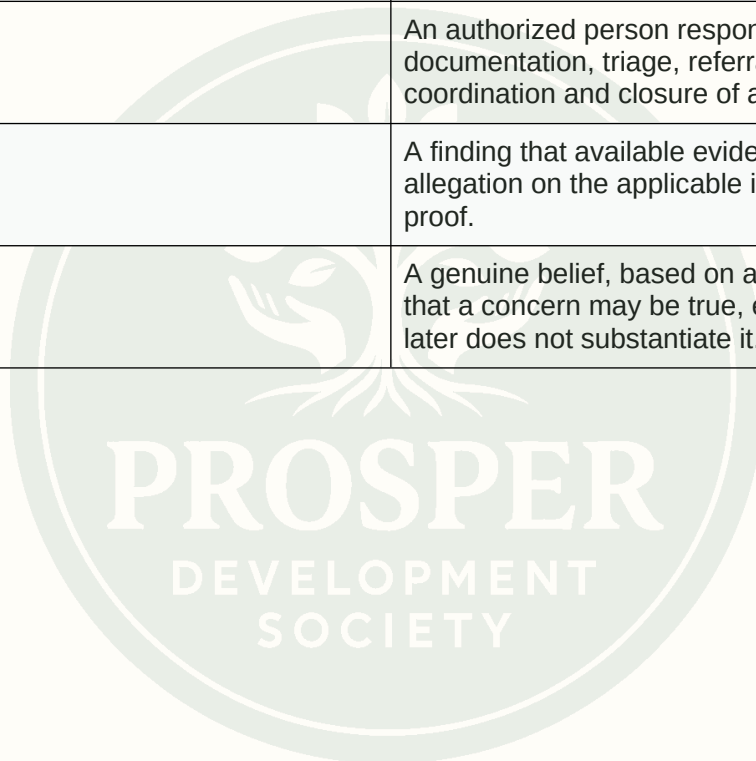
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2	Definitions & Safeguarding Risk Categories
3	Governance, Roles & Independence
4	Code of Ethics & Expected Conduct
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KEY DEFINITIONS

Term	Meaning
Safeguarding	Actions to prevent and respond to harm, abuse, exploitation, neglect and unsafe practice affecting people connected with Prosper.
Child	A person under 18 years of age.
Vulnerable Adult	An adult who may be at increased risk of harm because of disability, illness, age, dependency, crisis, displacement or other circumstances.
SEA	Sexual exploitation and sexual abuse, including abuse of power or trust for sexual purposes.
Sexual Harassment	Unwelcome sexual conduct, request, communication or behavior that creates harm,

Term	Meaning
	pressure, humiliation or an unsafe environment.
Whistleblower	A person who in good faith reports suspected wrongdoing, misconduct, illegality, safeguarding concern or serious risk.
Retaliation	Any punishment, threat, intimidation, disadvantage, exclusion or adverse treatment because a person raised or supported a good-faith concern.
Conflict of Interest	A personal, family, financial, political, professional or other interest that could improperly influence an official decision.
Case Manager	An authorized person responsible for safe intake, documentation, triage, referrals, investigation coordination and closure of a case.
Substantiated	A finding that available evidence supports the allegation on the applicable internal standard of proof.
Good Faith	A genuine belief, based on available information, that a concern may be true, even if investigation later does not substantiate it.



CHAPTER 1 - PURPOSE, SCOPE & CORE COMMITMENTS

One standard of dignity and integrity across every Prosper structure.

This Policy creates Prosper's integrated framework for safeguarding, ethical conduct, whistleblowing, complaint handling, investigations, non-retaliation and accountability. It applies to governance, welfare, field operations, enterprise, events, loans, partnerships, digital systems and all other Society activity.

- Protect children, vulnerable adults, PWDs, members, beneficiaries, workers, volunteers and community participants from abuse, exploitation, neglect and avoidable harm.
- Establish clear ethical standards for leaders, staff, volunteers, members, contractors, suppliers and partners.
- Create confidential and accessible channels for reporting wrongdoing without fear of retaliation.
- Ensure allegations are triaged, investigated and decided by persons without material conflict.
- Separate safeguarding response from ordinary politics, popularity, factional pressure or financial influence.
- Refer criminal, protection, health, regulatory or other matters to competent authorities where law, safety or seriousness requires.
- Preserve fairness: an allegation is not proof, but safety concerns must still be acted upon promptly.

Non-Negotiable Rule

No office, title, contribution level, founding status, wealth, popularity, relationship or performance result gives anyone permission to abuse, exploit, harass, defraud, retaliate or silence another person.



CHAPTER 2 - DEFINITIONS & SAFEGUARDING RISK CATEGORIES

Classify risk early so the right response starts quickly.

Risk category	Examples	Default response
Immediate / Critical	Threat to life, ongoing violence, child sexual abuse, severe SEA, abduction, credible suicide/self-harm risk, major fraud with active loss	Protect safety immediately; notify competent authorities/emergency services where required; preserve evidence; senior safeguarding escalation.
High	Serious harassment, exploitation, assault, retaliation, significant financial abuse, repeated boundary violations	Same-day triage; protective measures; case manager; independent investigation/referral as appropriate.
Moderate	Bullying, inappropriate conduct, conflict of interest, repeated policy breach, unsafe practice	Prompt intake, proportionate safeguards, investigation/management action.
Low / Advisory	Minor conduct issue, misunderstanding, process concern with no immediate harm	Record, clarify, coach or resolve through appropriate channel; monitor for recurrence.

Risk classification is a management tool, not a conclusion on guilt. A case may be upgraded or downgraded as facts emerge.

CHAPTER 3 - GOVERNANCE, ROLES & INDEPENDENCE

Safeguarding needs authority, expertise and freedom from conflict.

Role/Body	Core responsibility
Board of Directors	Approve policy, oversee culture and high-risk trends, ensure resources and independent review structures.
Founder-President	Champion institutional integrity; receive escalated strategic risk; exercise constitutional authority without obstructing independent safeguarding or lawful reporting.
Director Secretariat	Board-level governance oversight of ethics, complaints, records and due process.
Executive Director	Ensure operational implementation, resourcing, case cooperation and corrective action.
Executive Secretary / HR	Maintain registers, declarations, training records, disciplinary interfaces and controlled case administration.
Director/Officer Welfare	Lead member safeguarding integration, survivor-centered support and welfare referrals.
Programs/Field Leadership	Implement safe field practice, community reporting access and incident escalation.
Finance Officer / Audit functions	Escalate fraud, bribery, theft, conflicts and financial misconduct; preserve transaction evidence.
Safeguarding Focal Person	Receive/triage cases, coordinate immediate protection, referrals, case records and training.
Independent Ethics & Safeguarding Panel	Handle major, conflicted or senior-leadership cases and appeals when ordinary management is unsuitable.

Independence Rule

A person who is the subject of a complaint, a close associate, relative, witness, beneficiary or materially interested decision-maker shall not investigate or decide that case.

CHAPTER 4 - CODE OF ETHICS & EXPECTED CONDUCT

Prosper representatives must be worthy of member trust.

- Put member and community dignity before personal advantage.
- Use authority only for legitimate Prosper purposes.
- Tell the truth in records, reports, claims, procurement, recruitment, loans, welfare and financial transactions.
- Respect privacy, consent, boundaries and cultural differences.
- Do not discriminate, bully, intimidate, humiliate or threaten.
- Do not solicit sexual favors, unofficial payments, kickbacks or personal gifts in exchange for services.
- Do not misuse Prosper identity, logo, member lists, social media, funds, property or confidential information.
- Avoid favoritism and disclose conflicts before participating in a decision.
- Report serious wrongdoing rather than conceal it.
- Cooperate truthfully with authorized investigations while respecting confidentiality.

4.1 Power and dependency

Leaders, officers, field workers, welfare personnel and credit staff often hold power over access to benefits, information, approvals or opportunities. That power must never be used to demand money, political support, sex, loyalty, silence, business favors or personal service.



CHAPTER 5 - SAFEGUARDING CHILDREN

Children connected to Prosper must be protected from harm and exploitation.

- No sexual activity, sexualized communication, grooming or exploitative relationship with a child is permitted.
- No corporal punishment, degrading treatment, threats or deliberate humiliation.
- A child should not ordinarily be alone in a secluded place with an adult Prosper representative without a legitimate reason and appropriate safeguarding controls.
- Obtain appropriate consent for participation, transport, images, stories and sensitive data, while also respecting the child's age and evolving capacity.
- Do not publish identifying details that expose a child to stigma, trafficking, targeting or other harm.
- Use safe recruitment and enhanced screening for roles with regular child contact.
- Report suspected child abuse promptly through safeguarding channels and to competent authorities where required by law or necessary for safety.

Best Interests of the Child

In decisions affecting a child, safety, dignity, wellbeing and lawful protection take priority over reputation management, internal hierarchy or event continuity.



CHAPTER 6 - SAFEGUARDING VULNERABLE ADULTS & PWDS

Protection must preserve autonomy, accessibility and dignity.

- Never exploit disability, illness, age, bereavement, poverty, dependency or crisis to obtain money, sex, labor, influence or property.
- Use accessible communication and reasonable accommodation where practicable.
- Do not assume incapacity merely because a person has a disability.
- Where decision-making support is needed, involve lawful/appropriate support persons while preserving the individual's voice and privacy.
- Protect welfare beneficiaries from coercion by family members, leaders or service providers.
- Escalate suspected financial abuse, neglect, violence or exploitation.



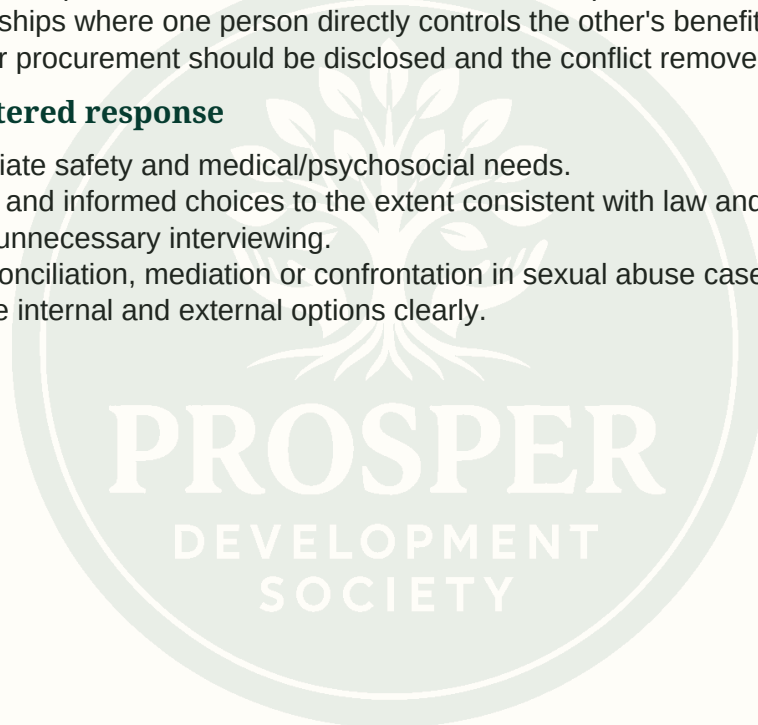
CHAPTER 7 - PREVENTION OF SEXUAL EXPLOITATION, ABUSE & HARASSMENT

Consent cannot be purchased with organizational power.

- Prosper prohibits sexual exploitation, sexual abuse and sexual harassment in all activities and relationships connected to Society work.
- No person may condition membership, welfare, loans, employment, contracts, events, training, leadership, referrals or any benefit on sexual contact or romantic compliance.
- Sexual activity with a child is prohibited regardless of claimed consent.
- Transactional sex linked to Prosper resources, influence or assignments is prohibited.
- Retaliation against a person who refuses sexual conduct or reports concern is prohibited.
- Intimate relationships where one person directly controls the other's benefits, supervision, discipline, pay or procurement should be disclosed and the conflict removed.

7.1 Survivor-centered response

- Prioritize immediate safety and medical/psychosocial needs.
- Respect privacy and informed choices to the extent consistent with law and safety.
- Avoid repeated unnecessary interviewing.
- Do not force reconciliation, mediation or confrontation in sexual abuse cases.
- Explain available internal and external options clearly.



CHAPTER 8 - DIGNITY, NON-DISCRIMINATION & ANTI-BULLYING

Strong accountability does not require humiliation.

Prosper prohibits bullying, discriminatory treatment, degrading language, intimidation, malicious isolation, threats and repeated abuse of authority. Legitimate performance management, lawful discipline and firm disagreement are not bullying when conducted respectfully and fairly.

- Use respectful language in meetings, WhatsApp groups, field visits and public events.
- Do not expose private member hardship for entertainment, fundraising or social media engagement without appropriate permission.
- Reasonable disagreement with leadership is not misconduct by itself.
- Faith, political or cultural differences shall not be used to deny lawful member services.



CHAPTER 9 - CONFLICT OF INTEREST, GIFTS & IMPROPER BENEFIT

Declare first; recuse where necessary.

Situation	Required action
Personal interest in supplier/contract	Declare before procurement; recuse from evaluation/approval.
Relative applying for job/benefit	Declare relationship; independent selection/verification.
Leader is loan guarantor/borrower in case they supervise	Remove from approval/recovery decision.
Gift from bidder/claimant/borrower	Decline or declare and surrender/handle under approved rules.
Officer has side business using Prosper member data	Prohibited unless explicitly authorized, lawful and consented.
Romantic relationship in direct supervision	Disclose and restructure decision/reporting conflict where practicable.

Annual conflict declarations shall be required for Board Directors, senior executives, finance/procurement staff, welfare decision-makers and other designated positions. Event-based declarations remain mandatory whenever a new conflict arises.

CHAPTER 10 - ANTI-FRAUD, ANTI-CORRUPTION & FINANCIAL INTEGRITY

Every shilling and every member record must be traceable.

- No theft, diversion, bribery, kickback, false receipt, ghost member, duplicate claim, fabricated attendance, false facilitation, unauthorized deduction or falsified banking record.
- No officer may request unofficial cash for registration, welfare, loan approval, CAG transfer, leadership appointment or member service.
- Collections shall use authorized channels and be reconciled against PIMIS/approved records.
- Suspected fraud shall be preserved as evidence and may trigger transaction holds, access restrictions, recovery and external reporting.
- Good-faith reporters of financial wrongdoing are protected under this Policy even where the suspected loss is later not substantiated.

Evidence Preservation

Do not delete chats, edit registers, overwrite PIMIS records, destroy receipts or privately settle serious suspected fraud after a report is made.



CHAPTER 11 - WHISTLEBLOWING & PROTECTED DISCLOSURES

Speaking up in good faith is service to Prosper.

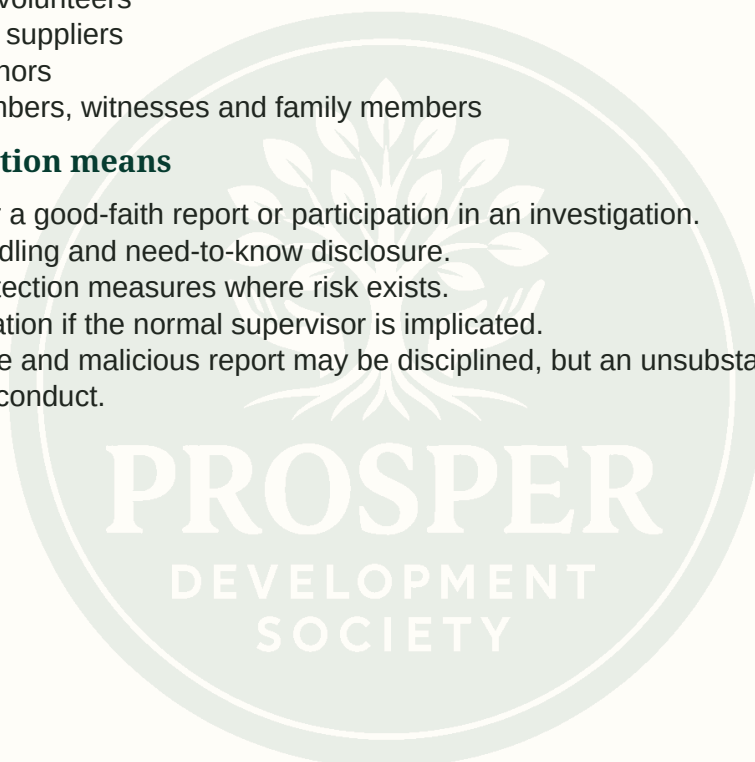
A protected disclosure is a good-faith report of suspected safeguarding harm, fraud, corruption, legal breach, serious misconduct, abuse of authority, conflict of interest, retaliation, concealment, substantial risk to health/safety, or deliberate falsification of institutional records.

11.1 Who may report

- Members and beneficiaries
- Board Directors and leaders
- Employees and volunteers
- Consultants and suppliers
- Partners and donors
- Community members, witnesses and family members

11.2 What protection means

- No retaliation for a good-faith report or participation in an investigation.
- Confidential handling and need-to-know disclosure.
- Reasonable protection measures where risk exists.
- Access to escalation if the normal supervisor is implicated.
- A knowingly false and malicious report may be disciplined, but an unsubstantiated good-faith report is not misconduct.



CHAPTER 12 - REPORTING CHANNELS & ESCALATION

People must have more than one safe way to report.

Channel	Use
CAG Welfare Officer / CAG leadership	Routine local safeguarding concern where no conflict exists.
Ward/Subcounty Champion	Territorial escalation or unsafe CAG-level handling.
County Director / County Welfare Officer	County case coordination and escalation.
Executive Welfare Officer / Executive Secretary	Formal safeguarding, ethics or whistleblower intake.
Director Secretariat / Board oversight	Governance, serious ethics, executive-level or conflicted matters.
Founder-President	Strategic/high-risk escalation where he is not the subject of the allegation.
Independent Ethics & Safeguarding Panel	Senior leadership, serious conflict, appeal or independent review.
Official email / PIMIS channel	Written confidential reporting and case reference.
Competent public authority / emergency service	Where law, immediate safety or seriousness requires external intervention.

Bypass Rule

A reporter may bypass any level that is implicated, unsafe, unresponsive or reasonably believed to have a conflict. No one is required to report misconduct to the alleged wrongdoer.

CHAPTER 13 - IMMEDIATE SAFETY, TRIAGE & PROTECTIVE MEASURES

Safety first; fairness throughout.

1. Receive the report respectfully and record only necessary facts.
2. Check immediate danger, medical need, child/vulnerable-person risk and evidence preservation.
3. Assign risk level and case manager.
4. Apply proportionate interim safeguards without presuming guilt.
5. Make required/appropriate external referrals.
6. Notify only persons who need to know.
7. Set next review date and communicate safe contact arrangements.

13.1 Possible interim measures

- Temporary reassignment or removal from direct contact with complainant/beneficiary
- Restriction of system, cash, vehicle, procurement or data access
- Change of supervisor or meeting location
- No-contact instruction
- Temporary pause on a transaction/claim/payment where evidence protection requires
- Security, medical, psychosocial or legal referral
- Administrative leave/suspension where lawful and authorized

Interim measures are protective, not disciplinary findings. They should be the least restrictive measures reasonably capable of controlling the identified risk.

CHAPTER 14 - CASE MANAGEMENT, INVESTIGATION & EVIDENCE

Investigate competently, impartially and with a documented chain of evidence.

14.1 Investigation principles

- Independence and absence of conflict
- Presumption of innocence while protecting safety
- Confidentiality and data minimization
- Trauma-informed and culturally respectful interviewing
- Opportunity for the respondent to know and answer material allegations before adverse final decision
- Reasonable timeliness
- Corroboration and reliability assessment
- Written findings and rationale

14.2 Evidence may include

- PIMIS records and audit logs
- M-Pesa/bank records and receipts
- Attendance and meeting reports
- Messages, emails and call records lawfully obtained
- Photos/video where authentic and relevant
- Witness statements
- Medical/protection records where lawfully available
- Contracts, procurement documents and asset registers

Do Not Investigate Beyond Competence

Internal investigators should not conduct forensic medical examination, unlawful device searches or coercive interrogation. Serious criminal, child-protection or specialized matters should be referred to qualified authorities/professionals.

CHAPTER 15 - DECISION-MAKING, SANCTIONS, RECOVERY & REFERRAL

Findings must lead to proportionate action.

Outcome	Possible action
Not substantiated	Close case; restore status/access as appropriate; address residual safety or relationship issues.
Partially substantiated	Corrective action proportionate to supported findings.
Substantiated misconduct	Warning, PIP, reassignment, removal from assignment, restitution/recovery, suspension or termination/removal according to governing instrument.
Serious safeguarding breach	Protective action, removal from contact, contract/office action and external referral where required.
Fraud/corruption	Recovery, access restrictions, disciplinary action, audit and possible police/regulatory referral.
Malicious false report	Action only where deliberate falsity/bad faith is established; never merely because a claim could not be proved.

No internal settlement may lawfully obstruct a person from reporting crime, abuse or regulatory concerns to competent authorities.

CHAPTER 16 - NON-RETALIATION & PROTECTION OF REPORTERS/WITNESSES

Prosper will not punish people for raising genuine concerns.

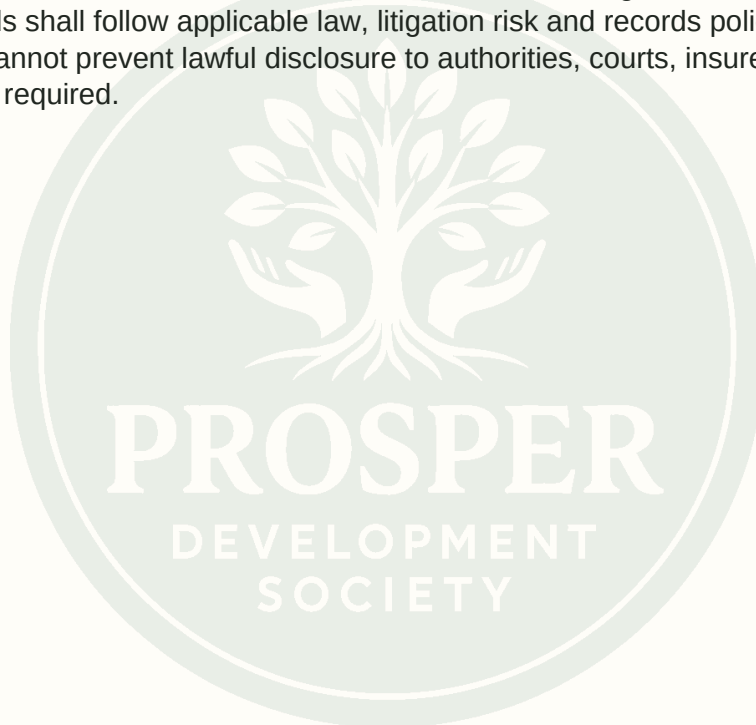
- Prohibited retaliation includes dismissal, demotion, denial of benefits, malicious transfer, threats, bullying, isolation, defamatory counter-campaigns, withdrawal of assignments, financial punishment, interference with loans/welfare, or pressure to recant.
- Protection may include alternative reporting lines, access restrictions, transfer at the protected person's request, secure communication, confidentiality controls and monitoring.
- Retaliation is a separate misconduct allegation even if the original report is not substantiated.
- Managers who know of retaliation and deliberately permit it may be accountable.



CHAPTER 17 - CONFIDENTIALITY, PRIVACY, RECORDS & DATA PROTECTION

Protect case information without using secrecy to hide wrongdoing.

- Case information is shared strictly on a need-to-know basis.
- Safeguarding records shall be separated from ordinary membership/HR files where practicable.
- Use case reference numbers rather than unnecessary names in dashboards.
- Collect only information necessary for safety, investigation, legal duty and case management.
- Sensitive health, sexual, child, disability, identity and disciplinary information requires heightened protection.
- Keep an audit trail of case access, decisions and evidence changes.
- Retention periods shall follow applicable law, litigation risk and records policy.
- Confidentiality cannot prevent lawful disclosure to authorities, courts, insurers, auditors or regulators when required.

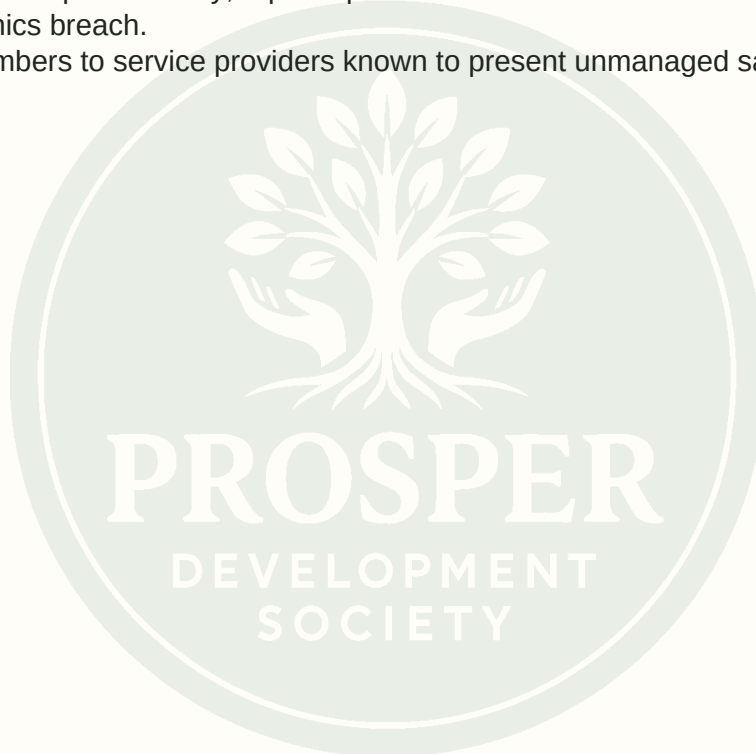


CHAPTER 18 - PARTNER, SUPPLIER & THIRD-PARTY SAFEGUARDING

Prosper cannot outsource its values.

Contracts, MOUs and procurement arrangements should include proportionate safeguarding, ethics, anti-bribery, confidentiality, data and reporting clauses where the counterparty will interact with members, children, vulnerable people, funds, sensitive data or Prosper-branded activities.

- Conduct risk-based due diligence before high-risk partnerships.
- Require partners to notify Prosper of material safeguarding incidents connected to joint activities.
- Reserve rights to suspend activity, replace personnel or terminate for serious safeguarding/ethics breach.
- Do not refer members to service providers known to present unmanaged safeguarding risk.



CHAPTER 19 - FIELD, EVENTS, DIGITAL & SOCIAL MEDIA SAFEGUARDING

Safeguarding follows the activity wherever it occurs.

19.1 Field and home visits

- Use approved itinerary/assignment where applicable.
- Avoid secluded one-to-one situations with children or vulnerable persons where reasonable alternatives exist.
- Do not transport members/children in unsafe vehicles or under intoxicated drivers.
- Do not use field facilitation, welfare support, stipends, collection commissions, recruitment incentives, share/member-capital incentives, ProChama targets/payout positions or any other Prosper benefit to pressure, threaten, shame or coerce members/beneficiaries, or to induce false attendance, payments, declarations or records.

19.2 Prosper Events

- Assess crowd, transport, child, alcohol/substance, cash, security and accessibility risks appropriate to the event.
- Designate an incident/safeguarding contact for major events.
- Protect participant images, names and stories.
- Vendor and performer conduct remains subject to event safeguarding terms.

19.3 Digital and social media

- No sexualized, humiliating or exploitative content involving members/beneficiaries.
- Do not share private welfare, medical or financial information without lawful basis/permission.
- Report impersonation, cyber abuse, doxxing, threats or unauthorized database sharing.
- Official admins must use controlled credentials and handover procedures.

CHAPTER 20 - RECRUITMENT, VETTING, TRAINING & SAFER ENGAGEMENT

Prevention begins before appointment.

- Risk-rate roles based on contact with children, vulnerable people, money, data, vehicles, procurement and authority.
- Verify identity and relevant qualifications.
- Use references and enhanced checks for sensitive roles where lawful and proportionate.
- Require Code of Conduct, conflict and confidentiality commitments.
- Include safeguarding duties in job descriptions, volunteer agreements and contracts.
- Complete induction before unsupervised high-risk duties.
- Provide refresher training and incident-based learning.

20.1 Mandatory training groups

Group	Minimum focus
Board & Executive	Duty of care, conflicts, whistleblower protection, serious-case governance
Welfare & Programs	Survivor-centered response, child/vulnerable-person safeguarding, referrals
Finance/Procurement	Fraud, bribery, conflict, evidence preservation
Champions/CAG leaders	Boundaries, local reporting, non-retaliation, safe events
Digital/Admin	Data protection, cyber conduct, confidential case handling
Volunteers/Consultants	Code of Conduct and role-specific safeguarding

CHAPTER 21 - COMPLAINTS, APPEALS & INDEPENDENT REVIEW

A person affected by a serious decision should have a fair review route.

Appeals may challenge material procedural unfairness, conflict of interest, significant new evidence, unreasonable findings or disproportionate sanction. Appeals are not a complete re-investigation by default.

1. Submit appeal within the timeframe stated in the decision or applicable governing instrument.
2. Identify specific grounds and any new evidence.
3. Assign a reviewer/panel not involved in the original final decision where practicable.
4. Review record, fairness, evidence and proportionality.
5. Issue final written outcome or remittal for further investigation where necessary.



CHAPTER 22 - SPECIAL CASES INVOLVING SENIOR LEADERSHIP

The higher the office, the stronger the need for independent process.

22.1 Board Director or Executive Director

Serious allegations should be escalated to the Director Secretariat, Founder-President (where not conflicted) and/or Independent Ethics & Safeguarding Panel. The subject shall not control evidence, investigators or the decision route.

22.2 Founder-President

Where the Founder-President is the subject of a serious safeguarding, ethics or whistleblower allegation, the matter shall be handled through an independent panel or external professional mechanism consistent with the Constitution. No subordinate officer or ordinary Board majority acquires an implied power to suspend or remove the Founder-President contrary to the Constitution. This does not prevent lawful evidence preservation, survivor protection, voluntary recusal from a specific decision, or reporting to competent public authorities where required by law or immediate safety.

22.3 Founding Director

Founding status does not immunize misconduct. Any action affecting protected founding status must, however, follow the Constitution, due process and the correct authority. Operational reassignment may be considered separately from historical founding recognition where permitted.

No Institutional Cover-Up

Prosper's reputation is protected by addressing serious wrongdoing lawfully and fairly, not by concealing it.

CHAPTER 23 - MONITORING, REPORTING & LEARNING

Measure culture, not just case numbers.

Indicator	Purpose
Reports received by category/level	Understand risk patterns and reporting confidence
Time to triage high-risk cases	Measure responsiveness
Cases with conflict checks	Protect investigation independence
Retaliation allegations	Test speak-up safety
Safeguarding training completion	Measure prevention readiness
Repeat incidents by unit/activity	Identify systemic weakness
Partner due-diligence coverage	Control third-party risk
Case closure and action follow-up	Ensure decisions are implemented
Anonymous trend reporting to Board	Support governance without exposing unnecessary identities

Low reporting does not automatically mean low risk. It may indicate fear, inaccessible channels or poor awareness. Prosper should interpret trends alongside training, surveys, audits and field feedback.

CHAPTER 24 - IMPLEMENTATION, REVIEW & INTERNATIONAL APPLICATION

Build the system, test it, improve it.

24.1 90-day implementation priorities

1. Appoint/confirm Safeguarding Focal Person and Independent Ethics & Safeguarding Panel arrangements.
2. Publish safe reporting channels and escalation routes.
3. Train Board, Executive Secretariat, County teams, Champions and CAG leaders.
4. Collect conflict-of-interest declarations from designated roles.
5. Add case register, restricted access, incident categories and whistleblower controls to PIMIS/AppSheet.
6. Insert safeguarding/ethics clauses into volunteer, consultant, supplier and partner templates.
7. Review major events, child-contact activities, welfare processes and digital media for safeguarding risks.
8. Establish quarterly anonymized Board safeguarding/ethics dashboard.

24.2 Legal and policy alignment

This Policy shall be interpreted consistently with the Constitution of Kenya, applicable child-protection, sexual-offences, employment, anti-corruption, criminal, disability, data-protection, occupational-safety and other laws as amended from time to time. Where Prosper operates outside Kenya, the Country Annex shall incorporate host-country mandatory law while preserving or exceeding this Policy's minimum protection standards where lawful.

24.3 Review triggers

- At least every three years
- After a major safeguarding incident or systemic failure
- Following significant legal/regulatory change
- When Prosper enters a new country or substantially new high-risk program
- When monitoring shows reporting barriers, repeated retaliation or recurring misconduct

OPERATIONAL SCHEDULES

These schedules form part of the Policy and may be updated through the authorized governance route without weakening the core protections in the main Policy.

SCHEDULE 1 - CODE OF CONDUCT ACKNOWLEDGMENT

- Name/ID/role
- Commitment to dignity and non-discrimination
- No SEA/harassment/exploitation
- No bribery/fraud
- Conflict disclosure
- Confidentiality/data protection
- Reporting duty
- Non-retaliation
- Signature/date

SCHEDULE 2 - SAFEGUARDING INCIDENT / WHISTLEBLOWER INTAKE

- Case reference
- Date/time/channel
- Reporter contact or anonymous
- Person(s) at risk
- Allegation summary
- Immediate danger
- Subject(s)
- Location/activity
- Evidence available
- Reporter protection needs
- Consent/preferences
- Triage decision

SCHEDULE 3 - RISK TRIAGE MATRIX

- Immediate safety
- Child/vulnerable adult involvement
- Sexual abuse/violence
- Financial loss
- Retaliation risk
- Evidence destruction risk
- Public/regulatory risk
- Conflict of interest
- Risk rating
- Immediate controls

SCHEDULE 4 - CASE MANAGEMENT PLAN

- Case manager
- Risk level
- Protection plan
- Referral plan
- Investigator
- Terms of reference
- Evidence plan
- Communication plan

- Target dates
- Decision authority
- Appeal route

SCHEDULE 5 - CONFLICT OF INTEREST DECLARATION

- Financial interests
- Family relationships
- Supplier/partner interests
- Loans/guarantees
- Outside offices
- Political/public roles where relevant
- Gifts/hospitality
- Conflict event
- Recusal/mitigation
- Annual affirmation

SCHEDULE 6 - GIFTS & HOSPITALITY REGISTER

- Date
- Giver/recipient
- Description/value
- Purpose/context
- Decision: decline/return/accept institutionally
- Approver
- Conflict check

SCHEDULE 7 - CHILD SAFEGUARDING CHECKLIST

- Activity risk assessment
- Parental/guardian consent where applicable
- Child assent/voice
- Safe transport
- Adult-child ratios
- Photography/media consent
- Medical/emergency contacts
- Reporting focal person
- Accessibility
- Incident plan

SCHEDULE 8 - PSEA / SEXUAL HARASSMENT RESPONSE CHECKLIST

- Immediate safety
- Medical referral
- Psychosocial referral
- Confidential intake
- No forced mediation
- Evidence preservation
- Subject contact controls
- External reporting considerations
- Survivor communication
- Case follow-up

SCHEDULE 9 - WHISTLEBLOWER PROTECTION PLAN

- Identity exposure risk

- Retaliation risk
- Supervisor conflict
- Alternative reporting line
- Access/assignment safeguards
- Secure communication
- Monitoring dates
- Escalation trigger

SCHEDULE 10 - INVESTIGATION TERMS OF REFERENCE

- Allegations/issues
- Scope
- Investigator independence
- Standard of proof
- Evidence sources
- Witnesses
- Confidentiality
- Timeline
- Reporting format
- Decision authority

SCHEDULE 11 - INVESTIGATION REPORT TEMPLATE

- Executive summary
- Mandate
- Method
- Allegations
- Evidence
- Responses
- Credibility/reliability analysis
- Findings
- Risk issues
- Recommendations
- Annexed evidence index

SCHEDULE 12 - DECISION & ACTION RECORD

- Finding per allegation
- Reason
- Sanction/corrective action
- Recovery/referral
- Protection continuation
- Communication recipients
- Appeal information
- Implementation owner/date

SCHEDULE 13 - ANTI-RETALIATION MONITORING

- Protected person
- Known risks
- Contact schedule
- Changes in role/benefits
- New threats/comments
- Manager checks
- Corrective action

- Closure criteria

SCHEDULE 14 - PARTNER/SUPPLIER SAFEGUARDING DUE DILIGENCE

- Policies/code
- Past incidents
- Child/vulnerable-person contact
- Data access
- Financial control
- Reporting channels
- PSEA commitment
- Staff screening
- Contract clauses
- Risk rating/approval

SCHEDULE 15 - EVENT SAFEGUARDING PLAN

- Event/activity
- Venue/crowd risks
- Children/vulnerable participants
- Transport
- Security
- Cash/alcohol risks
- Medical plan
- Focal person
- Reporting point
- Vendor controls
- Media consent
- Post-event incident check

SCHEDULE 16 - DIGITAL & SOCIAL MEDIA SAFEGUARDING CHECKLIST

- Admin access
- 2FA/password control
- Consent for images/stories
- No sensitive welfare data
- Child identity protection
- Comment moderation
- Cyberbullying/escalation
- Impersonation response
- Access handover

SCHEDULE 17 - SAFEGUARDING TRAINING REGISTER

- Person
- Role
- Module
- Date
- Facilitator
- Assessment
- Refresher due
- Acknowledgment

SCHEDULE 18 - QUARTERLY BOARD ETHICS & SAFEGUARDING DASHBOARD

- Cases by category/risk

- High-risk triage timeliness
- Open overdue cases
- Retaliation reports
- Training coverage
- Conflict declarations
- Partner due diligence
- Systemic themes
- Corrective actions - anonymized

SCHEDULE 19 - COUNTRY SAFEGUARDING ANNEX

- Country law mapping
- Mandatory reporting duties
- Child-protection authorities
- Emergency contacts
- Local referral services
- Data requirements
- Translation/accessibility
- Country focal persons
- Conflict with Master Policy resolution

SCHEDULE 20 - 90-DAY IMPLEMENTATION PLAN

- Days 1-30: focal person, panel, channels, case register, conflict declarations
- Days 31-60: leadership/CAG training, partner clauses, PIMIS restricted case module
- Days 61-90: scenario drills, event/field risk review, first anonymized Board dashboard, corrective-action register



CERTIFICATION AND ADOPTION

This Master Safeguarding, Ethics & Whistleblower Policy 2026 is adopted as Prosper Development Society's controlling framework for safeguarding, ethical conduct, whistleblowing, non-retaliation, case handling and integrity. It shall operate subject to the Master Working Constitution, applicable law and other controlled policies.

Institutional Pledge

Prosper will protect people before image, evidence before rumor, fairness before faction, and accountability before convenience.

Office	Name (print clearly)	Signature	Date signed
Founder-President	Gago Leakey Acharry		
Director Secretariat	Maureen Muhonja		
Director Finance & Investments	Kizito Baraza Oboya		
Director Programs	Asman Shihoba Opanda		
Director Welfare & Social Impact	Petronilla Wafula		

Official Seal / Stamp: _____

BETTER TOGETHER ALWAYS