

Child Safeguarding Policy

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Policy Owner: Agami Education Foundation

Cross Reference/ Related policies:

Protection from Sexual Exploitation and Abuse (PSEA) Policy

Whistleblowing policy

Introduction:

Agami Education Foundation (AEF) is committed to working with others to end injustice and eradicate poverty and to build a world that upholds the rights and dignity of all. Agami is dedicated to improving the quality of education for underprivileged children in Bangladesh. We recognize that to work with integrity we must 'walk the talk' and ensure that anyone who comes into contact with Agami Education Foundation (AEF) is protected from any form of injustice, discrimination, or abuse.

Agami Education Foundation (AEF) will not tolerate any form of abuse, exploitation, or harm carried out towards children (defined as anyone under the age of 18.)

The purpose of this policy is to ensure that procedures are in place to protect children from deliberate or unintended actions that place them at risk of abuse, exploitation, discrimination, or other harms carried out by any member of the Agami Education Foundation (AEF) representative.

Every aspect of our work must be carried out in a way that ensures the safety, rights, dignity, and empowerment of children. We are committed to engaging with children in a way that recognises their agency, individuality, and value, and work with them to ensure they are not only safe *from* harm but safe *to* realise their rights and become active agents of change.

Building on our Code of Conduct and feminist approach, Agami Education Foundation (AEF) is committed to **preventing** any form of sexual harassment, exploitation and abuse and **responding** robustly when these harms take place. We recognize that all these harms are rooted in an imbalance of power, particularly gendered and sexualised abuses of power, and in the case of children – imbalances

of power between children and adults.

We have a duty to prevent and respond to allegations of harm and risk to children because of the power imbalances inherent in the international aid sector, and within the wider social norms and structures in which we work. When addressing child abuse, we are committed to addressing all forms of abuse – physical, psychological, sexual abuse, and neglect. This means that we take all concerns seriously and carry out timely and robust responses to allegations of abuse. No one will be victimised for making a complaint and Agami Education Foundation is committed to taking a survivor-centered approach throughout. This means we work with survivors to ensure they are central to any response, are not further harmed or disempowered by any processes, and receive support throughout.

Agami Education Foundation views any form of child abuse as a gross violation of human rights. We are committed to the UN Convention on the Rights of the Child but our approach further extends from this to provide detailed guidance on how to ensure all children are safe. In line with those policies, we will not tolerate any form of abuse, exploitation, or harm carried out towards our own employees, rights holders, communities, or anyone we come into contact with through our work. Zero tolerance means we will always take action when Safeguarding harm takes place, ensure that support is offered to all affected and that the organization learns from the harm, so it does not happen again.

We recognize that gendered forms of sexual violence disproportionately affect women and girls, and our work also recognizes the impact on boys, men, transgender, and non-binary people. We are committed to having an inclusive safeguarding approach and working with marginalised, oppressed, and hard-to-reach groups, recognizing the impact of sexual violence on people living in poverty, people in the LGBTQI community, and people of different ethnicities, religions, races, classes, and abilities. We will listen to them, learn about their concerns from them and follow up on those so that SEA and Safeguarding approach supports the work they do to promote their rights and enable them to live with dignity.

Purpose

We are committed to safeguarding all people who come into contact with Agami Education Foundation from abuse of that power and privilege in any form.

This applies to everyone irrespective of race, age, gender, gender identity, sexual orientation, culture, dress, language, political affiliation, health status, class, caste, ethnicity, marital status, disability, location, pregnancy, and religion. Inequality, exclusion, and discrimination towards children will not be tolerated.

Agami Education Foundation is committed to the principles and rights promoted in the Convention of the Rights of the Child 1989^{and} the Universal Declaration of Human Rights 1948. We believe that **all children** have a right to be protected from abuse, exploitation, and harm. We recognize that some children can be additionally vulnerable because of their gender, ethnic origin, disability status, or other factors. We have a responsibility to protect the welfare of all children, recognizing their different needs and experiences. In all actions concerning children, their welfare is paramount.

Agami Education Foundation recognizes that we have a duty to respond to all concerns raised to us relating to children regardless of whether or not the alleged harm results from actions taken or not taken by Agami Education Foundation.

For example, abuse carried out by an individual from a community we work with or a staff member at another agency.

This policy provides guidance and direction to anyone associated with Agami Education Foundation so that:

- All Agami Education Foundation staff and other representatives understand the importance of safeguarding children, recognizes how it intersects with their work, and their responsibility to ensure they and their work do not deliberately or inadvertently cause harm to children.
- All Agami Education Foundation staff and other representatives understand their roles in keeping children safe, and the consequences for breaching this policy
- All Agami Education Foundation staff and other representatives understand their responsibility to report any concerns relating to child abuse and have access to clear guidelines on how to report suspected abuse.
- All organisational processes and structures reflect our duty of care towards children and put in place procedures to safeguard children in every aspect of our work so that we build a culture free from abuse, exploitation, discrimination, and harm.
- All Agami Education Foundation operations and programming must be designed with a safety lens; all activities of Agami Education Foundation must prevent harm to communities and rights-holders; Child Safeguarding, PSEA and Safeguarding against Sexual Harassment and Abuse should be central to all interventions and should be included in all programme activities.
- Agami Education Foundation commits to uphold the highest level of personal and professional conduct amongst its staff, contractors, volunteers, board members and partners working in or visiting all programming contexts, and particularly humanitarian settings, ensuring zero tolerance of all forms of exploitation and abuse carried out towards children.

Section 1: Our Values and Principles

This policy is concerned with the Safeguarding of all children from all kinds of violence and abuse. This includes direct or indirect beneficiaries of our programs and services, children in the wider communities in which we work and those who encounter Agami or our representatives. We take very seriously our responsibility and duty to ensure that we, as an organization, and anyone who represents us does not in any way harm, abuse or commit any other act of violence against children and young people or place them at risk of the same. We promote child and youth safe practices, approaches, interventions, and environments which respects, recognizes and respond to the specific safeguarding needs and addresses the protection risks of the different gender and other identities. We will challenge and shall not tolerate inequality, discrimination or exclusion. All children have the equal right to safeguarding regardless of any personal characteristic, including their age, gender, ability, culture, racial origin, religious belief, and sexual identity. We practice a Zero Tolerance policy regarding Child Safeguarding. This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, suppliers, and project partners.

Note on language: This policy is called the *Child Safeguarding* policy and replaces the *Child Protection* policy. The Child Safeguarding Policy supersedes the Child Protection Policy and the previous Child Safeguarding policy, as such all future incoming policies will be presumed to replace previous existing policies. Child safeguarding cases that are being addressed under an older version of this policy will

automatically be handled under this new policy. We use the term *safeguarding* rather than *protection* since the term *safeguarding* refers to ensuring the rights of all children, while protection generally refers to protecting the rights of specific children who are identified as suffering or more likely to suffer harm. Agami Education Foundation recognizes the particular safeguarding challenges presented by working with young people. We have included information on this area in this policy, and we are committed to strengthening our approach to safeguarding young people through further stand-alone work.

Difference between Agami Education Foundation's Protection from Sexual Exploitation and Abuse; Sexual Harassment, Exploitation, and Abuse at Work; and Child Safeguarding policies

Agami Education Foundation's SHEA and Safeguarding approach seeks to prevent and robustly respond to all forms of sexual harassment, exploitation, abuse, and other safeguarding harms carried out by Agami Education Foundation staff and other representatives towards anyone we come into contact with through our work.

We recognize the ways in which these forms of sexual violence and abuse of power intersect and inform each other. However, in order to identify and address the different ways in which these abuses of power manifest our policies distinguish between them. The below table shows the different forms of harm and what policy they sit under:

Form of Harm	Policy this falls under
Harmful behavior carried out by staff/representatives towards other staff and representatives	<i>SHEA and Safeguarding policy</i>
Harmful behavior carried out towards children and young people	Addressed through this policy
Harmful behavior carried out towards rights holders and communities, including adults-at-risk	<i>Protection from Sexual Exploitation and Abuse policy</i>
Illegal and/or improper conduct and wrongful acts including, but not limited to, suspected fraud, criminal activity, or miscarriages of justice	<i>AEF Whistleblowing policy</i>

Scope

This policy is binding for all offices and working locations of Agami Education Foundation, and at both the organizational and project level. Policies created by Agami Education Foundation entities must include all elements of this policy and may only differ to ensure alignment with national legislation as appropriate. Should this policy demand a higher standard than the local laws then this policy will prevail. This policy supersedes previous policies on SHEA and Safeguarding.

This policy is binding for all Agami Education Foundation staff members, whether full time, part-time or engaged on fixed-term contracts. **It is also binding for other representatives working with Agami Education Foundation, including (but not limited to) partners, volunteers (including board and assembly members), consultants, contractors/suppliers/vendors, interns, visitors (e.g. donors), dependents accompanying staff while working for Agami Education Foundation, and other individuals acting as representatives of Agami Education Foundation.** In line with Agami Education Foundation's Code of Conduct, this policy is binding both in and outside of working hours and in all aspects of a staff member's/representative's life. **All staff and representatives named above can raise a complaint via the procedures outlined in this policy. All community members and rights-holders including adults at-risk, and children can raise a complaint about any Agami Education Foundation staff member or representative, using the channels as outlined in the**

policy.

Agami Education Foundation Executive committee/International Leadership Team and International Board hold overall accountability for this policy and its implementation. They are responsible for ensuring that the policy is reviewed and updated **every three years**. Agami Education Foundation Executive committee/International Leadership Team and International Board may hold departments accountable to ensure that they align their work to this policy and embed child safeguarding in their work.

Adherence to this policy will be reviewed through Agami Education Foundation's internal Assurance and auditing mechanisms. If the international SHEA and Safeguarding Team have concerns that an Agami Education Foundation entity is not implementing SHEA and Safeguarding as outlined in this policy, the international SHEA and Safeguarding Team will raise this first with the President/ Country/Executive Director for action. If no action is taken within one week (e.g. agreeing to a meeting, or developing an action plan), the International SHEA and Safeguarding Team will inform the Head of Country Support who will follow up with the President/ Country/Executive Director and request a response within 48 hours. If no action is taken, or there is sustained in-action by an entity, this will be raised to the International Leadership Team and if needed to the International Board (Agami Inc.) for wider action.

Definitions and Policy Positions

In line with Agami Education Foundation's Code of Conduct and mission, Agami Education Foundation:

Strictly prohibits staff and other representatives from engaging in or promoting any form of abusive, exploitative or harmful behaviour towards children.

Strictly prohibits staff and other representatives from engaging in any kind of sexual activity with children (anyone under the age of 18 years, or older if the local law indicates this). Mistaken belief of age is no defence.

Affirms that all staff and other representatives have a duty to protect the rights of children, ensure that Agami Education Foundation's SHEA and Safeguarding approach is embedded into all areas of Agami Education Foundation's work, and ensure that every aspect of our work is carried out in a way that ensures the rights, dignity and empowerment of children.

Definitions

Child	"Any individual under the age of 18, irrespective of local country definitions of when a child reaches adulthood." This definition is in line with the <i>UN Convention on the Rights of the Child</i> , given our human rights-based approach to SHEA and Safeguarding. Whilst a person under the age of 18 may have reached the age of majority, age of sexual consent, or voting age, this does not alter their inherent vulnerability as a child.
Child abuse	All forms of physical and/or emotional ill-treatment, sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the child's health, survival, development or dignity in the context of a relationship of responsibility, trust or power. The main categories of abuse are defined by WHO as physical abuse;

	<p>sexual abuse; psychological abuse; and neglect.</p> <p><u>Physical</u> abuse can include inappropriate physical punishments towards a child, and/or assaulting, pushing, hitting, and slapping them.</p> <p><u>Sexual</u> abuse is defined as any sexual activity, or actual or threatened physical intrusion of a sexual nature, with someone under the age of consent or under 18, whichever is greater, is considered sexual abuse.</p> <p><u>Psychological</u> abuse can include, especially in relation to children, threats of harm or abandonment, deprivation of contact, humiliation, blaming, intimidation, coercion, harassment, verbal abuse, and isolation.</p> <p><u>Neglect</u> can involve preventing access to education, food or other life necessities, and any emotional or physical care needs. Whatever form it takes, neglect can be just as damaging to a child as physical abuse. Children are more susceptible to neglect given their inherent vulnerability and dependence on adults for support.</p> <p>It is common for a child that is abused to experience more than one type of abuse, and it often happens over a period of time rather than being a one-off event.</p>
Sexual abuse	<p>The UN Secretary-General defines sexual abuse as the “actual or threatened physical intrusion of a sexual nature, whether by force or under unequal conditions e.g. sexual assault, rape.</p> <p>Agami Education Foundation strictly prohibits staff and other representatives from engaging in any kind of sexual activity with children (anyone under the age of 18 years, or older if the local law indicates this). The mistaken belief of age is no defence.</p> <p>If a child attempts to initiate a sexual relationship with Agami Education Foundation staff/representative, the responsibility lies with the staff/representative to refuse in line with the provisions in this policy. If a staff/representative acts on a child’s request for a sexual relationship, the Agami Education Foundation staff or representative will be held accountable under this policy, given the power dynamic and their responsibilities.</p>
Sexual exploitation	<p>The UN Secretary General defines sexual exploitation as “any actual or attempted abuse of power or trust for sexual purposes, including, but not limited to, profiting commercially, monetarily, socially, or politically from the sexual exploitation of another”.</p> <p>This can represent a wide spectrum of examples including but not limited to invasion of someone’s sexual privacy, forced transactional sex, non-consensual filming of a sexual act or exposure of genitals, online grooming, or knowingly spreading a sexually transmitted disease or infection.</p> <p>It is important to understand that sexual exploitation is not limited to sexual intercourse, as detailed in some examples above, and includes acts of intimidation of a sexual nature that are intended to cause discomfort and embarrassment.</p>
<u>OTHER RELEVANT TERMS</u>	
Adolescent	<p>Adolescents are individuals aged between 10-19 years.</p> <p>Adolescence is one of the most rapid phases of human development during which biological maturity precedes psychosocial maturity. Younger adolescents may be particularly vulnerable when their decision-</p>

	making capacities are still developing, and they are beginning to mix with people outside the confines of their families.
Child labour	<p>According to the International Labour Organization (ILO), child labour is defined as work that deprives children of their childhood, their potential and their dignity. It refers to work that is mentally, physically, socially or morally dangerous and harmful to children and interferes with their schooling by depriving them of the opportunity to attend school.</p> <p>Some countries have laws and policies that allow children to work. When considering whether such work amounts to child labour or not, consideration should be made to the national laws and policies of that country on child labour alongside the definition of the ILO. Should the ILO definition demand a higher standard than the national laws and policies, then the ILO definition shall take preeminence.</p> <p>Reported child labour allegations will be handled with support from Protection colleagues.</p>
Child marriage	<p>A formal marriage or informal union involving someone aged under 18. The practice of marrying off young children is a form of sexual violence since the children, and particularly girls, involved are unable to give or withhold their consent.</p> <p>Even though this occurs in many parts of the world where it is also entirely legal, it is something Agami Education Foundation campaigns against given our human rights-based approach.</p>
Child protection	<p>This refers to activities or processes that focus on “preventing and responding to violence, exploitation and abuse against children – including but not limited to commercial sexual exploitation, trafficking, child labour and harmful traditional practices.”</p> <p>Child protection is part of wider safeguarding activities and refers to activities that are undertaken to protect specific children who are suffering or likely to suffer significant harm. This includes procedures which detail how to respond to concerns about a child.</p> <p>More than half the people affected by disaster and conflict are children and the risks children face are exacerbated by living in these contexts. Therefore, it is vital that Agami Education Foundation addresses issues of child protection across our work and on a global level.</p>
Child safeguarding	<p>Child safeguarding is the action that is taken to promote the welfare of all children and protect them from harm. In practice it means:</p> <ul style="list-style-type: none"> protecting children from abuse and maltreatment preventing harm to children’s health or development ensuring for children to grow up with the provision of safe and effective care taking action to enable all children and young people to have the best outcomes ensuring that an organisation’s processes or procedures do not deliberately or inadvertently cause harm to children
Child sexual exploitation	<p>This can take the form of commercial and/or online sexual exploitation of children:</p> <p>Commercial sexual exploitation is sexual abuse enabled by payment in cash or in-kind to the child or another person (or group of people).</p> <p>The commercial sexual exploitation of children is a form of coercion and</p>

	<p>is a form of modern slavery.</p> <p>Online sexual exploitation covers any act of sexual exploitation towards a child that has at any point been carried out online.</p> <p>It includes any use of technology (e.g. phones, computers, cameras, online platforms, social media) that causes a child to be sexually exploited and any material created using this technology to be produced, bought, sold, possessed, distributed or transmitted</p>
Community member	A person living in a community within which Agami Education Foundation operates, however, they are not necessarily engaged with any programme.
Complainant	This is the person making a complaint; it may be the person who experienced what is being reported (the survivor), or it may be another person (a third-party complainant) who becomes aware of an issue and makes the complaint.
Complaint	<p>The specific grievance of anyone who has been negatively affected by an individual's action towards them, or who believes that an organization has failed to meet a stated commitment that is intended to keep them safe from harm.</p> <p>Individuals can make a complaint on behalf of someone else as a third party, even if they were not directly affected by the alleged harm.</p>
Convention on the Rights of the Child	United Nations Convention on the Rights of the Child is a human rights treaty that sets out the civil, political, economic, social, health, and cultural rights of children. The Convention defines a child as any human being under the age of eighteen unless the age of majority is attained earlier under national legislation. Agami Education Foundation works in full recognition of this treaty in line with our organizational values and goals.
Digital Safeguarding	Agami Education Foundation recognizes the risk that staff/representatives could carry out online sexual harassment, exploitation, and abuse. Agami Education Foundation has a responsibility to protect staff/representatives, community members, young people and children that it engages with on online spaces.
Forced marriage	<p>Marriages in which one and/or both parties, whether adults or children, have not personally expressed their full and free consent to the union.</p> <p>As is the case with child marriage more specifically, this is something Agami Education Foundation campaigns against given our human rights-based approach.</p>
Gender-based violence (GBV)	<p>"Gender-based violence is an umbrella term for any harmful act that is perpetrated against a person's will, and that is based on socially ascribed (gender) differences between males and females"</p> <p>Acts of gender-based violence are a form of sexual abuse and can affect any stakeholder, whether staff or community members.</p>
Grooming	<p>Grooming is when an individual deliberately tries to gain a child's trust for the purpose of carrying out sexual abuse or exploitation.</p> <p>An offender may seek to build a sexual relationship with a child having purposefully built a trusting relationship with them in advance in order to enable this (e.g. favouring a child, giving them gifts, using sexualised language or physical contact, or exposing the child to sexual concepts and sexualised language). This can happen face to face or online. It is common for children not to understand that they have been groomed or</p>

	<p>that this is a form of abuse.</p> <p>Offenders may also groom adults in order to enable the abuse of children in their care to take place (for example, persuading those around them that they are safe and responsible individuals so that they allow children in to their care or do not believe children when they raise concerns about this individual).</p>
Modern slavery	<p>Slavery is a situation where a person exercises perceived or real power of ownership over another person.</p> <p>Modern slavery covers different types of labour exploitation, ranging from the mistreatment of vulnerable workers to human trafficking to child labour and forced sexual exploitation.</p> <p>Related terms include human trafficking, covering coercion and recruitment under false pretenses, and bonded and forced labour, which is labour undertaken as a repayment or under threat of punishment respectively.</p>
Rights holder	<p>A rights holder is someone receiving assistance through Agami Education Foundation's work. This is alternatively referred to in other organizations as a member of the affected population, person we seek to assist, person affected by crisis, or beneficiary. A <i>rights holder</i> is different to a <i>community member</i> in that a <i>community member</i> may not be engaging in our programmes and Agami Education Foundation must therefore be more aware of the risks that they face.</p>
SHEA and Safeguarding Focal Point	<p>A person within an organization designated to receive concerns and complaints of cases of sexual abuse, exploitation, and harassment.</p> <p>Within Agami Education Foundation we are developing a network of trained SHEA and Safeguarding Focal Points across countries. These are people designated to receive disclosures, as detailed above, take responsibility for embedding safeguarding into their respective offices and programmes, and act as a first point of contact to any SHEA and Safeguarding queries that staff and rights holders may have.</p>
Staff/Representatives	<p>This refers to "staff, volunteers (including board and assembly members), consultants, interns, visitors, dependents accompanying staff while working for Agami Education Foundation, and other individuals acting as representatives of Agami Education Foundation, such as partners working in communities." When we refer to staff and other representatives in the document we are referencing this entire group.</p> <p>This is not an exhaustive list and covers anyone who is a representative of Agami Education Foundation including individuals acting in the capacity of agents or implementing on behalf of representatives of Agami Education Foundation e.g. teachers working in the community schools through a partner's project. Agami Education Foundation may not have the jurisdiction or expertise to take action on cases where individuals are not directly under Agami Education Foundation or partner authority, but will do everything it can to raise to relevant authorities and ensure any action undertaken by others has the child's best interest at heart.</p>
Survivor	<p>"...a person who has experienced sexual abuse, exploitation, or harassment.</p> <p>The terms 'victim' and 'survivor' can be used interchangeably. 'Victim' is a term often used in the legal and medical sectors. 'Survivor' is the term</p>

	generally preferred in the psychological and social support sectors because it implies resiliency.” AEF uses the term <i>survivor</i> as part of our survivor-centered approach as it emphasizes the power of the individual, which the term ‘victim’ can remove, and their agency. However, it is important that those affected by sexual harassment, exploitation and abuse can choose the term they prefer.
Survivor-centred approach	“Recognizing that violence, particularly sexual violence, is carried out in order to remove the power of the person experiencing the harm, a survivor-centred approach works to place the power back with the survivor.” Survivor-centred approaches must consider the rights, choices, dignity, confidentiality, and safety of the survivor. This ensures that the survivor, their family, and their community do not come to any further harm as a result of having chosen to report an incident.
Trafficking	Trafficking is a process of enslaving people, coercing them into a situation with no way out, and exploiting them. People can be trafficked for many different forms of exploitation such as forced transactional sex, forced labour, forced begging, forced criminality, domestic servitude, and forced marriage, and forced organ removal.
Transactional sex	This is the exchange of money, employment, goods, or services for sex, including sexual favours. Transactional sex is strictly prohibited by Agami Education Foundation along with any other forms of humiliating, degrading or exploitative behaviour, including exchange of assistance that is due to rights holders. Agami Education Foundation does not make a judgement against rights holders or others who choose to take part in such transactions but recognises the inherently unequal power dynamic and so prohibits staff from exchanging money or anything else for sex.

Confidentiality

Confidentiality is vitally important to SHEA and Safeguarding. We are committed to working with survivors/complainants and all others involved in an incident management process in a confidential and respectful manner. Breaches of confidentiality undermine confidence and trust in Agami Education Foundation’s safeguarding and complaints management processes and in the organization itself. Maintaining confidentiality around people’s personal data and information is particularly important when managing issues relating to sexual harassment, exploitation and abuse and is part of living out our survivor-centered approach.

From the point of disclosure to the final outcome of any investigation, every effort will be made to maintain and promote confidentiality in order to protect the safety and privacy of everyone involved.

Information must be shared on a need-to-know basis – that is, only those who need to be informed so they can support an investigation or because they hold overall accountability will be given information, and they will receive only as much information as they need in order to be effective.

If information is shared confidentially which relates to a child or suggests that someone’s life is in

danger, then action will need to be taken outside of standard confidentiality procedures in order to ensure that everyone is safe. This will be managed on a case by case basis, and the safety and wellbeing of the child in question is always paramount. As noted above, only those who need to know will be informed so they can take effective action.

3.1 Data Protection

Agami Education Foundation will ensure that it complies with local and international data protection laws when gathering, storing, or sharing any data relating to individuals and SHEA and Safeguarding (e.g. in our fundraising, communications, and incident management approach), and will follow the Data Protection policies owned by the Digital and Technology Team and guidance on retaining data on SHEA and Safeguarding incident management that is issued by the AEF SHEA and Safeguarding Team. Any breaches of Agami Education Foundation's data protection guidelines, particularly if they put individuals at risk, will be treated as serious misconduct.

Working with partners

Agami Education Foundation will work collaboratively with partners to create safe working approaches that uphold the rights of all. Building on Agami Education Foundation's Partnerships Framework, engagement with partners on safeguarding will be based on mutual respect and learning.

Agami Education Foundation will work with partners to create programmes and operational approaches which uphold the rights of staff, community-members, rights holders and children at all times.

Agami Education Foundation partners must abide by Agami Education Foundation's Code of Conduct and all SHEA and safeguarding related policies. All memorandum of understandings (MoU) with partner organizations and consultancy agreements with consultants and suppliers should include this policy as an appendix when starting any project. Breaches can lead to termination of contractual and/or partnership agreements.

Agami Education Foundation will work with all partners to ensure they receive training on Agami Education Foundation's SHEA and Safeguarding policies and approach, and to ensure that spaces are created to share knowledge on best practices to address child abuse and recognize the expertise of our partners in this area as well as our own approach.

Staff working with partners must ensure that partner organizations and their staff and other representatives sign up and abide by the Agami Education Foundation Code of Conduct. Agami Education Foundation must work with partners to carry out SHEA and Safeguarding risk assessments and/or ensure that partners carry out their own SHEA and Safeguarding risk assessments.

Agami Education Foundation partners, by the nature of their work, interact with children and will therefore be aware of sensitive information concerning children. Agami Education Foundation will work with partners to ensure that partners have a robust reporting mechanism for partner staff and children to access. Agami Education Foundation and partners must have agreements in place to ensure that concerns relating to SHEA and Safeguarding (for partner staff and children) are shared through designated roles to maintain confidentiality.

Concerns regarding partner staff members must be reported immediately via the reporting mechanisms. If Agami Education Foundation receives a complaint about a member of staff at a partner organisation, Agami Education Foundation will risk assess informing the partner with the aim of working with the partner to ensure this is responded to quickly and appropriately in line with Agami Education Foundation's policies and values. Agami Education Foundation will support a partner's capacity to manage a concern, for instance, if the partner is engaging well but does not yet have the resources to respond. If appropriate, concerns will be managed through a joint process or by Agami Education Foundation if appropriate. If there is reason to believe that a complaint has been dealt with inappropriately or inadequately by a partner, Agami Education Foundation must consider whether they

will withdraw funding or end the relationship.

Safer recruitment and employee lifecycle

In line with best practice, stringent recruitment processes will be put in place to ensure that staff/representatives share our values and in order to reduce the likelihood of engaging someone who may pose a SHEA or safeguarding risk to the communities we work with, and to staff and other representatives within the organization. The following steps must be included in all Recruitment and Selection procedures:

Job adverts and job descriptions clearly detail any role responsibilities relating to children, and the organisational values and commitment to SHEA and Safeguarding. The job description is to be used as the primary basis of assessing an applicant's abilities.

All interviews will include questions that assess an applicant's understanding of SHEA and Safeguarding (including child safeguarding) and assess their ability to reflect on Agami Education Foundation's values and feminist approach.

Interviews for positions that involve working with children must include behavioural based questions that assess the candidate's suitability to work with children.

Gaps in employment and/or education history will be discussed at interview.

Agami Education Foundation will not knowingly appoint any person with a history of perpetrating any form of sexual harassment, exploitation, and abuse, e.g. child abuse, or Gender Based Violence. Agami Education Foundation will ensure that recruitment of staff and other representatives will include reference checks (written and verbal where necessary).

Consent will be sought from the successful applicant to request two references, including one from their most recent employer (or place of education), which provides, where permitted, the reason for leaving, and where appropriate, whether the candidate is suitable to work with children.

Relevant police/criminal records checks must be carried out in line with country requirements, as appropriate. Staff and other representatives in roles that involve having direct access to rights holders and community members, particularly children, will require a self-disclosure of any convictions (relating to child abuse in any form) prior to interview stage and a criminal record check, wherever this is obtainable.

This also applies to staff changing role internally, and those who are likely to be deployed, in which case a check should be completed in advance. In countries that have a database of sexual offenders or people not suitable to work with children, those too will be checked.

Proof of identity should be confirmed at the interview stage, and a hard copy added to the staff file.

The Code of Conduct and the SHEA and Safeguarding overarching policy are included alongside the offer letter to all new staff and representatives. The Code of Conduct must be signed by all staff and other representatives before commencing duties.

HR staff drafting employment contracts should, where possible under national law, include a clause that specifies the staff member can be dismissed if they are found to have breached this policy or AEF's Code of Conduct.

All performance management processes and appraisals must include an assessment of how the individual upholds Agami Education Foundation's values and how SHEA and Safeguarding intersects with their work.

It should be ensured that exit processes are carried out in person or remotely, learning is recorded and acted upon as appropriate, and any SHEA and Safeguarding concerns raised at this stage are addressed appropriately.

It should be ensured that references are provided in line with our HR policies, and that information on staff SHEA and Safeguarding misconduct/disciplinary proceedings is shared with the prospective employer in line with AEF best practice and our HR procedures.

It is recognized that it may be difficult or impossible to obtain police checks, statutory declarations of previous convictions, and references in some operating contexts, or that time constraints in humanitarian contexts may justify the need to start work before obtaining the outcome of the police checks. In such instances, other checks must be put in place. Recruiting managers must ensure they put in place all reasonable steps to manage risk including extensive questions on safeguarding and Agami Education Foundation's values at interview, and a more intensive form of reference check (e.g. mandatory written submissions and telephone conversations with referees). Line managers and HR should also use the probationary period to observe the employee for any signs of policy violations that should be dealt with expeditiously and in accordance with this policy.

Where police checks/references raise concerns about the suitability of the candidate and Agami Education Foundation takes the decision whether to proceed with the recruitment; justification for the decision to proceed must be recorded in the HR files and signed off by the Country/Executive Director and by Cluster Directors in the General Secretariat.

Induction

The SHEA and Safeguarding Focal Point and HR will ensure all joining staff and other representatives have an induction on Agami Education Foundation's SHEA and Safeguarding approach and this policy **no later than one month** after they have been appointed. It is the responsibility of the individual's Line Manager to ensure that this briefing is carried out. Depending on the nature of the role, more extensive inductions on Agami Education Foundation's SHEA and Safeguarding approach and country-specific risks and challenges should be carried out.

Training

Regular training and refresher courses on SHEA and Safeguarding must be planned and delivered for all staff and partners on a regular basis. This can include but is not limited to:

AEF's SHEA and Safeguarding policies

AEF's Code of Conduct as part of our commitment to working with staff and other representatives to transform our working culture

International and local laws relating to sexual exploitation and abuse, including child abuse

Information on how to recognise sexual exploitation and abuse, including child abuse

Information on how to report sexual exploitation and abuse, including child abuse

All programmes must establish a training programme, including stand-alone and refresher training on Agami Education Foundation's SHEA and Safeguarding approach so that all staff receive at least one SHEA and Safeguarding training per year, with further training for specific teams as required. Evidence of training must be captured and retained (e.g. training attendance records, training materials). Informal discussions in team meetings are also encouraged. Further communications on Agami Education Foundation's SHEA and Safeguarding approach could include information campaigns, regular updates on new developments in the sector, or policy revisions.

Further specialist SHEA and Safeguarding training will be provided depending on the nature of the work being undertaken, the context, donor requirements, and where staff and other representatives are in contact with children or other vulnerable populations, such as displaced communities. The SHEA and Safeguarding Focal Point, in line with the AEF's SHEA and Safeguarding Team, will work together to identify and address these needs.

Safer programming

Agami Education Foundation recognizes that safeguarding children must be integral to its humanitarian, resilience and wider development work. All programme activities must be carried out in a way that ensures the rights, dignity and empowerment of children and recognizes their agency, individuality, and value.

We must recognize that rights holders and communities, including children, can be harmed as a result of poorly designed programmes and projects, and related activities. Staff members/representatives responsible for programme or project design and implementation must ensure that SHEA and Safeguarding is accounted for at all stages of the programme/project cycle. It is important for safer programming measures such as risk assessments to be carried out even for programme activities that do not explicitly engage with children.

Internal misconduct can affect our programming, as an Agami Education Foundation staff member or representative's behavior towards colleagues can indicate the level of risk towards rights holders, at risk groups including children, and the communities in which Agami Education Foundation works.

It is to be ensured that SHEA and Safeguarding is embedded into the entire programme cycle, from design to conclusion, and that budget is included for Child Safeguarding activities.

It is to be ensured that active participation of rightsholders takes place in assessing, planning, implementing, monitoring and evaluating programs through the systematic use of participatory methods; Recognise that sexual exploitation and abuse is often grounded in gender and other inequalities, Agami Education Foundation will ensure that development and humanitarian activities are conducted in a gender-sensitive manner, drawing on intersectional feminist analysis. This will include:

Ensuring that the programmes are designed in an inclusive way and with a safety and child rights lens so that those who are most marginalized can access the programme and realize their rights.

Creating separate spaces for children, young people, women, men, transgender and gender non-binary people to raise concerns and share ideas;

Creating safe spaces for consultation and monitoring of programme activities based on strong contextual intersectional feminist and power analyses;

Having a clear risk assessment in place for all programmes outlining sexual exploitation and abuse and safeguarding risks within the programme and putting in place measures to address these in programme plans (e.g. looking at where and when activities take place, assessing staff and representatives including drivers, partners etc for awareness of risks, ensuring services are safe and accessible etc.).

As programmes close, embed SHEA and Safeguarding into exit strategies and monitoring and evaluation processes to ensure that learning has been documented and taken on board, and any concerns that exist can be addressed.

All development and humanitarian programmes will include community-based complaints mechanisms and reporting processes that are designed in collaboration with communities. A complaints mechanism should be set up to receive both safeguarding and non-safeguarding related concerns. Child friendly community-based and young people friendly complaints mechanisms should also be accessible to children and young people to raise concerns.

We must enable concerns to be raised internally and externally, be transparent and accessible to the communities being supported, and ensure that concerns are responded to in a timely and robust manner.

It should be ensured that this policy is in place, translated into a local language and communicated to and understood by Agami Education Foundation staff and other representatives, and the communities we work with.

It will be ensured that all responses are developed in a manner that balances respect for due process with prioritising the safety, dignity and rights of survivors;

PSEA will be Integrated and mainstreamed into all development and humanitarian work. In addition, stand-alone protection programming will be promoted in humanitarian settings with clear

complaints mechanisms;

It will be ensured that assistance for those affected is carried out in line with Agami Education Foundation's survivor-centred approach

It will be ensured that all staff and other representatives recognize their responsibility to maintain an environment that is free of sexual exploitation and abuse and to report any abuse they suspect or witness, whether within Agami Education Foundation or outside, in line with the reporting protocols outlined in this policy;

With the programmes evolving into digital spaces, it will be ensured that staff and representatives' behavior reflects Agami Education Foundation's values, adheres to the Safeguarding policies and Agami Education Foundation's Code of Conduct.

Ensure that a copy of this policy will accompany all partner MOUs and discussions held with partners to further embed understanding and compliance.

Agami Education Foundation recognizes that there may be programmes where risks may be heightened e.g. short-term humanitarian projects; in these instances, rigorous safeguarding measures will be put in place, appropriate to the context, e.g. training, regular reviews, displaying messages that humanitarian aid is free, working with partners to ensure safer recruitment and generally incorporating safeguarding into wider response work.

While programming with children, it needs to be ensured that children are informed about their rights and on how to raise concerns. This can include content on safe/unsafe touching, appropriate and inappropriate behaviours, consent, and regarding spotting and reporting signs of abuse. It is to be ensured that staff and all other representatives are informed that Agami Education Foundation has raised awareness with children about consent and appropriate behaviours so that they are aware that children are encouraged to report. During online programming with children and young people, it is to be ensured that all programmes and activities are designed with a child safety lens so as not to cause intended or unintended harm to children and digital safeguarding measures must be in place.

It is required to work with partners to ensure they practice safer recruitment.

Risk assessments

Risk assessments help identify areas in programme or project design where there is risk of abuse or exploitation taking place, or not being responded to adequately. Safeguarding risk assessments must be carried out at the organisational and project level and integrated into the organisational risk matrix. Agami Education Foundation must work with partners to carry out SHEA and Safeguarding risk assessments and/or ensure that partners carry out their own SHEA and Safeguarding risk assessments. Risk assessment should be carried out at the project inception stage and regularly reviewed as part of standardised monitoring activities and monitored by the Senior Management/Leadership Team and the Board.

Efforts should be made by all parties concerned to reduce the identified risks: mitigation strategies must be developed and be incorporated into the design, delivery, and evaluation of all programmes, operations, and activities which in any way involve or impact on children. If this is not possible then the programme/activity should not proceed. AEF Programmes and Agami Inc. Hubs are encouraged to develop risk assessment checklists that are relevant to their contexts and put in place risk mitigation plans at the programme design stage.

Complaint's mechanisms

As part of embedding SHEA and Safeguarding into all programme design and activities, complaints mechanisms must be established in order to ensure that children are able to raise concerns.

A child friendly community-based complaints mechanism is a reporting procedure that is accessible to

children and enables them to raise concerns. They are created with children and are informed by children's ideas about their needs. Child friendly complaints mechanisms uphold the rights and voice of children by providing opportunities and platforms for children to be heard.

Staff/representatives should work in a participatory way with children to create, strengthen, and evaluate existing complaints mechanisms in line with best practice, and ensure that the mechanisms used are relevant to the local context, translated into local languages, and made publicly available (e.g. published on the website). As part of our commitment to accountability, staff and representatives must ensure that policies and procedures are shared with rights holders and community members so they can provide feedback and be instrumental in developing our approach.

The SHEA and Safeguarding Focal Point will work with relevant teams to ensure that any complaints mechanisms are accessible, inclusive, survivor-centred, and relevant to the local context (e.g. to ensure that people with disabilities are able to access complaints mechanisms and report concerns). It is critical that any complaints mechanisms provide a variety of ways of reporting (recognising that many people prefer to disclose allegations of abuse or exploitation to someone they trust) and that people are assured of confidentiality.

Staff and representatives should work with relevant internal teams and with children to build child-friendly complaints mechanisms to ensure that children are able to raise concerns and have a voice in how safe spaces are created.

Community-based complaints mechanisms ensure that communities can raise concerns about Agami Education Foundation staff/representatives/processes. Communities can use community complaints mechanisms to raise concerns and report incidents of sexual exploitation and abuse. They help to create a strong culture of accountability; enable us to improve the quality, impact and effectiveness of our programmes; and ensure our programmes are safe.

All complaints mechanisms must be established under the principle of 'do no harm'. They must be safe and accessible to use, ensure confidentiality, and not put children and others at risk of harm.

Complaints mechanisms must be inclusive and ensure that diverse groups of children and young people can safely access the mechanisms and are not excluded from these processes, including those who are traditionally marginalized (for example, children with disabilities, children from minority ethnic groups, LGBTQI children).

Staff and representatives must be trained on managing complaints procedures involving children to ensure they have the skills and competencies to take complaints of abuse and exploitation from children and that they do this with sensitivity and care, and do not bring any bias or prejudice to those interactions. Agami Education Foundation must continually assess the effectiveness of complaints mechanisms and request feedback on these, as part of our accountability to those we work with. Staff/representatives will be accountable for ensuring that cases are referred and that records are kept securely, in line with our data protection approach.

Alongside developing complaints mechanisms, staff, representatives, and partners must continually engage with children about Agami Education Foundation's values, what behaviour is and is not appropriate, their rights, and how to report concerns.

Monitoring and Evaluation

As part of embedding SHEA and Safeguarding into all programme design and activities, staff and representatives must ensure that all monitoring and evaluation activities address SHEA and Safeguarding considerations and that data is analysed and shared so that lessons can be learnt and good practice disseminated. It is necessary to make sure that Monitoring and Evaluation activities such as complaints mechanisms, focus groups, and surveys are suitable for completion by children, that interviews are conducted sensitively, and parents and care-givers are involved where appropriate. From initial needs assessments to final project reports, Monitoring and Evaluation is a vital part of safer programming and ensuring safe outcomes for children.

Safeguarding and information technology

Technological development has increased the possibilities for risk of online sexual harassment, exploitation and abuse of **children**. Social media and technology evolve rapidly and so we must remain vigilant to ensure that alongside the positive aspects of engaging via different technologies, online platforms and digital spaces, we recognise these provide opportunities for inappropriate contact with children (and others) and we must put safeguards in place.

Staff or other representatives who provide children with access to computers as part of an Agami Education Foundation programme or who engage with children and young people on online platforms and digital spaces to facilitate online programmes and activities, must ensure that children and young people know how to use them safely and are able to report any online concerns in order to mitigate the risk of online sexual exploitation and other harmful behaviours.

There are a range of risks to children and young people in the online context. These include:

Contact Risks – children and young people can be at risk of contact behaviours such as bullying or grooming

Content Risks – children and young people can access content that is discriminatory, violent, sexual or extremist

Conduct Risks – young people can adopt risky behaviours such as creating their own sexual content without recognition of the impact (e.g. sexting, sending images of themselves to others) or bullying another young person

Programming with young people and children

When carrying out programmes with young people and children, all activities should be designed to promote the empowerment of young people and children to realise their rights and reach their full potential. Any decisions made about young people must be made as far as possible with their participation. Throughout any actions or activities, the wellbeing of the young person(s) is paramount. Agami Education Foundation recognizes that young people and children are not a homogenous group – we are committed to ensuring that our safeguarding work is done collaboratively with young people and children, and that we take an inclusive approach at all times. This includes recognising that some young people and children will be particularly at risk of experiencing harm, and that we have an additional duty to work with them to mitigate these risks.

It is important that young people and children have the opportunity to participate in risk assessments concerning any activities in which they will be involved. In such risk assessments, young people and children should be encouraged to discuss the social, cultural and political context as well as the individual situation of the young people and children engaging with Agami Education Foundation. This should include (but is not limited to) risk factors relating to race, ethnicity, gender identity, sexual

orientation and political affiliation.

When carrying out content gathering or research involving young people under 18 years old then informed consent of a parent/legal guardian must be obtained before any action is carried out. Informed consent ensures that the parent/legal guardian and young people understand how their images, stories and videos will be used by Agami Education Foundation/representatives of Agami Education Foundation. The parent/legal guardian and young people must also understand who will be the audience of the images, stories, and videos that they will share. Once this is understood, then they will be able to understand and provide their informed consent for usage. Only those images will be used for which we have consent. However, even when informed consent is obtained from parents/legal guardians, young people must have the right to refuse to take part. This option must be made clear to them. We must respect their decision to say no and make it clear that there will be no negative repercussions from denying consent. Young people reserve the right to remove any images or stories relating to them from public view at any stage and should be made aware of this.

Young people should not undertake activities supported by Agami Education Foundation if:

They are of compulsory school age and this involvement would or could harm school attendance or academic performance

It is deemed to put them at risk of violence (e.g. gender-based violence, political violence)

It involves a risk to their health (e.g. a risk of accidents which they are unlikely to recognise due to lack of previous experience)

Any other restriction specific to local legislation exists

It needs to be ensured that young people are informed about their rights and how to raise concerns. As a preventative measure, when working with young people include content on safe/unsafe touch, appropriate and inappropriate behaviours, consent, and about spotting and reporting signs of abuse. Ensure that staff and all representatives are informed that Agami Education Foundation has raised awareness with young people about consent and appropriate behaviours so that they are aware that young people are encouraged to report.

Content gathering

Agami Education Foundation's duty of care towards children and young people also exists in the process of gathering, aggregating and publishing any communications that could expose them to risk.

A risk assessment must first be conducted to assess whether and how to tell the stories and anonymise the identity of any child who is identified as:

A victim of sexual abuse, exploitation or abduction, to include girls/boys who have experienced sexual abuse (e.g. sexual abuse, rape), child marriage, a child who had a child while under 18 years old

A perpetrator of physical or sexual abuse

Living with any illness, condition or identity that is known to attract social stigma locally, in their country or internationally– unless in carefully considered contexts the child and legal guardian are certain they want to provide these e.g. in promoting the work of a centre for children of sex workers, or an orphanage.

Charged or convicted of a crime

A child combatant or former child combatant.

These stories should be told through illustrations and animations and not through child actors.

Should a child actor be used to tell the story, the risk should be assessed, and the filming closely

monitored, putting the child's wellbeing first. Psychosocial support should be provided to the child actor when necessary. To protect wellbeing, use of actors is discouraged and preference should be for illustrations and animations to tell these stories.

The following are practices that staff members/representatives must follow in the collection, storage and dissemination of communications material concerning children:

The child's best interests must always be the primary consideration, and they must be in a safe and conducive environment protected from any kind of abuse.

Data will be gathered, stored, and shared in line with local and international data protection laws. Agami Education Foundation will use testimonies, video and photos for 5 years after which we will contact the rights holder to obtain renewed consent in order to continue using the content. Content will be stored securely in line with data protection standards.

The content gathering must always be a positive experience for the child, providing a potential for learning and enjoyment.

It is to be ensured that full parental or legal guardian informed consent is received before gathering or using any content relating to children (e.g. interviews, images or footage of children) and that they understand the purpose of this activity and how their testimonies, images or footage will be used without posing any risk to the child.

The Child's free, prior, and informed consent should be sought where possible. A reluctant child should never be photographed, videographed or interviewed, even with parental or legal guardian consent. The child needs to fully understand why they are being interviewed/photographed. For example, you could show examples of how their photos could be used.

When children/young people are heads of a household or already married or parents before the age of 18, the child's/young person's fully informed consent must be obtained, and they should sign both the child and adults' section on the consent form.

A content should never be gathered that could shame, humiliate or degrade the child, put them at risk immediately or at a later date, or perpetrate any form of emotional abuse, discrimination and exploitation.

Children should never be depicted in sexual or sexualised, undignified or provocative poses or contexts. Images of children should never be taken with no clothing, appearing to be wearing no clothing or wearing transparent clothing. Do not take any such pictures with the intention of blurring naked areas or using props or photo manipulation to cover naked areas later. Pictures should never be taken of full-frontal nudity and no genitals, nipples or naked bottom clearly visible; any partial nudity is appropriate to age and gender and relevant to the context and Agami Education Foundation's work.

A child should never be used to promote the Agami Education Foundation brand, e.g. by taking an image of them holding up a banner of our logo – this doesn't apply to our logo being present in the background e.g. on a sign or a sticker on an item.

Payment and/or gifts must not be given following content gathering as it can be confused with payment for information.

All content gathering should be carried out by authorised staff or representatives who must be trained on SHEA and safeguarding. Training should include safe content gathering and ensuring that support systems are available for authorised staff/representatives who may be required to collect distressing content. Because of the risks that can result from content being gathered and shared outside of Agami Education Foundation's procedures it is strongly advised that no photos/videos are taken by staff, partners, volunteers or visitors to a programme for personal use. All visitors must receive a pre-travel briefing on Agami Education Foundation's approach to content gathering and our rights and risk based approach to increase understanding of why we take this stance. If an individual wants to take or share any photos for personal use this must be authorised by an appropriate Agami Education Foundation staff member or representative (e.g Communications Lead, SHEA and Safeguarding Focal Point) prior to any action being taken. They must ensure that any content is taken in line with Agami Education

Foundation's approach and will be guided at all times by the advice and permission given by the relevant Agami Education Foundation staff member or representative. To avoid the risk of children or others being identifiable and/or put at risk, where possible only Agami Education Foundation devices should be used to take photos and videos; devices should be encrypted and meta-data such as GPS should be removed, and content should be gathered, in a way that does not identify the location of the child.

If a contractor is used to gather content, they need to have a contract with Agami Education Foundation and have been briefed on this policy, and have signed Agami Education Foundation's Code of Conduct. They must understand safe content gathering processes including being required to assess SHEA and safeguarding risks before gathering the content.

Emergency response

Emergencies cover a wide range of events, from environmental disasters to politically driven, religious or ethnic conflict. Children are often at much greater risk of violence, abuse and exploitation during and after emergencies particularly due to their age and developmental stage.

During emergencies there is the increased risk of exploitation/abuse by staff, partners, and other representatives (e.g. from a sudden increase in recruitment, agreements being established with new partners quicker than usual). The following provisions during emergencies must be carried out to mitigate risk:

Ensure that Agami Education Foundation's *Child Safeguarding Policy* is in place, translated into a local language and communicated to and understood by all people connected with Agami Education Foundation during an emergency. This includes carrying out training, as appropriate, to ensure all Agami Education Foundation staff and other representatives are aware of our approach. This should be done as soon as is reasonably possible, and within 2 weeks at the latest. Referral and support mechanisms must be mapped as soon as possible. The Emergency Programme Manager and SHEA and Safeguarding Focal Point are responsible for identifying the relevant statutory authorities (such as the police and/or social services) and other referral mechanisms in the country. An emergency mapping exercise should be carried out with support from the Protection Cluster

HR will follow safer recruitment and selection procedures as far as possible during an emergency. For example, asking questions around protection of children for those working directly with children and communities.

Carefully check offers of assistance (e.g. from new staff, partners, and volunteers). Where it is not possible to check backgrounds put measures in place to prevent abuse and exploitation, including carrying out risk assessments, carrying out regular 'spot' checks, ensuring that individuals are not alone with groups of children or have one-to-one time with children.

Fundraising

School programme

All School programme activities must be carried out in a way that ensures the rights, dignity and empowerment of children and recognises their agency, individuality, and value.

All staff members/representatives must take adequate time to explain to the child the meaning and purpose of all activities so that the child understands and gains confidence from how this will contribute to the development of their community. They must explain how the School programme process works and how the child and their community will benefit from the program.

It is to be ensured that parental or caregiver consent is received when children are involved in a

programme event (e.g. workshops, campaigns, educational trips), or enrolled in the School programme and encourage parents or care-giver participation, if there any event organized for parents, All staff members and representatives involved in School programme activities (i.e. message collection, story collection, video & photo-taking) shall endeavour to make it a positive experience for the child with potential for learning and enjoyment.

Staff members or representatives must take time to explain to a child when their sponsor stops their support or withdraws out of the school programme. Staff/representatives must also take time to explain to a child when they are withdrawn from the school programme because of unforeseen events in the child's life. When a withdrawal of a child is because of child marriage, child labour or early pregnancy, countries shall put measures in place to follow up with this child and offer support within the child's best interest.

The consent of the child and parent/legal guardian must be taken in line with agreed standards in using the consent form.

Visits

Supporters, donors and other visitors should receive a briefing on our values and Agami Education Foundation's Code of Conduct (with a copy to be signed), *Child Safeguarding policy*, and our SHEA and Safeguarding approach (including instructions on content gathering, appropriate behaviours and how to raise concerns) before any visit.

Supporters and donors will be required to go through and pay for a criminal background check by the Agami Inc. and AEF's relevant authority, they are associated with, should they wish to visit a school child in an Agami Education Foundation supported school.

Funding Affiliate (Agami Inc.) should advise supporters against posting any photo or details of their sponsored school child on any social media. This is for the sake of protection and privacy.

Agami Inc. should advise supporters against interacting with sponsored school children and their family through social media. Interactions with sponsored children and supporters should always be through Agami Education Foundation/Agami Education Foundation representatives.

The Agami Education Foundation hosting the supporter or donor is not permitted to leave a child unattended with the supporter or donor.

A child should not be taken to where the supporter is located, instead, the supporter should visit the child and their family in a public place with Agami Education Foundation staff in attendance

If a donor wishes to gather their own stories or visual content from a child or community, they need to work in close coordination with AEF staff and follow Agami Education Foundation guidelines for doing so, all outputs need to be agreed from the start and outputs will be signed off by Agami Education Foundation. An Agami Education Foundation staff member needs to be present at all times.

A donor or supporter should always be accompanied by an Agami Education Foundation staff member while visiting a child.

With the increased use of digital spaces and information technology, 'virtual visits' may be considered where supporters are unable to physically visit their sponsored children. Digital SHEA and Safeguarding measures must be put in place to enable 'virtual visits' between supporters and their supported children to take place safely. This will always include an Agami Education Foundation staff member being present with the child during the virtual call and in a public space. These activities must be guided by the SHEA and Safeguarding Focal Point, and Safeguarding Team, and with IT and digital colleagues.

If a donor or supporter is in breach of the Child Safeguarding Policy, action may be taken against them including being suspended or permanently removed from the school programme.

Reporting procedures

The Code of Conduct states that it is the duty and the responsibility of all staff and other representatives

to report any suspicions or incidences of sexual harassment, exploitation and abuse. This applies to Agami Education Foundation staff and representatives including (but not limited to) partners, volunteers (including board and assembly members), consultants, and contractors/suppliers/vendors. This is a key way to challenge inappropriate behaviors and help create a safe work environment. Failure to report to an appropriate person is a breach of Agami Education Foundation's Code of Conduct, and this policy, and could lead to disciplinary action being taken.

If any Agami Education Foundation staff or other representatives have concerns that a rights holder or community member, including adults at-risk, has been or it at risk of being abused, exploited, or harmed in any way **they must report this immediately.**

If any Agami Education Foundation staff or other representatives have concerns that this policy may have been breached, they must report this immediately.

In line with Agami Education Foundation's survivor-centered approach, individuals do not have to report about something that they have experienced.

If you have experienced harm yourself, you can choose if, when, and how you want to tell someone. If you choose to tell Agami Education Foundation what has happened to you, we will work with you to discuss your options and find you support.

Members of the public (e.g anyone external to Agami Education Foundation) can also raise concerns about Agami Education Foundation staff using the reporting procedures below. If the allegation does not relate to Agami Education Foundation, such as harm carried out during the course of a staff member's work, then Agami Education Foundation will look at how best to safely respond (including raising with external agencies better able to support), and will take any action with the best interests of the survivors in mind.

Concerns raised about ex-Agami Education Foundation staff/representatives (e.g people formally employed by Agami Education Foundation in any capacity) will be addressed as far as possible, recognizing potential legal challenges to such processes.

Agami Education Foundation staff members and other representatives can report SHEA and Safeguarding concerns in their Agami Education Foundation to any of the following channels in person, via email, or telephone:

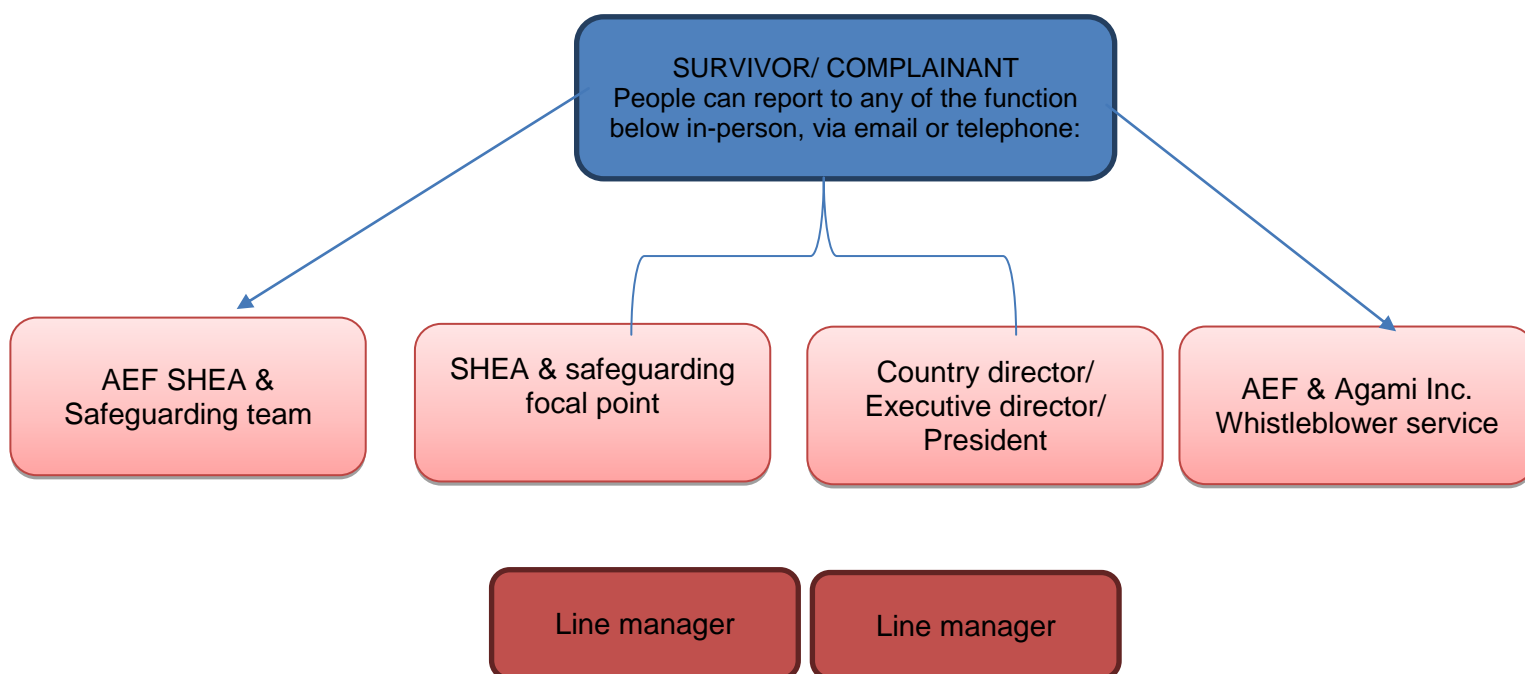
SHEA and Safeguarding Focal Point
SHEA and Safeguarding Stakeholder Panel members
Executive committee (eg. SHEA and Safeguarding EC Lead)
Country Director/ Executive Director/ President
Line Manager
HR Representative

If Agami Education Foundation staff or representatives have concerns about first reporting in office or if

they want to raise concerns (i.e. appeal against) how a process has been managed in office, they can report directly to:

Agami Education Foundation SHEA and Safeguarding Team (Email ID)

Agami Education Foundation Whistleblowing Service (hotline no e.g. mob no or email id)



SHEA and Safeguarding Focal Points are responsible for reporting all concerns and complaints to the AEF SHEA and Safeguarding Team to ensure that the AEFI Team has oversight of all SHEA and Safeguarding concerns in the Agami Inc. The SHEA and Safeguarding Focal Point must complete a SHEA and Safeguarding Incident Reporting Form and send this to the AEF Executive committee's Focal person within 24 hours of a concern being raised, where possible. The AEF SHEA and Safeguarding Team will update the Agami Inc. case register and support the Focal Point and Agami Education Foundation on a case-by-case basis to respond to all concerns and complaints raised, and monitor action taken.

The Country Director/ Executive director/ President, through designated positions/teams, will work with the Agami Inc. SHEA and Safeguarding Team to ensure that donors and others (e.g. other Agami Education Foundation countries so that they can fulfill their own donor reporting requirements; statutory/regulatory bodies) are informed of SHEA and Safeguarding concerns, in line with the AEF Donor Reporting SOPs. Any breach of the SOPs will be raised to the CD/ president for action.

Any concerns raised relating to sexual exploitation or abuse of children by Agami Education Foundation staff or other representatives will be addressed as a priority, in line with our SHEA and Safeguarding approach. Agami Education Foundation will ensure that the safety, dignity, and rights of the survivor are respected at all times. There is no time limit on when someone can raise a concern about something they have experienced. There may be limitations in how a historical concern can be addressed but Agami Education Foundation will take every reasonable measure to address the concern. For example, by gathering any available evidence and contacting witnesses, where a risk assessment shows it is safe

to do so. We are committed to carrying out robust and fair investigations that protect the rights of all involved, with a particular focus on the survivor/complainant and the subject of the complaint, ensuring that confidentiality is maintained and that the wellbeing of all is protected.

As part of our survivor-centred approach, survivors/complainants can choose if, when, and how to make a report and decide whether they want Agami Education Foundation to take formal action. However, there may be occasions where Agami Education Foundation has a duty of care to respond even if the survivor/complainant does not want to take forward action. This will be managed on a case by case basis and the decision will be made by the SHEA and Safeguarding Stakeholder Panel, in conjunction with the AEF SHEA and Safeguarding Team. This will only be done following clear risk assessments, analysis of the age and agency of the survivor (as decisions may need to be taken on behalf of children, working with their care givers) and will always ensure that the safety and wellbeing of the survivor/complainant is paramount.

Cases relating to children must be treated with urgency, and in line with national laws that regulate reporting of child abuse allegations. Agami Education Foundation Countries should have clearly marked referral pathways including established procedures for how child abuse cases will be handled from the time they are reported until when handed over to a service provider. The established procedures should reflect the national laws and policies on response to child abuse cases. The following are some key guidance questions when developing the procedures:

Who is required to report cases of child abuse?

Who are the officials designated to receive such reports?

When is the obligation to report triggered (i.e. at suspicion of abuse?)

What information needs to be shared?

What are the reporting regulations regarding timing and other procedures?

How is confidentiality protected?

What are the legal implications of not reporting?

While taking actions on behalf of children, it should be ensured that their best interest is always the primary consideration even in the context of mandatory reporting laws and policies. The child and their caregiver should also understand what is happening and why. The child can be asked a few questions relating to the subject to determine their ability to comprehend what is happening but care should be taken to avoid distressing or overburdening them with decision making that is beyond their capacity. Any contact with a child to discuss a case should be taken by specialists and under the advice of the SHEA and Safeguarding Focal Point and AEF SHEA and Safeguarding Team. Children should be given a chance to respond and express their thoughts as decisions are made concerning them.

All staff and other representatives are required to report if:

They become aware that a child is experiencing or at risk of experiencing sexual exploitation or abuse - whether carried out by Agami Education Foundation staff and representatives, or others.

A staff member or other representative suspects that someone connected to Agami Education Foundation is or maybe about to carry out sexual exploitation and abuse towards children.

A staff member or other representative suspects that someone external to Agami Education Foundation (e.g. a Teacher or Community Leader) is or maybe about to carry out sexual exploitation or abuse towards a child. This is not a breach of this policy as the harm is not carried out by staff/representatives. However, as part of our commitment to eradicating violence and ending poverty, we still have a duty to report such concerns. This must be reported to the SHEA and Safeguarding Focal Point and Country Director/ Executive Director/ President, who has overall responsibility for referring this to an external agency so that this can be safely addressed.

Agami Education Foundation is committed to creating a working culture in which everyone feels safe to raise a concern. If a staff member or other Agami Education Foundation representative **does not** report an incident or suspicion, they will be in breach of the Code of Conduct and may face disciplinary proceedings.

Responding to concerns and complaints

The SHEA and Safeguarding Stakeholder Panel will oversee all concerns relating to children. They will ensure that:

Within 24 hours the concern is acknowledged and the SHEA and Safeguarding Focal Point (or another staff member as appropriate) will engage with complainant/survivor to ensure they are safe and their concerns are understood. The Agami Inc. SHEA and Safeguarding Team is informed so they can support as appropriate and manage donor reporting requirements.

Within 48 hours the SHEA and Safeguarding Stakeholder Panel meet to discuss the case.

The SHEA and Safeguarding Stakeholder panel will triage all cases to assess what action can be taken by Agami Education Foundation or other external bodies. Risk assessment carried out to address any immediate security or welfare concerns, and legal guidance sought. If the concern includes a partner organization, risk assess their involvement. If the matter is best addressed by an external body (e.g a Child Protection Authority) then they will refer the case to them and follow up on the process until it is concluded. If the actions on the case are led by another agency, the Stakeholder Panel will assess and carry out any actions that can be taken by Agami Education Foundation (e.g assessing recruitment practices or developing an action plan to prevent risks happening in the future). At all times the wellbeing of the child/young person will be paramount.

Our survivor-centered approach applies to our work with children and Agami Education Foundation will always try to ensure that the survivor is consulted and their wishes and concerns addressed as far as possible. However, there may be occasions where Agami Education Foundation has a duty of care to respond even if the survivor/complainant does not want to take forward action. This will be managed on a case-by-case basis and the decision will be made by the SHEA and Safeguarding Stakeholder Panel, in conjunction with the Agami Inc. SHEA and Safeguarding Team. This will only be done following clear risk assessments, analysis of the age and agency of the survivor (as decisions may need to be taken on behalf of children, working with their caregivers), and will always ensure the safety and wellbeing of the survivor/complainant is paramount.

There is no time limit on the activities of the SHEA and Safeguarding Stakeholder Panel. They must take action as quickly as possible to ensure they are managing risk and the rights of all involved. However, in line with our survivor-centered approach, timing will depend on the needs and wishes of the survivor and so no time limit is set for this stage. The Stakeholder Panel will keep the survivor and subject of concern updated throughout, and ensure they are supported.

Concerns relating to a child

Agami Education Foundation is not a child protection agency and does not have the expertise required to carry out investigations of child abuse itself. This will be carried out by external experts brought in specifically for this purpose. However, where the external response is unable to provide this specialized service or the service is not in place, then Agami Education Foundation may provide such services only as a last resort. For concerns raised relating to school authority, the AEF SHEA and Safeguarding team will work with Agami Inc. colleagues to address the concern appropriately and strengthen processes as appropriate.

Agami Education Foundation is committed to strengthening our approach to working with external actors and will ensure that support is given by referring all cases to appropriate professionals and

organisations. We will ensure that referrals are made to individuals and organisations that act in line with Agami Education Foundation's values and puts the welfare of the child as the highest priority.

What to do if you have concerns relating to a child's safety

The first priority is the immediate safety and welfare of the child.

Keep calm and act normally; do not say or show that you are shocked.

Do not investigate or question the child. If a child reports abuse directly to you, only ask questions to gather enough information so that you are sure you understand the complaint (e.g. 'who, what, where, when' questions) Do not ask 'why' questions as it can make a child fear you are judging or blaming them as this could stop them from speaking further or raising a concern

Never agree to keep a secret. If a child is in danger you will have to inform others. Staff and representatives cannot keep confidences when they involve concerns about a child. Any information offered in confidence to other Agami Education Foundation representatives relating to risks or concerns about a child should be received on the basis that it will have to be shared with the relevant person or people in authority.

Do not directly challenge parents, carers or teachers about your concerns.

Record all the details that support your suspicion and report this in line with the reporting procedures detailed in this section.

Security in SHEA and Safeguarding incident management

Recognising the inherent risk in addressing allegations of sexual exploitation and abuse, any internal responses to allegations of sexual exploitation and abuse must be carried out in line with Agami Education Foundation's security approach. Risk assessments must be carried out in incident management processes to help mitigate risks and protect the rights and safety of all involved.

Retaliation Against Complainants, Victims and Witnesses

Agami Education Foundation will take action against any staff or other representatives who seek to or carry out retaliatory action (e.g. intimidation, threatening behaviour) against complainants, survivors, witnesses or any others involved or believed to be involved in an incident management process. Staff who are found to have done this will be subject to disciplinary action, up to and including termination of employment.

False or malicious complaints

False or malicious allegations relating to child abuse are extremely rare. However, if a member of Agami Education Foundation staff is found to have made an allegation that they knew to be false they will be subject to disciplinary action, up to and including termination of employment. It must be noted that if a case is not upheld that does not mean that the complaint was false, rather that there was insufficient evidence or that, even if the complaint is found not to reach the threshold for sexual harassment, it may represent harassment or sexist behavior that is contrary to AEF policies and Code of Conduct.

Support Options

Agami Education Foundation does not have the expertise to provide professional support to child

survivors of abuse or exploitation. However, Agami Education Foundation will ensure support is given by referring the cases to appropriate professionals and organisations that act in line with Agami Education Foundation's values and puts the welfare of the child as the highest priority. As appropriate, Agami Education Foundation will ensure that support is offered to those involved in an incident management process, recognising the impact this can have, for example on witnesses and those accused of carrying out inappropriate or harmful behaviours. This can include specialist psycho-social counselling, medical support, legal support and/or access to other specialist and appropriate support as needed. Country Directors/ Executive Director/ Present must ensure there is budget available to provide support as needed.

In line with our survivor-centred approach, support will be offered to survivors and complainants, regardless of whether a formal response is carried out (e.g. an investigation). Survivors and complainants can choose if and when they would like to take up the support options available to them. Agami Education Foundation is committed to learning from survivors and being guided by them, where safe and appropriate to do so.

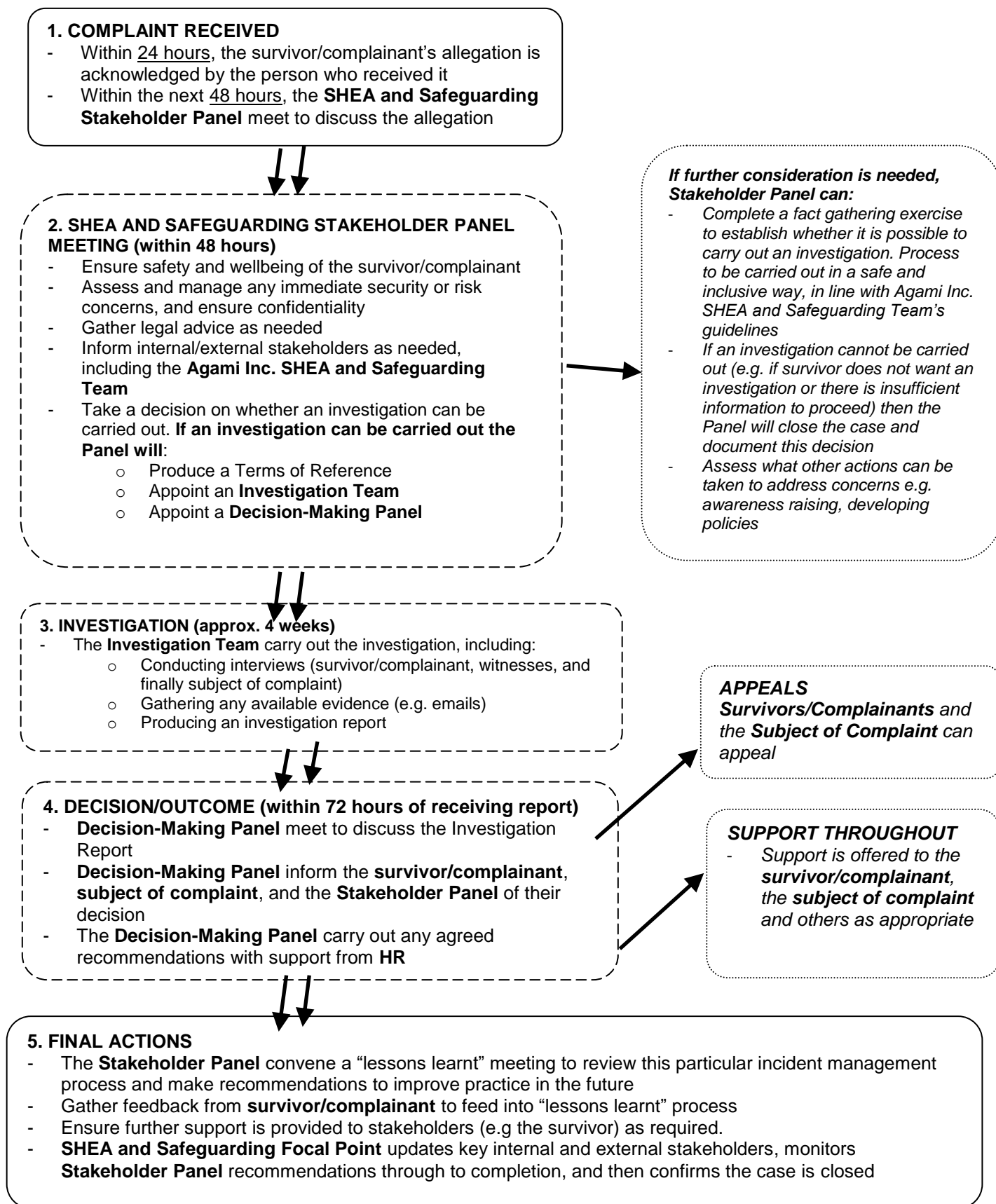
Agami Education Foundation is committed to working with schools, local NGOs and child rights groups to develop learning on safe, intersectional support options and ensuring that the support options offered to meet the needs of diverse survivors.

If you have any questions about support options, please contact your SHEA and Safeguarding Focal Point and/or the Agami Inc. SHEA and Safeguarding Team.

Further Reading

Agami Education Foundation Process Map for Donor Reporting on Sexual Harassment, Exploitation and Abuse (SHEA) and other Safeguarding concerns (child abuse and adult at-risk abuse)
SHEA and Safeguarding and Safer Programming in Agami Education Foundation's

Appendix 1 – Incident Management Flowchart



Appendix 2 – Indicators of child abuse

Listed below are a number of indicators of child abuse. These may vary between contexts and should be considered in relation to the expected norm. This is not exhaustive but is a guideline to help establish whether some form of child abuse or exploitation may have taken place.

If you have any questions about this, please contact the Agami Safeguarding focal person and SHEA and Safeguarding Team.

1. Indicators of possible emotional abuse

Physical

Persistent tiredness or lack of concentration
Frequent psychosomatic complaints (e.g. headaches, nausea, stomach pains)

Behavioural

Suffers from severe developmental gaps
Symptoms of depression, anxiety, withdrawal, or aggression
Overly compliant; too well-mannered; too neat and clean
Copying of negative behaviour and language used at home whilst playing
Attention-seeking and self-destructive behaviour, stealing, impulsive lying, self-destructive behaviour
Changes or regression in mood or behaviour, particularly where a child withdraws or becomes overly attached.
Nervousness, frozen watchfulness, Obsessions, irrational phobias, extreme inhibition whilst playing

2. Indicators of possible physical abuse

Physical

Unexplained bruises, cuts, burns, bites, or fractures, or other injuries especially in areas not normally exposed to falls, rough games etc

Behavioural

Wary of adults or of a particular individual
Violent towards other children
Dressed inappropriately to hide bruises or other injuries
May be extremely aggressive or extremely withdrawn
Cannot recall how injuries occurred or gives inconsistent explanations

3. Indicators of possible sexual abuse

Physical

Severe sleep disturbance, with fears, phobias, vivid dreams or nightmares, sometimes with overt or veiled sexual connotations
symptoms of sexually transmitted diseases or infections, or urinary infections

Unusual or excessive itching or pain in the genital, anal, or stomach area

Behavioural

Child who is sexually provocative with adults

Age-inappropriate sexual play through drawing, with toys alone, and with others

Preoccupation with sexual matters; bizarre, sophisticated or unusual sexual knowledge

Secretive comments and/or comments that allude to the behaviour of care givers

4. Indicators of possible neglect

Physical

Under nourishment and failure to grow

Constant hunger, stealing or gorging food

Untreated illnesses

Inappropriately dressed

Extremely dirty or unbathed

Inadequately supervised or left alone for unacceptable periods of time

Behavioural

Demonstrates severe lack of attachment to other adults or is very demanding of affection or attention

Poor social skills when interacting with other children and adults

Has no understanding of basic hygiene

Poor school attendance or performance

Appendix 3 – Content storage, distribution, and publishing

Storage

All content should be stored and shared using the Agami Education Foundation's and Agami Inc. database. For content that is not shared using these systems, remove any embedded metadata attached to a case study, photograph or video that could lead to the child's full identity and location being discovered.

Children should be identified by their given names, so long as this does not expose a child to risk. Changes to names should be made clear. A secure record of the actual name must be maintained, but never published.

All content concerning children is stored only on the Agami Education Foundation's and Agami Inc. database to provide security and effective controls over access and correct levels of information and to ensure that these principles and practices are adhered to. Content not yet stored on these two systems must be carefully stored on safe servers and access is limited to only authorised staff.

Adequate safety measures must be put in place for transporting content from the field. Such security measures must include encryption of data; ensuring laptops have strong passwords, not sharing passwords etc.

All content gathered must be assessed for appropriateness and context before it's approved for storage and sharing using authorised databased. Do not store or share any content that is graphic and distressing, shows a child who is naked or not fully dressed or images that appear to sexualise or

degrade children in any way.

Distribution and publishing

When publishing content the basic principle is to not provide too much information e.g. family name, exact location or school name which would allow the child to be identified and located by anyone with access to our communications materials. It is also necessary to be mindful of the effect. Where separate limited amounts of information can be aggregated to reveal direct identification and location e.g. the presence of an unnamed child in a photograph captioned with the mother's family name and separately a photo of the child captioned with her first name.

All forms of external communication whether it be media, marketing, donor engagement or social media need to adhere to the child protection policy and guidelines.

Staff and representatives should not post photos of themselves with children linked to Agami Education Foundation's work on their personal social media accounts, if they wish to show Agami Education Foundation's work, they should repost from the official Agami Education Foundation accounts.

Staff and representatives must not accept any friend requests from children engaged with Agami Education Foundation under any circumstances. Parents are asked to inform Agami Education Foundation immediately if it appears that a member of staff has accepted a friend request as it may be someone pretending to be associated with Agami Education Foundation.

All content posted online should have downloads disabled.

Publications in any media must never include a child's full name, school or precise location that could lead to the identification of a child. Location should be kept broad e.g. Amina, 13, from the Rangamati community.

Do not publish pictures that include school names in the background or school badges on shirts, maps, etc, that could identify child and location.

Check that fully informed consent consistent with Section 7.6 has been gathered before the publication of case studies, photos or videos using on any channel or platform.

Should a child have had their story collected for a specific use it should not be appropriated for a different use without seeking permission e.g. the story was collected to show a new well in the community so their photo should not then be used as the face of a period poverty campaign.

Never write a message on a child's behalf for a child to hold in a photograph. They should write it themselves or it should be written for them, in their own words, if they can't write and clearly state that this is the case in the caption

Remove the GPS metadata that some cameras may record with images before using or uploading them to social media accounts (these are removed automatically when uploaded to databased so if you are using content from here it has been done for you). Otherwise, Switch off the GPS or location tracking settings used on social networking sites or adjust them to make sure that children's personal details (e.g. address or location) are not revealed online. Information on removing GPS data from photos can be found here:

Consult legal opinion if a child is in anyway involved in any current or potential legal proceedings (e.g. where they are a witness or a community dispute over land) in case publication puts the child at risk or prejudices the proceedings.

If any staff members or representatives find any content published by Agami Education Foundation that contravenes the practices of this policy, the relevant line manager must be informed immediately.

Delivering Content from a Smart Phone

As much as possible, organizational equipment should be used to take videos or images of children when content gathering. If not possible, then smart phones may be used but agreed measures must be in place to reduce chances of abuse.

Line managers must sign off on the use of personal mobile phones. Staff/representatives must not use personal mobile phones for content gathering without risks being identified and measures put in place to reduce risk of abuse and exploitation of children and young people.

Collected content must be shared with the Agami Inc. communications team for editing and safeguarding before uploading on any social media, website and any online platform.

Avoid using social media platforms to share images. Only upload images on organizational approved accounts, sites and apps e.g. Google Drive and log using your Agami Education Foundation account. Photos or videos taken using smartphones during any Agami Education Foundation activity should not be taken for personal use or posted on Agami Education Foundation staff/representatives' personal social media accounts. These should immediately be deleted from smartphones after uploading on official Agami Education Foundation sites and apps. Avoid storing data on smartphones as these can be lost, stolen or seized.

All content posted online should have downloads disabled and GPS metadata removed from images to be used.

When sharing content on websites or any kind of online platform, remove surnames from any shared documents other than consent forms, remove any names of schools, villages or towns that can identify a child, remove anything else in images or photographs that can identify a child's specific location.

Appendix 4 – Permission for use of information and images

There are two ways to gather informed consent:

1. Verbal Recorded Consent: Make a recording (audio or video) of you reading this full script aloud. The recording must include the contributor agreeing to each point on the consent form.
2. Written Consent: Read the same full script aloud and ask the contributor to sign the form. You can choose whether Verbal or Written consent is most appropriate.

Option 1. Verbal Consent

Please read this script and ask the interviewee to say 'yes' or 'no' when prompted.

Appendix 5: Child Risk Assessment template

This form is to be completed by staff/representatives trained/experienced in carrying out risk assessments

Date of risk assessment	
Name of project	
Name of partner	
Donor(s)	
Name of AEF reporter	
Name of partner reporter	

Risk Assessment:

		Impact		
		Low	Medium	High
Likelihood	H-3	M	H	H
	M-2	L	M	H
	L-1	L	L	M

For additional information, the Agami Human Resource department can be consulted.

Version Control:

Version Number	Version Date	Section(s) Revised	Revisions Made by
Version 1.0	October 4, 2021	Drafted entire document	Dilruba Chowdhury
Version 1.1	October 6, 2021	Reviewed with minor edits	Sabir Majumder
Version 1.2	October 6, 2021	Approved edits and resolved comments	Dilruba Chowdhury
Version 1.3	October 6, 2021	No edits. Added version control. Review completed.	Sonia Afroz
Version 1.4	17 th February 2022	Reviewed in the total process and approved	Executive Committee of AEF