



# Policy Document

## Protection Against Sexual Exploitation and Abuse

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## ABBREVIATIONS

Shule Direct	SD
Sexual Exploitation and Abuse	SEA
Non-Governmental Organization	NGO
Protection against Sexual Exploitation and Abuse	PSEA
Standard Operating Procedures	SOPs
Human Resources	HR
Chief Executive Officer	CEO
Inter-Agency Standing Committee	IASC

## DEFINITIONS

**Sexual Exploitation:** is any actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes, including, but not limited to profiting monetarily, socially or politically from the sexual exploitation of another.

**Sexual Abuse:** is the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. This includes non-contact and online sexual exploitation and abuse.

**Sexual harassment:** is any unwelcome conduct of a sexual nature that might reasonably be expected or be perceived to cause offense or humiliation, when such conduct interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment

**Staff:** Individuals employed by SD, including full-time, part-time, and temporary employees.

**Users:** Individuals who access SD's digital learning resources and services, including students, educators, and other beneficiaries.

**Partners:** Organizations, institutions, or individuals collaborating with SD on projects, initiatives, or programs.

## INTRODUCTION

Shule Direct is a Non-Governmental Organization (NGO), established under and subject to the exclusive jurisdiction of the laws of Tanzania. The organization specializes in digital education for African school children providing platforms, content, and services for learners at both the primary and lower secondary education levels. The goal of Shule Direct is to provide local and accessible digital educational content for young learners across Africa to improve learning outcomes.

With an expansive community exceeding 4.4 million learners, accompanied by 61,000 dedicated teachers, our digital platform is redefining education's reach across Africa. Leveraging strategic content development, innovative engagement strategies, and impactful partnerships, our efforts have led to 276,000 mobile app downloads and active participation from 100 schools and learning centers.

Our diverse product portfolio, ranging from the student-centric mobile app to our comprehensive Learning Management System, Makini SMS, Education Repository content (API), Secondary Students and primary school learners' mobile apps, and Digital storytelling platform showcases our dedication to enriching every facet of the learning journey and to empower educators to craft a rich tapestry of learning content. Our digital tutorials, interactive quizzes, and multimedia resources transcend geographical barriers, reaching learners in every corner of the continent.

## Vision

Our vision is to provide children and youth with skills, competencies, and values to be lifelong learners and to thrive in the digital economy of the future. We aim to provide high-quality resources that promote effective learning and academic success while also fostering creativity and critical thinking skills.

## Mission

Our mission is to improve holistic learning for children and youth in Africa through the delivery of relevant and engaging digital education content. We aim to provide an educational learning platform that is easily accessible and affordable to school children across the region and continent

## FOREWORD

Sexual exploitation and abuse are grave violations that undermine the integrity and trust of our organization. This policy serves as a commitment to uphold the highest standards of conduct and ensure accountability at all levels of SD's operations. We urge all stakeholders to familiarize themselves with this policy and actively contribute to its implementation.

SHULE DIRECT (SD) has zero tolerance for sexual exploitation and abuse (SEA) since it is committed to providing a safe and secure learning environment for all its stakeholders, including staff, users, and partners. As an NGO dedicated to digital learning, we recognize the importance of protection against sexual exploitation and abuse (SEA). Also, Shule Direct respects and is committed to international Standards on SEA. This policy outlines our comprehensive approach to prevent, detect, and address SEA within our organization.

## PREAMBLE

Shule Direct acknowledges its responsibility to create a culture of respect, dignity, and accountability in all interactions. We recognize that SEA can occur in various forms and contexts, including but not limited to physical, verbal, and digital exploitation. Shule Direct is committed to protect its beneficiaries from SEA through proactive measures, robust reporting mechanisms, and effective response protocols.

## CHAPTER ONE

### CORE PRINCIPLES AND COMMITMENTS

#### 1.1 Organizational Commitment to PSEA

At Shule Direct, we are dedicated to creating a safe and supportive learning environment for all students, educators, and community members. We are committed to preventing sexual exploitation and abuse (SEA) in all our programs and activities.

**Policy Statement:** Shule Direct maintains a zero-tolerance towards sexual exploitation and abuse (SEA). We are committed to taking immediate and appropriate action on any allegations of SEA to ensure the safety and well-being of our beneficiaries and stakeholders.

Objectives of Shule Direct to have a PSEA policy is to ensure the following is attained:

**Protection:** Safeguard the rights and dignity of all students, educators, and community members involved in Shule Direct's programs.

**Ethical Behavior:** Promote ethical behavior and respect for all individuals.

**Compliance:** Ensure adherence to international standards and best practices for preventing SEA.

#### 1.2. Guiding Principles

**Respect and Dignity:** We treat all individuals, including students, educators, staff, and community members, with respect and dignity, recognizing their inherent rights and worth.

**Accountability:** All personnel, including leadership, are accountable for upholding PSEA principles and are responsible for their actions.

**Transparency:** We maintain transparency in our policies, procedures, and actions related to PSEA to build trust and ensure stakeholders are well-informed.



**Confidentiality:** We guarantee the confidentiality of all reports and protect the identities of whistleblowers and survivors.

**Non-Discrimination:** We ensure that all actions and decisions are free from bias or discrimination, providing equal access to reporting mechanisms and support services for everyone.

**Survivor-Centered Approach:** We prioritize the rights, needs, and wishes of survivors in all our PSEA activities, ensuring they receive the appropriate care and support.

### 1.3 Code of Conduct

#### 1.3.1 EXPECTED BEHAVIOR:

**Professional Boundaries:** All Shule Direct personnel must establish and maintain appropriate boundaries with students, educators, and community members to prevent any form of exploitation or abuse.

**Respect for Privacy:** Personnel must respect the privacy and confidentiality of beneficiaries and colleagues at all times.

#### 1.3.2 PROHIBITED BEHAVIOR:

**Sexual Activity with Minors:** Any sexual activity with individuals under 18 years of age is strictly prohibited, regardless of the local age of majority or consent.

**Exchange for Sex:** Personnel must not exchange money, goods, services, or favors for sex, including sexual favors or other degrading, exploitative behaviors.

## Prohibited sexual harassment

- Any form of sexual harassment or abuse, including jokes, comments, gestures, or any behavior that could be perceived as sexually offensive.
- Any sexual advances or propositions, whether in person, online, or through other communication channels.

Retaliation against individuals who report sexual harassment or abuse or who participate in the investigation of such reports

Relationships with Beneficiaries: Any sexual relationship with beneficiaries of Shule Direct' s programs are prohibited due to the inherent power imbalances.

## Reporting Obligations:

1.3.4 Duty to Report: All personnel are obligated to report any concerns or suspicions of SEA immediately, including suspicions about colleagues.

## 1.3.5 DISCIPLINARY ACTIONS:

Consequences: Violations of the code of conduct will result in disciplinary actions, up to and including termination of employment or contract.

## Commitment to Training and Compliance:

Regular Training: All Shule Direct personnel will receive regular training on the code of conduct and their responsibilities under the PSEA policy at least twice per year to ensure full understanding and compliance.

## CHAPTER TWO

### ROLES AND RESPONSIBILITIES

#### 2.0 Leadership and Governance

**Executive Leadership:** The executive leadership team at Shule Direct, including the CEO and board members, is responsible for setting the tone and culture of zero tolerance for SEA. They ensure that the PSEA policy is integrated into all aspects of the organization's operations and strategic planning.

**Governance Committee:** A designated governance committee oversees the implementation and compliance of the PSEA policy. This committee regularly reviews the policy, ensures it aligns with international standards and addresses any gaps or issues identified during audits and evaluations. Shule Direct Management team will be the governance committee for PSEA policy.

**Policy Approval and Monitoring:** The executive leadership approves the PSEA policy and ensures regular monitoring and reporting on its effectiveness. They are also responsible for allocating resources necessary for effective implementation, including training and support services.

#### 2.1 Designated PSEA Officers

**PSEA Coordinator:** The PSEA Coordinator is the primary point of contact for all matters related to PSEA. They are responsible for the overall coordination of the PSEA program, including the development, implementation, and monitoring of PSEA activities and initiatives.

**Shule Direct focal point:** The focal point is appointed within Shule Direct to handle SEA reports and ensure that all cases are managed with confidentiality, professionalism, and sensitivity. The focal point receives specialized training to effectively support survivors

and manage investigations. At Shule Direct the Chief Operational Officer is a focal point to PSEA policy.

The focal point is responsible for designing and delivering PSEA training and awareness programs for all staff, volunteers, and partners. The focal point ensure that all personnel understand their roles and responsibilities regarding PSEA and are equipped to recognize and report SEA.

## 2.3 Responsibilities of Staff and Volunteers

2.3.1 All Employees and Volunteers: Every staff member and volunteer at Shule Direct has a responsibility to uphold the PSEA policy. This includes:

- Adhering to the Code of Conduct: Understanding and complying with the organization's code of conduct, which prohibits any form of SEA.
- Reporting Obligations: Promptly reporting any concerns or suspicions of SEA through the designated reporting channels. This includes both direct observations and disclosures from beneficiaries or other staff.
- Participating in Training: Attending mandatory PSEA training sessions and actively participating in awareness activities to stay informed about PSEA policies and procedures.

2.3.2 Program Managers and Supervisors: Program managers and supervisors have additional responsibilities to:

- Ensure Compliance: Monitor and ensure that all team members adhere to the PSEA policy and code of conduct.
- Support Reporting: Create an environment where staff and beneficiaries feel safe to report concerns without fear of retaliation. They should also assist in the reporting process and ensure that reports are escalated appropriately.

- Facilitate Training: Ensure that their teams complete all required PSEA training and have access to necessary resources and support.

2.3.4 HR Department: The Human Resources department plays a crucial role in:

- Screening and Recruitment: Implementing rigorous screening and background checks for all potential employees and volunteers to prevent hiring individuals with a history of SEA.
- Policy Enforcement: Enforcing disciplinary measures for violations of the PSEA policy and ensuring fair and transparent processes for handling allegations.
- Support Services: Providing support services to survivors, including access to medical, psychological, and legal assistance.

## CHAPTER THREE

### PREVENTION MEASURES

#### Prevention Measures

##### 3.0 Recruitment and Screening

Rigorous Recruitment Process: Shule Direct is committed to ensuring that all personnel, including staff, volunteers, and partners, are carefully vetted before joining the organization. This includes:

- **Background Checks:** Conduct comprehensive background checks to identify any previous allegations or incidents of sexual exploitation and abuse (SEA). This includes verifying references and previous employment records.
- **Interviews:** Utilizing behavior-based interview techniques to assess candidates' attitudes and behaviors towards safeguarding and their understanding of SEA issues.
- **Declaration of Past Misconduct:** Requiring candidates to sign a declaration disclosing any past involvement in SEA or related misconduct.

3.1 Child and Adult Protection Considerations: Given that Shule Direct works closely with children and adults, additional measures include:

- **Child and Adult Safeguarding Questions:** Include specific questions about child and adult safeguarding practices during the interview to gauge the candidate's awareness and commitment to protecting children and adults.

## 3.2 Training and Awareness

3.2.1 Mandatory PSEA Training: Shule Direct ensures that all personnel undergo mandatory training on the prevention of sexual exploitation and abuse. This training includes:

- SEA Definition and Scope: Providing a clear understanding of what constitutes SEA, aligned with the United Nation's definitions.
- Code of Conduct: Educating staff and volunteers on the organization's code of conduct, emphasizing the prohibition of SEA and the expectations for professional behavior.
- Reporting Procedures: Training on reporting SEA allegations, including using confidential reporting channels and the importance of timely reporting.

3.2.2 Regular Refresher Courses: To ensure ongoing awareness, Shule Direct conducts regular refresher courses on PSEA:

- Annual Refresher Training: All personnel must attend annual refresher training sessions to stay updated on new policies, procedures, and best practices.
- Workshop Integration: PSEA topics are integrated into all workshops and training sessions organized by Shule Direct, reinforcing the importance of safeguarding in every aspect of the organization's work.

3.2.3 Community Awareness Campaigns: Shule Direct actively raises awareness within the communities it serves:

- Community Meetings: Regular meetings with students, parents, and community members to discuss SEA issues, reporting mechanisms, and the support available for survivors.
- Educational Materials: Distribution of brochures, posters, and digital content to inform the community about SEA and encourage the use of reporting channels.

### 3.3. Safe Programming

3.3.0 Risk Assessment: Shule Direct incorporates SEA risk assessments into the planning and implementation of all programs:

- Program Design: Ensuring that program activities are designed to minimize the risk of SEA. This includes safe recruitment practices for program staff and volunteers.
- Environmental Safety: Assessing the physical environment where programs take place to ensure it is safe and secure for all participants, particularly children and vulnerable individuals.

3.3.1 Safeguarding Policies: Implementing and enforcing safeguarding policies across all programs:

- User Protection Policy: A robust beneficiary protection policy that outlines the measures in place to protect children from abuse and exploitation.
- Participant Code of Conduct: Establishing clear behavioral expectations for all participants in Shule Direct programs to prevent SEA.

3.4 Monitoring and Evaluation: Continuous monitoring and evaluation of programs to ensure compliance with PSEA standards:

- Regular Audits: Conduct regular audits and assessments to identify and address any potential risks or breaches of the PSEA policy.
- Feedback Mechanisms: Implementing feedback mechanisms that allow beneficiaries and community members to report concerns and provide suggestions for improving program safety.



## CHAPTER FOUR

### REPORTING MECHANISMS

4.0 All individuals receiving assistance from Shule Direct are safely obliged to report SEA, and it can be both internal and external reporting Mechanisms to facilitate the reporting on SEA allegations or concerns by personnel and affected populations

4.1 Core Principles applicable by Shule Direct in ensuring Effective Reporting are the following;

**Confidentiality:** Shule Direct ensures all reports are handled with the utmost confidentiality to protect the identity and privacy of the complainant and the alleged victim. Any personnel who know a SEA report or complaint must respect confidentiality to protect those directly involved. Information shall only be shared on a need-to-know basis in a strictly confidential manner following Shule Direct' s Data Protection Policy. The obligation of confidentiality continues after the matter has been closed. Failure to respect such confidentiality is considered misconduct and may result in disciplinary measures

- **Safety:** Guarantee the safety and protection of the complainant and the alleged victim from retaliation or harm.
- **Accessibility:** Provide multiple, easily accessible reporting channels for all stakeholders, including vulnerable groups.
- **Transparency:** Maintain transparency in the reporting process, ensuring that all parties are informed of the steps and outcomes.
- **Accountability:** Establish clear responsibilities and accountability for handling reports, ensuring timely and appropriate responses.

4.2 Shule Direct provides different reporting channels to its personnel and beneficiaries to ensure effective Reporting Mechanisms in case of any allegation, the following are available channels for reporting any allegation

Designated Focal point	Patience Richard Chief Operational Officer Email address <a href="mailto:report@shuledirect.org">report@shuledirect.org</a> Phone number +255675904152
Designated whistleblower email	Dedicated Email Address <a href="mailto:whistleblower@shuledirect.org">whistleblower@shuledirect.org</a>
Anonymous Reporting	Drop box located at Shule Direct Office
Online reporting form	Dedicated Link on our Platform <a href="#">Online form link</a>

4.3 Shule Direct provides awareness raising on available reporting Channels to all Shule Direct personnel and beneficiaries to smooth prompt reporting when an allegation occurs, Shule direct provides awareness through;

Training Sessions: Regular mandatory training for all staff, volunteers, and partners on SEA policies and reporting mechanisms at least once per quarter.

Information Campaigns: Posters, brochures, and digital media highlighting the importance of reporting SEA and how to use the available channels.

Community Meetings: Periodic meetings with community members to inform them about SEA reporting channels and encourage their use.

Website and social media: Information about reporting channels prominently displayed on the organization's website and social media platforms.

Employee Induction: Inclusion of reporting mechanisms in the induction process for all new employees, volunteers, and partners.

**4.4** In ensuring protection against sexual exploitation and abuse (PSEA) Shule Direct keeps sharing reported information with UNICEF

Timely Reporting: All SEA allegations must be reported to UNICEF within 72 hours of receipt.

Data Protection: Ensure all shared information complies with data protection laws and confidentiality agreements.

Detailed Documentation: Provide comprehensive and accurate documentation of the allegation, including the nature of the allegation, actions taken, and outcomes.

Follow-Up Reports: Regular updates to UNICEF on the status of the investigation and any additional actions taken.

Coordination with UNICEF: Maintain ongoing communication and coordination with UNICEF to ensure alignment with their procedures and support mechanisms.

**4.5** Shule Direct Provides support and protection for whistleblowers, witnesses, and victims throughout the reporting and investigation process

## CHAPTER FIVE

### INVESTIGATION AND RESPONSE PROCEDURES

5.0 Conduct thorough and impartial investigations into all reported allegations, involving relevant stakeholders and authorities as necessary.

5.1 The committee carrying out the investigation will:

1. Interview the victim and the alleged harasser separately
2. Interview other relevant third parties separately
3. Decide whether the incident(s) of sexual abuse or exploitation took place
4. Produce a report detailing the investigations, findings, and any recommendations
5. If the sexual abuse or exploitation took place, decide what the appropriate remedy for the victim is, in consultation with the victim (i.e., an apology, a change to working arrangements, a promotion if the victim was demoted because of abuse or exploitation, training for the harasser, discipline, suspension, dismissal)
6. Follow up to ensure that the recommendations are implemented, that the behavior has stopped, and that the victim is satisfied with the outcome
7. If it cannot be determined that the sexual misconduct took place, the investigator may still make recommendations to ensure the proper functioning of the workplace
8. Keep a record of all actions taken
9. Ensure that all records concerning the matter are kept confidential
10. Ensure that the process is done as quickly as possible and in any event within 14 days (about 2 weeks) of the complaint being made.

5.2 The Investigation Committee of SD must be formed with PSEA focal persons, Shule Direct Board members, and external advisors who are experienced, impartial, and trained investigator(s) who are qualified to handle cases that require a high degree of sensitivity and confidentiality. The investigator(s) should speak the language of witnesses and be familiar with local laws if possible. Take appropriate disciplinary actions against perpetrators by SD's policies, contractual agreements, and legal obligations.

## CHAPTER SIX

### ASSISTANCE AND REFERRALS

6.0 Shule Direct is responsible for ensuring victims of SEA allegedly perpetrated by their personnel receive immediate professional assistance by referring them to relevant service providers per the victim's wishes and with their informed consent/assent.

**6.1** The assistance is immediately upon receipt of a report or within 24 hours from the time the disclosure or allegation is received, based on their needs and wishes, regardless of decisions by organizations or others to investigate the case and regardless of the status/outcome of an investigation.

**6.2** Available Referral to Appropriate Services Are:

Service	Contact Link
Safety	<a href="#">Safety</a>
Medical Care	<a href="#">Medical</a>
Psychosocial Support	<a href="#">Psychological</a>
Basic Material Assistance	<a href="#">Basic Material</a>
Support for children born as a result of SEA	<a href="#">Support for Children</a>
Legal Services	<a href="#">Legal</a>

**6.3** The focal point conducts regular follow-ups with survivors to ensure they are receiving the necessary support and services. Continuous monitoring of the case is carried out to ensure compliance with SOPs and to address any further needs of the survivor.

#### 6.4 Referral Pathway

Shule Direct commits to follow the specific procedure to identify the needs of assistance and timely follow the referral pathway through focal point.

Detailed referral procedures are as follows:

1. Explain the referral process and document informed consent
2. Assess survivor's needs
3. Identify relevant service provider(s)
4. Contact service provider(s), like survivor eligibility; relevant referral protocol
5. Make a referral (and assist with transport, where possible)
6. Follow up with the survivor and receiving agency
7. Store information and ensure confidentiality



## CHAPTER SEVEN

### COLLABORATION AND COORDINATION

#### 7.0 Interagency Cooperation

**Building Networks and Partnerships:** Shule Direct recognizes the importance of working collaboratively with other organizations, agencies, and stakeholders to effectively prevent and respond to sexual exploitation and abuse (SEA).

#### 7.1 Sub-contractor and Partnership Agreements

**Integrating PSEA into Partnerships:** Shule Direct ensures that all partnership agreements include clear commitments to PSEA:

**PSEA Clauses in Contracts:** All contracts and partnership agreements with other organizations, contractors, and consultants must include specific clauses on PSEA. These clauses outline the expectations for behavior, reporting obligations, and consequences for breaches.

**Capacity Assessment:** Conducting capacity assessments of potential partners to evaluate their ability to comply with PSEA standards. Partners must demonstrate their commitment to safeguarding and their capacity to implement effective PSEA measures.

**7.2 Ongoing Support and Monitoring:** Providing continuous support to partners to strengthen their PSEA capabilities.

**Training and Resources:** Offering training and resources to partners to help them develop and implement their PSEA policies and procedures.

**Regular Audits and Reviews:** Conduct regular audits and reviews of partners' PSEA practices to ensure ongoing compliance and address any identified gaps or issues.

## CHAPTER EIGHT

### COMPLIANCE AND ACCOUNTABILITY

#### **8.1** Legal Framework and Compliance

**Adherence to Local and International Laws:** Shule Direct is committed to complying with all relevant local, national, and international laws and regulations regarding the prevention of sexual exploitation and abuse (SEA):

**National Laws:** Ensuring that all activities and policies align with Tanzanian laws and regulations related to child protection, sexual offenses, and labor laws.

**International Standards:** Adhering to international conventions and guidelines, such as the United Nations' protocols on SEA including [standards](#) in ST/SGB/2003/13 and the Inter-Agency Standing Committee (IASC) guidelines, to ensure global best practices are implemented.

#### **8.2** Accountability Mechanisms

**Robust Reporting Mechanisms:** Shule Direct has established clear and accessible reporting mechanisms to ensure accountability in handling SEA allegations.

**Confidential Reporting Channels:** Providing multiple confidential reporting channels, including a hotline, secure email, and an online reporting form, to ensure that all individuals can report SEA allegations safely and without fear of retaliation.

**Anonymous Reporting Options:** Allowing for anonymous reporting to encourage individuals who may fear identification to come forward with information about SEA incidents.

**8.3 Investigative Procedures: Implementing thorough and impartial procedures for investigating SEA allegations**

**Trained Investigators:** Utilizing trained investigators who are skilled in handling SEA cases with sensitivity and professionalism to conduct thorough investigations.

**Fair Process:** Ensuring that all investigations follow a fair and transparent process, respecting the rights of all parties involved, and maintaining the confidentiality and dignity of survivors.

**8.4 Consequences and Remedies: Enforcing appropriate consequences for SEA violations and providing remedies for survivors.**

**Disciplinary Actions:** Implementing strict disciplinary actions for personnel found guilty of SEA, which may include termination of employment, legal action, and reporting to relevant authorities.

**Support for Survivors:** Offering comprehensive support services to survivors, including medical care, psychological counseling, and legal assistance, to help them recover and rebuild their lives.

**8.5 Monitoring and Evaluation: Continuously monitoring and evaluating PSEA practices to ensure effectiveness and accountability.**

## CHAPTER NINE

### REVIEW

9.0 Conduct regular reviews and updates of SD's SEA policy to reflect evolving standards, best practices, and stakeholder feedback.

9.1 Involve relevant stakeholders in the revision process to ensure inclusivity, transparency, and accountability in policy development and implementation.

9.2 This policy shall be disseminated to all staff, users, and partners of SHULE DIRECT and prominently displayed on its website and digital platforms for easy access and reference.

Any amendments or additions to this policy shall be communicated promptly to all stakeholders and implemented accordingly.

Signed for and behalf of:	Signed for and behalf of:
Board of Directors	Shule Direct
Chairperson	Secretary
Name: Dr.Honorati Masanja	Name: Faraja Kotta Nyalandu
Signature and date:	Signature and date: