

Safeguarding & PSEAH Policy 2025 -2030	
---	--

Distribution	Policy Number	Policy Duration	Policy Revise Date
All Divisions, Subsidiaries and Affiliate/Associate Organisations	POL HR-SG 001/2024/5	1 April 2025 – 31 March 2030 Updated July 2026	Annual
Policy Status		Maintained by	
Approved		GL Regional Hub	

The signatures below certify that this document has been reviewed and accepted and demonstrate that the signatories know all the requirements and are committed to ensuring their provision.

Prepared by	Name	Debrah Mukuku	Signature and Date	
	Role	Director GL Regional Hub		31 March 2026
Reviewed by	Name	Colleen Lowe Morna	Signature and Date	
	Role	Special Advisor		
Approved by	Name	Gender Links Board	Signature and Date	
	Role	Board of Directors		

These policies are based on the laws in all the countries where GL operates. If there is a conflict between the policies and national laws, the national laws will take priority, unless the policies have been standardised across countries in the interest of fairness. All GL employees, associates, and consultants must adhere to GL Policies outlined in their contracts. This policy should be read in conjunction with all relevant policies.

Table of contents	Page/s
Abbreviations	3
Glossary of Terms	3
I. Introduction	5-8
II. Procedures	8-14
Endnote	14

Abbreviations

DRH	Director, Regional Hub
DOP	Director of Programmes
GBV	Gender Based Violence
GL	Gender Links
IT	Information Technology
ITC	Information and Communications Technology
OD	Organisational Development
PSEAH	Prevention of Sexual Exploitation, Abuse and Harassment
SADC	Southern African Development Community

Glossary of Terms

At risk or vulnerable person	Any person at greater risk of harm, abuse, or exploitation due to factors such as age, disability, sexual orientation, experience of an emergency, illness, or economic disadvantage. These individuals may be unable to protect themselves from significant harm
Bullying	Aggressive, and repeated behaviour, that involves a real or perceived power imbalance, with intent to cause physical, social, or psychological harm.
Child	Any person under the age of 18
Child sexual abuse	All sexual activity with a child is considered as sexual abuse.
Cyberbullying	Deliberate and repeated online harassment through digital technologies to cause distress. It includes posting harmful content, spreading false information, sharing private details, or humiliating someone online.
Designated person(s)	Named staff of GL responsible for promoting Safeguarding and prevention of SEAH and to whom any concerns are reported for investigation and necessary action.
Harassment	Prohibited conduct in the work context and can be committed against staff and related personnel. It can include any unwelcome sexual advance, request for sexual favour, verbal or physical conduct or gesture of a sexual nature, or any other behaviour of a sexual nature.
Prevention of sexual exploitation, abuse and harassment	Preventative and proactive policies, actions, procedures and guidelines designed to prevent, address and respond to incidents of sexual

	exploitation, abuse and harassment committed by staff and contracted individuals or suppliers
Safeguarding	Measures and actions taken to protect all individuals especially those who have less power, such as children or at-risk adults from harm, abuse, or neglect from the staff or activities of GL
Sexual exploitation	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	Actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions
Technology facilitated violence against women (TFVAW)	Any act of violence or abuse committed, assisted, or amplified through digital technologies (like smartphones, dating apps, and social media) that disproportionately targets women. Tactics include cyberstalking, harassment, image-based abuse, sextortion, and deep fakes. It can result in psychological, social, reputational, or economic harm.

I. INTRODUCTION

This policy sets out the commitments, standards, responsibilities and procedures adopted by Gender Links (GL) to prevent, identify, report, investigate and respond to safeguarding concerns, including sexual exploitation, abuse and harassment (SEAH), bullying, physical abuse, emotional abuse, neglect, discrimination, abuse of power and all forms of gender-based violence.

The policy informs staff and associated personnel of their responsibilities and those that GL works with of the steps that GL will take to safeguard them and prevent sexual exploitation, abuse and harassment.

Safeguarding refers to the set of measures and actions taken to protect all individuals especially those who have less power, such as children or at-risk adults from harm, abuse, or neglect from the staff or activities of GL. Safeguarding aims to prevent harm and promote the physical, emotional, and social welfare of individuals, ensuring their rights are respected and that they can live free from harm, exploitation, or discrimination.

Prevention of Sexual Exploitation Abuse and Harassment (PSEAH) are preventative and proactive actions, procedures and guidelines to prevent, address and respond to incidents of sexual exploitation, abuse and harassment committed by GL staff and GL contracted individuals or suppliers.

Gender Links adopts a zero-tolerance approach towards abuse of any form, Forms of abuse include:

- Sexual exploitation.
- Sexual abuse.
- Sexual harassment.
- Bullying, cyberbullying and technology assisted violence against women or children.
- Physical abuse.
- Emotional and psychological abuse.
- Abuse of power.
- Victimisation and retaliation.
- Child abuse.
- Exploitation of adults at risk.
- Discrimination and hate-based conduct.
- Human trafficking.
- Forced labour and modern slavery.

1. Purpose

The purpose of this Safeguarding and PSEAH policy is to ensure that Gender Links staff, interns, Board members, service users and management can work to prevent exploitation and abuse and know what to do in the event of abuse. The Policy Statement and Procedures have been drawn up to enable Gender Links to:

- Prevent harm arising from Gender Links activities and programmes.
- Protect children and adults at risk from abuse and exploitation.
- Prevent sexual exploitation, abuse, and harassment.
- Prevent bullying, intimidation, victimisation, and physical abuse.
- Promote a respectful workplace culture.
- Establish clear behavioural standards.
- Ensure safe reporting mechanisms.
- Support survivors through a rights-based approach.
- Ensure accountability and disciplinary action.
- Meet donor, legal, and regulatory safeguarding requirements.

All safeguarding actions shall be guided by the following principles:

- Survivor-centered practice.
- Do No Harm.
- Confidentiality.
- Accountability.
- Non-discrimination.
- Best interests of the child.
- Participation and empowerment.
- Gender equality.
- Respect for human rights.

2. Scope

This policy applies to employees, managers, directors, board members, interns, volunteers, consultants, downstream partners, grantees, and service providers. The Policy shall be referenced in all GL contracts; its Code of Conduct and the Board Charter.

Code of Behaviour

All Gender Links representatives shall:

- Treat all persons with dignity.
- Maintain professional boundaries.
- Use respectful language.
- Promote inclusion and equality.
- Respect confidentiality.
- Report safeguarding concerns.

GL staff shall not:

- Exchange assistance, employment, money, gifts, or services for sexual favours.
- Engage in sexual activity with a child.
- Engage in exploitative relationships with beneficiaries.
- Use violence or threats.
- Bully or intimidate others.
- Engage in discriminatory behaviour.
- Retaliate against complainants.
- Engage in cyberbullying.
- Send inappropriate content.
- Harass others online.
- Share confidential information.
- Use organisational systems to access abusive or exploitative content.

3. Related Policies

This policy outlines Gender Links' commitment to keep all people, especially those deemed vulnerable with whom it works safe. Gender Links acknowledges its duty to act expeditiously and appropriately to any reports or suspicions of abuse. This policy should be read in conjunction with the following Gender Links policies:

- Human Resources - Disciplinary and Grievance policy
- Human Resources -Recruitment and Selection
- Code of conduct extract of the Gender Links Human Resources policy
- Anti- Bullying extract from the Gender Links Human Resources policy
- Staff wellness extract of the Gender Links Human Resources policy
- Gender Links Health and Safety policy
- Gender Links Green Policy

- Gender Links HIV and AIDS policy
- Gender Links Disability policy
- Risk Management policy
- I.T Policy

4. Values

- Freedom and dignity of the person who has or is experiencing abuse or exploitation.
- The rights of all people to live free from abuse and coercion.
- Ensuring the safety and well-being of people who cannot decide how they want to respond to abuse that they are experiencing.
- Managing services in a way which promotes safety and prevents abuse. (value or commitment)
- Confidentiality
- Transparency
- Responsiveness

5. Commitments

Gender Links commits to:

- Creating a culture which promotes safeguarding and prevents sexual exploitation, abuse and harassment (SEAH) throughout the organisation.
- Maintaining safe recruitment practices.
- Conducting safeguarding risk assessments.
- Ensuring all programmes are designed and implemented safely.
- Providing safe and accessible reporting channels.
- Supporting survivors and complainants.
- Taking prompt disciplinary action where required.
- Learning from incidents and improving practice.
- Ensuring partner compliance with safeguarding requirements.
- Preventing retaliation against whistle blowers and complainants.
- Ensuring that all management, board members, staff, interns, service providers and partners are familiar with this policy and procedures.
- Acting with confidentiality and expeditiously.
- Informing relevant stakeholders where a person is in danger, a child is at risk or a crime has been committed.
- Making a referral to relevant social services.
- Endeavoring to keep up to date with national developments relating to preventing abuse and the welfare of adults and children.
- Ensuring that the designated named person(s) understands his/her responsibility to refer incidents of abuse to the relevant statutory authorities.

6. Safer Programming

Gender Links' mission is to promote equality and justice in the SADC region and beyond. GL's most important responsibility is to those who participate in our programmes physically and virtually. GL must ensure that its programmes and processes are safe; that our staff or other representatives and partners cause no harm, and that we do not put ourselves or those we work with at risk. All programmes and wider activities (e.g. events, meetings, campaigns) must include safeguarding in their planning, implementation, and review; for example, embedding safeguarding into risk assessments, ensuring staff/representatives and partners are aware of safeguarding, that relevant reporting options are available and that people are encouraged to report. While all programmes require vigilance, the following require special attention due to the inherent power dynamics in these undertakings:

- Work with survivors of GBV, and especially with their male relatives, directly or through grantees.
- Infrastructure and construction programmes, especially those that employ women and people living with disability.
- Programmes that involve travel and accommodation.
- Work with traditional and local authorities.
- Work that involves ICTs and may expose participants to cyber bullying.
- Work involving children and youth.
- Community dialogues.
- Economic empowerment initiatives.
- Digital and online engagement.
- Research activities.
- Media and communications activities.
- Programmes involving vulnerable adults.

All programmes that involve sub-granting or organisational development to other organisations will include safeguarding and PSEAH awareness, training and development or review of policies.

7. Child Safeguarding

- Gender Links strictly prohibits staff and other representatives from:
 - Engaging in any kind of sexual activity with children (defined as anyone under the age of 18, or older if the local law indicates this). The mistaken belief of age is no defence.
 - Sexual abuse or exploitation of children.
 - Knowingly engaging in any commercially exploitative activities with children or adults at risk, including child labour or trafficking.
 - Physically assaulting a child.
 - Emotionally or psychologically abusing a child
 - View/use pornography or other inappropriate content/software on GL work-related IT
- Gender Links strictly prohibits staff and other representatives from engaging in or promoting any form of abusive, exploitative or harmful behaviour towards children.
- All staff and other representatives must protect the rights of children and ensure that our Safeguarding approach is embedded into all areas of our work.
- Every aspect of our work must be carried out in a way that ensures the rights, dignity and empowerment of children.
- We will engage with children in a way that recognises their agency, individuality, and value and work with them to ensure that they are not simply safe from harm but safe to realise their rights and become active agents of change.

II. PROCEDURES

1. Preventing abuse and SEAH

Gender Links is committed to putting safeguards and measures in place to reduce the likelihood of abuse or SEAH within the services it offers and to ensuring that all those involved within Gender Links will be treated with respect.

Gender Links shall maintain a prevention-first approach through:

- Awareness campaigns.
- Risk assessments.
- Partner due diligence.
- Monitoring and evaluation.
- Strong reporting systems.

2. Safer Recruitment and Employee Life Cycle

Gender Links is committed to safer recruitment policies and practices for paid staff, board members and interns. Management, staff and board members will be required to provide two references and where appropriate have a Criminal Records Bureau disclosure before taking on employment. The organisation will work within the current legal framework in each country that it works in for reporting staff or interns who are abusers. Board members and service providers completing current terms should furnish a CRB when undergoing their new term acceptance and due diligence.

All GL Staff shall:

- Sign the Code of Conduct.
- Sign a Safeguarding & PSEAH Declaration.
- Undergo reference and identity verification.
- Disclose previous safeguarding and PSEAH related disciplinary findings

GL will ensure:

- Performance and behaviour concerns are addressed promptly
- We share safe and respectful information via references as part of our commitment to the wider sector.

3. Training

Gender Links is committed to ensuring that all staff, management, the board and interns have access to training around Safeguarding and PSEAH. Training will take place as follows:

- As part of the induction of all new staff and Board Members (within one month of joining the organisation).
- All new and existing staff members of Gender Links will take up a quiz on PSEAH and Safeguarding before they receive staff contracts, with an expected pass mark of atleast 85%
- Annual refresher courses, including an online quiz during joint Board/ Staff engagements linked to the March and August Board meetings.
- In depth training for all Designated Persons.

Mandatory staff training and staff quizzes shall include:

- Safeguarding.
- PSEAH.
- Anti-bullying (including anti cyber bullying).
- Survivor-centred response.
- Online safeguarding.
- Data protection and confidentiality.

4. Reporting a Safeguarding or SEAH alert

Reporting mechanisms, with designated persons and their contact details, will be accessible and available to all that GL works with. Complaints can also be made on the website. The complainant is assured of confidentiality. The complaint can also be made anonymously. Anonymous reports shall be accepted and investigated where sufficient information exists. They shall be thoroughly investigated and verified before they can be brought as evidence to a hearing.

All GL Staff have a duty to report actual, suspected or attempted safeguarding violations. If you witness abuse or abuse has just taken place the priorities will be to:

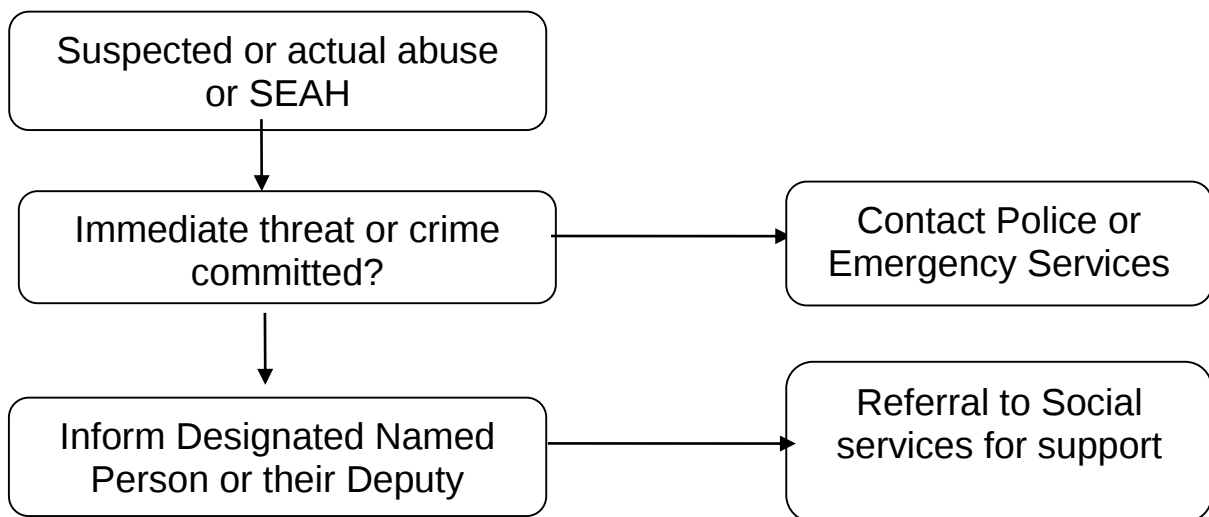
- Call an ambulance if required.

- Call the police if a crime has been committed or it is an emergency situation.
- Preserve evidence.
- Keep yourself, staff, or any affected parties safe.

Inform the alleged victim that the issue will be reported and report the issue by telephone through:

- Designated Persons (listed below).
- Line Managers.
- Human Resources.
- Board Chairperson.
- Whistleblowing channels.
- Website reporting mechanisms.

Failure to report safeguarding concerns may constitute misconduct



Gender Links designated persons are:

Country	Designated Person	email	Telephone
South Africa and regional	Debrah Mukuku	directorRH@genderlinks.org.za	+27 84 724 7988
Lesotho	Thakane Sello	lesmanager@genderlinks.org.za	+266 6382 7817
Madagascar	Ialfine Papisy	madamanager@genderlinks.org.za	+261 32 873 2519
Mauritius	Anushka Virahsawmy	maumanager@genderlinks.org.za	+230 5934 5787
Zimbabwe	Priscilla Maposa	zimmanager@genderlinks.org.za	+263 772 735 722

The roles and responsibilities of the designated person(s) are to:

- Ensure that all staff including interns and board members are aware of what they should do and who they should go to if they have concerns that a vulnerable person may be experiencing, or has experienced abuse, neglect or SEAH.
- Ensure that concerns are acted on, investigated and corrective action taken
- Ensure that affected persons are referred to social services or other relevant authorities, that referrals are followed up and that the issues have been addressed.
- Reinforce the utmost need for confidentiality and ensure that staff and interns are adhering to good practices about confidentiality and security. This is because it is around the time

that a person starts to challenge abuse or SEAH that the risks of increasing the intensity of abuse and SEAH are greatest.

- Ensure that staff and interns working directly with persons who have experienced abuse, or who are experiencing abuse, are well supported and receive appropriate supervision.
- Give support and protection if necessary. Those affected will be dealt with fairly and equitably and they will be kept informed of any action that has been taken and the outcome.
- Monitor safeguarding & PSEAH implementation.
- Maintain incident registers in a safe and confidential platform.
- Coordinate investigations.
- Monitor corrective actions.
- Report safeguarding trends to management and governance structures.

5. Responding to people who have experienced or are experiencing abuse

Gender Links will act on reports or suspicions of abuse, neglect or SEAH. Responses will be survivor centred:

- Ask if the person is safe now; if not, then take measures to ensure they are safe/away from harm now and in the foreseeable future whilst you conduct the investigation
- Reassure the person concerned.
- Listen to what they are saying and respect their wishes.
- Record what you have been told/witnessed as soon as possible.
- Remain calm and do not show shock or disbelief.
- Tell them that the information will be treated seriously.
- Do not start to investigate or ask detailed or probing questions.
- Do not promise to keep it a secret. Confidentiality is possible, anonymity is often not
- Provide psychosocial support, information, and referral to the person. This could be about medical or legal assistance. Support informed consent as much as possible.

Support shall not be dependent upon participation in an investigation

6. Responding to incident reports

Step 1: Within 48 hours of receiving a report the designated person will:

- i. Ensure that any allegations made against members or a member of staff or a supplier are dealt with swiftly as per the Gender Links Code of Conduct¹ in the Human Resources Policy. Where a member of staff/intern is thought to have committed a criminal offence the police will be informed.

The safety of the individual(s) concerned is paramount. A risk assessment must be undertaken immediately to assess the level of risk to all service users posed by the alleged perpetrator. This will include whether it is safe for them to continue in their role or any other role within the service whilst the investigation is undertaken.

Protective measures may include:

- Suspension.
- Reassignment.
- Restricted access.
- Removal from programme activities

Where allegations involve:

- Sexual exploitation.
- Sexual abuse.

¹ Code of conduct page 35 of the GL HR Policy 2018(clause 194)

- Physical assault.
- Child abuse.
- Human trafficking.

Gender Links shall immediately assess whether referral to law enforcement is required. Such referrals will be made with informed consent from the individual, unless there is a good reason to override consent, such as risk to others. If the individual experiencing abuse does not have capacity to consent a referral will be made without that person's consent, in their best interests.

Confidentiality shall never prevent reporting criminal conduct or safeguarding concerns involving children.

- ii. engage with the complainant/survivor to ensure they are safe and their concerns are understood.

In consultation with the survivor the designated person will determine what action to take. If an investigation cannot be carried out (e.g. if the survivor does not want an investigation or there is insufficient information to proceed) then the designated person will close the case and assess what other actions can be taken to address concerns e.g. awareness raising and support to the survivor.

Step 2: Investigation: A Safeguarding/PSEAH panel (comprised of the Designated Person; the investigator who may be an independent external expert appointed by GL and the Chairperson of the hearing who will be another senior member of the GL team appointed by SMT for each case) will be constituted.

The investigation will include interviews with the survivor, the complainant (if not the survivor), any witnesses and the subject of the complaint; gathering available evidence; producing and submitting an investigation report to the Safeguarding Panel. It will normally be concluded within four weeks.

If a partner organisation is responsible, they may use their own investigation process if it aligns with Gender Links' approach and values or use the Investigation Guidelines set out by the Safeguarding Team. Gender Links is a key stakeholder in this process, and should be updated regularly.

Step 3: Decision: The Safeguarding/PSEAH panel will review the report and take a decision on the findings. The Safeguarding/PSEAH Panel, or others as appropriate, carry out any recommendations agreed on (e.g. disciplinary hearing, termination, awareness raising, and policy development) with support from HR as required.

Step 4: Outcomes shared and lessons learnt: The Safeguarding/PSEAH Panel document the decision and inform the complainant/survivor and subject of complaint of the outcome. SMT is informed of the outcome.

A case conference is convened so that the Safeguarding/PSEAH Panel and SMT discuss learning from the case. Feedback must be sought from the survivor/complainant and incorporated into the lessons learnt conversation. Lessons learnt are to be shared as appropriate, removing identifiable information, with relevant boards to ensure key learning is shared and improvements made to practice.

7. Appeal

The subject of the complaint and the survivor/complainant have the right to appeal against the decision, in line with Gender Links' HR policies and procedures. If they have concerns about the

response (e.g. if a conflict of interest has impacted the investigation). The appeal process is as follows:

- If the complaint concerns a staff member or a partner and they are not satisfied with the outcome, they may appeal to the Executive Committee
- If the complaint concerns a Board Member and they are not satisfied, they may appeal to the GL Members (the Association).
- An appeal must be lodged within 14 days

Protection Against Retaliation

Gender Links prohibits retaliation against:

- Survivors.
- Witnesses.
- Whistle-blowers.
- Investigators.

Retaliation shall be treated as serious misconduct.

8. Confidentiality

Maintaining confidentiality around people's data and information is important when managing issues relating to sexual harassment, exploitation and abuse and is part of living out our survivor-centred approach. Every effort will be made to maintain and promote confidentiality to protect the safety and privacy of everyone involved.

Information shall 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 to be effective.

If information shared confidentially relates to a child or suggests that someone's life is in danger, action will need to be taken outside of standard confidentiality procedures to ensure that everyone is safe. This will be managed on a case-by-case basis. The safety and well-being of the child or at-risk adult in question are always paramount. Only those who need to know will be informed so they can take effective action.

For further information, please see Gender Links' confidentiality policy contained within the Human Resources Policy².

9. Record Keeping and Data protection

All reports/concerns should be recorded in the Safeguarding and SEAH Incidents register by the Director RH. The information should be factual and not based on opinions, record what the person tells you, what you have seen and witnesses if appropriate.

This information will be secured in a password protected online file in the Director RH's office. Access to this information will be restricted to the Designated Persons.

The Organisational Development Committee shall receive an annual PSEA report containing:

- Number of incidents.
- Types of incidents.
- Investigation outcomes.
- Training completion rates.
- Lessons learned & Risk mitigations proposed.

² Code of Conduct page 35 of GL HR Policy 2018(clause 194)

10. DISSEMINATING/REVIEWING POLICY AND PROCEDURES

This Safeguarding and PSEAH Policy will be communicated to staff, Board members, interns, service providers, partner organisations and people that Gender Links works with. The Designated Persons will be responsible for ensuring that this is done.

Adherence to the Safeguarding and PSEAH Policy will be a condition on any staff or service provider contractual arrangement, failure of which will constitute breach of contract.

The Safeguarding and PSEAH Policy and Procedures will be reviewed annually by the Organisational Development Committee. The Designated Named Persons for Safeguarding and PSEAH will be involved in this process and can recommend any changes. The Designated Named Person will also ensure that any changes are communicated to staff, board members and interns.

ENDNOTE:

In South Africa, this policy should be read together with:

- Children's Act (Act No. 38 of 2005): This act provides comprehensive provisions for the protection and care of children. It addresses issues such as child abuse, neglect, exploitation, and the establishment of child protection services. It sets out the responsibilities of parents, caregivers, and relevant authorities in safeguarding children's well-being.
- Criminal Law (Sexual Offences and Related Matters) Amendment Act (Act No. 32 of 2007): This act focuses on preventing and addressing sexual offences, including those committed against children. It defines various sexual offenses, establishes procedures for reporting and investigating such offenses, and provides support for survivors.
- Domestic Violence Act (Act No. 116 of 1998): This act aims to protect victims of domestic violence, including both adults and children. It provides for the obtaining of protection orders against perpetrators, the establishment of specialized domestic violence courts, and support services for survivors.
- Prevention and Combating of Trafficking in Persons Act (Act No. 7 of 2013): This act addresses the prevention, investigation, and prosecution of human trafficking. It seeks to protect individuals, particularly women and children, from being trafficked and exploited, and it establishes mechanisms for victim support and assistance.
- Older Persons Act (Act No. 13 of 2006): This act focuses on the rights and well-being of older persons. It includes provisions for protecting older persons from abuse, neglect, and exploitation, as well as establishing support services and mechanisms for reporting and investigating elder abuse.
- Promotion of Equality and Prevention of Unfair Discrimination Act (Act No. 4 of 2000): This act prohibits unfair discrimination on various grounds, including race, gender, age, disability, and sexual orientation. It promotes equality and ensures the protection of vulnerable individuals from discrimination and harm.