



<b>Subject: CHILD AND VULNERABLE ADULT SAFEGUARDING POLICY</b>			
<b>Policy Number:</b>	<b>Department:</b> HR	<b>Effective Date:</b> April, 2024	<b>Page 12 of 27</b>

The following list provides concrete examples, but is not exhaustive, of all behaviors that every staff, faculty, student, and affiliate commit to abide by.

### **6.1 Prohibited behaviors against children**

UGHE staff, faculty, students, and affiliates commit that they should never:

- ✓ Behave in inappropriate physical manner or develop a sexual relationship with a child (under 18 years old), regardless of the country specific legal age of consent or age of majority. Mistaken belief regarding the age of a child is not a defense. This also includes consenting or condoning the above behavior (including fostering or condoning child marriage (under 18 years old); This also includes behavior that could be seen as grooming a child for a future inappropriate relationship.
- ✓ Engage in any form of child exploitation and abuse, including sexual exploitation, abuse, and harassment, including child marriage with children.
- ✓ Engage in any form of child abuse, harassment be it physical, sexual, or emotional and neglect.
- ✓ Use abusive language or behavior towards a child that is inappropriate, belittling, degrading, humiliating, harassing, abusive, sexually provocative or that is intended to shame, or emotionally abuse.
- ✓ Doing things of a personal nature for an unsupervised child that the child can do for themselves (e.g. bathing, dressing, etc.) or sharing a bedroom with them. “Unsupervised child” means a child who is not supervised by an adult who is an immediate family member.
- ✓ Condone or participate in behavior, which is illegal, unsafe, or abusive to children, including harmful traditional practices, or ritualistic abuse.
- ✓ Hire children in any form of child labour (including as “house help”) and/ or using forced labor in the performance of any work.
- ✓ Engage in any form of child trafficking, servitude, debt bondage and unlawful recruitment and procuring commercial sex acts.
- ✓ Spend excessive or unnecessary time alone with a child away from others or behind closed doors or in a secluded area.
- ✓ Have unsupervised in-person or virtual interaction with child program participants during or off duty without prior authorization from either a parent or a guardian. In rare cases where it is not possible to have at least two adults supervising and there is authorization, all possible efforts should be made to remain visible with the child.



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- ✓ Misuse or be careless with personal data (both hard and soft versions) about individual children.
- ✓ Take a child alone in a vehicle for UGHE work, unless it is absolutely necessary, and with parental/guardian and managerial prior consent.
- ✓ Hit or use other corporal punishment against a child while the child is participating in UGHE program or UGHE staff, faculty or affiliate is conducting UGHE work.
- ✓ Provide children with condoms and contraceptives.
- ✓ Exchanging money, goods, or services/ assistance for sex, including sexual favors, or other forms of degrading exploitative behavior to children.
- ✓ Collect data from children or recording interactions with them and take photograph of a child without prior informed consent from parents or guardians.
- ✓ Take photograph of a child who is not adequately clothed (dirty or tattered clothed).
- ✓ Stay silent, cover up, enable, or fail to report any known or suspected safeguarding incident against a child or any other breach of this policy by staff, faculty, student, and affiliate.
- ✓ Retaliate against a child complainant or a witness.

## **6.2 Prohibitive behaviors against vulnerable adults and program participants**

UGHE staff, faculty, students, and affiliates commits that they should never:

- ✓ Engage in any form of exploitation and abuse, including sexual exploitation, abuse, and harassment, with program participants and community members.
- ✓ Engage in any form of harassment be it physical, sexual, or emotional.
- ✓ Use abusive language or behavior towards a vulnerable adult or program participant that is inappropriate, belittling, degrading, humiliating, harassing, abusive, sexually provocative or that is intended to shame, or emotionally abuse.
- ✓ Condone or participate in behavior, which is illegal, unsafe or abusive to program participants or vulnerable adults, including harmful traditional practices, or ritualistic abuse.
- ✓ Exchange money, employment, goods or services or assistance for sex, including sexual favors, or other forms of degrading exploitative behavior to program participants or vulnerable adults.



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- ✓ Exchange money, employment, goods, or services or assistance for sex, including sexual favors, or other forms of degrading exploitative behavior between staff; and between staff and affiliates.
- ✓ Engage in any form of trafficking in persons, servitude, debt bondage and unlawful recruitment, or use forced labor in performance of any work and procuring commercial sex acts.
- ✓ Involve in recruitment, harboring, transportation, provision, or obtaining of a person for the purpose of a commercial sex act, for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery.
- ✓ Misuse or be careless with personal data about adult program participants.
- ✓ Collect data from adult program participants or vulnerable adults or recording interactions with them without their prior informed consent.
- ✓ Take photograph of an adult program participant or vulnerable adult who is not adequately clothed (dirty or tattered clothes).
- ✓ Take photograph of a person with disabilities capturing or highlighting specific disabled body parts in a way that could potentially demean or stigmatize the individual. Photographs of people with disabilities should be taken and shared with sensitivity and respect for their dignity and privacy.
- ✓ Take photograph of a vulnerable beneficiary or program participant without their prior informed consent.
- ✓ Stay silent, cover up, enable, or fail to report any known or suspected safeguarding incident against adult program participant or any other breach of this policy by staff, faculty, student, and affiliate.
- ✓ Retaliate against an adult complainant or a witness.

### **6.3 Prohibitive behaviors against students**

UGHE staff, faculty and affiliates commits that they should never:

- ✓ Engage in any form of exploitation and abuse, including sexual exploitation, abuse, and harassment of students.
- ✓ Engage in any form of harassment be it physical, sexual, or emotional.
- ✓ Use abusive language or behavior towards a student that is inappropriate, belittling, degrading, humiliating, harassing, abusive, sexually provocative or that is intended to shame, or emotionally abuse.



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- ✓ Condone or participate in behavior, which is illegal, unsafe, or abusive to students, including harmful traditional practices, or ritualistic abuse.
- ✓ Provide students with any alcohol or illegal drugs within or outside UGHE premises, during and outside of work hours.
- ✓ Exchange money, employment, goods, or services/ assistance/ marks for sex, including sexual favors, or other forms of degrading exploitative behavior to students.
- ✓ Engage in any form of trafficking in persons, servitude, debt bondage and unlawful recruitment or use of forced labor in performance of any work and procure commercial sex acts.
- ✓ Procure commercial sex acts.
- ✓ Involve in recruitment, harboring, transportation, provision, or obtaining of a person for the purpose of a commercial sex act, for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery.
- ✓ Stay silent, cover up, enable, or fail to report any known or suspected safeguarding incident against a student or any other breach of this policy by staff, faculty, student, and affiliate.
- ✓ Retaliate against a student complainant or a witness.

UGHE reserves the right, in its sole discretion, to determine whether a particular behavior or incident rises to the level of unexpected behavior by this policy, regardless of whether it is listed in this Code of Conduct.

UGHE staff, faculty, students, and affiliates must immediately report to the safeguarding reporting channels or to the safeguarding focal person any breach or reasonable suspicion of breach of this Code of Conduct by anyone to whom it applies. Malicious safeguarding complaints that intend to harm the alleged Subject of complaint, or failure to report or failure to disclose any convictions for, or any safeguarding related investigations may in itself amount to a breach of this Code and may lead to disciplinary action.

## **7. SAFE RECRUITMENT**

### **7.1 Screening of Candidates**

UGHE shall take various measures to screen out all people who may pose a risk to harm children, students, or vulnerable adults within the institution. These measures shall be consistently applied to all candidates/positions. Safeguarding considerations will be integrated in job advertisements (where feasible), application processes, interviews, and reference checks.