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1. POLICY STATEMENT

The University of Global Health Equity (UGHE) is on a mission to radically transform global health education and health care delivery around the world by training the next generation of health professionals who strive to deliver equitable, quality, and holistic health services for all.

The UGHE operates a zero-tolerance approach to all forms of child and adult safeguarding incidents, including physical, emotional, sexual, neglect, trafficking, and modern slavery. This applies to staff, faculty, students, and affiliates and UGHE will take appropriate action against anyone who is found to have committed abuse, failed to report a concern, or retaliated against someone who has reported abuse or participated in an investigation. UGHE also is committed to upholding the rights of children and safeguarding them against actions that place them at risks of all forms of abuse and harm including neglect, exploitation, harassment, and child trafficking.

2. PURPOSE

The primary goal of UGHE's Safeguarding Policy is to ensure the safety and wellbeing of children and adults with whom interactions are made during teaching, research, outreach programs, clerkships, program activities, and in the communities where UGHE operates.

This commitment extends to doing no harm to children and vulnerable adults, intentionally or unintentionally, due to their engagement with UGHE. This includes integrating robust safeguarding requirements throughout the recruitment process (e.g. reference and background checks) and implementing context-specific safeguarding measures to mitigate risks associated with UGHE's activities.

The purpose of the safeguarding policy is to establish high level requirements for protecting children and vulnerable adults with whom we come into contact throughout UGHE's activities. No child, those with disabilities included, or vulnerable adult must be subjects to trafficking or suffer harm, intentionally or unintentionally, as a result of their engagement, association or contact with UGHE, whether as a student, a participant in our programmes, projects, events, processes, or as part of a training or a conference sponsored or organized by UGHE.

In furtherance of these goals, UGHE:

- Recognizes that a child occupies a unique and privileged position in the society.
- Acknowledges the heightened risks faced by children and vulnerable adults in humanitarian settings.
- Reaffirms adherence to the rights and wellbeing of the child as contained in the United Nations Convention on the Rights of the Child and in the African Charter on the Rights and Welfare of the Child and their protocols, and those of adults as enshrined in the Convention on the Elimination of All forms of Discrimination Against Women



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(CEDAW), Universal Declaration of Human Rights (UDHR) and other conventions and legal instruments; and

- Acknowledges the measures that the Government of Rwanda has taken, including incorporation of regional and international legal instruments pertaining to the human rights in general and more specifically to child rights into national laws.

UGHE believes that any form of violence is unacceptable and inaction on reports of any safeguarding concern will not be tolerated. We recognize that zero tolerance does not mean there will be no reports or incidents, nor does it mean that all reports of breaches will result in termination of contracts or employment without due process and investigations. Instead, zero tolerance for inaction means we will act on all safeguarding concerns and allegations, ensuring that our actions are timely, appropriate, and centered on the best interest of the victim/survivor, taking into account their specific safeguarding needs and vulnerabilities.

3. SCOPE

This Policy applies to all UGHE staff, faculty, students and affiliates and all people employed by or working for UGHE, regardless of the type and duration of the contract.

For the purpose of this policy, the term “**staff**” shall mean such persons including but not limited to:

- Administrative staff
- Support staff
- Seconded workers
- Volunteers
- Chaperons
- Professional interns
- Fellows

For the purpose of this policy, the term “**faculty**” shall include all such persons, regardless of whether they are paid or volunteers:

- Chancellor, Vice Chancellor, Deans, Full /Associate/ Assistant Professors,
- Full time faculty
- Visiting faculty
- Adjunct faculty
- Part time faculty



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- Lecturers
- Teaching Assistants
- Lab Assistants
- Academic support staff
- Any other person with an academic appointment

The term “UGHE **affiliate**” refers to any individual, institution or organization that has a working relationship with UGHE but is not considered a member of staff:

For the purpose of this policy, it shall include, but not limited to all such persons:

- Suppliers
- Independent contractors
- Vendors/ service providers
- Partners
- Consultants
- Visitors
- Interns on professional internships
- Any other affiliates as well as those people holding hourly contracts.

For the purpose of this policy, the term “**student**” shall include all such persons:

- All students (from undergraduate and post-graduate programs)
- Visiting students/trainees (nationals or internationals including those on student internships) and training participants in executive education.

All students are equally expected to comply with this policy, along with the relevant student code of conduct policies/manual or handbook.

All UGHE staff, faculty, students, and affiliates are bound and expected to abide by this policy. The policy will be regarded and interpreted inclusively to the extent it complies with other applicable laws of the Republic of Rwanda and may be subject to monitoring, review and change at the discretion of UGHE management to ensure adaptation to any new or emerging challenges.

Also, this policy applies within UGHE premises and outside, including at social events, business trips, training, on and off duties, during and outside of work hours.



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4. DEFINITIONS OF KEY SAFEGUARDING CONCEPTS

- **Safeguarding:** Preventing, reporting, and responding to harm or abuse by UGHE staff, faculty, students, and affiliates, of any children anywhere and of any program participant and vulnerable adults living where UGHE has a programming presence or operates. It includes Prevention of Sexual Exploitation and Abuse (PSEA), a frequently cited subset of safeguarding, as well as child and human trafficking.
- **Child:** Any person below the age of eighteen (18) years as stated in the Rwandan Law N° 71/2018 of 31/08/2018 relating to the protection of the child. The Safeguarding Policy covers interactions by UGHE staff, faculty, students, and affiliates with all children anywhere (which may include UGHE students and visiting students).
- **Child Safeguarding:** Preventing, reporting, and responding to harm, abuse, or exploitation (child trafficking included) of any child (<age 18) anywhere by a UGHE staff, faculty, student, and affiliate.

It is the act of making UGHE safe for children (both students and non-students aged below 18). It involves our collective and individual responsibility and preventative actions to ensure that all children are protected from deliberate or unintentional acts that lead to the risk of or actual harm by UGHE staff, faculty, students, and affiliates. Safeguarding is carried out by developing and implementing a set of policies, procedures, and practices to ensure all organizational functioning prioritizes each child’s safety.

- **Adult safeguarding:** Preventing, reporting, and responding to harm, abuse, or exploitation (human trafficking included) of vulnerable adults (≥ 18) by a UGHE staff, faculty, student, or affiliate.
- **Prohibitive safeguarding behaviours:** they refer to actions, attitudes, or practices that pose a risk of harm, exploitation or abuse of individuals working for an institution and those that the institution serve. Those behaviours violate safeguarding principles and standards set forth by the institution and they undermine the safety, dignity, and rights of individuals, and they require immediate intervention and corrective actions to prevent harm and protect those at risk.
- **Safeguarding Incident:** any intentional or unintentional event, action, or circumstance that causes or has the potential to cause harm, risk, or vulnerability to staff, faculty, students, community members (children and/or adults) and program participants by the organization’s staff, faculty, students, and affiliates.
- **Sexual Exploitation and Abuse (SEA):** The term “Sexual exploitation” means 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. The term “sexual abuse” means the



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actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

- **Sexual Abuse:** Constitutes any actual or threatened physical intrusion of a sexual nature toward another person whether by force or under unequal or coercive conditions. When carried out against a child by an adult, such conduct is considered sexual abuse even in the absence of force or unequal or coercive conditions.
- **Grooming:** generally, refers to behaviour that makes it easier for an offender to procure a child for sexual activity. For example, an offender may build a relationship of trust with the child, and then seek to sexualise that relationship (for example favouring a child, isolating a child, giving excessive attention or gifts, using sexualised language or physical contact, or exposing the child to sexual concepts through online sexual exploitation material).
- **Human trafficking or trafficking in persons** is any act committed by a person for the purpose of exploitation, hires or recruits, transports, transfers, harbours, or receives another person; by means of threat or use of force, or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability, or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation.
- **Survivor-centred approach** is a framework designed to prioritize the needs, experiences, and autonomy of individuals who have experienced trauma, violence, or abuse. It aims to place survivors at the centre of decision-making processes, honouring their agency, and empowering them to direct their own recovery and healing journey.
- **“Community with whom UGHE works” or “living in a UGHE programming area”;** UGHE uses a broad working definition of these terms to ensure that any individuals who may be subject to power imbalance with UGHE staff, faculty, affiliates, or programming, including UGHE students, are protected through this policy.
- **UGHE premises:** For the purpose of this policy, the term “premises” means, at the campus, at the hostels while in clerkships with students or at any other places where they are accommodated by UGHE (such as PCG).
- **Gossip:** it refers to the spreading of rumors, hearsay, or unverified information about individuals, particularly concerning their safety, well-being, or behavior. Gossip can be harmful and may lead to the dissemination of false or misleading information, which can negatively impact the reputation, privacy, and dignity of individuals, such as staff, faculty, students, affiliates, community members and program beneficiaries. Even if the information being shared is accurate or verified, gossip can still be harmful if shared



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without consideration for the feeling or rights of the individual(s) involved. Therefore, UGHE prohibits gossip of any nature and encourages staff, faculty, students, and affiliates to exercise discretion, empathy, and respect for privacy when discussing others, particularly in situations where the information being shared may be unwelcome or private to the victim.

- **Discrimination:** it refers to unfair or unjust treatment of individuals or groups based on certain characteristics or traits, such as race, ethnicity, religion, gender, sexual orientation, disability, or socio-economic status.

Discrimination can manifest in various forms, including exclusion, harassment, stereotyping, or differential treatment, and may result in harm, marginalization, or denial of rights and opportunities for the affected individuals.

Addressing discrimination in safeguarding is essential to ensure that all individuals, regardless of their background or characteristics, are treated with dignity and respect.

Child Safeguarding Definitions

- **Child abuse:** means emotional, physical, sexual, neglect or any other ill-treatment carried out against a child by an adult. Child abuse includes but is not limited to:
 - i) **Physical Abuse:** means acts or failures to act resulting in injury (not necessarily visible) or unnecessary or unjustified pain or suffering without causing injury, harm, or risk of harm to a child’s health or welfare, or death.
 - ii) **Child Sexual abuse:** is inappropriate sexual behaviour with a child that encourages and/or forces the child to observe or participate in any form of sexual activity, such as rape, incest, and pornography. Please see the Sexual Abuse definition above.
 - iii) **Emotional abuse or ill-treatment** is injury to the psychological capacity or emotional stability of the child caused by acts, threats, or coercive tactics, such as consistently mocking or ridiculing a child for their appearance, abilities, or intelligence.
 - iv) **Child Neglect:** is depriving a child of their basic needs when the adult has the means to provide those needs. It is deliberate denial to provide the child with clean water, food, shelter, sanitation or supervision or care to the extent that the child’s health and development is placed at risk. Neglect happens under circumstances that threaten or cause harm to the child’s health and/or welfare and can also consist of exposing a child to any kind of danger such as cold and starvation, etc.
 - v) **Exploitation:** Constitutes any actual or attempted abuse of a position of vulnerability, differential power, or trust, including for the purposes of



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profiting monetarily, social, or politically. When carried out for a sexual purpose, this constitutes sexual exploitation. This includes, but is not limited to, child labour and sexual exploitation. Examples include child prostitution, child pornography and trafficking of children for sexual abuse or child labour.

- vi) **Child labour:** Often defined as work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development. It refers to work that is mentally, physically, socially, or morally dangerous and harmful to children and interferes with their schooling and recreation. In its most extreme forms, child labour involves children being enslaved, separated from their families, and exposed to serious hazards and illnesses. To comply with the UN agency’s requirements on child labor and protection, UGHE strictly prohibits the full-time employment of anyone under the age of 15 and engaging any child, including those aged 15-17, in any hazardous work such as construction and manufacturing related work by staff, faculty, students and affiliates.
- vii) **Child Marriage:** a formal marriage or informal union before the age of 18. This is a reality for both boys and girls, although girls are disproportionately the most affected. Child marriage is widespread and can lead to a lifetime of disadvantage and deprivation. □
- viii) **Child trafficking:** is a form of human trafficking and is defined as the recruitment, transportation, transfer, harbouring, and/or receipt, kidnapping of a child for the purpose of slavery, [forced labour](#), and [exploitation](#), by means of threat, force or other forms of coercion. This includes abuse of power.
- ix) **Modern Slavery:** encompasses forced labour, debt bondage, human trafficking, and other practices that deprive a person of their freedom and exploit them for personal or commercial gain.

5. SAFEGUARDING POLICY AND RESPONSIBILITIES

5.1 Periodic review of the safeguarding Policy

UGHE shall be responsible for ensuring the development, implementation, and periodic review of this Policy every three years or as otherwise required.

5.2 Awareness

UGHE equips all staff, faculty, students, and affiliates to understand and perform their safeguarding responsibilities and obligations.

UGHE also applies appropriate standards to external parties, including visitors, community and volunteers, contractors, partners, and other affiliated with partners or contractors, to



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address safeguarding risks relating to their engagement with UGHE’s work. Hereafter, the full range of people for whom all or some of this Policy are relevant (either directly or through contractual arrangements) will be referred to as “UGHE staff and/or affiliates”.

It will also ensure that this Policy is integrated into the Human Resources Manual. Orientation of new staff, faculty, students, and affiliates will also include a detailed explanation on the safeguarding Policy and Procedures including the Code of Conduct that embeds expected Behaviours.

All UGHE staff, faculty and students will be requested to complete a mandatory online training available on UGHE website and Canvas respectively, prior to joining UGHE. UGHE staff, faculty, students, and affiliates will receive face-to face safeguarding training within 30 days from the start of employment, studies, or UGHE affiliation. They shall also receive periodic refresher or other safeguarding training at least once every two years thereafter.

Safeguarding training for staff, faculty, students, and affiliates shall include Prevention of Sexual Exploitation Abuse and Harassment (PSEAH).

Supervision and performance appraisals will include an assessment of the UGHE staff and faculty members adherence to the Safeguarding Policy.

All UGHE students, staff, faculty, and affiliates, will be required to read, understand, and acknowledge, in writing, receipt of the UGHE Safeguarding Policy and they will be informed of Policy changes as they arise.

All contracts with staff, faculty and affiliates with UGHE shall include an assurance that (1) in the course of the contracted works and services they agree that they will act in the best interest of children and uphold UGHE’s Safeguarding accepted behaviour and other child and adult safeguarding measures as requested, (2) If they become aware of any harm or risk to children, they will inform UGHE through the available safeguarding reporting channels immediately, (3) Each contract/agreement with staff, faculty and affiliates shall include a copy of the Safeguarding Policy. Specifically, agreements and supplier contracts will embed the Safeguarding Code of Conduct with expected behaviours.

5.3 Agreement with contractors

Contractors engaged in situations where they—or their employees or subcontractors—may have access to any child including students aged below 18, students, program participants or vulnerable adult living where UGHE has a programming presence or may have access to personal data about such children or vulnerable adults, require the safeguarding language below (or language substantively the same) in their contract with UGHE. In addition, a copy of the Safeguarding Code of Conduct with expected behaviours must be attached to the contract. These requirements apply whether the contractor is being paid for the services or is providing them for free (‘pro bono’) and is irrespective of the duration of the contract.



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In the course of performing this contract, Contractor and Contractor’s employees will ensure that:

- I. Any of their interactions with any children, including students aged below 18, or with vulnerable adults who are program participants or living where UGHE has a programming presence/operates, or with personal data about such persons, will comply with the attached UGHE Safeguarding Code of Conduct with expected behaviors, and with any other reasonable safeguarding measures that UGHE may specify.
- II. Any incidents of harm or risk of harm to any children including students aged below 18 or to vulnerable adults who are program participants or living where UGHE has a programming presence/operates will be reported immediately to UGHE using the available reporting mechanisms.
- III. Any individuals with access to any children or vulnerable adults who are program participants or living where UGHE has a programming presence, or to personal data about such persons, will have a current clean criminal background check for offenses against children or abuse of adults, to the extent permitted by law (evidence of which will be provided to UGHE upon request); and
- IV. These safeguarding obligations will be clearly communicated to, and acknowledged by, all contractors and their employees who may have access to any children or to adults’ program participants or living where UGHE has a programming presence, or to personal data about such persons, and will be extended in identical form to any subcontractors (if any are authorized) engaged to perform this contract.
- V. The Safeguarding Policy is fully cascaded to all persons involved in the contracted activities. It is insufficient to rely only on the contractor to fulfill the requirements, although non-compliance should be addressed immediately and may be grounds for breach of contract.

Equally like their Heads of security companies, **security guards** who serve at UGHE campus must adhere to the Safeguarding Policy as well. It is insufficient for only the security company entity or manager to acknowledge this, as this provides no assurance that the Safeguarding Policy will be communicated to individual guards.

5.4 Agreement with Partner Organizations

When engaging a partner for the UGHE program activity, the agreement (whether referred to as an ‘agreement’, ‘subgrant’, “Memorandum of Understanding”, or any other term), specifies that, if the partner has their own Safeguarding Policy, before the Partner begins any work on the project, the Partner’s safeguarding policy and procedures must be provided to UGHE and approved by UGHE as appropriate for the program at issue. Alternatively, the Partner can agree to follow UGHE’s Safeguarding Policy in carrying out the program activities. The



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agreement must ensure that any of the Partner’s personnel working in the UGHE project will have a current clean criminal background check for offenses against children or abuse of adults, to the extent permitted by law (evidence of which will be provided to UGHE upon request).

Also, before signing the agreement with the partner, UGHE must assess their safeguarding capacity, as well as developing a capacity building plan if the partner does not meet UGHE’s safeguarding standards.

5.5 Safeguarding Staffing

The overall responsibility of ensuring the implementation of UGHE Safeguarding Policy and Procedures lies in the hands of the Vice Chancellor and the Senior Leadership Team (SLT).

UGHE shall have a Safeguarding Staff (Safeguarding Manager and any other staff as deemed relevant) to provide technical guidance to leadership and technical guidance across all staff teams in UGHE operations and programs. Due to the nature of the safeguarding responsibilities, the safeguarding staff shall directly and regularly contact/access the Human Resources Director, Regional Safeguarding Advisor and PIH General Counsel for any required guidance or support.

The UGHE Child and Adult Safeguarding Committee will be appointed by the Vice Chancellor to stand as custodian and guardian of the implementation of the Safeguarding Policy and Procedures in UGHE. Terms of Reference approved by the UGHE Vice Chancellor, provide specific positions to be part of the committee.

5.6 UGHE Safeguarding Committee

The UGHE Safeguarding Committee, being a multi-sectoral one, should have a representative from all departments that directly or indirectly respond to safeguarding incidents.

The committee members will:

- I. Ensure that all safeguarding incidents are timely reported and managed appropriately, as well as provide adequate guidance on response plan.
- II. Ensure that safeguarding is mainstreamed in all UGHE programs.
- III. Ensure that UGHE institutes mechanisms that prevent potential cases of abuse/putting any children anywhere, students and vulnerable adults who are program participants or living where UGHE has a programming presence at risk.
- IV. Ensure that necessary referral mechanisms are put in place to support abused students, children, vulnerable adults living where UGHE has a programming presence.



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- V. Ensure that donors/visitors/ international collaborators are briefed on UGHE Safeguarding Policy prior to engaging with students, children, program participants and/ or community members living where UGHE has a programming presence.

The UGHE safeguarding Committee meets on a bi-annual basis and any other time if a need arises.

6. CODE OF CONDUCT FOR SAFEGUARDING POLICY

Safeguarding the well-being and protection of children, students, and vulnerable adults and program participants is paramount in any learning institution. As custodian of their welfare, it is UGHE’s moral and ethical responsibility to create a safe and nurturing environment where they can learn, grow, and thrive free from harm, exploitation, or abuse. To uphold these principles and ensure the safety and dignity of all individuals within our community, we have developed a comprehensive Code of Conduct.

This Code of Conduct serves as a set of guiding principles and standards that outline the behaviours and attitudes that are prohibited, and responsibilities of all members of our institution, including staff, faculty, students, and affiliates. It reflects our commitment to fostering a culture of respect, integrity, and accountability, and to upholding the rights and well-being of children, students, and vulnerable adults at all times.

We commit to prevent and protect from all forms of abuse, neglect and exploitation including sexual exploitation, abuse and all forms of harassment, human/child trafficking, child marriage, child labour and other forms of harm whether intentional or unintentional harm to staff, faculty, students, affiliates, community members by staff, faculty, students, and affiliates.

Rules of behavior are based on local and culturally appropriate interactions with any children (students aged below 18 included) and other program participants or vulnerable adults living where UGHE has a programming presence.

All UGHE staff, faculty, students, and affiliates abide by this code of conduct in their activities with UGHE, for all children anywhere, for students and for all vulnerable adults, both on and off duties and during and/or outside of working hours.

They are also designed to protect staff, faculty, students, and affiliates from false accusations of inappropriate behaviour or abuse as well as allow no retaliation against incident reporters.

UGHE staff, faculty, students, and affiliates are strictly forbidden from engaging in any form of harassment, exploitation, or abuse, be it physical, sexual, emotional, neglect, child, or human trafficking. This always applies whether on or off duty. Other actions, such as inappropriate behavior toward or with student, a child, or vulnerable adults, supporting or advancing these actions, intentionally ignoring, or failing to act upon allegations of these actions, failing to report an allegation of any form of abuse, child marriage, child labor, child, and human trafficking, or retaliating against a complainant or a witness are also prohibited.



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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.



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Safeguarding screening measures are mandatory for all prospective employees, and individual contractors who will interact with UGHE students, children, program participants or vulnerable adults residing in UGHE operated areas, or who will have access to their personal information.

During the interview process, candidates will be prompted to disclose any past involvement in substantiated misconduct investigation related to harassment, exploitation and/or abuse.

For references supplied by the candidates, questions are explicitly asked regarding the candidates previous safeguarding related information, to check if there was no previous substantiated safeguarding misconduct.

Applicants' references will be rigorously and comprehensively checked and will inform to determine whether the candidate aligns with UGHE's mission and values. Also, information regarding Sexual Exploitation, abuse and Harassment (SEAH) will be collected from both the candidate in the interview, as well as to the referees to ensure the applicant has never behaved in such a way or has no criminal record on that. Any reference documentation will be safely kept, and the candidate sworn statement/self-declaration will be signed by the applicant themselves declaring that they have never behaved in a safeguarding inappropriate manner.

Note that major grant donors may have specific screening requirements for work they fund, so relevant grant terms and regulations should be checked and taken into consideration.

7.2 Identity and Background Checks

Candidates for employment—as well as relevant personnel of contractors and partners—have an identification check and an appropriate criminal record/police background check, to the extent permitted by law, prior to employment or engagement with UGHE.

People with a prior conviction for any crime against children or sexual exploitation and abuse against an adult are not hired or engaged by UGHE.

Criminal record checks must be obtained for each country in which a staff member has lived for 12 months or longer in the five past years. As an alternative, a statutory declaration can be signed for any country from which such a criminal record check was or is impossible to obtain.

Background checks shall be done prior to hiring faculty and staff, and every faculty and staff shall submit once a criminal record certificate before signing employment contract. However, basing on additional requirements from major donors or change in circumstances, new background checks shall be done, and faculty and staff shall be required to update or submit new criminal records on a given regular basis. The Human Resources department shall inform additional or new requirements to the concerned staff.



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7.3 Employment contracts

Employment contracts should contain provisions for:

- Suspension or transfer to other duties for any staff or faculty who is under investigation for breach of the safeguarding policy (and provisions to dismiss if allegations are substantiated).
- Agreement to abide by the safeguarding Code of Conduct.

8. SAFE COMMUNICATIONS, CONTENT, AND MARKETING

8.1 Dignity

UGHE takes care to ensure local sensitivity or restrictions for reproducing personal images are adhered to before photographing or filming a subject, and UGHE ensures images are honest representations of the context and the facts. In all forms of communication, students, children, program participants and community members should be treated and portrayed with respect and dignity and not as helpless victims. Poses that could be interpreted as sexually suggestive should be avoided.

8.2 Consent

Children (including students who are under 18) and vulnerable adults who are primary subjects of text, photo, video, audio and/or data gathered on behalf of UGHE must provide prior informed consent and ascent and have the right to withdraw their consent at any time for any reason.

UGHE must be able to demonstrate that informed consent/ascent has been given and that request to withdraw consent has been respected.

Informed consent/ ascent means the subject has a general understanding of the purpose of the content and gives verbal or written permission thereof.

If the primary subject is a child, written informed consent is collected from the parent, guardian, or other legally required entity or individual. If they are students aged below 18, or any other child, to the extent possible, given their age or capacity, older to understand the activity written informed ascent is also collected from the students or children themselves.

In the following situations, verbal consent is not acceptable and only written consent is to be collected:

- The sensitive nature of their personal disclosure or situation could possibly cause damage to their privacy, dignity, safety, or reputation, or
- Where otherwise required by the applicable law.



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8.3 Prevention of Harm in Communication

UGHE is committed to storytelling that raises awareness of the public, thus takes the following steps to prevent harm through communications, content gathering and marketing (including digital or offline photographs/videos/audio clips, stories, articles, or any other communication materials):

1. Personal information on children and adults that is captured, stored, or sent through electronic, online, or mobile devices is password protected. In addition, data is handled in accordance with the information security standards for personal data, which may include encryption and other requirements.
2. Recognizing the special vulnerability of children, material posted on social media or digital channels mention only the child's first name and country name, and does not contain a child's family name, or child's personal location/address. In cases of sensitive subjects such as unaccompanied children or child sex workers among others, UGHE conceals the child's identity in images and uses a pseudonym.
3. Materials with a child or children is not geo-tagged to precise locations if it contains any part of the child's name.
4. Use of platforms to share marketing or communications content with no ability to track back evidence of informed consent and/or platforms that lack the ability to withdraw consent is forbidden.

9. PROTOCOLS FOR REPORTING SAFEGUARDING INCIDENTS AND RESPONSE

9.1 Reporting a breach of this policy

It is the duty of all staff, faculty, students, and affiliates not only to adhere to this policy but to report any potential safeguarding incidents. UGHE staff, faculty, students, and affiliates must immediately report any suspicion or incident of safeguarding incident.

UGHE staff, faculty, or students should not decide whether or not safeguarding incident has occurred or conduct any type of investigation into alleged behavior before reporting.

UGHE has safe, confidential, and accessible complaints mechanisms and procedures for staff, faculty, students, affiliates, program participants, and communities, including children, to report safeguarding allegations.

UGHE is also committed to ensuring that affiliates and program participants or community members are aware of these procedures and reporting mechanisms.

Suspected violation of this policy can be reported verbally to the Human Resource department/ Safeguarding manager or in writing through the channels mentioned hereunder.



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9.2 Reporting channels

UGHE has put in place various reporting channels to give different options for safe and confidential reporting, including a dedicated email ughe-safeguarding@ughe.org and mobile/ telephone +250 788383593 or a toll-free 1002 created and handled by safeguarding team. UGHE encourages all to file a safeguarding complaint as soon as possible after the incident occurs.

If the complainant would like to report outside of UGHE, they may contact Sarah Mwebaze, PIH Regional PSEAH/Safeguarding Advisor at smwebaze@pih.org or +256 772 428185 or PIH PSEAH Champion in Boston, Lori Silver, General Counsel at lsilver@pih.org; + 1 857-880-5170 (US).

1	Email: ughe-safeguarding@ughe.org
2	Call or WhatsApp: 0788383593
3	Toll-free line: 1002
4	One PIH Regional PSEAH/Safeguarding Advisor: +256 772 428185 or at smwebaze@pih.org
5	One PIH PSEAH in Boston: +1 857-880-5170 (US) or at lsilver@pih.org

9.3 Responding to Safeguarding Incidents

When the UGHE Safeguarding Manager receives a Safeguarding case, it has to be recorded in the case tracker by the Safeguarding Manager.

The UGHE Safeguarding Manager is also required to promptly inform the OnePIH Regional Safeguarding Advisor, the PIH PSEAH Champion upon receiving any report.

A claim for the Safeguarding policy breach has to be made as soon as the occurrence of the incident is discovered and shall include the following details of who (perpetrator), what (breach/ abuse / violation), where, when and how at the minimum. Such information shall support the Safeguarding Manager, including the investigation team.

The Safeguarding Manager shall acknowledge receipt of the complaint in writing and communicate the next steps. Reporting to the PIH Speak-Up email may be done anonymously, although this may impede our ability to assess the complaint or conduct a full investigation locally. UGHE encourages non-anonymous reporting.

When the allegation involving staff, faculty, student, or affiliate suggests crime may have been committed (serious/ criminal offense), and if that it is legally required, safeguarding team reports the case to Rwanda Investigation Bureau (RIB) after informing the Vice Chancellor.



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In case of any safeguarding incident against a child that might draw media attention, UGHE communications department shall prepare a plan for dealing with media inquiries in a form of a reactive statement. Only UGHE Vice Chancellor or his /her designated spokesperson shall speak to the media on behalf of the University.

UGHE responds and investigates to reports of Safeguarding Policy violations and harm of children, students and vulnerable adults residing in UGH areas of operation or adults program participants as soon as they are reported, in ways that are consistent with local law.

UGHE will use a “survivor-centered approach” for responding to alleged violations of this Policy. Such an approach will ensure the survivor’s dignity, experiences, considerations, needs, and resiliencies are placed at the center of the process. When a child is involved, UGHE will require a “best interest of the child determination” for responding to alleged violations of this Policy. This determination considers the best possible outcome for a vulnerable child who has been exposed to violence, abuse, exploitation, or neglect.

9.4 Notification of Safeguarding Incidents

The UGHE Safeguarding Team (Safeguarding Manager, Regional Safeguarding Advisor, and Human Resources Director) informs the Senior Leadership Team (SLT) of safeguarding incidents. Additionally, the SLT may be notified if an incident has potential reputational issues to the university.

In line with the principle of “*need to know*”, no identifying information on victims, witnesses or subjects of complaint are shared in these notifications.

Only basic information is provided in order to a) ensure the privacy and safety of those involved in the incident and b) provide assurances that UGHE is appropriately managing the case.

9.5 No Retaliation for Reporting

UGHE does not tolerate any harassment, retaliation, or adverse action whatsoever by any staff, faculty, student, or affiliate as a result of any safeguarding report provided in good faith to UGHE, law enforcement or other recognized reporting mechanism.

UGHE will take all necessary actions against any of its staff, faculty, student, or affiliate who seek or carry out retaliatory action against complainants, victims, or other witnesses.

If you believe that you have experienced or witnessed retaliation, you should immediately report your concern to the Safeguarding Manager through provided channel. UGHE staff, faculty, student, or affiliate who engages in retaliation will be subject to disciplinary action, up to and including termination of employment or contracts.

No staff, faculty, student, or affiliate shall be adversely affected because they refuse to carry out a directive that could reasonably be construed as likely to create abuse or neglect of a child or a vulnerable adult.



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UGHE’s commitment to antiretaliation does not prevent a reporter from appropriate disciplinary action if they are found to have engaged in unethical behavior or misconduct.

9.6 Safeguarding Investigations

Safeguarding investigations meet minimum standards and follow the core principles of investigating allegations of harm, exploitation, or abuse to children, students and vulnerable adults of where UGHE operates and program participants (**thoroughness, confidentiality, safety competent investigators, impartiality, objectivity, timeliness, accuracy, and documentation**).

Investigations follow a victim-centred approach, and investigators conduct the process in accordance with sector best practice to prevent further harm to the affected individual.

UGHE prioritizes the safety, physical and psychological health and welfare of all affected individuals while upholding and promoting their rights of confidentiality, equality, and access to justice.

UGHE may deploy internally trained investigator or retain the services of an external investigator to manage an incident according to One PIH investigation policy and procedures.

Staff, faculty, student and affiliate accused of abusing any child, student and vulnerable adult will be suspended during the course of the investigation. They should be informed about charges that have been made against them and given an opportunity to respond.

They will be encouraged to participate in the investigation by providing information and the names of witnesses to be interviewed. At the conclusion of the investigation, they will be informed of the results of the investigation and what corrective action, if any, will be taken. Staff, faculty, students and affiliates who have knowledge relevant to the investigation must cooperate with the investigation.

All information concerning the incident and investigation will be documented in writing. The confidential draft report of the investigation and conclusion should be provided to the nominated fair hearing committee. As a result of the fair hearing, a final report with recommendations is provided to the Vice Chancellor for implementation.

9.7 Confidentiality

Because of the nature and sensitivity of safeguarding allegations, UGHE will treat all reports and allegations with the greatest respect for confidentiality of all individuals involved. Sensitive information related to incidents shall be shared only with enforcement authorities (if need be) and UGHE agents and employees of the appropriate function who have “a need to know” such information.

UGHE staff who handle investigations and sensitive information are required to maintain the confidentiality of such information and will be subject to disciplinary action in the event of any unauthorized disclosure.



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The soft version of such information should be password protected and handled in accordance with the information security standards for personal data, which may include encryption and other requirements. The hard copies should also be kept in locked offices or drawers with limited access.

9.8 Disclosure

In the event a staff, faculty, student, or affiliate is discharged for any suspected abuse of a child, students, or vulnerable adult, UGHE may disclose such information if requested by a prospective employer or competent judicial organ. UGHE maintains appropriate confidentiality for individuals involved in any safeguarding incidents. However, UGHE may disclose general information about incidents in order to support learning and accountability, and prevent future incidents, and as required by law. Information related to ongoing investigations of safeguarding incidents can only be shared with those on a ‘right-to-know’ and ‘need-to-know’ basis, as deemed necessary by the safeguarding team and the Senior Leadership Team. Information regarding safeguarding incidents is not faxed. Email messages are labelled with a generic title such as Safeguarding Matter, Event or Action and flagged as confidential. UGHE maintains sensitive personal data on a strictly confidential basis and protects such information in accordance with the applicable data protection and informational security standards.

10. REPORTING SAFEGUARDING INCIDENTS TO GOVERNMENT AUTHORITIES

UGHE shall evaluate reporting safeguarding violations to appropriate legal authorities, assessing any legal obligations to report, as well as the interests of the affected individual(s).

When UGHE Safeguarding Manager receives a safeguarding incident, the latter has to be recorded in the case tracker by the Safeguarding Manager. When the allegation involving staff, faculty, student, or affiliate suggests crime or a protection incident may have been committed (serious/ criminal offense) and if that it is legally required, the safeguarding team reports the case to Rwanda Investigation Bureau (RIB) after informing the Vice Chancellor.

11. CHILD SAFEGUARDING

Child safeguarding refers to the process of protecting all children including children with disabilities, from harm, abuse, neglect, exploitation, or any form of violence. It involves creating safe and supportive environments where children can grow, develop, and thrive free from the risk of harm. Safeguarding encompasses a range of measures and interventions aimed at preventing, identifying, and responding to risks and threats to children's well-being.

UGHE acknowledges the importance of safeguarding all children, including those with disabilities. We are committed to taking appropriate measures to ensure that children with disabilities that come into contact with us are safeguarded.



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We understand that ensuring the safety of children requires us to take extra care when interacting with children with disabilities. If we become aware of any safeguarding concerns involving a child with a disability, we will seek guidance and support from experts who can advise us on how best to communicate with and support the child.

We will also ensure that children with disabilities, and their parents or guardians, are aware of the reporting mechanisms for any safeguarding concerns, such as sexual harassment, abuse or exploitation, and other safeguarding concern, including from being photographed without their consent.

Child safeguarding in UGHE is a shared responsibility that requires collaboration and commitment from staff, faculty, students, and affiliates from one hand and program participants and community members living where UGHE has a programming presence on the other hand, to create a culture of safety, protection, and respect for children's rights.

UGHE prioritizes child safeguarding in all aspects of its work, thus commits to create an environment where children can thrive free from risk of harm and reach their full potential.

In this policy, child safeguarding encompasses a range of measures and interventions aimed at preventing, identifying, and responding to all forms of child abuse, violence, exploitation, neglect, including child labour, 1.07 and child trafficking.

Notwithstanding with other forms of child abuse, exploitation, and violence, UGHE prohibits the following forms of child exploitation:

✓ **Child labor**

Child labor, in any form, is strictly prohibited and constitutes a violation of children's rights. UGHE recognizes that it is imperative to safeguard children from any forms of exploitation and therefore, requires staff, faculty, students, and affiliates to refrain themselves from engaging a child in any forms of child labor, such as construction where they are exposed to physical dangers and health risks, or domestic work at the expense of their education and overall well-being.

✓ **Child marriage**

Child marriage is an instance where underage girls and boys, often below the age of 18, are coerced, forced, or compelled into marriage against their will.

UGHE prohibits staff, faculty, students, and affiliates to get involved in any child marriage arrangements for it violates the fundamental rights and well-being of children, particularly girls, exposing them to a myriad of risks, and perpetuates cycles of poverty, inequality, and discrimination.



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✓ **Child trafficking**

Child trafficking is a grave violation of children’s rights, which includes instances where children are coerced, deceived, or abducted for the purpose of exploitation, including forced labor, sexual exploitation, or involvement in criminal activities such as begging or drug trafficking.

UGHE prohibits staff, faculty, students, and affiliates to never engage in any forms of child trafficking for it exposes children to unimaginable suffering, enduring physical and psychological abuse, exploitation, and deprivation of their freedom and dignity.

11.1 Safe Child Participation

Child participation refers to the active involvement of children in decision-making processes, activities, and initiatives that affect their lives. It encompasses the right of children to express their views, opinions, and perspectives on matters that impact/ affect them, and to have those views considered and taken into consideration by adults and decision-makers. Child participation recognizes children as rights-holders and active agents in their own lives, rather than passive recipients of adult decisions and interventions.

Safe child participation UGHE context refers to the meaningful involvement of children in decision-making processes, activities, learning, research, and initiatives in a manner that prioritizes their safety, well-being, and protection from harm. It also involves providing support, guidance, and safeguards to ensure children’s participation is informed, voluntary, and conducted in a safe and supportive manner.

11.1.1 Prevention of Harm in Child Participation

Students, aged below 18, shall be empowered to actively participate in their own well-being and to minimize any risks when there are at the UGHE campus or other UGHE programme or project activities or events.

UGHE shall carry out general risk assessments before engaging children including students aged below 18 to participate in any UGHE community and programme activities or events.

11.1.2 Ethics

Child participation activities must be designed and implemented to adhere to principles and ethics which keep the following as the top priority:

- i) Best interests of the child:** all decisions and actions regarding child participation should prioritize the best interests of the child, considering their safety, well-being, and development.
- ii) Non-discrimination** in all actions concerning children UGHE will not discriminate against a child. Children are entitled to their rights and those rights will not be infringed



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upon irrespective of the child’s race, colour, sex, language, religion, political or other opinion, national, social origin, poverty or wealth rank, disability, birth, or other status.

- iii) **Right to be heard;** UGHE acknowledges that any child is capable of forming their own views and maintains the rights to express those views freely in all matters affecting them.
Child views and opinions shall be considered before any child (age appropriate) participates in any UGHE activities or events.
- iv) **Inclusivity:** Child participation should be inclusive, ensuring that children from diverse backgrounds and circumstances are provided with opportunities to participate and have their voices heard.
- v) **Voluntary Participation:** Children should be given the freedom to choose whether or not to participate in decision-making processes, and their participation should be voluntary and based on informed consent.
- vi) **Empowerment:** Child participation aims to empower children by building their confidence, skills, and knowledge, enabling them to actively contribute to decisions that affect their lives.
- vii) **Safety and Protection:** Child participation should prioritize the safety, well-being, and protection of children, ensuring that appropriate safeguards are in place to minimize risks of harm or exploitation.
- viii) **Accessibility:** Child participation processes should be accessible and inclusive, removing barriers that may prevent children from participating fully, such as language, physical, or logistical barriers.
- ix) **Right to Privacy:** Children have the right to privacy and confidentiality when participating in decision-making processes, and their personal information should be handled with care and respect.

11.1.3 Informed Consent/ ascent in Child Participation

Child participation activities are voluntary and inclusive (especially of the most vulnerable children) and both children and parents/ legal guardians shall be informed of any possible risks, be requested for consent/ ascent and to voluntarily participate in activities that require their participation. The parents/legal guardians will consent on behalf of their children as required by the Rwandan law and ascent may also be required to children who are older to understand the activity as well as to any students who are under the age of 18.

11.2 Children’s Travel

When there is a need for a child to travel for a UGHE program, activity or event, parents or caregivers will give informed consent prior to the travel.



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The health, safety and well-being of children are the most important priorities, therefore, UGHE reminds them to carry their health insurance cards with them and assigns chaperons (male and female) to accompany them and ensures that they use transportation means that have a valid insurance.

12. VISIT TO UGHE OFFICE & CAMPUS

12.1 Visitors

Visitors subject to this Policy include people going to Butaro campus or Kigali office, meeting with students, children and/or adults program participants. This includes but not limited to sponsors, donors, partners, and other delegations such as international collaborators, celebrity supporters, or journalists invited by UGHE.

Government officials or institutional donors (government, multilateral) based in Rwanda do NOT require Safeguarding clearance but are accompanied by a UGHE employee(s).

UGHE rules and procedures for visits to campus and office must be observed. Always, visitors/sponsors will be accompanied by a UGHE staff or faculty member during their visits to UGHE premises and programs.

Actual or suspected cases of abuse or inappropriate behaviour by a visitor are reported immediately through the safeguarding reporting channels (refer to section 9.2 on reporting).

12.2 Visitor's orientation to safeguarding

The following requirements apply to visitors who visit a UGHE campus or office:

Prior to their arrival, visitors from all over the world will receive a brief written (one-pager) orientation of the Safeguarding Code of Conduct with expected behaviour and prevention of harm in communication that apply in that context as well as local customs regarding interactions with children and community members, and they will acknowledge in writing receipt and understanding of these behaviours. The signed acknowledgement is kept on file by the host team and shares copies with the Safeguarding team.

13. CORRECTIVE ACTIONS

Failure to comply with the UGHE Safeguarding policy by a staff, faculty, student, and affiliate will result in disciplinary action, which could lead to immediate termination of employment or partnership agreements, and the possibility of referral for further handling by public organs.

UGHE will take prompt action to eliminate the offending behaviour, impose disciplinary measures, and take any necessary remedial action. The disciplinary proceeding will follow the appropriate procedures outlined in the Human Resources Manual for faculty and staff or the Student Handbook for students.



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UGHE is committed to education, and in the case of a first-time offender, a student who has engaged in a single instance of verbal, non-physical or non-threatening harassment, and demonstrates appropriate recognition of their actions, lesser sanctions may be imposed. These may include a written warning with additional training, or suspension.



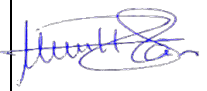
Disciplinary action may also be taken against individuals who fail to report any safeguarding incidents or cooperate with investigations. Individuals who have breached this policy may have "Do Not Rehire" placed on their personnel file, while partners and contractors may have "Do Not Re-engage" placed on their file based on the nature of the case.

Disciplinary action will also be taken against individuals who provide false or misleading information during investigations or submit a false report maliciously.

The purpose of disciplinary actions is to protect staff, faculty, students, and affiliates from untrue allegations of misconduct or abuse. However, those who raise a complaint which is not upheld, but who did so with a reasonable belief that the matter required investigation, will not be penalized for raising a legitimate concern.

This policy is not intended to limit UGHE's authority to discipline or take remedial action for any prohibitive behaviour, regardless of whether it satisfies the definitions provided above.

The disciplinary sanctions imposed by UGHE shall not preclude the affected individual from seeking remedies provided by the Rwandan judicial framework, nor prejudice any criminal proceedings.

Approved by	Name	Signature	Date
Policy Originator	Janet Kaviiko		27/03/2024
Chair of the Review Committee	Alice Muhoza Mutoni		04/04/2024
Chair of the SLT Meeting that passed the Policy			
Vice Chancellor	Dr. Joel Mubiligi		10 th April 2024