

EMERGING PUBLIC LEADERS

Empowering the next generation of civil service professionals

Safeguarding and Security Policy

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Section 1

EMERGING PUBLIC LEADERS Safeguarding and Security Policy (the “Policy”)

Introduction

EMERGING PUBLIC LEADERS¹ vision is to strengthen Africa's prosperity and equity by fostering good governance.

As the most effective strategy to strengthen the public sector, EMERGING PUBLIC LEADERS provides additional pathways into civil service through a Public Service Fellowship program, recruiting Africa's most promising future leaders and placing them into meaningful civil service positions. Over a period of one to two years, depending on the country program, Fellows are provided with the supervisory support, rigorous training, and mentorship they need to launch and build a successful career in public service. The focus is on bringing African youth across genders, socio-economic, and demographics into the public service and empowering them to drive innovative change.

EMERGING PUBLIC LEADERS places the protection and safeguarding of vulnerable young people at the heart of all its work. Its focus is on youth in public service, and increasing the number of women and vulnerable groups represented in those positions acknowledges the limiting and at times degrading work environment these populations face in the civil service.

¹This policy is intended to apply to both Emerging Public Leaders, a nonprofit corporation incorporated and based in Washington, D.C., U.S.A. (“EPL”) as well as any organization which adopts this policy and with which EPL partners in order to implement Public Service Fellowships in Africa through the Emerging Public Leaders program (such organizations referred to in this document as “country programs” and “country program partners”). Here and throughout, EMERGING PUBLIC LEADERS refers to both EPL

and the country programs, to the extent they are promoting, managing, representing themselves as affiliated with, or otherwise associated with Emerging Public Leaders Public Service Fellowships.

EMERGING PUBLIC LEADERS believes that protecting young people against abuse in all its forms is an ethical and moral responsibility. Everyone who works for or partners with EMERGING PUBLIC LEADERS is expected to sign on to the principles and values enshrined in this Policy. EMERGING PUBLIC LEADERS has a zero- tolerance approach to abuse and exploitation.

Basis of the Policy

EMERGING PUBLIC LEADERS bases its work and policies on the principles enshrined in many binding international human rights instruments, including the Universal Declaration of Human Rights; the Convention on the Rights of Persons with Disabilities and its Optional Protocol (CRPD, 2006, A/RES/61/106). These include providing dignified and equitable job opportunities and work for young people, protecting covered persons and associates from abuse, and ensuring the protection of vulnerable adults. EMERGING PUBLIC LEADERS is also committed to complying with all federal, state, provincial, and local laws everywhere it operates.

The Policy

All references in the Policy apply equally to young people and vulnerable adults. EMERGING PUBLIC LEADERS' organizational ethos values and respects all young people. We work in consideration of the whole being of the young person, including their physical, material, and psychological well-being. Young people's welfare comes first in all our work.

EMERGING PUBLIC LEADERS believe that communities can protect young people

from abusive situations and EMERGING PUBLIC LEADERS will build their confidence to deal with these situations.

EMERGING PUBLIC LEADERS recognizes that women are especially vulnerable to abuse and that they require special protection. EMERGING PUBLIC LEADERS believes that its aim of empowering women is the foundation for enabling them to be less vulnerable to abuse of any kind. A key element of our program is to support women to develop confidence in the workplace to reduce their exposure to abusive situations and to be willing to report abuse or threatened abuse.

EMERGING PUBLIC LEADERS recognizes that abuse can take many forms including physical, emotional, and sexual abuse, as well as neglect, exploitation, radicalization, and the misuse of personal data. Our procedures and processes take into account of the different forms that abuse can take.

All EMERGING PUBLIC LEADERS board members, employees, contractors, and volunteers (collectively, "covered persons"), have a duty to comply with the law and EMERGING PUBLIC LEADERS' guiding principles if they believe it is reasonably likely that any young person with whom they work is in danger of harm. All covered persons shall, in compliance with the applicable law, notify EMERGING PUBLIC LEADERS promptly once they are aware of a reporting obligation, and shall provide EMERGING PUBLIC LEADERS with all information and assistance that EMERGING PUBLIC LEADERS may require. This section is not to be construed in such a way as to obligate any covered person or EMERGING PUBLIC LEADERS to report

information in violation of applicable laws concerning confidentiality.

EMERGING PUBLIC LEADERS will work actively with all stakeholders to spread best practices in the protection of all young people.

Review

The Policy is reviewed by EPL's Executive Director and ratified by the EPL board of directors annually.

Groups protected by this Policy

Our Policy aims to protect those who are fellows in any Public Service Fellowship program sponsored by EMERGING PUBLIC LEADERS. These Fellows range in age from 18 to 35 and represent all demographics.

The Policy and Code of Practice apply to the following groups:

Young People: All participants in our program are 18 or older and are thus young adults. They are mature and recognized by society as adults. However, we recognize that as entry-level public servants many young people are vulnerable in new, highly charged work environments dictated by substantial power differences, and many need protection beyond the age of 18.

Vulnerable Adults: Adults who are dependent on others for protection continue to merit the protection of the program even beyond the age of 18.

EMERGING PUBLIC LEADERS recognizes that girls do not automatically become protected, and they may remain in a position of dependence on their family or other adults for a variety of reasons. Vulnerable adults could include young women, mothers, and people with disabilities - defined as those who have long-term physical, mental, intellectual, or sensory impairments which in interaction with various barriers may hinder their full

and effective participation in society on an equal basis with others.²

Groups governed by the Policy

Every EMERGING PUBLIC LEADERS representative must act in accordance with the Policy. This includes anyone paid by EMERGING PUBLIC LEADERS or voluntarily carrying out work for EMERGING PUBLIC LEADERS, and includes covered persons and associates (as defined below).

As used in this Policy, the term “employees” applies to full-time, part-time, national, international, temporary, daily/hourly paid and other employees of EPL or an EMERGING PUBLIC LEADERS country program. The term “contractors” applies to other individuals who perform work for EMERGING PUBLIC LEADERS organizations under an independent contracting or consulting arrangement. The term “board members” means members of the Board of Directors of EPL or its country program partners, respectively. The term “volunteers” means those who assist on an uncompensated basis with EMERGING PUBLIC LEADERS programs in capacities other than those listed in this paragraph. In this Policy, board members, employees, contractors, and volunteers are collectively called “covered persons”. Associates includes representatives of partner agencies who work with EMERGING PUBLIC LEADERS in the implementation of its programs.

² The Convention on the Rights of Persons with Disabilities and its Optional Protocol (CRPD, 2006, A/RES/61/106) defines persons with disabilities to “include those who have long-term physical, mental, intellectual or sensory impairments which in interaction with various barriers may hinder their full and effective participation in society on an equal basis with others”.

We will work with country programs, associates, and other adults who are not direct representatives of EMERGING PUBLIC LEADERS but who are linked to the program. We will work with them to ensure that they understand the standards we require from them in relation to the program. We will expect them to abide by the Policy in order to safeguard fellows. We will require from them a commitment to learning about and implementing the protection of young people.

EMERGING PUBLIC LEADERS will encourage representatives of government and/or civil authorities to comply with this Policy to the full extent possible without conflicting with their official obligations.

Section 2

EMERGING PUBLIC LEADERS Code of Practice for Youth Protection

Introduction

This Code of Practice is a statement of principles and procedures that applies to all of EPL covered persons when they come into contact with youth and vulnerable young adults, and actions that should be taken to prevent abuse or to respond to allegations of abuse. In addition, this Policy applies to all covered persons affiliated with each EMERGING PUBLIC LEADERS country program that adopts this Policy.

All covered persons should bear in mind that they have a duty to act as stated in the

Policy. Any associates of EMERGING PUBLIC LEADERS will also be expected to comply with the terms of this Policy.

EMERGING PUBLIC LEADERS' Code of Practice for Youth Protection is informed and guided by EMERGING PUBLIC LEADERS' core values and principles that put the best interests of fellows at the center of its work in protecting young people. It is also guided by the United Nations Convention on Human Rights which enshrines fundamental human rights.

Definition of a Young Person

For the purposes of this Code, a young person is defined as anyone younger than thirty-five (35). This Code shall apply equally to young people and vulnerable adults.

Definition of Abuse

Abuse is any form of physical, emotional or sexual mistreatment or lack of care that results in actual or potential harm to the young person's physical, psychological or emotional health, development, dignity or well-being in the context of a relationship of responsibility, trust or power. Abuse is categorized under four main forms, namely:

Physical abuse is the actual or likely physical injury to a young person or failure to prevent physical injury or suffering.

Sexual abuse is the actual or likely sexual exploitation of a young person. It includes direct or indirect sexual exploitation of young people by involving them (or threatening to involve them) in sexual activities.

Emotional abuse is the actual or likely adverse effect on the emotional or behavioral development of a young person caused by repeatedly rejecting and humiliating them or denying their worth and rights as human beings.

Neglect is the persistent lack of care of young people including safety, warmth and medical attention.

Contact with Young People

Direct contact is being in the physical presence of a young person or people in the context of EMERGING PUBLIC LEADERS work, whether occasional or regular, short or long term. This includes visits to training centers, universities, attending meetings, workshops or conferences at which young people are present, as well as correspondence and electronic contact with young people (the list is not exhaustive)

Indirect Contact is having access to information on young people in the context of EMERGING PUBLIC LEADERS' work such as youth's names, locations, addresses, photographs and case studies (list not exhaustive)

This Code of Practice recognizes that covered persons and associates are often in direct contact with young people and vulnerable young women as they carry out their day-to-day duties and are entrusted with their confidence. Covered persons and associates may have access to information about young people or be responsible for producing communications that portray young people or vulnerable young women's

lives and the challenges they face. The code also has practical advice on behavior protocols when working with young people, and action required in case of allegations of abuse.

Strategies to Ensure Awareness and Prevention of Abuse

Recruitment of Board Members, Employees, Contractors, and Volunteers

As part of the recruitment process, EMERGING PUBLIC LEADERS may require prospective covered persons to be subject to a criminal record check. Interview

questions will include questions on suitability to work with young people.

EMERGING PUBLIC LEADERS will seek references from former employers on prospective [board members', employees' contractors' or volunteers suitability to work with young people and vulnerable groups, recognizing that criminal record checks do not reveal all risks associated with inappropriate behavior.

Recruitment and induction of new covered persons will include briefing on safeguarding and security issues as a major concern for EMERGING PUBLIC LEADERS.

EMERGING PUBLIC LEADERS has a moral obligation to ensure that individuals and agencies contracted to provide a service which may involve direct or indirect contact with youth are aware of, and abide by, the Policy and this Code of Practice.

Training and Education

Covered persons will receive training; associates and appropriate stakeholders will be invited and strongly encouraged to attend all trainings as recommended by the Youth Protection Designated Person to:

- work safely and effectively with young people;
- recognize abuse and respond to concerns expressed by a young person;
- recognize their responsibilities and how to report any concerns about suspected poor practice and/or abuse;
- analyze their own practice against what is deemed good practice and to ensure their practice is likely to protect them from false allegations; and

- encourage youth's self-confidence and willingness to report inappropriate behavior.

EMERGING PUBLIC LEADERS will support parents and other community members to understand and identify abuse and build their capacity to report to relevant authorities and follow up on cases to deter further abuse; through linking communities with stakeholder agencies on abuse such as victim support, social welfare, medical personnel or other organizations working in this area.

Selection of Beneficiaries

EMERGING PUBLIC LEADERS shall take steps to ensure that any Fellow that is considered for receiving support through EMERGING PUBLIC LEADERS' disability benefits, mental health and wellness program, or any other part of EMERGING PUBLIC LEADERS' program, is protected from any form of actual or potential abuse or exploitation during the process of selection and in the subsequent provision of entitlements. To that end, EMERGING PUBLIC LEADERS will ensure that:

- selection is based on set criteria of youth-indicated need or on other bases that align with EMERGING PUBLIC LEADERS' program and mission;
- the criteria are shared with young people during the application stage and orientation stage of the program so that they are fully informed about the basis on which decisions around selection are made;
- young people are made fully aware of their entitlements prior to acceptance in the program, as the need arises for each individual, and upon receipt of the benefit;
- there are clear procedures in place to ensure transparency and accountability

when reporting on the receipt of benefits; and

- there is clear segregation of duties to ensure responsibility and follow through distributing benefits and monitoring their use.

Any violation of this Code of Practice is not tolerated and will result in the perpetrator being relieved of his/her duties in connection with EMERGING PUBLIC LEADERS, and all affected stakeholders will be made aware of the violation.

Monitoring, research and interviews involving young people and vulnerable youth

Any monitoring, research or interviews involving young people/vulnerable youth shall be done in accordance with the EMERGING PUBLIC LEADERS Monitoring and Evaluation Code of Conduct attached here as Appendix 4.

Meetings, Workshops or Conferences

To ensure the protection young people at such events, at most EMERGING PUBLIC LEADERS-organized meetings, events, or workshops, covered persons shall ensure that the following rules are observed:

- participants are made aware of the conduct expected of them at such a meeting, event or workshop, in line with this Code of Practice, that should include reference to what constitutes inappropriate behavior in terms of relations conducted out-of-hours;
- unless otherwise arranged, all young people and other participants at a meeting, event or workshop shall not leave the site of the meeting, event or workshop without notifying the responsible person of their whereabouts;
- arrangements for accommodation and other services are made in a manner that will allow participants to travel at a good time back to their homes;

- accommodations are made with attention to vulnerable young people and necessary provision of follow-on support;
- the experience is safe, welcoming and encouraging for the participation of all; and
- participation is voluntary.

Young People Staying in EMERGING PUBLIC LEADERS Accommodations

EMERGING PUBLIC LEADERS has housing available to those Fellows who are young people and come from outside the city of programmatic operations and in case where EMERGING PUBLIC LEADERS cannot accommodate all Fellows they assist in the procurement of accommodation outside of the housing managed by EMERGING PUBLIC LEADERS. In such cases where Fellows are accommodated by EMERGING PUBLIC LEADERS it shall be ensured that:

- where the premises are community owned, an agreement is in place of how the premises will be managed;
- all residents of such premises shall adhere to a code of behavior that ensures the safeguarding of young people;
- the premises are safe and secure and do not compromise the welfare of young people;
- clear rules are in place regarding visitors to the premises; and
- buildings are accessible to all disabled young people

Where EMERGING PUBLIC LEADERS assists women with accommodation, it shall be ensured that:

- women are, where possible, accommodated in groups;
- women are fully aware of their rights or entitlements under this provision; and
- the person(s) responsible for that accommodation is fully aware of this Policy.

Consensual/Personal/Sexual Relationships between Covered Persons (including vulnerable adults)

EMERGING PUBLIC LEADERS is committed to protecting the integrity and objectivity of covered persons. EMERGING PUBLIC LEADERS believes that it is fundamental to the organization's overall mission that trust and confidence exist between all those that work with the organization and that professional responsibilities are carried out in an atmosphere that is free of conflicts of interest, or perceptions of undue advantage/unfair treatment, that compromise the organization's principles. Accordingly, EMERGING PUBLIC LEADERS covered persons and associates shall abide and be guided by the EMERGING PUBLIC LEADERS Policy on Consensual/Personal/Sexual Relationships attached here as Appendix 1.

Implementation and Monitoring of the Policy

Implementation of the Policy

The Executive Team has overall responsibility to ensure that the Policy is implemented and will monitor EMERGING PUBLIC LEADERS' commitment to Fellow's protection through a review process to be held at least once every two (2) years.

Appointment of a Youth Protection Designated Official

There shall be a designated person for each EMERGING PUBLIC LEADERS

country program (the "Youth Protection Designated Person"), currently the Country Directors for each of the country programs, who will be responsible for the implementation, supervision, and monitoring of the Policy in each country. The Executive Director of EPL will serve as Youth Protection Designated Person for EPL and as a resource to the other Youth Protection Designated Persons. [The country program Youth Protection Designated Persons are responsible for coordinating action within the country program and for liaising with health, social welfare, police, and other agencies about suspected or actual cases of abuse.]

The Executive Team shall ensure that the Youth Protection Designated Person has received training on youth protection, is aware of local laws applying to youth protection and has information on local and international youth protection agencies.

It shall be the duty of the Youth Protection Designated Person to:

- provide information and advice on youth protection within their organization (which shall be their country program or EPL, as applicable);
- ensure that their organization's Policy and procedures are followed;
- be familiar with local procedures;
- liaise with police, social or welfare agencies, and other agencies as appropriate.
- keep relevant people informed about any action taken and further action required.
- ensure an individual case record is maintained of the action taken by the

country program, liaison with other agencies, and outcome under confidential cover;

- design a reporting format that is friendly to users; and
- advise the country program on youth protection training needs.
- ensure a risk assessment is conducted periodically to identify potential safeguarding risks and develop mitigation controls.

Standards of Behavior

All covered persons and associates in contact with children shall:

- treat everyone with respect, recognizing their right to personal privacy.
- plan and organize events in a manner that reduces risk.
- Get consent from participants before taking photographs.
- foster a culture of mutual accountability so that potentially abusive behavior can be challenged, and
- help young people to develop their own sense of their rights as well as helping them to know what they can do if they feel that there is a problem.

Covered persons and associates who come into contact with young people should:

- empower young people by promoting their rights and raising awareness.
- ensure that field visits, studies and programs affecting young people are in the best interests of the young people concerned; and
- consult with young people, to the extent feasible, in the planning,

implementation, and evaluation of field visits, studies and programs that affect them.

Covered persons and associates **must not**, under any circumstances:

- act in ways that may be abusive or may place a young person at risk of abuse;
- use language, make suggestions or offer advice which is inappropriate, offensive or abusive;
- condone, or participate in, behavior which is illegal, unsafe or abusive; and
- act in ways intended to shame, humiliate, belittle or degrade young people.

Reporting and Reacting to Allegations of Suspected Abuse

The following procedure will be followed for reporting and reacting to any witnessed, suspected or alleged incident of child abuse or violation of this Policy by a covered person. The guiding principle in responding to any concerns around youth protection is that the safety and welfare of the young person should always come first. No young person should be put at more risk by any action that may be taken.

If you witness, suspect or a disclosure is made to you about a case of abuse:

Stay calm, being mindful of your body language. Avoid language which might make them feel small so as not to frighten the young person.

1. Do not confront or challenge the alleged person, consider using words like "I trust/believe you" which may make the young person feel comfortable.

2. Do not investigate or inform the parents or guardians of the child.
3. If you have to ask questions, keep them to a minimum so that there is a clear and accurate understanding of what has been said. The law is very strict and abuse cases have been dismissed where it is felt that the young person has been led or ideas have been suggested during the questioning.
4. Let the young person know what you are going to do next and that you will let them know what happens.
5. Do not promise confidentiality, but that you will inform people who need to know.
6. Safety of the young person should always be considered to be paramount. If urgent action is required in order to protect the young person then action may be undertaken prior to the reporting procedure.
7. e.g. If the young person needs urgent medical attention make arrangements to get the young person to the nearest health facility and inform the medical personnel of your concerns and make them aware that there is an abuse protection issue.
8. Record in writing all concerns relating to the case.
9. Report as soon as possible to the Youth Protection Designated Person who will assess the situation in liaison with EPL and advise on further steps that may need to be taken.
10. At this stage, any reported or suspected abuse is an allegation rather than a proven fact. All concerns, even when they are doubted, and allegations about abuse must be referred to the Youth Protection Designated Person.

If allegations are made against you:

1. Inform the local Youth Protection Designated Person, and/or the Executive Director of EPL.
2. Record all details in writing as you know them and send to your respective EMERGING PUBLIC LEADERS Country Director.

Outside Concerns

Any person having any abuse concerns from outside the immediate EMERGING PUBLIC LEADERS related activities should:

1. Contact local protection agencies and/or the police.
2. The police and relevant protection agencies will decide how to handle the matter.
3. Also report the incident to the Youth Protection Designated Person within EMERGING PUBLIC LEADERS who shall ascertain whether the person(s) involved in the incident play any role in EMERGING PUBLIC LEADERS and act accordingly.
4. Maintain confidentiality on a need-to-know basis.

Confidentiality

Any information offered in confidence to an EMERGING PUBLIC LEADERS covered person is received on the basis that it will be shared with people in relevant authority: this will be in the first instance the Youth Protection Designated Person, currently respective Country Directors, but may include statutory agencies

(e.g. police or social welfare). Apart from this, careful confidentiality will be observed.

Any recorded information must be kept confidential and should be passed on to the respective Country Directors. Sharing of information, which could identify a young person or an alleged perpetrator, should be purely on a “need to know” basis.

All information, including that contained in correspondence or reports from the field, shall be kept secure with limited access to only EPL covered persons with a need to know. It should not under any circumstances be available for wider viewing.

The Country Directors together with EPL will look at the allegations and gather evidence, determine what action to take and how, and who are the people who need to know.

In certain instances, there may be an obligation for employees and program activists to report concerns to the appropriate external bodies. This will usually occur as a consequence of the reporting procedure to the Youth Protection designated person.

Whistle-Blowing

Concerns in relation to child protection may be reported in a whistle-blowing

manner as set out in the EPL Whistleblowing Policy.

Management Responsibilities

An alleged perpetrator of abuse will be immediately suspended from their normal relationship with EMERGING PUBLIC LEADERS pending investigation. It should be made clear that suspension does not imply guilt but is necessary to protect both parties while undertaking an investigation.

In deciding the appropriate course of action, the Youth Protection Designated Person may report and follow up cases in relation to:

- a member of the public service – to their line manager or head of department and/or police;
- a member of the public – to the police community liaison officers.

In deciding the appropriate course of action, subject to conditions of employment, codes of practice and local law, proven abuse will lead to:

- In the case of an employee: classified as gross misconduct leading to summary dismissal.

- In the case of a contractor: termination of their contract.
- In the case of a volunteer or associate: termination of their relationship with EMERGING PUBLIC LEADERS.
- In the case of a board or committee member: removal from the committee and termination of their relationship with EMERGING PUBLIC LEADERS.

The person may be subjected to criminal prosecution under local laws in addition to other disciplinary procedures by their employer.

All cases will be considered on an individual basis and arrangements will be put in place to provide support to those affected during and following an allegation.

Addressing the Aftermath

After a suspicion or allegation about an abuse issue has been investigated, there are likely to be strong feelings amongst covered persons, Fellows, and/or associates which will need to be addressed.

There are likely to be issues of:

- Communication – if rumor or fact
- Guilt and blame – if suspicions had been around for some time
- Impact – on individuals, on the nature of what occurred and to whom
- Gaps in the organization in terms of roles and post held

Careful thought will need to be given to the sharing of information and the provision of appropriate information.

Appendices

Appendix 1

EMERGING PUBLIC LEADERS Policy on Consensual / Personal / Sexual Relationships between Covered Persons and/or Associates

Introduction

EMERGING PUBLIC LEADERS' vision and mission to strengthen Africa's development and economic growth by building the next generation of civil servants is promoted by professionalism that derives from mutual trust and respect among covered persons and/or associates.

EMERGING PUBLIC LEADERS is committed to protecting the integrity and objectivity of its covered persons and associates in the performance of their duties and service to individuals and their communities. EMERGING PUBLIC LEADERS believes that it is fundamental to the organization's overall mission that trust and confidence exist between covered persons and/or associates and that professional responsibilities are carried out in an atmosphere that is free of conflicts of interest, or perceptions of undue advantage/unfair treatment, that compromise the organization's principles.

Accordingly, EMERGING PUBLIC LEADERS prohibits sexual/personal relationships between covered persons and program participants (including vulnerable young adults) because these are based on inherently unequal power dynamics. Given the

imbalance of power between covered persons and participants, any abuse of professional duty is considered a breach of professional ethics to be viewed with the utmost concern and will result in disciplinary action³.

EMERGING PUBLIC LEADERS discourages covered persons and/or associates from entering into a consensual personal relationship⁴. Such relationships have the potential to undermine the credibility, integrity and reputation of the work of the organization, and compromise professional relationships.

Moreover, such relationships may damage others in the work environment.

Relationships in which one party has authority or influence on decisions regarding work or benefits for the other party may provide grounds for complaint when that relationship gives, or creates the appearance of, undue access or advantage to an individual involved in the relationship, or when it restricts opportunities or creates a hostile environment for others.

However, EMERGING PUBLIC LEADERS does recognize that relationships may develop between covered persons and/or associates as a result of their contact with the organization without deliberate intent and that such relationships may be desired by both parties and may lead to successful long-term relationships.

This Policy seeks to balance the risk of damage to EMERGING PUBLIC LEADERS against respecting the freedom of consenting adults. It outlines the guidelines for such sexual and/or personal relations and all covered persons and associates are expected to follow it for the protection of themselves, young adults and the

organization.

³ EPL's Disciplinary Policy can be found in the Employee Handbook. The respective disciplinary policies of the country programs can be requested from the respective Country Director.

⁴ A consensual/personal/sexual/romantic relationship is any relationship that crosses professional boundaries.

Any relationship that is deemed exploitative, or behavior that is deemed inappropriate and counter to the principles and values of EMERGING PUBLIC LEADERS as enshrined in this Safeguarding and Security Policy, shall be referred to the Country Director for appropriate sanction.

Procedure

Any covered persons or associates who are currently involved in a sexual, romantic, or personal relationship, or feels that such a relationship may develop with another covered person or associate should declare their relationship (not necessarily its nature) in confidence to the Youth Protection Designated Person or other established reporting mechanisms within the organization⁵. Any person who suspects or is informed of a non-declared relationship that they feel may interfere with the professional duties of covered persons or associates may also approach the Youth Protection Designated Person in confidence.

Managers at all levels (including leaders of associate groups) are obliged to create and maintain an environment that prevents sexual exploitation and abuse and promotes the implementation of the Code of Practice. Cases will be evaluated on an individual basis and a case management plan will be developed to address

⁵ Such a relationship may not in itself be a ground for disciplinary action; however failure to report such a relationship may be grounds for such action.

areas of potential conflict of interest. The case management plan must be adhered to by all affected parties.

Any exploitation of the professional duty in pursuit of these relationships will be addressed under the organization's disciplinary procedures and is grounds for termination of employment.

Exchange of money, employment, goods or services for sex, including sexual favors or other forms of humiliating, degrading or exploitative behavior is strictly prohibited.

Appendix 2

EMERGING PUBLIC LEADERS Nondiscrimination and Harassment Policy

Introduction

EMERGING PUBLIC LEADERS is committed to ensure that all covered persons⁶, associates⁷, and fellows are valued and treated equitably and fairly.

EMERGING PUBLIC LEADERS works with covered persons and associates, selects fellows, and makes available on an equal basis all rights, privileges, programs, and activities, without regard to any race, color, national or ethnic origin, sex, age, disability, religion, or marital status. In the administration of EMERGING PUBLIC LEADERS programs and activities, EPL and its country program partners prohibit unlawful discrimination on the basis of race, color, national or ethnic origin, sex, age, disability, religion, gender identity or expression, marital status or any other characteristic

protected by applicable law. EPL and its country program partners also prohibit unlawful harassment including sexual harassment and sexual violence. This Policy applies to EMERGING PUBLIC LEADERS programs taking place in any location.

Sexual Harassment in employment has been defined generally as including unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature, whenever: (1) submission to the conduct is either an explicit or implicit term or condition of employment; (2) an employee's reaction to the conduct is used as a basis for employment decisions affecting that employee; or (3) the conduct has the purpose or effect of interfering with the employee's work performance or creating an intimidating, hostile or offensive working environment.

No covered person, associate, Fellow, or applicant should be subjected to unsolicited and unwelcome sexual overtures, nor should any covered person, associate, Fellow, or applicant be led to believe that an employment or program opportunity or benefit will in any way depend upon "cooperation" of a sexual nature.

Sexual harassment is not limited to demands for sexual favors. It also may include such actions as: (1) sex-oriented verbal "kidding," "teasing" or jokes; (2) repeated offensive sexual flirtations, advances, or propositions; (3) continued or repeated verbal abuse of a sexual nature; (4) graphic or degrading comments about an individual or his or her appearance; (5) the display of sexually suggestive objects or pictures; (6) subtle pressure for sexual activity; and (7)

inappropriate physical contact.

⁶ In this policy, "covered persons" include board members, employees, contractors, and volunteers of EPL and any EMERGING PUBLIC LEADERS country program partner.

⁷ In this policy, "associates" includes representatives of partner agencies who work with EMERGING PUBLIC LEADERS in the implementation of its programs.

Sexual harassment does not refer to occasional compliments of a socially acceptable nature, or consensual personal and social relationships without a discriminatory employment effect. It refers to behavior that is not welcome and that is personally intimidating, hostile, or offensive.

General Harassment on other grounds, including race, color, religion, national origin, pregnancy, childbirth or related medical conditions, age, genetic information of the individual or family member of the individual, disability, marital status, veteran status, or any other basis prohibited by law is also prohibited. Prohibited harassment may include, but is not limited to, epithets, slurs, derogatory comments or jokes, intimidation, negative stereotyping, threats, assault or any physical interference with the individual's normal work or movement, and other conduct that the individual might reasonably find to be offensive and which is directed at an individual, his/her relatives, friends or associates. Harassment may also include written or graphic material placed on walls, e-mail, bulletin boards or elsewhere on EPL or country program premises, or circulated in the workplace that denigrates, shows hostility or aversion towards an individual or group because of the characteristics

identified above.

Scope of Policy

This Policy prohibiting discrimination and harassment, whether sexual or of another nature, is not limited to relationships between and among employees and prospective employees, but also extends to interaction with covered persons, associates, customers, suppliers, and others having a business relationship with EPL or its country program partners. No covered person shall ever subject any customer, supplier, or other person to sexual harassment or other unlawful harassment or discrimination of any nature, including that conduct described above. Furthermore, no employee or applicant will be required to suffer discrimination or harassment, including sexual harassment, by any contractor, associate, vendor, or supplier. Any unwelcome sexual overtures or other forms of sexual or unlawful harassment or discrimination advanced by a contractor, associate, vendor, or supplier should be reported immediately to a supervisor or anyone in EMERGING PUBLIC LEADERS' management.

Prevention

Prevention through education is a fundamental aspect of the EMERGING PUBLIC LEADERS' commitment to addressing discrimination and harassment. The individual country programs, with the support of the EPL Team, is responsible for coordinating the EMERGING PUBLIC LEADERS' prevention, education and training initiatives for their covered persons, associates, and fellows, which will be attuned to

the broader social context in which discrimination and harassment may occur.

Complaint Procedure

EMERGING PUBLIC LEADERS encourages reporting of all incidents of discrimination and harassment, including sexual harassment, regardless of the identity of the offender. While EMERGING PUBLIC LEADERS encourage individuals who believe they are being harassed to firmly and promptly notify the offender that his or her behavior is unwelcome, EMERGING PUBLIC LEADERS also recognizes that power and status disparities between the offender and the recipient of the offensive conduct may make such a confrontation impossible. Consequently, such direct communication is not a requirement or prerequisite to filing a complaint. Any covered person who feels that he or she is or has been subjected to illegal discrimination or harassment in violation of this Policy should immediately notify his or her supervisor or the Board Chairman.

EMERGING PUBLIC LEADERS will fully investigate all complaints, and will maintain confidentiality to the extent possible given EMERGING PUBLIC LEADERS' duty to investigate the complaint. Anyone who is found to have engaged in illegal discrimination or harassment will be subject to appropriate disciplinary action depending on the circumstances, including possibly termination of employment. No employee will be retaliated against for making a complaint or assisting with the investigation of a complaint. Making a knowingly false complaint, however, may result in disciplinary action, including possibly termination of employment.

EMERGING PUBLIC LEADERS is strongly committed to maintaining a workplace free of impermissible discrimination, harassment or intimidation, including sexual harassment. All complaints will be taken seriously. If you have questions, please speak to your supervisor or anyone in EMERGING PUBLIC LEADERS' management.

Appendix 3

EMERGING PUBLIC LEADERS Policy for Ethical Conduct Whistle-Blowing – Dealing with Serious Wrongdoing

The Grievance Procedure sets out how you should deal with concerns about your direct work situation. This section covers significant malpractice at an organizational level.

How to Raise a Concern

Concerns may be submitted either in writing or orally. No specific form is required to be filled out in order to submit a Concern, but you are encouraged to provide as much information and detail as possible so that the Concern can be properly investigated. A Concern may be submitted:

- To the Director of Finance and Operations (the "Policy Administrator," who is an employee, officer or director of the Organization, as required by law);
- By discussing it with a supervisor or manager, who will in turn forward the Concern to the Policy Administrator for review where appropriate; or
- In writing (including by e-mail) to the Chair of the Board of Directors of the Organization (the "Board"), who will in turn forward the Concern to the Policy Administrator for review where appropriate.

Concerns may be raised anonymously; however, any individual reporting his or her own violation shall not satisfy his/her disclosure obligation hereunder with a Concern raised anonymously. Any individual who is the subject of a Concern is prohibited from participating in any board or committee deliberations or voting

relating to the evaluation of such Concern in accordance with this Policy; provided, that the Board is not prohibited from requesting that such individual present information as background or answer questions at a meeting of the Board prior to the commencement of deliberations or voting relating thereto.

Appendix 4

Indicators of Abuse

Listed below are a number of indicators; however, they may vary by cultural and economic context. This list is not exhaustive but is a guideline to help establish whether some form of abuse or exploitation has taken place. However, it is not your role to become an investigator. Any concerns must be directed to the Designated Youth Protection Person.

Emotional Signs of Abuse

- Sudden under achievement or lack of concentration
- Inappropriate relationships with peers and/or supervisors
- Changes or regression in mood or behavior, particularly where a young person withdraws or becomes clinging
- Depression or extreme anxiety
- Nervousness, frozen watchfulness
- Obsessions or phobias
- Persistent tiredness
- Running away/stealing/lying

Indicators of Possible Physical Abuse

- Any injury inconsistent with explanation given to them
- Reluctance to participate in group activities
- Repeated illness
- Bruises, bites, burns, fractures, or other injuries which do not have a reasonable explanation
- Infections and/or symptoms of sexually transmitted diseases

Indicators of Possible Sexual Abuse

- Any allegations made by a young person concerning abuse
- Sexually provocative or seductive with supervisors

Indicators of Neglect

- Frequent lateness or non-attendance at work
- Inadequate care

Appendix 5

Legal and Procedural Framework

The practices and procedures within this Policy are based on principles contained within national legislation and international human rights law.

Legislation	Useful contacts
Ghana	
Constitution of the Republic of Ghana Education Act Criminal Code	District Education Directors Regional Ghana Educational Directorates Girl Child Education Unit Domestic Violence and Victim Support Police Officers Christian Aid Commission on Human Rights and Administrative Justice www.chrajghana.org
International	
Convention on the Rights of Persons with Disabilities and its Optional Protocol (CRPD, 2006, A/RES/61/106) Data Protection Act. 1998	