

Village Enterprise Safeguarding Policies **& Procedures**

1.0 CODE OF CONDUCT

The Village Enterprise Code of Conduct outlines behaviors and actions that are consistent with the values and ethics of our organization. Village Enterprise Team members are required to know and adhere to all elements of the Code. If you are aware of a Village Enterprise employee acting in violation of the Code, it is your responsibility to report these activities to the Human Resource Department.

1.0.1 RESPECT /COURTESY

All Village Enterprise Team members are expected to act with the utmost respect for fellow staff members, program participants, and their communities. We strive to treat everyone equally and fairly, and take special care to avoid discrimination or favoritism in our work.

1.0.2 INTEGRITY

While both on and off-duty, Village Enterprise employees conduct themselves as professionals and display the highest level of integrity and honesty. As Village Enterprise Team members, we are committed to honoring all personal and organizational obligations, and maintaining an exemplary reputation for both Village Enterprise and ourselves.

1.0.3 ACCOUNTABILITY AND TRANSPARENCY

We strive to cultivate an organizational culture of sincerity, trust, and transparency. Village Enterprise Team members are committed to ensuring that accurate records are kept, reliable reports are submitted, and financial and physical resources are responsibly used. As Village Enterprise Team members, we are accountable to each other and to the communities we serve.

1.0.4 SAFEGUARDING

Village Enterprise employees are dedicated to protecting the well-being and human rights of our fellow team members, program participants, and people living in the communities where we we work. We believe everyone should live free from abuse, harm, and neglect, and strive to uphold this value in every aspect of our work at Village Enterprise.

1.0.5 POLITICAL AND RELIGIOUS ACTIVITIES

Village Enterprise is an organization without any political or religious affiliation. Team members are free to engage in political or religious activities when off-duty, so long as they do not involve Village Enterprise resources or staff in any way. Any employee that chooses to campaign for or is appointed to a political office is expected to voluntarily resign from their position with Village Enterprise.

1.0.6 GIFTS

Village Enterprise Team members do not accept gifts from any person, organization, or community member attempting to influence Village Enterprise business decisions or activities. Employees will not be penalized for being offered a gift, as long as they are transparent in reporting the incident to their supervisor. Employees are not prohibited from accepting small advertising novelties such as pens, pencils, calendars, etc.

1.0.7 BRIBERY AND SOLICITATION

Village Enterprise has a zero tolerance policy on any form of bribery. A bribe is a gift, facilitation payment, or other benefit provided to expedite or secure performance by another person.

Village Enterprise Team members do not solicit for or accept any loans, gifts or favors from co-workers, program participants, community members, suppliers, or donors. Village Enterprise prohibits the distribution of materials that might interfere with normal business operations or negatively impact employee productivity.

1.0.8 ALCOHOL, DRUGS AND NARCOTICS

Village Enterprise maintains a drug and alcohol-free workplace. Employees are prohibited from being under the influence of alcohol, drugs or narcotics during office hours, or while driving a Village Enterprise vehicle. Possessing illegal drugs on Village Enterprise property is strictly forbidden.

1.0.9 ATTIRE

Village Enterprise Team members dress appropriately while on duty, maintaining a neat and clean appearance that demonstrates respect for our colleagues and the communities in which we work.

1.0.10 CONFIDENTIALITY

In your role at Village Enterprise, you may have access to information and records that are considered confidential. This includes (but is not limited to) information about program participants and their communities, employees, financial records, monitoring and evaluation data, and other Village Enterprise operational materials. We respect the sensitive nature of this knowledge and act in a responsible way to protect it at all times.

1.0.11 EQUIPMENT, STATIONERY AND MATERIALS

Village Enterprise Team members are provided with the necessary equipment, stationary, and materials to execute their job duties. These assets are available for Village Enterprise activities only, and must be treated with the utmost care while in your possession. Communication services provided by Village Enterprise, such as airtime and internet, are to be used exclusively for professional purposes.

1.0.12 CONFLICT OF INTEREST

An actual or potential conflict of interest occurs when an employee is in a position to influence a decision that may result in a personal gain for that employee or for a relative as a consequence of Village Enterprise activities. Village Enterprise Team members should not engage in any activity, practice, or acts which conflict with, or appear to conflict with, the interests of Village Enterprise, its programs or participants.



1.1 CHILD SAFEGUARDING POLICY

1.1.1 Policy Goals

Village Enterprise (VE) recognizes the personal dignity and rights of children. VE Team members have a special responsibility and duty to care for and respect children. We believe that all children (anyone under the age of 18) have equal rights to safeguarding from harm as set out in the United Nations (UN) Convention on the Rights of the Child. VE does not tolerate child abuse, neglect, violence or exploitation in any form. Staff, board members,

interns, volunteers and consultants are committed to creating a safe environment for children and young people and to preventing their physical, sexual or emotional abuse.

The aim of this policy is to safeguard children from all forms of abuse. Setting standards for appropriate behavior, it also protects VE representatives who come into contact with children from unfounded accusations of improper conduct. It clarifies unacceptable forms of behavior that will result in a formal enquiry and which could lead to disciplinary measures being taken, or criminal proceedings instituted. In no way does misunderstanding the age of an individual constitute a defense against allegations of misconduct.

1.1.2 Child Safeguarding Best Practices

Staff, Board Members, Interns, Volunteers and Consultants Should Always:

- Plan and organize their activities and working environment so as to minimize risks to children and remain in public view while interacting with them
- Ensure a culture of transparency, so that issues or concerns can be raised and discussed
- Promote a sense of accountability among staff so that violations of child safety best practices or potentially abusive behavior is addressed immediately
- Act in a caring and responsible way towards children
- Provide equal treatment to both girls and boys
- Be aware of potential acts of abuse, and responsive to children's concerns and complaints
- Act impartially when resolving conflicts between children and adults
- Play a positive role in safeguarding children and promoting their well-being
- Respect the dignity of children at all times

Staff, Board Members, Interns, Volunteers and Consultants Should Never:

- Spend excessive time alone with children out of public view, or take children to their homes
- Strike or otherwise physically abuse children
- Develop physical or sexual relationships with children
- Use language, make suggestions or offer advice that is inappropriate, offensive or abusive
- Behave in a manner that is inappropriate or sexually provocative
- Do things for children of a personal nature that they can do for themselves
- Condone or participate in behavior towards children that is illegal, unsafe or abusive
- Act in ways intended to shame, humiliate, belittle or degrade children, or otherwise perpetrate any form of psychological or emotional abuse
- Expose children to pornography
- Allow children to engage in hazardous business activities
- Exploit children through sex work and/or domestic work
- Infringe upon children's rights to privacy and confidentiality
- Employ children under the age of 18 as VE staff

1.1.3 Reporting and Response to Child Safeguarding Incidents

It is the responsibility of Village Enterprise team members to report any suspected violations of child safeguarding best practices using the Reporting Procedures outlined in Section 1.5. Village Enterprise recognizes the traumatic effect of child abuse, and is fully committed to providing assistance and support to victims.



1.3 SEXUAL AND OTHER FORMS OF HARASSMENT¹

Village Enterprise is committed to providing a program setting and work environment for employees and community members that is free from sexual, verbal, or physical harassment. Any action or conduct by a Village Enterprise Team member that could reasonably be viewed as sexual harassment, bullying or intimidation is prohibited.

1.3.1 Definition of Sexual Harassment

For the purposes of this policy, sexual harassment is defined as unwelcome requests for sexual favors and other verbal or physical conduct of a sexual nature when:

- (i) Submission to improper pressure or coercion is made, either explicitly or implicitly, a term or condition of an individual's employment or program participation;
- (ii) Demanding sexual favors is a precondition to receiving money, goods, employment, or participation in our program;
- (iii) Submission to, or rejection of, unwanted advances is used as the basis for decisions affecting an individual's employment or program participation; or
- (iv) Inappropriate behavior creates an intimidating, hostile or offensive environment for employees or community members.

Sexual harassment includes a range of subtle and not so subtle behaviors and may involve individuals of the same or different genders. Depending on the circumstances, these behaviors may include, but are not limited to: unwanted sexual advances or requests for sexual favors; sexual jokes and innuendo; verbal abuse of a sexual nature; commentary about an individual's body; inappropriate touching; insulting or obscene comments or gestures; display or circulation in the workplace of sexually suggestive materials (including through e-mail, SMS and other social media); and other physical, verbal or visual conduct of a sexual nature. Gender-based biases affecting employment or programmatic decisions may also be considered sexual harassment.

¹Section 6(2) of the **Kenya** Employment Act provides that an employer shall provide a policy statement on sexual harassment. Such policy must be in accordance with Section 6(3) of the Act which states that 3) The policy statement required under subsection (2) may contain any term the employer considers appropriate for the purposes of this section and shall contain—

- (a) the definition of sexual harassment as specified in subsection (1);
- (b) a statement—
 - (i) that every employee is entitled to employment that is free of sexual harassment;
 - (ii) that the employer shall take steps to ensure that no employee is subjected to sexual harassment;
 - (iii) that the employer shall take such disciplinary measures as the employer deems appropriate against any person under the employer's direction, who subjects any employee to sexual harassment;
 - (iv) explaining how complaints of sexual harassment may be brought to the attention of the employer; and
 - (v) that the employer will not disclose the name of a complainant or the circumstances related to the complaint to any person except where disclosure is necessary for the purpose of investigating the complaint or taking disciplinary measures in relation thereto.

A similar provision to this in the Ugandan Employment in section 7 which in addition to prohibiting sexual harassment defines sexual harassment to include a situation where the employer;

- a) Directly or indirectly makes a request for sexual intercourse or any other form of sexual contact that contains,
 - i) Implied or express promise of preferential treatment
 - ii) Implied or express threat of detrimental treatment in employment
 - iii) Implied or express threat about present or future employment status of the employee
- b) Uses language written or spoken of a sexual nature
- c) Uses visual material of a sexual nature
- d) Shows physical behavior of a sexual nature

Under the same section where the employer has more than 26 employees, he/she is supposed to make rules to prevent sexual harassment). This can be included in the human recourse guidelines where applicable.

1.3.2 Definition of Other Forms of Harassment

Harassment is verbal or physical conduct that denigrates, negatively stereotypes, or shows hostility toward an employee or community member because of his/her race, color, religion, national origin, age, disability, marital status, HIV status, sexual orientation or any other characteristic protected by law. Harassment is considered any activity that:

- (i) has the purpose or effect of creating an intimidating, hostile or offensive environment;
- (ii) has the purpose or effect of unreasonably interfering with an individual's job duties or program performance; or
- (iii) otherwise adversely affects an individual's employment or program participation opportunities.

All forms of sexual or other harassment as defined above are strictly prohibited. Any VE employee who has concerns or suspicions regarding sexual harassment, abuse, or exploitation should immediately report those concerns using the Reporting Procedures outlined in Section 1.5.



1.4 WHISTLEBLOWING

Village Enterprise requires directors, officers and employees to observe high standards of business and personal ethics while carrying out their duties. As employees and representatives of Village Enterprise, we must practice honesty and integrity in fulfilling our professional responsibilities and comply with all applicable laws and regulations.

1.4.1 Reporting Responsibility

This Whistleblower Policy is intended to encourage and enable employees, program participants and community members to raise serious concerns so that Village Enterprise can address and correct inappropriate conduct or actions. Examples of activities that should be reported include but are not limited to ethics violations, discriminatory behavior, abuse of power and suspected fraud. It is the responsibility of all employees and program participants to report concerns about breaches of Village Enterprise's Code of Conduct or suspected violations of laws/regulations using the Village Enterprise Reporting Procedures outlined in Section 1.5.

1.4.2 No Retaliation

No employee, program participant, or community member who, in good faith, reports a concern shall be subject to retaliation or adverse employment consequences. A Village Enterprise employee who retaliates against someone who has reported a concern in good faith will be subject to disciplinary action.

1.4.3 Acting in Good Faith

Anyone reporting a suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed reflects illegal or prohibited activities. Any allegations that prove not to be substantiated and which also prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

1.4.4 Confidentiality

Suspected violations may be submitted on a confidential basis by employees, program participants and community members. Whistleblowing reports will be kept confidential to the greatest extent possible, consistent with the need to conduct an adequate investigation.



1.5 REPORTING AND INVESTIGATION OF ALLEGED MISCONDUCT

1.5.1 How to Report Concerns

Employees, program participants and community members have the following options for reporting alleged misconduct by Village Enterprise staff:

- Send an email to HR at reporting@villageenterprise.org
- Call a dedicated, country-specific safeguarding hotline monitored by our human resource department (Kenya +254 771639074) (Uganda +256 393228417)
- Submit a confidential report at: <https://goo.gl/forms/oMBMWaGJY0mn5GBa2>
- Directly contact a Village Enterprise human resource professional
- Send an email to the Board of Directors at boardreporting@villageenterprise.org

Please provide full details, such as names, dates, places, the reason for the concern, and any supporting evidence or documentation.

1.5.2 How Reports Will Be Addressed

All individuals who make a complaint in good faith can expect to receive an acknowledgement from the Village Enterprise Safeguarding Officer within two working days, at which point the incident will also be recorded in the Safeguarding Log. The Safeguarding Officer, Country Director and Human Resource Coordinator will then review the case, determine the level of investigation and confidentiality required, and initiate suspension of implicated employees if necessary. A formal investigation will be completed within 25 working days of the complaint being logged, and the results and disciplinary actions required will be promptly communicated to the individual who reported the incident and the employee accused of misconduct. The Safeguarding Officer is responsible for preparing and filing an Official Incident Report once the case has been resolved.

