

SAFEGUARDING AND CHILD PROTECTION POLICY

Prime Expertise Limited

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EFFECTIVE DATE	March 2022	DATE OF LAST REVISION	March 2023	VERSION NO.	1.0.2
APPLIES TO					
GROUP 1	Associates	GROUP 2	Employees	GROUP 3	Partners
GROUP 4	Interns	GROUP 5	—	GROUP 6	—

VERSION HISTORY				
VERSION	APPROVED BY	REVISION DATE	DESCRIPTION OF CHANGE	RESPONSIBILITY
1.0.1	Board of Directors	N/A	N/A	Managing Director
1.0.2	Board of Directors	March 2023	Annual review to address any gaps or inconsistencies	Managing Director

Purpose

Prime Expertise is firmly committed to safeguarding as an essential component of the services it offers. The Company recognises that all children and vulnerable adults have the right to be free from abuse and to be in an environment where safety and security are paramount. We take very seriously our responsibility and duty to ensure that we, as an organisation, and anyone who represents us do not in any way harm, abuse, or commit any other act of violence against children and vulnerable adults or place them at risk of the same.

The purpose of this Policy is therefore to communicate our commitment and process to protect children and vulnerable adults from any harm that may be caused as a result of their coming into contact with Prime Expertise's representatives, services, or activities. This includes any harm arising from:

- the conduct of associates, employees, and anyone working for or associated with Prime Expertise; and
- the design and implementation of our consulting services and activities.

Scope

Prime Expertise's Safeguarding and Child Protection Policy applies to all those who work for Prime Expertise across Tanzania, East Africa, and beyond, whether full-time or part-time, temporary or permanent. This includes:

- associates;
- employees;
- interns; etc.

Prime Expertise will also apply this Policy in its interactions with other stakeholders, such as consortium partners and subcontractors. That, when entering into partnership with Prime Expertise, this Policy should be adhered to, even where the partner or a subcontractor has their own Policy in place.

The term "Prime Expertise personnel or personnel" is used throughout this Policy to cover all associates, employees, and interns.

Policy statement

Prime Expertise believes that everyone we as an organisation come into contact with, regardless of age, gender identity, disability, sexual orientation, or ethnic origin, has the right to be protected from all forms of harm, abuse, neglect, and exploitation. Prime Expertise will not tolerate abuse or exploitation by any of our personnel.

This Policy will address the following areas of safeguarding: child safeguarding, vulnerable adult safeguarding, and protection from sexual exploitation and abuse.

Prime Expertise commits to addressing safeguarding consistently and without exception throughout all its services and activities, through the three pillars of prevention, reporting, and response.

Prevention

Prime Expertise's responsibilities:

Prime Expertise will:

- Ensure all our personnel have access to, are familiar with, and understand and accept their responsibilities as outlined within this Policy;
- Design and undertake all its consulting services and activities in a way that protects people from any risk of harm that may arise from their coming into contact with Prime Expertise. This includes how we gather and communicate information about individuals in our assignments;
- Implement stringent safeguarding procedures when recruiting, managing, and deploying our personnel;
- Ensure all our personnel receive information and training on safeguarding at a level commensurate with their role in the organisation;
- Follow up on reports of safeguarding concerns promptly and according to due process.

Personnel responsibilities:

1) Child safeguarding:

Prime Expertise's personnel must not:

- Engage in sexual activity with anyone under the age of 18;
- Sexually abuse or exploit children or young people;
- Subject a child or young people to physical, emotional, or psychological abuse or neglect;
- Engage in any commercially exploitative activities with children or young people, including child labour or trafficking.

2) Vulnerable adult safeguarding:

Prime Expertise's personnel must not:

- Sexually abuse or exploit vulnerable adults;
- Subject a vulnerable adult to physical, emotional, or psychological abuse or neglect.

3) Protection from sexual exploitation and abuse:

Prime Expertise's personnel must not:

- Exchange money, employment, goods or services for sexual activity. This includes any exchange of assistance that is due to beneficiaries of assistance;
- Engage in any sexual relationships with beneficiaries of assistance, since they are based on inherently unequal power dynamics.

Additionally, Prime Expertise's personnel are obliged to:

- Contribute to creating and maintaining an environment that prevents safeguarding violations and promotes the implementation of this Policy; and
- Report any concerns or suspicions regarding safeguarding violations by Prime Expertise's personnel.

Reporting

Prime Expertise will ensure that safe, appropriate, and accessible means of reporting safeguarding concerns are made available to our personnel and the subjects or beneficiaries of assistance we interact with.

Any personnel reporting concerns or complaints through formal whistleblowing channels (or if they request it) will be protected by Prime Expertise's [Whistleblowing Policy](#).

Prime Expertise will also accept complaints from external sources, such as members of the public, partners, and official bodies.

How do I report a safeguarding concern?

Personnel who have a complaint or concern related to safeguarding should report it immediately to their supervisor or line manager. If the personnel do not feel comfortable reporting to their supervisor or line manager (for example, if they feel that the report will not be taken seriously or if that person is implicated in the concern), they may report the concern directly to any member of the senior management team or a member of the Prime Expertise Board.

Response

Prime Expertise will follow up on safeguarding reports and concerns according to this Policy, procedure, and legal and statutory obligations.

Prime Expertise will apply appropriate disciplinary measures to its personnel found in violation of this Policy.

Prime Expertise will offer support to survivors of harm caused by our personnel, regardless of whether a formal internal response (such as an internal investigation) is carried out or not. Decisions regarding support will be led by the Managing Director.

Confidentiality

It is essential that confidentiality be maintained at all stages of the process when dealing with safeguarding concerns. Information relating to the concern and subsequent case management should be shared on a need-to-know basis only and kept secure at all times.

Definitions

- **Abuse:** a violation of an individual's human and civil rights by any other person or persons. It can take the form of physical, psychological, financial, or sexual abuse; neglect or negligent treatment; or commercial or other exploitation, resulting in actual or potential harm to the health, survival, development, or dignity

of a child or a vulnerable adult. Abuse can be a single act or repeated acts, and it can be unintentional or deliberate.

- **Beneficiary of assistance:** someone who directly receives goods or services from the client, Prime Expertise is providing consulting services.
- **Child:** a person below the age of 18.
- **Harm:** psychological, physical, and any other infringement of an individual's rights.
- **Psychological harm:** emotional or psychological abuse, including (but not limited to) humiliating and degrading treatment such as bad name calling, constant criticism, belittling, persistent shaming, solitary confinement, and isolation.
- **Protection from Sexual Exploitation and Abuse:** the term used by the humanitarian and development community to refer to the prevention of sexual exploitation and abuse of affected populations by personnel. The term derives from the United Nations Secretary General's Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse (ST/SGB/2003/13).
- **Safeguarding:** means protecting people's health, wellbeing, and human rights and enabling them to live free from harm, abuse, and neglect. Safeguarding entails taking all reasonable steps to prevent harm, particularly sexual exploitation, abuse, and harassment; protecting people, particularly vulnerable adults and children; and responding appropriately when harm does occur. This definition draws from our values and principles and shapes our culture. It pays specific attention to preventing and responding to harm from any potential, actual, or attempted abuse of power, trust, or vulnerability, especially for sexual purposes. Safeguarding applies consistently and without exception across our services, partners, and staff. It requires proactively identifying, preventing, and guarding against all risks of harm, exploitation, and abuse and having mature, accountable, and transparent systems for response, reporting, and learning when risks arise. Those systems must be victim-focused and also protect those accused until proven guilty. Beneficiaries and affected people are at the center of everything we do in the name of safeguarding.
- **Sexual abuse:** means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.
- **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. This definition includes human trafficking and modern slavery.
- **Survivor:** a person who has been abused or exploited. The term "survivor" is often used in preference to "victim" as it implies strength, resilience, and the capacity to survive; however, it is the individual's choice how they wish to identify themselves.
- **Vulnerable adult:** a person who is or may be in need of care by reason of mental or other disability, age, or illness, and who is or may be unable to take care of himself or herself or to protect himself or herself against significant harm or exploitation.

Amendments

Please note that this Policy is subject to change from time to time. Any changes to this Policy made in the future will be reflected on the Prime Expertise website.

Relevant legislations

The Anti-Trafficking in Persons Act, 2008, available at:

<https://www.ilo.org/dyn/natlex/docs/ELECTRONIC/82132/89609/F805268009/TZA82132.pdf>.

The Law of the Child Act, 2009, available at:

<https://www.ilo.org/dyn/natlex/docs/ELECTRONIC/86527/97740/F1329827361/TZA86527.pdf>.

Related policies

Anti-bribery and Anti-corruption Policy, available at: <https://primeexpertise.co.tz/wp-content/uploads/2023/04/Anti-bribery-Anti-corruption-Policy.pdf>.

Code of Conduct, available at: <https://primeexpertise.co.tz/wp-content/uploads/2023/04/Code-of-Conduct.pdf>.

Whistleblowing Policy, available at: <https://primeexpertise.co.tz/wp-content/uploads/2023/04/Whistleblowing-Policy.pdf>.

Workplace Equality and Diversity Policy, available at: <https://primeexpertise.co.tz/wp-content/uploads/2023/04/Workplace-Equality-Diversity-Policy.pdf>.