



# EXONUT UGANDA LIMITED

*“With you Always to the very End”*

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## **EXONUT UGANDA LIMITED SAFEGUARDING AND RISK MANAGEMENT POLICY 2021.**

### **Introduction:**

EXONUT UGANDA Limited is a Private Limited company registered in Uganda with the registrar of Companies since 2020 under registration Number 80020002768406 with its Head Office located at Plot 2 Rhino Camp Road Arua City. With branch offices in Kampala, Mubende, Mbale, and Gulu city. The company offers a wide range of products and services to its clients both private, Public, civil society and other Development Partners. Since inception, the company has positioned itself as the leading service provider of a wide range of professional consultancy services ranging from Business development services to supplier of quality products that meet our client's needs and expectations. We are a fast-growing Business development firm offering Tailored professional consultancy services to Micro-Small, Medium and large Enterprises in Uganda with over 20 senior consultant and 150 clients in Uganda, law abiding, and Tax compliant entity registered with URA under TIN 1020099261.

The company has a board of Directors and a team of professional and experienced Senior Management Team (SMT) responsible for day-to-day operations of the company under the leadership of our Managing Director Mr. Hassan Waswa a business development and financial inclusion specialist by profession with over 12 years of experience in Financial Inclusion, private sector development, market systems development and Humanitarian development work.



## Policy aims

1. Prevent harm, abuse, or exploitation
2. Protect individuals from harm, abuse, or exploitation
3. Promote a safe and respectful environment
4. Encourage open communication and reporting
5. Ensure appropriate responses to concerns or allegations resulting from actual or perceived risk.

## Organizational Commitment and Compliance.

Exonut Uganda Limited is committed Safeguarding and Safe programing Standards. To do so, we have a zero-tolerance policy for any form of abuse, exploitation, or violence. We take every measure to prevent such incidents and to ensure compliance with National, and international safeguarding standards, welfare protection laws and standards.

Exonut Uganda Limited will investigate, act upon, and report suspected safeguarding violations in accordance with the provisions of this policy and staff code of conduct for investigating ethics and fraud violations.

## Goals of Safeguarding Policy

Exonut Uganda Limited often implements programs designed to benefit Various clients and their families. These programs frequently include activities that could raise the risk of abuse, exploitation, and neglect. It is our responsibility to protect our clients we come in contact with from such harm.

Exonut Uganda Limited embraces the principles within the UN Convention on the Rights of the Child as its minimum standards of protection for children reached by its programs. The personal conduct of those engaged in work for Exonut Uganda Limited either as direct staff, consultants, volunteers, or as staff of our partners, contractors, vendors, and subrecipient will be measured against this policy.

Exonut Uganda Limited has developed this policy to comply with funders' safeguarding requirements, including standards against Sexual Exploitation, Abuse, and harassment .These standards, clauses, and provisions apply to activities that may involve our clients and award implementation in which personnel may come into contact with children, youths , Women and men here referred to as "our Clients)

## Safeguarding Principles

Ethical practices at Exonut Uganda Limited are guided by the principle that work and business relationships be conducted with the highest level of honesty, integrity, diligence, fairness, trust, and respect. Exonut Uganda Limited safeguarding principles include:

**Equality:** We will treat all children and adults equally with respect.

**Responsibility:** We are all responsible for protecting children in our work and daily life. We will demonstrate our commitment to safeguarding in all our interactions with children.

**Accountability:** We will hold ourselves and others accountable to our safeguarding policies and code of conduct.

**Cooperation:** We will work closely with government, funders, partner agencies, and beneficiaries to promote a safe environment for all including children, youth Women and Girls.

**Confidentiality:** Confidentiality is fundamental to safeguarding, reporting, and investigation processes. We will maintain confidentiality during all stages of a safeguarding investigation, sharing information only on a need-to-know basis. Confidentiality breaches can have serious consequences for all involved in a safeguarding investigation and will result in disciplinary action.

**Client-centered approach:** In a client-centered approach, the client's wishes, safety, and well-being are prioritized in all matters and procedures. Investigation and response processes will ensure sensitivity and accountability, avoid re-traumatizing children, maintain focus on the client, and ensure support to survivors.

**Client awareness:** We will ensure that clients understand and are aware of safeguarding and protection processes.

Children as participants in investigations: We will ensure that care is taken when children are involved in an investigation and that any investigative interview with a child be undertaken within best practice protocols (e.g., child-centered, child-paced, and conducted or guided by a suitably trained practitioner).

**Responsiveness:** We will ensure that reporting and investigating processes are conducted in a timely manner.

## To whom does the Child Safeguarding Policy Apply?

The Exonut Uganda Limited Safeguarding Policy applies to everyone associated with Exonut UG LTD, including but not limited to:

- All full-time, part-time, and temporary staff
- Partner staff
- Volunteers and interns
- Consultants
- Subcontractors and sub-recipients

## Designated Safeguarding Focal Person

Designated safeguarding focal persons will be identified to support the coordination and implementation of Exonut Uganda Limited safeguarding obligations across the organizations.



## Safeguarding Standards of Behavior

These standards of behavior are expected of and apply to all Exonut UG Ltd staff and associates. Employees, partners, consultants, subcontractors, subrecipients, interns, and volunteers are expected to understand the implications of this code on their language, behavior, actions, and relationships with clients.

The Safeguarding Standards of Behavior are applicable to the treatment of clients with whom our staff and associates come into contact. Any breach or failure to comply with them will be taken seriously by Exonut Uganda Limited and will result in disciplinary action.

The list below is not prescriptive and should be applied in the spirit of providing the highest level of protection and duty of care to our clients.

### **When working with clients YOU MUST NEVER:**

- Hit or otherwise physically assault, harm, or abuse clients.
- Engage in sexual activity or have a sexual relationship with anyone under the age of 18 years, regardless of the age of majority/consent or custom locally. Mistaken belief in the age of a child is not a defense.
- Develop relationships with client that could be in any way considered exploitative or abusive.
- Act in any way that may be abusive or place a client at risk of abuse.
- Use language with or behave toward a client in a way that is inappropriate, offensive, abusive, sexually provocative, demeaning, or culturally inappropriate.
- Have a child/children with whom we are working stay overnight at your home or other personal accommodation in which you are staying.
- Condone or participate in behavior that is illegal, unsafe, or abusive.
- Act in ways intended to shame, humiliate, belittle, or degrade client.
- Ignore or fail to report allegations made or concerns expressed by others about Client's welfare.
- Use a computer or other electronic device to view, download, distribute, or create indecent or inappropriate images of client.
- Use client's images or information without obtaining proper permission and consent.
- Use computers, social media, mobile phones, video, and digital cameras, or other electronic devices and mediums to exploit, harass or bully Clients.

# Safe Communication

Ensuring safe communication, including the use of Social Media, is critical in all areas of clients safeguarding. Exonut Uganda Ltd expects its staff to promote dignity and respect in all communications, and ensure that information and images of clients including children will never be used in a way that lessens their safety or dignity. Every effort should be made to ensure that confidentiality is maintained.

## Informed consent for use of images and information

We are committed to portraying clients respectfully and appropriately. Individuals representing Exonut Uganda Limited must adhere to the organization's guidelines when capturing, storing, displaying, and publishing client's images. Informed consent from the relevant caregiver and informed agreement from the child in question (according to age of understanding) must be secured before using any information about the child in external communications – written, audio, or visual. Consent must be evidenced on a consent form.

## Information and communications technology

Exonut Uganda Limited prohibits the use of its computer systems and networks to exploit, harass, or bully clients including children, or to access, create or distribute inappropriate images of them.

# Recruitment

Exonut UG Ltd takes preventive steps to reduce the risk of engaging a person who may be unsafe or unsuitable to work with, or be in contact with, clients including children.

Exonut UG Ltd has developed guidelines for recruitment to ensure we hire and engage with, the safest and most suitable staff, volunteers, Experts, Trainers, facilitators, consultants and partners. Such people act in the best interests of clients, protect them from all forms of abuse, and share our values. Lack of safe recruitment and screening procedures greatly increases the risk of engaging someone who may pose an unacceptable risk of harm (physical, sexual, or emotional) to clients.

By **promoting** safe recruitment and screening procedures, Exonut UG Ltd can attract the best people to work with clients, and deter those who seek to join us because they want to harm clients including children.

By **implementing** safe recruitment and screening procedures, Exonut UG Ltd aims to create and maintain a client safe environment, to keep all people safe in the delivery of programs.

For staff who will be working directly with Client as part of the scope of their project or Business, Exonut UG Limited conducts additional due diligence, including special behavior-based questions

during interviews; where legal, completes criminal background checks following all applicable local laws; and/or requiring a special signed disclosure that a staff member has not been charged with criminal, sexual abuse or exploitation offenses.

All Exonut Uganda Limited job descriptions are required to include the following language:

“Exonut Ug Ltd is a safe organization, and the safety and wellbeing of clients is a priority of our organization. We have robust recruitment procedures to ensure that all staff are suited to work with the clients served by our programs and Businesses.”

## Training

*All staff are required to take the Exonut Uganda Limited Ethics training within 30 days of hire and annually thereafter.* Note: the mandatory Ethics training is being updated to include the Safeguarding programming components. In the interim, all staff will receive a supplemental training.

All staff must receive the appropriate level of safeguarding training, and designated safeguarding focal persons will be trained to the level commensurate with their responsibilities. safeguarding training will be reviewed regularly to ensure it is up-to-date and relevant.

## Whistleblowing

Exonut Ug Limited whistleblowing policy encourages people who become aware of wrongdoing in the organization to report their concerns immediately. All incidents are investigated fairly and confidentially. We are committed to non-retaliation against staff members who report possible or actual violation of this policy.

Exonut Ug Limited treats malicious allegations with the utmost seriousness and takes appropriate disciplinary action.

Please refer to the whistleblower policy for more information.

## Reporting

Information about reporting violations of Exonut’s Code of Conduct, as well as this safeguarding policy, is available internally and externally via Email to [Exonutug2020@gmail.com](mailto:Exonutug2020@gmail.com) or Call +256779462769. We provide several avenues and mechanisms for reporting concerns.

Everyone involved in program and business activities (ranging from employees to training participants) must be made aware of the reporting helpline and how to report safeguarding concerns.

Any suspicion or allegation of a safeguarding violation by Exonut staff, partners, contractors, vendors, or subrecipients must be reported within 24 hours to the Exonut Ug Ltd Code of Conduct Helpline. The reporter should then communicate the concern to the Exonut Uganda Limited Managing Director (unless that person is implicated in the allegation). For field Offices, the report should be communicated to the Office in charge.



Recognizing the special responsibility of protecting the privacy of a client including children and the confidentiality of the implicated person, Exonut discourages communication about the details of client safeguarding concerns via unauthorized e-mail unless absolutely necessary. If e-mail is necessary, subject headings should be vague and inoffensive, and must be flagged as confidential.

The Managing Director should involve the designated safeguarding focal person in the incident response and management process. If a project or unit does not have a safeguarding focal person, they should be in touch with Head quarter Human Resource Manager.

### **Responding to Clients disclosures of abuse**

Because client safeguarding violations involve a minor, Exonut has developed the below additional guidance to ensure safety and appropriate sensitivity.

If information about child safeguarding violations is disclosed by a child, whether or not the complaint is made by the child survivor themselves, the process of reporting and managing the incident will require additional age-appropriate steps and considerations. Exonut staff or partners must keep in mind the age of the child or young person and do the following when receiving disclosures made by a child:

- Listen to and support the child.
- Reassure the child that they did the right thing.
- Assess the risk of ongoing abuse.
- Take action to provide all possible help.
- Do not promise something you can't deliver.
- Exercise caution and sensitivity in disclosing information (i.e., only to appropriate personnel).
- Contact the appropriate authorities.

### **Managing reported incidents**

Exonut Ug Ltd will immediately initiate an investigation of any safeguarding concern it becomes aware of. This investigation will follow our established policies and processes for all ethics/fraud incident reports. Additionally, for child safeguarding-related incidents, investigations will adhere to the following:

1. Persons reporting the incident and persons who have witnessed inappropriate conduct will be treated respectfully. Statements made by the complainant will be kept in appropriate confidentiality. The complainant will be:

- Interviewed to confirm all relevant facts.
- Given the opportunity to provide relevant facts.
- Given the opportunity to participate in the investigation by providing names/identities of other witnesses and recommending questions to be asked by investigators.

2. Information pertaining to incidents in which children's rights have been violated should be shared on a 'need to know' basis, as deemed by the Human Resource Manager in consultation with the Managing Director, and, if involved, the designated child safeguarding focal person. For Field Offices, the report should be communicated to the Office Manager. In all instances, children's names and identities must not be disclosed beyond the appropriate management personnel unless authorized.

3. As with all ethics/fraud violations we investigate, reports of abuse must be treated seriously and impartially, and appropriate confidentiality maintained. However, Exonut Uganda Limited reserves the right to disclose information to other organizations or authorities involving employees terminated because of safeguarding violations. Exonut complies with funder requirements for reporting such violations.

An employee who is dismissed because of misconduct with a client is not eligible for rehire. Exonut reports all credible evidence of abuse, exploitation, or neglect to the Police, which upon review of a case can recommend an implicated individual's name for debarment.

## **Safe Programming**

### **Risk Assessment**

Every project or business activity will be reviewed to determine the level of risk to clients including children. Projects or business activity heads should consult the Exonut Uganda Limited Safeguarding Guidelines, which supplements this policy. The risks will be mapped regularly and included in the risk register and appropriate action taken to minimize potential and perceived risks in doing business and engaging with our clients. Risk must be categorized and flagged as High risk, Low risk, Medium Risk and No risk.

**Risk Response:** Risk management should be handled based on the level of risk through 4 major approaches, risk Avoidance, Risk transfer, Risk acceptance and risk Tolerance.

### **Monitoring and review**

All projects and Business activities that could potentially affect clients including children must be annually reviewed to ensure that the project scope has not changed to affect clients. If, after the annual review, a project or activities is determined to be higher risk, it must follow additional actions as described in the Exonut Uganda Ltd Safeguarding Guidelines.

## **Sub-recipients, Subcontractors, Sub-grantees, Consultants, and Other Agents**

Exonut Uganda Limited includes child safeguarding requirements in all contractual documents. At a minimum, Exonut Uganda Limited partners must:

- Comply with welfare and protection laws and standards.
- Comply with the Exonut Ug Ltd Safeguarding Standards of Behavior.
- Maintain procedures to prevent and punish clients safeguarding violations.



- Immediately report to Exonut management any credible allegations of abuse, exploitation, or neglect related to the contract.

Additionally, partners working on Exonut Businesses or projects or activities that involve children or that otherwise present an increased risk to clients will be expected to comply with the principles and standards in our safeguarding policy (or the partner's equivalent policy). Contractual documents will also include funder-required safeguarding clauses including, as applicable, the Ugandans laws on Safeguarding.

Exonut Uganda Limited will monitor and ensure partner compliance in a manner commensurate with the safeguarding risk posed by the activities or partner. Exonut pre-award assessments will include a review of a partner's ability to comply with safeguarding requirements and the inherent risk in the project activities that they will be conducting. Monitoring of higher-risk partners and activities will include as applicable compliance in regular reporting, evaluations, and site visits and appropriate safeguarding training of partner staff.

Exonut's zero-tolerance for any form of abuse, exploitation, and neglect extends to the actions of its business partners and their employees. The consequences of a partner's safeguarding violation are explicit and include termination of the contract, along with additional action as required (e.g., referral to appropriate authorities or funder). If Exonut Ug Ltd determines that a partner or a partner employee has committed a safeguarding violation, we will take appropriate action including, but not limited to:

- Requiring the party to remove an employee or agent from a project or Business engagement
- Requiring the party to terminate its relationship with any other contractor, consultant, subcontractor, or sub-recipient found to be in violation.
- Suspending payments to the party until the violation is remedied.
- Immediately terminating the party's agreement, grant, or contract.
- Excluding the party from further work and other opportunities with Exonut Uganda Limited.
- Reporting the violation to the funder and appropriate authorities.

## Implementation

All staff are required to sign a code of conduct that commits them to abide by Exonut policies and procedures, including this policy and the standards of behavior included herein. this policy and the standards of behavior included herein. Each new employee is oriented to HR policies and procedures, including the code of conduct (which is part of the employee handbook).

Exonut Uganda Limited will ensure compliance with safeguarding standards through the procedures described and referenced throughout this policy and attached appendices. All our operations are subject to this policy and it will be enforced across all Exonut locations and activities. Exonut will take appropriate action against our employees found to have violated this policy, up to and including termination and referral to local authorities.

## Definitions

**Client:** Any individual with whom we conduct business for mutual benefit

**Child:** A person who has not attained age 18, regardless of the age of majority under local law.

**Client safeguarding:** The responsibility of organizations to make sure their staff, operations, and programs do not harm or expose client to abuse or exploitation.

**Child abuse or maltreatment:** Any form of physical (including sexual) abuse; emotional ill-treatment; neglect or insufficient supervision; trafficking; or commercial or transactional child labor; and other exploitation resulting in actual or potential harm to the child's health, well-being, survival, development, or dignity. Abuse and maltreatment include but are not limited to any act or failure to act that results in death, serious physical or emotional harm, or that presents an imminent risk of serious harm to a child.

**Physical abuse:** Actual or potential physical harm of a child resulting from an interaction or lack of interaction that is reasonably within the control of a parent or other person in a position of responsibility, power, or trust in relation to the child.

**Sexual abuse:** The involvement of a child in sexual activities, whether or not the child is aware of what is happening or gives consent. Activities may involve physical contact, including penetrative (i.e., rape) or non-penetrative acts. They also include non-contact activities, such as involving children in looking at or the production of pornographic materials or watching sexual activities, or encouraging children to behave in sexually inappropriate ways.

**Emotional abuse or ill treatment:** Injury to the psychological capacity or emotional stability of the child caused by acts, threats of acts, or coercive tactics. Emotional abuse may include, but is not limited to: humiliation, control, isolation, withholding of information, and any other deliberate activity that makes the child feel diminished or embarrassed.

**Exploitation:** The abuse of a child that involves some form of remuneration or in which the perpetrators benefit in some manner. Exploitation represents a form of coercion and violence that is detrimental to the child's physical or mental health, development, education, or wellbeing.

**Neglect:** The persistent failure to meet the child's basic physical and / or psychological needs, likely to result in the serious impairment of the child's physical or cognitive development. For example, inadequate care and supervision that leaves a child in a situation where s/he could be harmed (but only where this can be avoided).

### Approval

This policy has been approved by the Board on this 10<sup>th</sup> day of January 2022

**Name:** Waswa Hassan **Title:** Chairperson Board

Signature and Stamp: \_\_\_\_\_

