Education For Employment Safeguarding Policy

Introduction

Education For Employment expects all staff, participants, and partners to maintain the highest standards of conduct at all times in order to support the best futures for youth, their families, and their communities. Our work is guided by three core values to transform the future of youth through the dignity of work: we empower youth potential, we earn trust, and we create change. Should there be any violation of these values, EFE will investigate and take all action deemed necessary to repair any harm that may have resulted from such violations. The EFE Safeguarding Policy ensures that all EFE staff, participants, and partners understand the responsibilities and expectations surrounding the provision of a safe and secure environment for all involved in EFE activities.

All EFE staff, participants, and partners are required to review this policy and indicate that they have read and understood the information herein. Questions regarding this policy should be directed to executive staff at EFE-Global by sending an email to confidential@efe.org.

Guiding Principles

At EFE we believe it is all of our responsibility to protect the health, wellbeing, and safety of those with whom we interact, and therefore prevent the occurrence of harm. As such, this policy applies to all persons working for or with EFE, including full- and part-time, contract, permanent, and temporary employees such as consultants, trainers, interns, or volunteers (referred to as “staff” within this policy). Additionally, the policy applies to all participants engaged in any form of EFE programming, ranging from sourcing and outreach events, to classroom activities and post-program follow-up. This policy also applies to project partners, vendors, and service providers with whom EFE collaborates to carry out our work (referred to as “partners” within this policy). For persons considered staff, this policy applies both during and outside of work hours.

Key principles guiding the Safeguarding Policy are as follows:

- All participants have the right to participate meaningfully in decisions that affect their lives. As an organization that exists to empower youth potential, EFE is committed to openness and transparency in order to deliver optimal outcomes for beneficiaries.
- Discrimination, harassment (whether physical, mental, or sexual), bullying, and all other forms of behavior that harm or endanger any person is unacceptable and punishable by law.
- Everyone must have access to safe and responsive mechanisms to address feedback and complaints.
Responsibilities

As an organization, EFE is responsible for:

- Maintaining a process to address allegations of misconduct in a clear, transparent manner.
- Maintaining and implementing the Safeguarding Policy properly.
- Updating the Safeguarding Policy as determined necessary and appropriate.
- Ensuring that staff, partners, donors, and any other parties involved with EFE are aware of EFE’s safeguarding standards.

EFE staff and partners are responsible for:

- Adhering to the policy and reporting all instances of misconduct and abuse.
- Communicating the policy to participants in a way that is clear and understandable, and responding to questions or directing them to the person administrating the policy.

Participants of EFE’s programs are responsible for:

- Maintaining awareness of their rights and responsibilities in regards to participating in EFE’s programs.
- Adhering to the policy and reporting all instances of misconduct and abuse against others.

Strictly Prohibited Behavior

Any of the following behaviors are considered unacceptable as they are in conflict with EFE’s mission and core values. Prohibited behavior includes, but is not limited to:

**Harassment and unwanted attention:** Harassment can include any unwelcome and improper verbal or physical behavior that is likely to result in physical, psychological, sexual, or economic harm. This includes, but is not limited to, harassment based on race, color, religion, sex (including pregnancy), gender/gender identity, nationality, age, physical or mental disability, or genetic information. Harassing conduct may include offensive jokes, slurs, name-calling, physical assaults or threats, intimidation, ridicule, insults, offensive pictures, and more. Harassment is not limited to in-person communication, and extends to email, texts, and social media posts that may be about or seen by EFE staff, participants, and partners. Harassment of any individual in the workplace or during a training or other EFE-sanctioned events will not be tolerated.¹

**Sexual activity with participants:** Sexual activity with participants is prohibited regardless of their age or the legal age of consent in the country in which EFE programs are being

¹ Definition referenced from the United States Equal Employment Opportunity Commission (EEOC) and International Labor Organization (ILO) Violence and Harassment Convention 2019
implemented. These relationships are unacceptable as they are based on inherently unequal power dynamics. Such relationships undermine the credibility and integrity of EFE’s work.

*Sexual activity with children:* EFE’s staff are prohibited from sexual activities or relations with any child under the age of 18.

*Illegal activities:* EFE staff are strictly prohibited from engaging in any form of illegal, exploitative, or abusive activities. This constitutes any form of physical abuse; emotional ill-treatment; sexual abuse; neglect or insufficient supervision; trafficking; child abuse of any kind; child labor²; or other exploitation resulting in actual or potential harm to the health, well-being, survival, development, or dignity of others. It includes, but is not limited to, any act which results in death, serious physical or emotional harm, or an act which presents an imminent risk of serious harm.³

*Physical abuse:* Constitutes acts resulting in injury (not necessarily visible), unnecessary or unjustified pain or suffering without causing injury, harm or risk of harm to a person's health or welfare, or death. Such acts may include, but are not limited to: punching, beating, kicking, biting, shaking, throwing, stabbing, choking, hitting (regardless of object used), or burning. These acts are considered abuse regardless of whether they were intended to hurt the person.

*Emotional abuse or ill treatment:* Constitutes injury to the psychological capacity or emotional stability caused by acts, threats of acts, or coercive tactics. Emotional abuse may include, but is not limited to: humiliation, control, isolation, withholding of information, or any other deliberate activity that results in diminishment or embarrassment.

*Exploitation:* Constitutes the abuse of a person where some form of remuneration is involved or whereby the perpetrators benefit in some manner. Exploitation represents a form of coercion and violence that is detrimental to the person's physical or mental health, development, education, or well-being. Furthermore, any exchange of money, employment, goods, or services for sexual acts or other behaviors is prohibited.

*Trafficking:* Trafficking in persons refers to the recruitment, transportation, or receipt of persons by means of deception, coercion, threat, or force for the purpose of

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³ Definitions referenced from the “Policy/Guidance on the Implementation of USAID Child Safeguarding Standard” (06/08/2015)
exploitation such as forced labor and sexual exploitation. Acts that directly support or advance trafficking in persons is forbidden.\(^4\)

It is important to note that the list above is not exhaustive of conduct which could be considered inappropriate. Any person who observes the aforementioned prohibited behaviors exhibited by EFE staff, participants, or partners should follow EFE's procedures for making a report at the earliest opportunity and when it is safe to do so.

**Procedures for Addressing a Report or Complaint**

EFE recognizes the trust and vulnerability associated with reporting any incidents of misconduct. Violation of EFE's policies or complaints against persons working for or with EFE should be made at the earliest opportunity, and when the person making the complaint feels safe. All complaints will remain strictly confidential and handled with expediency.

There are multiple methods for individuals to report feedback, concerns, or complaints at EFE. The person who makes a complaint (“The Reporter”) may report on behalf of themselves or someone else, however the person harmed is not required to participate within the investigation process. If possible, reports should include information about the nature, timing, and location of the incident, and any immediate assistance or actions required. If the reporter consents to be contacted regarding the complaint they should include their contact details at the time of the report. Anonymous reports will also be accepted to protect the reporter's privacy. All reports will be promptly assessed, investigated, and addressed.

The reporting mechanisms include:

1. **Confidential email address:** An email can be sent to confidential@efe.org detailing the nature of the complaint as well as any other details the Reporter is comfortable sharing. Any messages sent to this email address will receive an automated response to confirm receipt. This email address is monitored by executive staff at EFE-Global.

2. **A trusted leader or supervisor:** Complaints and feedback can be made in person or through email to a trusted EFE staff member. This staff member may then elevate the concern to executive leadership at EFE to determine further action needed within 24 hours of the complaint being made.

3. **Locked feedback box:** As possible, each EFE training venue will have a locked feedback box where any person can submit a complaint in writing. This box will only be opened by a designated EFE staff member after the training has been completed who will then investigate any complaint.

What to Expect After Making a Report
Each complaint will be investigated by an executive staff member at the respective Affiliate who will engage one additional staff or board member. Written acknowledgement of the complaint will be provided to the Reporter within 48 hours. Investigating staff will keep the Reporter informed throughout the investigation process and may request additional clarification or information as necessary. Should EFE staff detect a complaint made through a participant-facing feedback channel, such as a post-training survey or employment status check phone call, the staff member will forward the complaint to executive staff for further investigation.

Following a report, EFE will discuss options for assistance to those who have experienced harm, if they desire support.

How We Conduct Investigations
The two staff members investigating the complaint will involve the appropriate leadership executive while conducting the investigation. If the complaint concerns a staff member, trainer, or participant from an EFE Entity, then the appropriate EFE Entity CEO will be involved. If the complaint concerns an EFE CEO, then the respective EFE Board of Directors will be involved. If the complaint concerns the EFE-Global CEO, the Human Resources Committee at the EFE-Global Board of Directors will be responsible for receiving and reviewing the complaint. The EFE-Global CEO will be informed of all complaints across the Network, including those involving EFE-Global staff, unless the complaint involves the EFE-Global CEO directly.

Reporters have the right to speak further with the investigating staff members and recommend what they need to repair the harm that may have been caused, if desired. Reporters will not be required to make a formal complaint or confront the person they have filed the complaint about. The Reporter has the right to have a companion during any meetings to discuss the matter further as well as the right to file an appeal. The person who has a complaint raised against them (“The Respondent”) has the right to receive a copy of the allegations against them, to respond to the allegations, and to file for an appeal of any decision taken.

While investigating, staff will consider the harm that may have been caused, the needs of the person(s) harmed, and how these needs should be addressed. Structural elements that may have contributed to the harm caused will be considered and rectified. After reviewing all available evidence, the appropriate CEO or Board Member will make a recommendation for the outcome they deem necessary to a committee, which will include the executive staff members who originally investigated the complaint, members of the appropriate EFE Board of Directors, and the EFE-Global CEO, unless the complaint involves the EFE-Global CEO directly. This committee will review the recommendation and determine the final course of action. If the complaint is substantiated, the Respondent will be subject to disciplinary action including, but not limited to, reprimands, demotion, and dismissal. The Reporter and Respondent will be notified in writing of the final action taken.
Confidentiality & Non-Retaliation
All complaints will remain strictly confidential and handled with expediency. Any emails, notes, or evidence collected through the investigation will be stored in a centralized location only accessible to those conducting the investigation. Once an investigation has been completed this information will be archived and kept in a private location. Staff members investigating the complaint are trusted to handle this matter with care. Any violation of this trust may also result in disciplinary action.

EFE ensures that all those following this complaint procedure in good faith will be protected against retaliation. EFE has zero tolerance for any form of retaliation, such as removal from training, exclusion from work opportunities, or hostile work/learning environment. Any violation may result in disciplinary action.

Appeal Process
Both the Reporter and the Respondent have the opportunity to appeal the decision made by the investigation committee. If an appeal is filed, a new committee will be formed of individuals that were not involved in the first investigation. These individuals will review the incident again to determine if the procedure was followed fairly and if the outcome, if any, is befitting of the incident. Parties to the complaint will be informed if an appeal is requested. They also will be invited to provide any new information that has become available and their recommendation for a different outcome, if any. The decision by the committee will be provided in writing to the Reporter and the Respondent.

Malicious Reports
EFE will not tolerate any reports made maliciously or in bad faith. Those found to have knowingly submitted a false report will be subject to disciplinary action (staff), removal from EFE training (participants), or exclusion from EFE’s partnership (partners).

In the case of an emergency, those concerned should contact emergency services as soon as possible. Nothing in this policy should be taken as limiting the right to seek assistance from law enforcement.

Policy Implementation Procedures
The following are guidelines for procedures that may be taken to implement the Safeguarding Policy, as determined appropriate by the Chief Executive Officer or their designee:

Policy Dissemination
Participants of EFE’s programs should be engaged and aware of their rights and responsibilities. EFE should ensure that all participants review and sign the Safeguarding Code of Conduct and return to the appropriate EFE staff member. It is recommended to be signed during a pre-training orientation or during the first day of training, accompanied by a discussion of the Safeguarding Policy by the class trainer and/or a dedicated EFE staff member. EFE should ensure that all EFE employees review and sign the Safeguarding Policy immediately.
upon their hire, and maintain appropriate records regarding adherence to the policy. In addition, EFE’s Anti-Human Trafficking Policy should also be circulated.

Selection Procedures
EFE will implement proper eligibility selection and screening processes for all individuals engaged with beneficiaries during EFE programming, as well as those persons selected to participate in EFE programming. EFE will also implement proper selection processes of employer partners to identify and address work environments that violate EFE’s Safeguarding Policy, and therefore exclude them from EFE’s Network of employer partners.

Communication Procedures
Communication with participants is governed by transparency and accountability to ensure their safety and protection. While most EFE participants are above the age of majority and thus are treated as adults by law, EFE recognizes the position of trust and authority that its employees occupy in the course of designing and delivering EFE programming and thus will be held to a higher standard. The following steps will reduce the risk of private or otherwise inappropriate communication between EFE staff and partners and the participants with whom they work:

Communication between EFE staff and partners and participants that is outside of the scope of a professional relationship is strictly prohibited. Electronic communication that takes place over an EFE-approved social media network or platform may be subject to periodic monitoring. Staff, trainers, and volunteers who use any form of online communications, including social media (Facebook, Twitter, LinkedIn, WhatsApp, Instagram, Workplace, etc.), and text messaging to communicate with participants may only do so for activities explicitly involving EFE business. When possible, email exchanges between a participant and an EFE staff member should be made using an EFE email address.

Physical contact between EFE staff and participants is considered inappropriate. Expressions of greeting, attention, care, concern, or celebration should be communicated in alternate ways than physical contact. One-on-one meetings with a participant are best held in a public area, such as in a room where the interaction can be observed or in a room with the door left open. One-on-one meetings with participants under the age of 18 should be avoided. Again, it is important to understand the power dynamics in play between an EFE staff member and a participant who depends upon EFE’s services.

Incorporation and Insurance
In alignment with local law, EFE should ensure that proper steps are taken to insure participants and prevent liability of incidence during their participation in EFE’s activities.

Document Retention and Information Privacy
EFE must ensure there are proper safeguards in place to protect personal information provided by participants, including phone numbers and email addresses, and that no staff have access
to or use of this information without a clear business need. Any EFE partners or third parties accessing participant data will be required to sign a non-disclosure agreement with EFE and must be engaged in an activity that will be beneficial to current or future participants, either directly or indirectly.

**Review**

EFE will review this policy and procedures on an annual basis, or as required, and will make necessary adjustments to ensure that it meets the needs of participants and staff. The updated version of the Safeguarding Policy will be circulated to EFE employees upon each review.

**Prevailing Language**

This policy is available in English, Arabic, and French. In case of any language dispute, the English version shall prevail.
Annexes

1. Code of Conduct for EFE Staff
2. Code of Conduct for EFE Participants
CODE OF CONDUCT FOR EFE STAFF

Education For Employment is committed to safeguarding all persons and protecting them by ensuring that high standards of conduct and integrity are maintained. This Code of Conduct applies to all persons working for or with EFE, including full- and part-time, contract, permanent, and temporary employees such as consultants, trainers, interns, or volunteers (referred to as “staff” within this policy).

The conduct of staff acting on behalf of Education For Employment can inspire and motivate those with whom they interact, or have the potential to cause great harm if inappropriate. We must, at all times, be aware of the responsibilities that accompany our work, and strive to always maintain the best interests of all persons.

All EFE staff should be aware of their own and other persons’ vulnerability, especially when working with participants, and be particularly aware that we are responsible for maintaining physical, emotional, and sexual boundaries. We must avoid any covert or overt sexual behaviors with those for whom we have responsibility. This includes seductive speech or gestures as well as physical contact that exploits, abuses, or harasses. We are to provide safe environments for participants and staff at all EFE programs and events, and in the workplace.

I promise to strictly follow the rules and guidelines in the Code of Conduct as a condition of my employment at EFE.

I will:

- Respect the dignity and worth of every individual, and show respect for all persons equally without distinction.
- Maintain appropriate boundaries and ensure interactions with peers, staff, trainers, and volunteers are appropriate, public, and non-sexual. This includes avoiding any harassing or abusive behavior.
- Prevent, oppose, and combat all exploitation and abuse of participants and staff.
- Comply with the EFE Safeguarding Policy and cooperate fully in any investigation.

I will not:

- Touch or speak to a participant or staff member in a sexual or otherwise inappropriate manner, or engage in sexual activity with a participant.
- Inflict any physical or emotional abuse such as striking, spanking, shaking, slapping, humiliating, ridiculing, threatening, or degrading.
- Engage in private communications with participants via text messaging, email, Facebook, Twitter, WhatsApp, or similar forms of electronic or social media except for activities explicitly involving EFE business.

My signature confirms that I have read the above Code of Conduct and the EFE Safeguarding Policy on which it is based. I agree to follow the standards described within, and understand that any action inconsistent with this Code of Conduct or failure to take action constitutes an act of misconduct and will result in disciplinary action.

Name (printed): ________________________________

Signature: ________________________________ Date: ________________
CODE OF CONDUCT FOR EFE PARTICIPANTS

Education For Employment (EFE) is committed to safeguarding participants and protecting them by ensuring high standards of conduct and integrity are maintained. This Code of Conduct applies to all participants who engage in EFE programming.

As a participant of EFE programming, I can expect to have access to a safe and respectful learning environment that aligns with EFE core values: we empower youth potential, we earn trust, and we create change. I am aware of the responsibilities that accompany participation in EFE programs. I promise to strictly follow the rules and guidelines in the Code of Conduct as a condition of my participating in EFE programs.

As a participant in EFE programs, I will:

- Respect the dignity and worth of every individual, and show respect for all persons equally without distinction whatsoever of race, gender, religion, color, national or ethnic origin, language, marital status, sexual orientation, age, socioeconomic status, disability, political conviction, or any other distinguishing feature.
- Maintain appropriate boundaries and ensure interactions with peers, staff, trainers, and volunteers are appropriate, public, and non-sexual. This includes avoiding any harassing or abusive behavior.
- Contribute to a safe environment for myself, my peers, and EFE staff, trainers, and volunteers, regardless of where the training takes place.
- Communicate appropriately with staff, trainers, volunteers, and my peers in a manner that is respectful and professional.

My signature confirms that I have read the above Code of Conduct and been informed of the EFE Safeguarding Policy on which it is based. I agree to follow the standards described within, and understand that any action inconsistent with this Code of Conduct or failure to take action mandated by this Code of Conduct constitutes an act of misconduct and will result in disciplinary action and possible removal from the program. I also understand that I may file a complaint regarding violation of the Safeguarding Policy by contacting a confidential email account (confidential@efe.org), speaking to a trusted EFE staff member, or submitting a complaint in writing to a locked feedback box.

Name (printed): __________________________________

Signature: ________________________________________ Date: _______________________