



**ENTERPRISE
DEVELOPMENT
CENTRE**
PAN-ATLANTIC UNIVERSITY

HANDBOOK ON

Safeguarding: Implications for Entrepreneurship Development

A PRACTICAL GUIDE TO ENHANCING
ENTREPRENEURIAL PSHEA NEEDS



Table of Contents

Foreword	4
Glossary and List of Abbreviations	5
Chapter 1: Introduction to the Handbook	6
1.1 Background	6
1.2 Purpose and Rationale	9
1.3 How to Use this Handbook	10
1.4 Further Examples	10
1.5 International Standards on PSHEA	17
1.6 Further Support	18
Chapter 2: Developing and Implementing Safeguarding and PSHEA Policy to Enhance Entrepreneurship Development	19
2.1 The Safeguarding and Do No Harm Standards	19
2.2 Code of Conduct (Dos & Don'ts)	20
2.3 Ensuring Stakeholders Understand and Comply with PSHEA Requirements	20
2.4 Assigning Specific Responsibilities for PSHEA	22
2.5 Implementation Steps and Considerations	23
2.6 Learning Example/Case Study	25
Chapter 3: Developing and Implementing a PSEA Complaints Mechanism	29
3.1 Overview of the Speak-Up/Reporting Process	29
3.2 Speak-Up Policy and Procedure	29
3.3 Disciplinary Procedures and Sanctions	30
3.4 Reporting Procedures and Protections for Complainants	30
3.5 Additional Reporting Channels and Protection Measures	31
3.6 Learning Examples/Case Studies	31
Chapter 4: Monitoring the Implementation PSEAH Policies at the Organisational and Workplace Levels	32
Safeguarding Indicators Checklist	32
4.1 PSHEA Monitoring, Evaluation, Research, and Learning (MERL)	33
4.2 Designing PSHEA Evidence-Inclusive Interventions	34
4.3 Best Practices for Sustaining Safeguarding in Entrepreneurship	35
4.4 Learning Examples/PSHEA	36
CONCLUSION	38
REFERENCES	39
Acknowledgement	40

Foreword

In today's evolving entrepreneurial landscape, safeguarding and protection from sexual exploitation and abuse (PSEA) are no longer optional; they are fundamental pillars of ethical and sustainable business practices. As we strive to create inclusive and empowering environments, it is essential to prioritise the safety and dignity of all individuals, especially within the entrepreneurial ecosystem where innovation, collaboration, and human potential intersect.

This handbook serves as a practical guide for fostering workplaces and communities that are free from harm, discrimination, and abuse. It underscores the critical role of safeguarding in building trust, enhancing organisational resilience, and enabling equitable opportunities for all, particularly for those from vulnerable or marginalised groups.

By implementing the principles and practices outlined in this handbook, entrepreneurs, leaders, and stakeholders can establish a culture of accountability and respect that drives both social and economic progress. Through these efforts, we can unlock the full potential of entrepreneurship to empower individuals, create jobs, and contribute to the broader goal of sustainable development.

Let this handbook inspire action and commitment as we work together to champion safeguarding and PSEA as essential components of entrepreneurship, thereby ensuring that innovation and opportunity flourish in an environment rooted in integrity, safety, and inclusion.

Dr. Nneka Okekearu
Director EDC

Glossary and List of Abbreviations

BBC	British Broadcasting Corporation
CHS	Core Humanitarian Standards
CRA	Civil Rights Act
EDC	Enterprise Development Centre
EKEDC	Eko Electricity Distribution Company
FP	Focal Person
GBV	Gender Based Violence
HQ	Head Quarters
IASC	Inter-Agency Standing Committee
NICN	National Industrial Court of Nigeria
PSEAH	Protection from Sexual Exploitation and Abuse and Sexual Harassment
SEAH	Sexual Exploitation, Abuse and Sexual Harassment
SG	Safeguarding
SGBV	Sexual Gender Based Violence
STER	Stand to End Rape Initiative
TUC	Trade Union Congress
UN	United Nations
WARIF	Women at Risk International Foundation

1

INTRODUCTION TO THE HANDBOOK

1.1 Background:

Overview of the Handbook’s Role in Promoting Safeguarding within Entrepreneurship, with a Specific Focus on Nigeria and Developing Countries

Workplace harassment, particularly sexual harassment, remains a pervasive issue worldwide, presenting significant challenges to creating safe and inclusive entrepreneurial spaces. A 2023 report by the Trade Union Congress in Scotland revealed that three in five women had experienced sexual harassment in the workplace, highlighting the urgent need for safeguarding mechanisms. Similarly, a 2017 BBC report indicated that one in five men had also experienced workplace harassment. These findings underscore the importance of addressing this issue within both traditional and entrepreneurial sectors.



Source: Trade Union Congress, 2023



Source: BBC, 2017

The evolving societal awareness and increased willingness of victims to report harassment are partly due to intensified media coverage and research. This shift demands that employers and senior management teams not only understand what constitutes sexual harassment but also implement effective strategies to prevent and address it. This includes fostering a culture of openness, undertaking regular training on legislative updates, and ensuring that employees feel safe to speak out without fear of retaliation.

Employers have both a moral and legal responsibility to provide a harassment-free workplace. Proactive measures—such as comprehensive training programs, clear reporting procedures, and swift action against offenders—are critical. Failure to meet these obligations can result in legal repercussions, including fines, penalties, reputational damage, or even the loss of operational licenses. Beyond compliance, cultivating a culture of dignity and respect is essential for fostering justice and equity within workplaces.

Context in Developing Countries

Workplace harassment is a significant issue in developing countries, often aggravated by systemic inequalities and cultural barriers. In Nigeria, a 2020 report by the Solidarity Center and the Nigeria Labour Congress (NLC) found that 57.5% of women workers had experienced workplace harassment. Similarly, a survey conducted by Ghana's Ministry of Employment and Labour Relations reported a 71.7% prevalence, illustrating the widespread nature of the problem across the region. While men in Nigeria are also affected—accounting for 15% of reported cases, according to a 2021 Stand to End Rape Initiative (STER) report—women are disproportionately impacted, largely due to deeply entrenched gender inequalities.

The Nigerian Context

In Nigeria, workplace harassment has garnered attention, spurred by advocacy and increased reporting. Laws such as the **Criminal Code Act** and the **Penal Code** criminalize acts of harassment, with offenders facing penalties including imprisonment of up to three years. The **Nigerian Labour Act** further mandates employers to establish policies prohibiting harassment and to take disciplinary measures against violators.

Despite these legal frameworks, enforcement remains a significant challenge. Limited public awareness of legal protections and cultural stigmas around reporting harassment often leave victims vulnerable. Many fear retaliation, social ostracism, or the difficulty of proving their cases. A 2020 report by the **Stand to End Rape Initiative (STER)** titled *Examining the Prevalence, Context, and Impact of Workplace Sexual Harassment in Nigeria* surveyed 493 workers aged 18–30. The findings revealed that 64% had experienced one or more forms of sexual harassment, underscoring the alarming prevalence of this issue.

Narratives from Nigeria and Africa

The African cultural context introduces unique complexities to addressing workplace harassment. In many traditional societies, power dynamics influenced by gender roles exacerbate vulnerabilities, particularly for women in subordinate positions. For example, in Nigeria's entrepreneurial spaces, where informal business networks thrive, women often encounter harassment while navigating male-dominated industries. This challenge is amplified in rural areas, where patriarchal norms and limited legal literacy hinder victims from seeking justice.

Across Africa, there are also stories of resilience. In Kenya, women-led cooperatives have created safe work environments that empower female entrepreneurs. Similarly, in Nigeria, advocacy groups like STER and Women at Risk International Foundation (WARIF) offer resources and platforms for victims to report abuse anonymously.

Global and Local Cases

Cases of workplace harassment resonate across the globe and within Nigeria. For instance:

- **Globally:** In the United States, the #MeToo movement shed light on systemic harassment in industries ranging from media to technology, leading to significant legal and cultural reforms.
- **Nigeria:** A landmark case involved a university lecturer accused of harassing students, sparking nationwide discussions on the misuse of power in professional and academic settings.



The Handbook's Role

This handbook seeks to serve as a practical guide for addressing workplace harassment, particularly within entrepreneurship in Nigeria and developing countries. By integrating legal frameworks, cultural narratives, and actionable strategies, it aims to equip business leaders and employees with tools to foster safer, more inclusive workplaces. In doing so, it aspires to create entrepreneurial ecosystems where innovation and creativity thrive free from the shadow of harassment.

In subsequent sections, this handbook will provide case studies, training modules, and resources tailored to the unique socio-cultural landscapes of Nigeria and other developing nations. Only through such comprehensive efforts can the scourge of workplace harassment be effectively addressed.

1. Pastor (Mrs.) Abimbola Patricia Yakubu VS Financial Reporting Council of Nigeria & Anor

A proven case in which National Industrial Court of Nigeria (NICN) awarded damages in favour of a claimant alleging sexual harassment at workplace in the case of Pastor (Mrs.) Abimbola Patricia Yakubu v. Financial Reporting Council of Nigeria & Anor (Suit No. NICN/ LA/673/2013 judgement delivered on November 24, 2016). The NICN awarded damages of N5M (Five Million Naira) only against the 2nd defendant for sexual harassment. The claimant's argument before the court was that while working with the 1st defendant's organisation, she was subjected to several harassments by the 2nd defendant while at work and pregnant with her third baby and was later redeployed to another unit under direct supervision and leadership of the 2nd defendant where she was allegedly exposed to promiscuous and indecent, ceaseless local trips, and demand for sexual favours.

Source: The National Industrial Court of Nigeria in the Kano Judicial Division Holden at Lagos

<https://www.nicnadr.gov.ng/judgement/details.php?id=6320>

2. The case of Mrs. Ejike Maduka v Microsoft NigLTD

In this case that was decided by the National Industrial court in Nigeria, Mrs. Ejike Maduka was a victim of workplace sexual harassment and had brought the matter to court. According to her, the job was terminated after she refused to give in to the sexual advances from her boss, Mr. Onyeje, who was the CEO of the company. She had repeatedly warned him to stop making inappropriate physical contact with her and that of other staff, but he failed to desist and instead terminated her employment because of her refusal. The court found all these allegations to be true and decided the case in her favour whilst awarding her the sum of Thirteen Million, Two Hundred Thousand Naira Only.

Source: Ejike Maduka v Microsoft Unreported Suit NICN/LA/492/2012, 19 December 2013

<https://compendium.itcilo.org/en/compendium-decisions/national-industrial-court-of-nigeria-ejike-maduka-v-microsoft-19-december-2013-case-no-nicn-la-492-2012>

3. Mitsubishi Motors Manufacturing

In 1998, Mitsubishi agreed to pay \$34 million to female workers at the Normal Illinois plant where the work environment was anything but normal. The company was charged with allowing a hostile setting for women since at least 1990. In addition to the \$34 million, Mitsubishi paid out several more million in individual suits. The women were routinely fondled, verbally abused, and subjected to obscene jokes, behaviour, and graffiti. One male worker even fired an air gun between a female's legs. The abusive work environment caused many women to quit. Others were simply denied promotions when they refused to grant sexual favours. The silver lining in this cloud is that Mitsubishi has impressively cleaned up its tarnished reputation. The company immediately hired Lynn Martin, former Secretary of Labor. Martin overhauled the anti-sexual harassment and complaint system, which now boasts of a zero-tolerance policy.

4. University of Colorado Football Program

Two women charged the University of Colorado's football programme with sexual harassment. The women claimed they were sexually assaulted in 2001 at an off-campus party by Colorado football players and recruits. They alleged the university was liable for fostering the atmosphere that led to the alleged assaults, claiming the school tried to draw in the best high school football prospects with sex-and-alcohol-parties. The women's suit was filed under Title IX, which promotes gender equality in education. Vastly different from the sexual harassment claims described above, violations of Title IX require showing that the school had actual notice of sexual harassment and then acted with deliberate indifference. The case was recently thrown out in a U.S. District Court, but the women have appealed. After the allegations, the University of Colorado Board of Regents backed an independent investigation. The results found that drugs, alcohol, and sex were used to draw in recruits but not with the sanctioning of university officials. The school now has some of the strictest recruitment policies in the country.

5. Where the #MeToo Movement needs to go next

Were you aware the #MeToo movement is over a decade old? Is it time to think about where it should go next? The social media slogan #MeToo was created by American activist Tarana Burke in 2006 to show solidarity with the victims of sexual assault. In 2017, the slogan went viral, with over 12 million posts on Facebook in a single day, when celebrities in the Hollywood movie industry were accused of sexual misconduct. It has since been shared in over 80 countries around the world. Though often associated with affluent white women in Hollywood, #MeToo has grown over the years to include many more women's stories from many cultures and areas of the world. However, women's rights activists say that there is more to be done. Ranjana Kumari, Director of the Center for Social Research in New Delhi, says the movement "has to come down to the level of a village woman who is working in somebody's farms in the field... to a labour woman who is trying to work in the construction industry or building the road, and being exploited by the contractor." This exploitation can come in the form of being groped by others, verbal abuse, unwanted sexual advances, and more.

INTERESTING FACT: In 1964, the Civil Rights Act made discrimination unlawful in the United States. Over two decades later, in 1986, the United States Supreme Court further protected people by recognising hostile work environment harassment for the first time. In *Meritor Savings Bank v. Vinson*, a woman maintained a sexual relationship with her boss in fear that she would lose her job if she ended the relationship. In this case, the Court states that if Meritor Savings Bank, the employer, knew of unwanted sexual advances being made by an employee, the employer is responsible to act.

1.2 Purpose and Rationale:

Providing a handbook that serves both as a compliance guide and as a strategic tool for creating safe, equitable, and resilient businesses.

A lot of sexual harassment and abuse of power in the workplace arises from the interaction of two factors. The first is ignorance on the part of the worker and some members of management as to what constitutes sexual harassment and abuse of power in the workplace. The second is a lack of knowledge and competence by persons exposed to sexual harassment and abuse as to what to do when they have been so exposed. The current handbook is conceived to serve both as a compliance guide and as a strategic tool for creating safe, equitable, and resilient businesses.

PSEAH (Protection from Sexual Exploitation and Abuse and Sexual Harassment) is a term used in a wide range of sectors and enterprises to refer to measures taken to protect people from sexual exploitation, abuse, and harassment by staff members and associated personnel. We also now use it to mean protecting staff and associated personnel from sexual harassment or misconduct within the workplace. In our various organizations, the contexts we work in bring us into contact with a lot of people including at-risk children and adults in the spaces and communities within which we work. As entrepreneurs, we have access to goods and services that put us in a position of power over these communities and individuals. Unfortunately, a minority of people use this power imbalance to exploit, abuse, and harass others. The business and private sector have developed standards and approaches to prevent and respond to such abuses of power.

#MeToo Movement



Created by American activist **Tarana Burke** in 2006

went viral in **2017**



over **12m**
posts in a single day



over **80**
countries in the world



In recent times, the sector has become more aware of the issues of abuse of power within the workplace, as well as in the spaces and communities where they carry out their business engagements. The humanitarian and development community, unlike the business and private sector, has had policies and measures in place for many years that are designed to create safe and productive workplaces which are free of abuse such as bullying, discrimination and sexual harassment. (In several countries, this is mandated by national legislation.) Since 2018, agencies have now been examining and strengthening these policies, as well as analysing in more detail the issues of gender, diversity, and power imbalance that are the root causes of these abuses of power. Private sector enterprises too are not far behind. Though private sector enterprises are committed to preventing sexual exploitation, abuse and harassment at work, the issue is complex and sometimes it is hard to know where to start from.

The Handbook on Safeguarding, Prevention of Sexual Harassment, Exploitation, and Abuse (PSHEA) has been developed to provide relevant and contextualised guidance for enterprises to consider when establishing safeguarding, prevention of sexual harassment, exploitation and abuse (PSHEA) reporting and response mechanisms within their companies. It provides practical steps, guidance and case studies aimed at improving knowledge about safeguarding. It also provides possible recommendations to ensure that effective reporting and response mechanisms are set up to enable affected persons report inappropriate behaviours that they may experience from others in the workplace. These mechanisms must be established to meet their safety, inclusion, accessibility and confidentiality needs in alignment with the Do-No-Harm principle.

1.3 How to Use this Handbook:

The handbook provides practical guidance on how different users (entrepreneurs, programme implementers, policymakers) can use its content to learn lessons on how to deal with sexual harassment and abuse of power in the workplace; and to maximise its impact in such an undertaking.

This handbook is designed to provide guidance and ideas when you are developing PSEAH measures. Each chapter takes a key element in implementing PSEAH and discusses what needs to be in place. It then takes you through a step-by-step guide of how to implement these measures, followed by a learning example.

1.4 Further Examples

There are copious examples of sexual harassment, sexual abuse, abuse of authority and distinguishing features – notably power asymmetry, bullying, sexism, racism, unconscious bias. Also included are the means of recognising these forms of abuse and how to deal with them at the individual, group and organisational levels.

As seen in news stories from around the world, sexual harassment, exploitation, and abuse have become a global topic. It is easier to deal with this topic when it lives in a distant place, but it can become difficult when it is close to you, whether it is in your community, your workplace, your region, or on your social media.

A Personal Conversation: This is a reflection that centres on you and the unique contributions you can make as an individual. Do you have a connection to the subject of sexual harassment and related misdemeanours? What does it mean to you when you hear you have the power to act and an obligation to report? Reflect on these prompts and then check the box for an answer that best represents your viewpoint.

The Prevention of Sexual Harassment, Exploitation, and Abuse (PSHEA) is important to me.

Disagree	Somewhat Disagree	Neutral	Somewhat Agree	Agree
<input type="radio"/>				

The Prevention of Sexual Harassment, Exploitation, and Abuse (PSHEA) requires everyone to be involved.

Disagree	Somewhat Disagree	Neutral	Somewhat Agree	Agree
<input type="radio"/>				

I have a responsibility to report incidents of sexual harassment, exploitation, and abuse that I witness, hear about, or experience.

Disagree	Somewhat Disagree	Neutral	Somewhat Agree	Agree
<input type="radio"/>				

To help deepen understanding on how sexual harassment, abuse and or exploitation express themselves in workplaces such as the entrepreneurial ecosystem we operate in, find below some hypothetical scenarios through stories:

Mary's Story

Mary is a Programme manager at a consulting firm. Recently, there have been a few questionable situations that she's encountered. Let's see what happened yesterday.

Kenneth: So, how was your weekend?

Zainab: It was good. I went to a party with my friends. How was yours?

Kenneth: It was good. Oh look, there's Mary." "She thinks she is so much better than everyone else.

Mary: Oh no, there is Kenneth. He has been bothering me to go out with him. Every time I have said no, but he won't take no for an answer". "Now he is gossiping about me to other people in the office.

It is obvious that Mary feels uncomfortable, degraded, and humiliated by her colleague's comments. Engaging in behaviours like this does not only affect the person who is the target, but also the work environment.

Tayo's Story

Tayo has been a Chief Executive Officer for 9 years and is well known for his charm and contributions towards the growth of the business. It is somewhat well known, though not openly discussed, that he has had numerous sexual relationships with female staff in his office. Many feel

these staff members are treated noticeably better than other women on the team who are not romantically involved with him.

Is this an instance involving potential sexual misconduct?

Throughout the rest of this handbook, you'll explore this topic, learn when and how to report such incidents, and your role in preventing it.

Here's another story.

Zarah is sharing what's been happening with their Chief Executive Officer and participants of their training Programmes recently.

Zarah knows that Kenneth has been with a consulting firm for the last five years and has become well known for his hard work, commitment to the mission of the enterprise and his ability to get things done. Kenneth is from a very prominent family and this has given him great respect in the business community.

Although not openly discussed, many staff have seen Kenneth make comments to participants of training Programmes under the age of 18 about their looks.

Zarah has even seen Kenneth "accidentally" brush against young female training participants and later stare at their bodies.

Zarah has overheard that some of the training participants feel uncomfortable during the training sessions and are afraid to speak up.

Let's explore some languages used when talking about the Prevention of Sexual Harassment, Exploitation, and Abuse (PSHEA)..



ESSENTIAL DEFINITIONS

Safeguarding & PSHEA

We have a safeguarding responsibility to ensure that our staff, operations, and programmes do no harm. This means protecting vulnerable populations of staff, programme participants¹ (including children²), and related personnel from risk and exposure to sexual harassment, exploitation, and abuse. The Prevention of Sexual Harassment, Exploitation, and Abuse or PSHEA (also known as PSEA) and Child Protection (CP) are forms of safeguarding.

Sexual Harassment

Sexual Harassment is any unwelcome sexual advance, comment, expressed or implied sexual demand, touch, joke, gesture, or any other communication or conduct of a sexual nature, whether verbal, written or visual, by any person to another individual. This includes sexual harassment that is directed at members of the same or opposite sex and includes harassment based on sexual orientation.

Sexual harassment is unacceptable and becomes unlawful when:

- Submission to such conduct becomes an implicit or explicit term or condition of employment,
- Submission to or rejection of the conduct is used as the basis for any employment decision,
- The conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

Sexual Exploitation

Sexual Exploitation is any actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes. This includes an exchange of some kind, such as profiting monetarily, socially or politically from the sexual act. This could also be referred to as "quid pro quo." An example is a Business Development Officer not providing an opportunity for scholarship/grant to a potential training participant unless she or he engages in a sexual act.

Sexual Abuse

Sexual abuse is the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. Child sexual abuse is the involvement of a child in sexual activity that they do not fully comprehend, for which they are not developmentally prepared for and cannot give consent, or that violates the laws or social taboos of society. This includes the coercion of a child to engage in any unlawful sexual activity, the exploitative use of a child in prostitution or other lawful sexual practices or the exploitative use of pornographic performances and materials.

Children can be sexually abused by other children. Other forms of abuse are emotional abuse³, neglect⁴, and physical abuse⁵.

PSHEA Focal Point

A PSHEA Focal Point (FP) is the designated person to help staff report sexual harassment, exploitation, and abuse. The PSHEA FP ensures that reports are properly made, appropriately and sensitively managed and that survivors stay informed. The PSHEA FP does not investigate reports of PSHEA. All report investigations are led by an impartial, trained PSHEA investigator⁶.

The PSHEA FP raises awareness of PSHEA at the Head Quarters level. In addition, they support the Director and Safeguarding & PSHEA Team in all aspects of PSHEA. However, the responsibility for managing PSHEA in the HQ remains with the Director.

¹ A Programme Participant is someone who receives ...

² CHILD: EDC defines a child as any person under the age of 18, irrespective of local country definitions of when a "child" becomes an "adult." A child cannot give consent to a sexual act. This definition is based on the age specified in the United Nations Convention on the Rights of the Child (UNCRC) and is widely accepted across the world.

³ Emotional Abuse can be difficult to identify because there are no outward signs of abuse. Emotional abuse is usually a verbal expression such as yelling, constant criticism, or using threatening language. Emotional abuse can damage self-esteem and self-worth.

⁴ Neglect is difficult to identify. Neglect occurs when a child doesn't have adequate food, housing, clothing, or medical care. Emotional neglect happens when the parent doesn't provide enough emotional support or pays too little attention to a child.

⁵ Physical Abuse is the most easily recognisable form of abuse. Physical abuse can be any kind of hitting, shaking, burning, pinching, biting, choking, throwing, beating, and other actions that cause physical injury, leave marks or pain.

⁶ A PSHEA Investigator is a staff member, who has received intensive training on how to sensitively investigate reports of SHEA, while maintaining confidentiality and keeping a survivor-centered focus.

A survivor is a person who is, or has been, sexually harassed, exploited or abused (SHEA). The term 'survivor' implies strength, resilience and the capacity to survive. You may use the term 'victim', to mean the victim of the alleged perpetrator's actions. However, this is not intended to negate that person's dignity and agency as an individual.

We are committed to ensuring that our response to sexual harassment, exploitation, and abuse is survivor centered. Being survivor-centered means that the needs, wants, and wishes of the survivor¹ guide the process and actions taken in managing the complaint. When we respond to a report² using our survivor-centered approach, the response is nonjudgmental and non-directive. Confidentiality³ and informed consent are prioritised at each stage of the process.

Survivor

Definitions in Context

Now that you understand some terms, let's practice using some of them in language that you may have used at work. Fill in the blanks with the correct words or phrases from the word bank.

Word Bank:

Safeguarding & PSHEA, Sexual Harassment, Sexual Exploitation, Sexual Abuse, PSHEA Focal Point, Survivor.

- We have a _____ responsibility to ensure that our staff, operations, and programmes do no harm.
- _____ is any unwelcome sexual advance, comment, expressed or implied sexual demand, touch, joke, gesture, or any other communication or conduct of a sexual nature.
- _____ is any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes.
- _____ is the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.
- The _____ ensures that reports are properly made, appropriately and sensitively managed and that survivors stay informed.
- We are committed to ensuring that our response to sexual harassment, exploitation, and abuse is _____-centered.

When you know how to use these terms appropriately, you help empower yourself and those around you.

1 If the survivor is under the age of 18, it is constituted as child abuse and must be reported to the authorities.

2 REPORT: A report is something a survivor of SHEA or someone who witnesses SHEA submits to stop SHEA and support a safe environment for everyone.

3 CONFIDENTIALITY: Confidentiality is something we work to maintain throughout the investigation process. Information is only available to a small number of authorised people.

MORE ESSENTIAL DEFINITIONS

Here is more of the language used to talk about safeguarding. Take your time to review because you will be using these definitions in the next activity.

Grooming is a process used most often by people with a sexual interest in children¹ to prepare a child for sexual abuse. It is often very carefully planned, and it can take place over weeks, months or even years. Grooming is about making the victim think that sex with the offender is normal or that they have no choice. Offenders do this by building a relationship and emotional connection, and often work in careers where they have access to vulnerable populations.

One of the most negative aspects of grooming is the way in which it mimics genuinely positive relationships. This can leave its victims very unsure of who to trust, sometimes assuming that they can trust no one, even people who seem to be nice and to care.

Grooming

Grooming can happen in-person and online. Grooming can also happen to adults.

In some countries, the law states that once married, people have a right to have sexual relations with their married partner even when the partner doesn't give consent. This is conjugal right, which is regarded as exercising in law.

However, EDC believes that consent is always required prior to sexual contact. If consent is not given or cannot be given² and sexual contact occurs, the act is sexual assault or rape. These are serious criminal acts.

Conjugal Rights & Consent

Consent cannot be assumed. The absence of the word "no" is not consent. Open communication is critical, and if there is doubt, ask.

Images of child sexual abuse are any sexually explicit visual depictions or displays of a child. Viewing images of child sexual abuse is not a victimless crime, it is an act of child sexual abuse. If you view these images, you are committing a crime. This is strictly prohibited and will be reported to the authorities.

We do not use the term child pornography, as this is a misrepresentation of the circumstances of the image being viewed. Sexually explicit images of children are images of child sex abuse, as a child is not able to consent.

Images of Child Sexual Abuse

Pornography is prohibited on EDC devices, networks, and at work.

Sex workers are people who receive money or goods in exchange for sexual services, and who consciously define those activities as income generating even if they do not consider sex work as their occupation.

Some vulnerable populations may be forced to engage in transactional sex (food or shelter in exchange for sex) as a way of surviving and protecting their families. This is known as survival sex. These people are engaging in sex work through desperation, not as a choice. Some may be forced into sex work through human trafficking or slavery.

EDC does not tolerate the hiring of sex workers (paying for sex) or any type of transactional sex by staff or related personnel. This rule applies even in countries where sex work is legal. Hiring sex workers or exploiting vulnerable people through transactional "survival sex" is an act of gross misconduct.

Sex Workers

¹ CHILD: A child is defined as any person under the age of 18, irrespective of local country definitions of when a "child" becomes an "adult." A child cannot give consent to a sexual act. This definition is based on the age specified in the United Nations Convention on the Rights of the Child (UNCRC) and is widely accepted across the sector.

² Consent cannot be given by a child.

A bystander is a person who is present when an event takes place but isn't directly involved. Bystanders might be present when sexual harassment, exploitation, or abuse occurs; or they could witness the circumstances that led up to these offenses.

Bystander

You may have heard the term "bystander intervention" which is being used to describe a situation where someone who isn't directly involved steps in to change the outcome.



All enterprise businesses should be committed to ensuring that their response to sexual harassment, exploitation, and abuse is survivor-centered.

Being survivor-centered means that the needs, wants, and wishes of the survivor¹ guide the process and actions taken in managing the complaint. When we respond to a report using a survivor-centered approach, the response is nonjudgmental and non-directive. Confidentiality and informed consent are prioritised at each stage of the process.

Definitions in Context

Now that you understand some terms, let's practice using some of them in language that you'd use at work. Fill in the blanks with the correct words or phrases using the word banks.

Word Bank:

Grooming, Conjugal Rights, Consent, Images of Child, Sexual Abuse, Sex Workers, Polygamy, Bystander.

- _____ is the practice or custom of having more than one wife or husband at the same time. We recognise that this is practised in some of the countries we work in.
- EDC does not tolerate the hiring of _____ (paying for sex) or any type of transactional sex by staff or related personnel.
- Viewing _____ is an act of child sexual abuse and will be reported to the authorities.
- A _____ is a person who is present when an event takes place but isn't directly involved.
- If _____ is not given, then the act may be regarded as sexual assault or rape.
- _____ is a process used by people with a sexual interest in children to prepare them for sexual abuse. It can also happen to adults.

When you know how to use these terms appropriately, you help empower yourself and those around you.

Remembering Zarah – Review

Reflecting on the story you heard earlier, what did Zarah witness Kenneth doing? Check the appropriate box.

Sexual harassment of a Programme participant

Sexual exploitation

Grooming

Polygamy

Circle your choice and then flip to the next page to see the answer.

¹ A survivor is a person who is, or has been, sexually harassed, exploited or abused (SHEA). The term 'survivor' implies strength, resilience and the capacity to survive. You may use the term 'victim', to mean the victim of the alleged perpetrator's actions. However, this is not intended to negate that person's dignity and agency as an individual.

Remembering Zarah – Explanation

Reflecting on the story you heard earlier, what did Zarah witness Kenneth doing? Check the appropriate box.

Sexual harassment of a Programme participant ✓	Sexual exploitation	Grooming
<p>Sexual Harassment is any unwelcome sexual advance, comment, expressed or implied sexual demand, touch, joke, gesture, or any other communication or conduct of a sexual nature, whether verbal, written or visual, by any person to another individual. Kenneth's repeated behaviors of staring and unwelcome touching are forms of sexual harassment. Because of his position of power, this could eventually led to sexual exploitation.</p>	<p>There are power dynamics at play here, and Kenneth's behaviour could eventually turn into sexual exploitation. However, sexual exploitation involves an exchange. Kenneth is not withholding or providing anything from the girls if they do not comply with his sexual requests.</p>	<p>Although Kenneth's repeated behaviors are targeted at children, he is not grooming them. Grooming is the process of building a relationship and emotional connection, where the victim thinks that the sexual abuse is normal or they feel like they have no choice. The programme participants are very clear that their interactions with Kenneth are uncomfortable and odd.</p>

You now have a better understanding of the terms used when describing sexual misconduct. Knowledge is power and the better you understand these concepts, the more empowered you are to keep yourself and those around you safe from sexual harassment, exploitation, and abuse.



1.5 International Standards on PSHEA:

Overview of relevant global standards, with emphasis on how they support safe and inclusive business environments.

The most widely used standards regarding PSHEA are the **Core Humanitarian Standard (CHS)** and the **Inter-Agency Standing Committee (IASC) Minimum Operating Standards for Protection from Sexual Exploitation and Abuse**. The

CHS is a broad quality and accountability framework describing the essential elements of principled, accountable and high-quality aid. Protection from sexual exploitation, abuse, and harassment is incorporated throughout the Standard. The Standard is a verifiable standard, meaning enterprises, whether civil society or business enterprises, can measure and improve their performance against it.

The IASC is a committee of United Nation agencies and Non-Governmental Organisations involved in the delivery of humanitarian assistance. They developed the PSHEA Minimum Operating Standards to support agencies in implementing PSHEA measures. The eight areas covered by the IASC Minimum Operating Standards are:

Minimum Operating Standard	Chapter in PSEAH Handbook
1. Effective policy development and implementation	Developing and implementing PSEAH policy and procedures
2. Cooperative arrangements	Implementing PSEAH requirements with partners, suppliers and contractors
3. A dedicated department/focal point is committed to PSHEA	Assigning specific responsibilities for PSEAH
4. Effective and comprehensive communication from headquarters to the field on expectations regarding raising beneficiary awareness on PSHEA	Engaging communities and people.
5. Effective community-based complaints mechanisms, including victim assistance.	Developing and implementing a Comprehensive complaints mechanism.
6. Effective recruitment and performance Management.	Developing and implementing PSEAH policy and procedures Ensuring staff, volunteers and associates understand and work to PSEAH requirements
7. Effective and comprehensive mechanisms are established to ensure awareness-raising on SEA amongst personnel.	Ensuring staff, volunteers and associates understand and work to PSEAH requirements
8. Internal complaints and investigation procedures are in place.	Responding to reports of PSHEA

The International Labour Organisation's (ILO) also has a standard on violence in the world of work which is the Violence and Harassment Convention (No. 190), that was adopted in June 2019. It is the first international treaty to recognise the right to a workplace free from violence and harassment, including gender-based violence. It provides methods for preventing violence and harassment and supporting victims/survivors.

It requires employers to:

- Adopt and implement a workplace policy on violence

and harassment

- Take violence and harassment into account when managing occupational safety and health
- Identify hazards and assess risks of violence and harassment
- Provide information and training to workers and others on the risks of violence and harassment

ILO also has other resources to help prevent violence and harassment in the workplace, including <https://c190guide.ilo.org/>

1.6 Further Support:

Resources for additional guidance on PSHEA and safeguarding.

- <https://www.ilo.org/topics/violence-and-harassment-world-work>
- Towards a Better Workplace for Women: Curbing the Menace of Sexual Harassment in Nigeria by www.bloomfield-law.com
- <https://www.svri.org/Engaging-the-private-sector-to-prevent-and-address-VAW>
- https://www.care-international.org/files/files/Counting_the_costofViolence.pdf
- Journal of Jurisprudence, International Law and Contemporary Legal Issues Rivers State University, Faculty of Law ISSN: 1115 5167 Vol.17 © March 2023
- Guidance Note: Protection from sexual exploitation and abuse for the Private Sector. Connecting Business Initiative, UNDP, OCHA.
- <https://kayaconnect.org/course/view.php?id=1212>
- <https://kayaconnect.org/course/info.php?id=1424>
- E-learning safeguarding modules by Safeguarding Resource and Support Hub (RSH); <https://safeguardingsupporthub.org/learning>
- https://www.engender.org.uk/content/publications/1663694699_MODEL-Sexual-Harassment-Prevention-and-Action-Policy.pdf

2

DEVELOPING AND IMPLEMENTING SAFEGUARDING AND PSHEA POLICY TO ENHANCE ENTREPRENEURSHIP DEVELOPMENT

2.1 The Safeguarding and Do No Harm Standards:

Discuss “Do No Harm” as a core principle for building trust, reducing risks, and supporting business sustainability within entrepreneurship.

Safeguarding and the “do no harm” principle are standards that aim to protect people from harm and exploitation. The goal of safeguarding is to protect people’s health, wellbeing, and human rights, and to prevent abuse and exploitation. Safeguarding can apply to children, adults, and vulnerable adults. The “do no harm” principle is defined by the Organisation for Economic Co-operation and Development as avoiding exposing people to additional risks through actions in international development and collaboration.

Creating a safe workplace environment intentionally established by policies and procedures that are administered creates a culture where management and staff of businesses irrespective of their gender trust and stay committed to the company as well as contribute towards sustainability of the enterprise. Applying Do No Harm helps enterprises to become more effective, accountable and efficient.

Safeguarding and Do No Harm Standards that could be adopted and adapted by business enterprises to create safe and enabling enterprises are as follows:

- **Standard 1:** Everyone connected with the enterprise knows how to keep adults and children safe and have appropriate learning opportunities to develop and maintain the necessary attitudes, skills, and knowledge to keep adults and children safe.
- **Standard 2:** Associates and partners have safeguarding measures, which are consistent with enterprise’s standards.
- **Standard 3:** Everyone engaging with enterprise, understand enterprise’s commitments to safeguarding and know what to do if concerns arise.
- **Standard 4:** The enterprise’s PSHEA and safeguarding policy commitments are integrated into existing organisational processes and systems and, where necessary, new procedures will be introduced.
- **Standard 5:** The enterprise has measures and mechanisms in place for monitoring and reviewing safeguarding measures and for both upward and downward accountability in relation to safeguarding.
- **Standard 6:** The enterprise ensures a workplace culture built on respect, tolerance, diversity, and inclusion that delivers a respectful environment for all staff.
- **Standard 7:** The enterprise promotes openness and transparency around its safeguarding of staff so that all staff are aware of the enterprise’s commitments to respectful workplaces, are clear on their responsibilities and feel able to raise questions or concerns and challenge and/or report actual/potential inappropriate or harmful conduct in the full knowledge that these will be taken seriously.

- **Standard 8:** The enterprise ensures robust protection for anyone who wishes to raise a concern or make a complaint regarding harassment, sexual harassment, or other workplace misconduct.

Consequences of Non-Compliance

Staff, associates, partners, volunteers, and vendors, among others: For staff, disciplinary action may include termination of contract, and for others, it could be an end to the relationship either through termination of contract or ending of the agreement/arrangement that covers their association with the company.

Appropriate legal and other actions based on the nature of the offence and in line with relevant national laws and policies may be taken for breaches or non-compliance.

2.2 Code of Conduct (Dos & Don'ts):

Outline a code that does not only include prohibitive behaviours but also actively promotes equity, inclusivity, and respectful conduct.

Depending on the nature of goods and or services being produced and or offered by the business, including clientele and coverage, the following outline a code that includes prohibitive behaviours that also actively promote equity, inclusivity and respectful conduct along a chain of engagements.

In relation to participants and communities:

Dos:

1. Treat all participants and community members with respect and dignity, acknowledging their inherent worth and unique perspectives.
2. Prioritise the well-being and safety of participants and communities in all interactions and decisions.
3. Ensure clear communication and transparency in all engagements, as it will foster trust and understanding.
4. Respect cultural diversity and sensitivities, actively seeking to learn about and accommodate different customs and traditions.
5. Provide equal opportunities for participation and representation, as it will promote inclusivity and empowerment.

Don'ts:

1. Refrain from engaging in any form of harassment, exploitation, or abuse. Recognise the profound harm it inflicts on individuals and communities.
2. Eschew discriminating based on race, gender, reli-

gion, ethnicity, disability, or any other characteristic; acknowledge the fundamental right to equality.

3. Refrain from violating the privacy or confidentiality of participants and communities; safeguard their personal information and stories.
4. Desist from using disrespectful or offensive language or behaviour; understand the impact it can have on trust and collaboration.

In relation to staff:

Dos:

1. Foster a supportive and inclusive work environment where all staff members feel valued, heard, and respected.
2. Encourage open communication and collaboration among staff members; recognise the strength of diverse perspectives and experiences.
3. Provide regular training and support on safeguarding and 'do no harm' principles, for it will equip staff with the knowledge and skills to uphold ethical standards.
4. Lead by example in upholding ethical standards and professional conduct by demonstrating integrity and accountability in all actions.

Don'ts:

1. Refrain from engaging in any form of discrimination, harassment, or bullying; recognise the destructive impact it has on individual well-being and organisational culture.
2. Desist from abusing power or authority in interactions with colleagues or participants; understand the importance of fair and equitable treatment.
3. Do not neglect reporting or addressing safeguarding concerns within the organisation; recognise the collective responsibility to ensure a safe and supportive environment for all.

2.3 Ensuring Stakeholders Understand and Comply with PSHEA Requirements:

Strategies to engage diverse stakeholders, including those in small enterprises and resource-limited settings; and to ensure their understanding and commitment to safeguarding.

- All staff, volunteers and associated personnel sign the organisation's code of conduct, or equivalent, which includes PSEAH.
- All staff, volunteers and associates receive induction and (where relevant) annual refresher training on PSEAH which includes the organisation's values and

how they help prevent PSHEA.

- Staff members are aware of their obligation to report PSHEA/misconduct and are aware that there is a policy for protection from retaliation (often called a Speak Up or Whistleblower Protection policy) in place.
- Supervision and performance appraisals include discussions on the level of understanding of PSEAH, adherence to the code of conduct and participation in training (or similar) that includes PSEAH.
- Secure leadership commitment within your organisation to ensure buy-in and ensure that safeguarding policies and procedures are in place to align with safeguarding practices.
- Consult with different clusters of persons with disabilities to ensure they understand the concept of safeguarding, and expectations from staff for inclusive budgeting in entrepreneurial programming.
- Ensure stakeholders understand their needs and what reporting channels would be most appropriate for them. You will likely need to develop a variety of reporting channels to meet diverse needs.
- Agree on an internal process for handling reports when they come in. Who is responsible for what? How will you support survivors? Who will analyse reports? Who will give feedback?
- Ensure mechanisms are in place to ensure confidentiality during all stages of the reporting process, and information is shared on a limited 'need to know' basis only. This includes senior management who might be implicated in a serious incident.
- Map local support services (e.g. financial, legal, psychosocial, medical, child protection support, law enforcement/police). Develop a plan so urgent cases can be referred to support services and identify alternatives where services are not in place.
- Train all staff on PSHEA including the Code of Conduct; identify and mitigate risks, and organisational reporting mechanisms, including how to prevent, recognise, receive, and respond to incidents of exploitation, abuse, or harassment.
- Ensure all materials are as accessible as possible (including using accessibility checkers for MS Office, accessible web pages, free toll lines using local sign language etc.)
- Raise awareness with all stakeholders about your reporting and response mechanisms.
- Regularly review reporting mechanisms with clusters to ensure they remain relevant and accessible (especially if reporting is low). Adapt or establish new channels based on stakeholders' feedback.
- Document and share lessons and good practices, e.g. most used channels, monitor and evaluate progress.

How to do it

1. All staff, volunteers, and associated personnel should sign a copy of the organisation's code of conduct (or equivalent) when joining the organisation. This can be annexed to their contract and, where necessary by employment law, form a part of the contract. Note that, as an organisational policy, the Code of Conduct still applies even to the staff who have for any reason not signed it.
2. Contractors, suppliers and other personnel associated with the organisation should also be made aware of the code of conduct. See the chapter on Implementing PSEAH requirements with partners, suppliers and contractors.
3. Staff should be briefed on their obligations in terms of PSEAH when joining the organisation. It is not enough just to sign the code of conduct; they need to be made aware of its contents. Inductions should include:
 - The organisational values, culture and contribution these make to PSEAH
 - What is expected of them in terms of their behaviour and conduct
 - What role they play on PSHEA in their team or department (their specific responsibilities for integrating PSEAH measures in their work)
 - What are the implications of breaching the code of conduct?
 - How to report any concerns they might have regarding PSHEA (and that staff should not attempt to investigate or resolve situations themselves).
4. Regular refresher training should be held on PSHEA, covering the above points.
5. Awareness-raising materials can also be used to remind staff of the code of conduct. These could be in the form of posters or leaflets displayed in the office and distributed to staff.
6. Procedures such as performance review, annual appraisal and so on could include a section on adherence to the code of conduct, and participation in training.
7. Staff should be performance-managed on whether they are implementing their role and responsibility for PSEAH effectively (see the chapter on Assigning specific responsibilities for PSEAH).
8. Senior managers should be performance-managed on whether they are creating a culture and environment to help prevent sexual harassment, exploitation and abuse, for example, by modeling the organisation's values, ensuring that inductions and training are taking place, communicating to staff that they will take any complaint or concerns seriously, and following up any PSHEA issues appropriately and according to the organisation's procedures.

2.4 Assigning Specific Responsibilities for PSEAH:

Detailed roles and responsibilities for implementing safeguarding, highlighting accountability as an integral part of inclusive business.

What should be in place?

- The Board (or equivalent governance structure) has accountability for PSEAH as part of its role.
- Senior management takes responsibility for ensuring PSEAH measures are implemented.
- The Board (and leadership teams are responsible for creating an organisational culture which supports PSEAH. An organisational culture which supports PSEAH is one in which:
 - Staff understand the organisation's shared values which help to prevent PSHEA
 - Staff can discuss and challenge attitudes, behaviours and practices that underpin PSHEA
 - Senior leadership models the organisation's shared values which help to prevent PSHEA
 - The organisation's policies and practices address issues of gender, diversity and empowerment.
- Organisations assign focal points for PSEAH, which support the development and implementation of PSEAH policy and procedures.
- PSEAH responsibilities are reflected in the role and job descriptions.

How to do it

1. Ensure that maintaining an organisational culture which supports PSEAH is built into job descriptions and performance management for senior leadership staff.
2. At least once every three months, include an item on PSEAH on your Senior Management Team meeting agenda. Discuss progress and challenges with implementing the PSEAH policy and implementation plan and how the organisational culture is either driving or hindering progress with implementation.
3. Present a progress report on implementing the PSEAH policy to your Board at least annually.
4. Identify staff members who can serve as focal points on PSEAH. These staff members should be relatively senior and/or hold roles which already implement PSEAH measures, such as human resources staff. Focal points should ideally reflect the diversity of staff who may wish to report sexual harassment, exploitation or abuse, and be 'trusted'.
5. Be clear on the role the focal points will play. The role will need to include:
 - Awareness raising/training for staff, stakeholders and communities
 - Documenting who has signed the PSEAH policy and code of conduct and who has received training on PSEAH
 - Supporting teams and departments to conduct risk assessments on their departmental systems and processes to ensure that PSEAH measures are integrated effectively
 - Receiving reports on PSEAH and referring them to the correct team or staff member for follow-ups.
6. Identify PSEAH responsibilities for other staff. These are typically:

Role	Responsibility
Board	<ul style="list-style-type: none"> • Ensure that PSEAH policies, procedures and approaches are in place and being implemented. • Foster and maintain an organisational culture which supports PSEAH. • Ensure accountability for serious PSHEA incidents.
All staff	<ul style="list-style-type: none"> • Adhere to the PSEAH policy and code of conduct, report concerns.
All Managers	<ul style="list-style-type: none"> • Foster and maintain an organisational culture which supports PSEAH. • Ensure all new employees receive the PSEAH policy training as part of their induction. • Ensure PSEAH measures are implemented within their area of responsibility and risk assessments conducted on systems, processes and activities. • Follow up, and address PSHEA issues appropriately and consistently.

Role	Responsibility
HR staff	<ul style="list-style-type: none"> • Implement the necessary measures when recruiting new staff and volunteers. • Ensure all new employees receive a copy of the PSEAH policy and code of conduct, prior to, or at the time of, issuing employment contract. Signed copies must be placed in their personnel file. • Serve as focal points (where appropriate) or be identified as the relevant personnel for addressing sexual misconduct within the workplace and PSHEA of communities by staff.
Programme staff	<ul style="list-style-type: none"> • Ensure that communities are aware of the PSEAH Policy and how to report concerns. • Serve as focal points (where appropriate) for PSHEA of affected populations e.g. as a trusted person to whom affected populations can report PSHEA. • Conduct PSHEA risk assessments of all programmes. • Ensure safe programming/ Design safe programmes.

7. Write PSEAH responsibilities into job descriptions and include it in performance management/appraisal discussions.

2.5 Implementation Steps and Considerations:

Practical steps for developing and monitoring safeguarding policies tailored to the entrepreneurial environment, with considerations for local contexts in Nigeria.

What should be in place?

A PSEAH or similar policy (such as a Safeguarding Policy) which describes the standard of behaviour expected of the organisation's staff and representatives, and which specifically prohibits sexual exploitation, abuse and harassment, must have the following characteristics

- the organisation's values and how these values are intended to create safe, equitable and inclusive organisations.
- victim/survivor-focused (i.e. the victim/survivor's wishes, safety, and well-being remain a priority in all matters and procedures).
- a Whistleblower Protection policy that protects staff who report PSHEA in good faith through the organisation's whistleblowing/Speak Up mechanisms.
- procedures describing how the policy is implemented throughout the organisation.
- an implementation plan, identifying gaps in implementing PSEAH and actions to address the gaps, which is reviewed and updated regularly.

How to do it

1. Develop a PSEAH policy. You can develop your policy by:
 - running a consultation with staff, raising awareness on what PSEAH means and asking for their inputs on what the policy should say (ensure the consultation is run with all groups of staff; or
 - Using an example of a PSEAH policy from elsewhere and adapting to suit your organisation and the context in which you work. You should involve staff by circulating the draft and asking for comments before finalising.
2. Check your PSEAH policy:
 - reflects organisational values which are explicit on e.g. non-discrimination, diversity and inclusivity, recognizing power and privilege,
 - identifies the organisation's commitment to the IASC Six Core Principles Relating to Sexual Exploitation and Abuse,
 - recognises the rights of all children, adults at-risk, affected populations and staff and associated personnel to be protected from sexual exploitation, abuse and harassment,
 - applies to all staff, volunteers and associates at all times,
 - identifies and manages risk,
 - includes the organisation's code of conduct,
 - integrates PSEAH measures into all areas of the organisation.
3. Organisations which have already developed a policy and procedure for sexual harassment in the workplace (often linked to policies on discrimination and other workplace issues such as bullying) should check that policy meets the requisite standards.
4. If your organisation gathers content from affected populations for research or communications materials, ensure you have policies and procedures in place

to prevent PSHEA that might arise from inappropriate use of content and safely store data on individuals.

5. If your organisation conducts online activities, ensure you have an Online Safeguarding policy or equivalent.

6. Develop PSEAH procedures or refer to relevant organisational procedures/ guidelines which include PSEAH measures. The procedures should include:

Procedure	PSEAH measures
Recruitment	<ul style="list-style-type: none"> • Job adverts include PSEAH commitments • Gaps in employment history checked during interview • Questions related to PSEAH asked during interview • At least two references taken, preferably verbally, from previous employers which include questions on candidate's conduct, behaviour. • A criminal record check is conducted, where possible • Consider a self-declaration form, where staff declare that they have no previous convictions or dismissals that prevent them from working with children or at-risk adults. • New employees sign contracts which include PSEAH and the organisation's code of conduct.
Induction/ training	<ul style="list-style-type: none"> • Induction includes at least a briefing on PSEAH. • All staff receive a half day training on PSEAH – recognising and responding to risks and concerns. • Annual refresher training opportunities provided.
Performance management	<ul style="list-style-type: none"> • Performance management discussions include understanding of PSEAH and an opportunity to raise concerns. • Where performance management includes working to values or competencies, these include PSEAH.
Whistleblowing	<ul style="list-style-type: none"> • A policy or procedure which encourages people to report on concerns without fear of reprisals.
Discipline and grievance	<ul style="list-style-type: none"> • PSHEA is explicitly stated as grounds for discipline which may result in termination of employment.
Programming guidelines	<ul style="list-style-type: none"> • Programming guidelines include identifying and mitigating risks of sexual exploitation, abuse and harassment in programmes to make them safer.
Risk Register	<ul style="list-style-type: none"> • PSHEA risks are included in the organisation's Risk Register • PSHEA is treated as a separate risk category • Major PSHEA risks have an assigned owner
Partnership arrangements	<ul style="list-style-type: none"> • All contracts with partners/suppliers/contractors include clauses on PSEAH. • Capacity building for partners includes capacity to implement PSEAH measures. • Partner monitoring includes PSEAH measures and PSHEA reports.
Complaints/ reporting	<ul style="list-style-type: none"> • Complaints/reporting mechanism developed to receive and respond to reports of PSHEA.

7. Develop a PSEAH implementation or work plan which identifies the gaps in the organisation in implementing PSEAH measures, and states what action will be taken to address the gaps, by whom and when.

8. Monitor the implementation plan on a quarterly basis to ensure that the organisation is making steady pro-

gress towards fully implementing PSEAH policy and procedures.

9. Review the PSEAH policy and procedures every two years to ensure they are fit for purpose.

2.6 Learning Example/Case Study:

Real-world example showcasing the positive impact of safeguarding policies on business trust, resilience, and community relationships.

LESSONS FROM ENGENDERING INDUSTRIES' PARTNER, EKO ELECTRICITY DISTRIBUTION COMPANY, IN NIGERIA

The role of workplace policies in preventing and addressing sexual harassment

Eighty-five percent of women globally have experienced sexual harassment in the workplace, which has traumatic consequences for survivors and reputational, financial, and legal costs for companies. A study from Nigeria showed that workplace sexual harassment is common, with over 60 percent of respondents reporting that they had experienced sexual harassment. Despite this, few organisations in Nigeria have formal sexual harassment policies.

When the Eko Electricity Distribution Company (EKEDC), a leading power distribution company in Nigeria, joined the United States Agency for International Development's Engendering Industries Program in 2015, the organisation did not have a sexual harassment policy. With the support of the Engendering Industries team, EKEDC developed a

sexual harassment policy with several survivor-centered elements. This achievement represents progress in Nigeria, where few companies have workplace sexual harassment policies. These efforts were part of a broader approach to increase gender equality across EKEDC, including comprehensive organisational policy reform, recruitment and succession planning changes, and other human resources (HR) and change management initiatives.

WHAT IS A SURVIVOR-CENTERED APPROACH TO GBV?

A survivor-centred approach is one in which the survivor's best interest, dignity, experience, and needs are at the centre of the entire grievance management mechanism and process. Organisations should use survivor-centred approaches to develop sexual harassment and GBV policies and investigate and respond to alleged incidents of workplace GBV. A survivor-centred approach returns power to the victim and facilitates a process in which a victim can become a survivor. When organisations lack survivor-centred sexual harassment policies and approaches, they compromise their employees' health, safety, and well-being and, thus, their business performance.

Sexual harassment negatively impacts corporate reputation, brand, and culture and hampers recruitment, hiring, and retention efforts. It also can increase operating costs through costly legal settlements and increased costs for the provision of medical care to employees. Conversely, organisations that prioritise survivor-centred approaches see business performance benefits, like improved reputation, reduced turnover, and increased employee satisfaction and retention. For these reasons, organisations



should develop and implement survivor-centred policies and practices that prevent and address sexual harassment and other forms of GBV.

DEVELOPING A SURVIVOR-CENTERED SEXUAL HARASSMENT POLICY

Conduct a Situation Analysis

For years, there were no official reports of sexual harassment at EKEDC, which was a red flag for management. Data shows sexual harassment is common in Nigeria, and lack of reporting could indicate distrust in reporting structures instead of a low rate of sexual harassment.

“We’d hear about sexual harassment by word of mouth,” said Oyinlola Osinubi, EKEDC’s Head of Organisational Development. “But, in official channels, people were silent. We recognised that we didn’t have the necessary reporting mechanisms. When someone is deciding whether to report sexual harassment, they begin asking themselves, ‘How do I report this? To whom should I report? What will happen to me if I report?’ When people don’t know the answers to these questions, they shrink away and choose not to talk. Every organisation in the world should have a sexual harassment policy.”

Use a Participatory Design Process

The utility used a strategic and participatory approach to draft, test, review, and finalise the policy. While the HR department spearheaded the policy, they engaged employees across the organisation to ensure an inclusive design process.

“When you have interventions coming only from HR, people might not feel ownership,” Oyinlola explained. “So, we ensured that members of other departments were nominated to the policy team so they could share what they have learned and get buy-in from others in their departments. We included our legal, auditing, customer service, commercial, and compliance representatives, and technical teams.”

Engendering Industries provided examples of survivor-centred sexual harassment policies and conducted trainings that helped them to frame and draft the policy. The process allowed EKEDC to clarify common misconceptions about sexual harassment, such as what types of actions are considered sexual harassment or who might experience it within the organisation.

“We had assumed that harassment was just male-on-female, but we learned that it could go both ways. So, we incorporated that in the policy,” Ms. Osinubi recalled. When the policy was ready for review, the utility used focus groups and presentations to socialise and solicit employee feedback from across the organisation, including men and women, at all levels.

“During the review process, we found that employees were most concerned about confidentiality in the reporting channels,” said Ms. Osinubi. “Other issues came up as well. For example, there was debate about whether to identify the individuals who would be receiving and managing the reports. Ultimately, we decided yes, our employees have the right to know who receives their complaints. This is a critical part of building trust in the system.”

With employee feedback incorporated, the HR department presented the policy to the leadership team and management. Finally, with the support of senior leadership, HR sent the policy to the CEO for approval.

Iterate the Sexual Harassment Policy

EKEDC’s first sexual harassment policy included sound approaches, like voluntary reporting and access to multiple anonymous reporting channels (including a web form, an ethics committee phone number, and an ethics committee email address). The policy also empowered victims of sexual harassment with decision-making control, including whether to initiate an internal investigation via formal or informal procedures.

But over time, EKEDC found opportunities to strengthen its sexual harassment policy by including more survivor-centred approaches that better support victims, such as providing access to internal counsellors and external counselling services by the Institute of counselling of Nigeria. Victims can also be temporarily moved to a safer workspace while the case is being investigated. The organisation also rolled out sexual harassment training for mid- and senior-level managers to ensure that supervisors and staff understand the importance of prioritising the needs of the victim by referring them to a counsellor as the first course of action.

“In our approach, the survivor understands their options, and nothing is imposed on them,” explained Wola Joseph, the Head of Legal at EKEDC. “Our goal is for the survivor to feel safe at work going forward. They have already had a traumatic experience. So, we are cautious. When sexual harassment is reported, we ask the complainant whether they are comfortable with escalating. The survivor drives the process and determines the steps we take and can choose at any time to stop an investigation once it has started. Sometimes, the survivor wants to take time off work, which is allowed.”

In addition to the Sexual Harassment Policy, Engendering Industries supports EKEDC’s goal of building a gender-equitable and safe workplace by improving adjacent policies and practices that impact workplace culture. For example, it is common practice in Nigeria for organisations to enact workforce dress code policies. However, dress code policies can be harmful if they unfairly target women or are used to prevent sexual harassment, as this can place blame on the victim rather than the perpetrator. Engendering Industries has supported EKEDC to ensure its Dress Code Policy is gender equitable, does not dispro-

portionately target women, and is not used as a means to prevent sexual harassment. To help achieve this, EKEDC renamed the policy Professional Attire and Grooming Policy, reflecting the policy's main purpose. Additionally, Engendering Industries is supporting the organisation to draft and roll out a larger gender-based violence policy, using survivor-centred approaches to address GBV.

Create a Rollout Strategy

With approval from the CEO, EKEDC's HR department shared the sexual harassment policy with employees via email and made it publicly available on the company's intranet site. They soon realised, however, that they needed to do more.

"Creating and sending a policy by email is one thing," said Ms. Alero Olayiwola, Head of Learning and Development at EKEDC. "Getting people to read, understand, internalise, and care about it is another. Unfortunately, not many people took the time to read it. Many knew they had received it but didn't know what it was about or why it mattered."

Engendering Industries supported EKEDC to create a sexual harassment training for all staff that included an overview of the behaviours that constitute sexual harassment, services available to victims, reporting procedures, and consequences for perpetrators, including possible termination. Then, using a training of trainers approach, Engendering Industries supported EKEDC in rolling out the policy to the utility's 2,000 employees.

Department managers nominated employees who met the criteria of effective facilitators, such as those with excellent communication skills. The HR department, with the support of an external consultant, trained these employees to facilitate sexual harassment trainings across the organisation. With support from the Engendering Industries coach, EKEDC created a list of anticipated questions from training participants and developed answers to ensure all trainers had the correct knowledge, capacity, and skills to navigate difficult and sensitive discussions. Additionally, EKEDC incorporated sexual harassment training into the onboarding protocol for all new employees.

EKEDC's primary objective was to create an approach that would result in high employee attendance and engagement levels. Therefore, the team developed a logistical approach that considered factors that could increase or reduce employee engagement, ensuring high levels of training participation.

"There were many factors to consider, and we needed to think strategically about how to roll these training sessions out," said Ms. Olayiwola. "We had to consider schedules, locations, and times of the day. We had to generate buy-in from district managers so that they would allow their employees to participate. We described the policy, the training, and the importance of employee participation, reassuring them that we would hold trainings during the

first week of the month when the workload was lighter. Finally, we located the trainings in a central location, eliminating concerns about traffic and reducing absenteeism."

Engage Staff in Dialogue about the Policy

EKEDC trainers approached the sessions as an opportunity for two-way dialogue among employees on all aspects of sexual harassment. The HR Department provided examples of behaviours that constitute sexual harassment, and the ensuing conversation revealed gendered differences in how men and women perceived these behaviours. Some behaviours that men thought were innocuous were perceived as harmful by women. For example, women shared that being casually touched by men during workplace conversations, receiving hugs at work, hearing men comment on the appearance of their female colleagues, and being stared at and "looked up and down" by men in the workplace were all behaviours that made them uncomfortable.

In addition to increasing knowledge, the trainings gave male and female employees a chance to express themselves freely, share their personal experiences and concerns related to sexual harassment, and relate to each other. This honest sharing helped break the mindset that sexual harassment is a woman's issue and improved understanding between male and female staff. The utility found that the benefits of the training extended beyond simple information sharing and had therapeutic value for participants.



"This two-way communication did not only allow us to ensure our employees understood everything, but it also allowed us to understand what particular issues were unfolding at the district level," said Ms. Osinubi. "It also gave us an opportunity to reassure our staff that our reporting mechanisms were safe, that anonymity would be protected, and that we would follow the wishes and protect the individual filing the complaint." Trainers also asked employees how the policy and training sessions could be improved upon and if anything required further clarification. Finally, the organisation used post-surveys to evaluate learning and analyse the effectiveness of the training. This information was used to strengthen future trainings.

Provide Ongoing Training and Evaluate Policy Efficacy

EKEDC has made the policy available on its corporate intranet and has incorporated it as one of the mandatory policies for onboarding every new staff member. The team has also held additional company-wide trainings to keep current employees informed. EKEDC also regularly monitors the impact of the sexual harassment policy and trainings.

IMPACT OF THE POLICY AND TRAININGS

Since improving its sexual harassment policies grievance mechanisms and holding the trainings, EKEDC has seen a slight uptick in reporting, which is an early sign that the changes are working. It shows that employees trust the process and people feel safer coming forward.

“Before the policy implementation and awareness programmes, there were no formal complaints [of sexual harassment] where a case was investigated and adjudicated formally. After, I think we’ve had three,” reflected Ms. Osinubi, “We had the first one, and we were like, ‘Ok, that

was new and, by following our policy, we handled it well.’ Then we had another two and knew we had a good model to follow.” In total, four cases have been elevated to the complete disciplinary process, which has resulted in one termination, two redeployments, and one resignation.

“The policy has helped greatly,” said Ms. Joseph. “I have seen men behaving better and women feeling safer. The company’s reputation has improved as word spreads that we are a gender-friendly and gender-protecting organisation. Between 2015 and now, there has been an increase, almost a doubling, of women working at the company. In my assessment, people perceive us as a gender-friendly company, and the bottom line will reflect that.”

EKEDC also recognises that every organisation still has room to grow in improving reporting rates and creating a safer environment for both female and male employees. The company plans to continue improving the content and implementation of its existing policy and will expand it to include other forms of GBV beyond sexual harassment such as domestic violence. EKEDC also plans to find new ways to measure the effectiveness of policy implementation, including the application of workplace climate surveys.

3

DEVELOPING AND IMPLEMENTING A PSEA COMPLAINTS MECHANISM



A robust and accessible complaints mechanism is a critical element of safeguarding efforts to protect individuals from sexual exploitation, abuse, and harassment. This chapter outlines the key components for designing and implementing an effective PSEA complaints mechanism, emphasising inclusivity, transparency, and the safety of all stakeholders.

3.1 Overview of the Speak-Up/Reporting Process

The complaints mechanism serves as the cornerstone of an inclusive and safe organisational environment. It empowers employees, partners, and stakeholders to raise concerns about misconduct, including sexual exploitation, abuse, and harassment (SEA).

Effective reporting systems are built on trust, confidentiality, and accessibility. A well-structured speak-up process ensures:

- **Trust:** Complainants feel confident their concerns will be addressed impartially.
- **Safety:** Reporters are protected from retaliation.
- **Accountability:** Organisations act on reports promptly and effectively, fostering a culture of transparency.

Organisations must communicate clearly that SEA is unacceptable and ensure that mechanisms are in place to respond to such issues promptly.

3.2 Speak-Up Policy and Procedure

A clear and comprehensive speak-up policy outlines how individuals can report incidents of SEA and ensures fair and consistent handling of complaints.

Key Components of a Speak-Up Policy:

1. **Accessibility:**
 - Reporting channels should be simple, available in multiple languages, and accessible to individuals of different abilities.
 - Outreach efforts should include remote areas or marginalised groups, ensuring inclusivity.

2. Clarity:

- Define what constitutes SEA, including specific examples relevant to the organisation's context.
- Provide clear instructions on how and where to report concerns.

3. Confidentiality:

- Protect the identity of complainants and witnesses, sharing information strictly on a need-to-know basis.

4. Multiple Entry Points:

- Offer diverse reporting channels (e.g., hotlines, email, in-person, or anonymous reporting systems).

5. Timely Response:

- Establish timelines for acknowledgment, investigation, and resolution of complaints to avoid delays and build trust.

6. Feedback Mechanisms:

- Keep complainants informed about the status of their case while maintaining confidentiality.

3.3 Disciplinary Procedures and Sanctions

Fair and transparent disciplinary procedures ensure accountability and deter future misconduct.

Core Principles:

1. **Consistency:** Apply the same standards regardless of the alleged perpetrator's role or rank in the organisation.
2. **Proportionality:** Match sanctions to the severity of the misconduct while ensuring due process for all parties involved.
3. **Transparency:** Communicate the outcomes of investigations (within confidentiality limits) to demonstrate commitment to justice.

Examples of Sanctions:

- Warnings or reprimands for minor infractions.
- Suspension or termination of employment for serious misconduct.
- Reporting criminal cases to appropriate law enforcement agencies.

Organisations must have policies for addressing malicious or false reporting while ensuring genuine complaints are protected and addressed fairly.

3.4 Reporting Procedures and Protections for Complainants

To encourage reporting, organisations must clearly define what can be reported and how complainants will be protected.

What Can Be Reported?

- Instances of Sexual Exploitation and Abuse (SEA) committed by staff, partners, or other stakeholders.
- Inappropriate behaviour violating organisational codes of conduct.
- Attempts to cover up or retaliate against complainants or witnesses.

Protections for Complainants:

1. **Non-Retaliation:** Strict policies must protect individuals from retaliation, including demotion, dismissal, or harassment, for filing a report in good faith.
2. **Psychosocial Support:** Provide access to counselling and other support services to mitigate the emotional and psychological impact of reporting SEA.
3. **Whistleblower Anonymity:** Allow for anonymous reporting options where necessary.

Organisations or groups should also train managers and investigators to approach complainants with sensitivity and respect.



3.5 Additional Reporting Channels and Protection Measures

While internal mechanisms are crucial, alternative reporting channels provide complainants with more options, ensuring they feel safe and supported.

Examples of Additional Channels:

- **Third-Party Hotlines:** Independent entities can handle reports to reduce fears of bias.
- **Ombudspersons or External Advisors:** Neutral individuals who can mediate or advise complainants on next steps.
- **Regulatory Authorities or NGOs:** Partnering with external bodies for oversight and additional support.

Protection Measures:

- **Relocation or Role Changes:** In cases where complainants fear retaliation, temporary reassignment or relocation may be considered.
- **Policy Awareness:** Regularly communicate reporting options and protections to all stakeholders, ensuring they are aware of their rights.

3.6 Learning Examples/Case Studies

Case studies help illustrate how effective complaints mechanisms build safer environments and improve organisational trust.

Example 1: Building an Accessible Reporting System in a Medium Enterprise:

A medium-sized NGO operating in rural regions implemented a mobile app for anonymous reporting of SEA. By integrating local languages and providing offline functionality, reporting increased by 50% in its first year, particularly among female staff.

Example 2: Partnering with Communities for SEA Oversight

A humanitarian organisation developed a complaints mechanism in partnership with community leaders. This approach ensured culturally sensitive reporting channels and increased trust among beneficiaries, leading to quicker resolutions.

Example 3: Transparency as a Trust Builder

A multinational corporation introduced quarterly reports summarising SEA complaints and outcomes (while maintaining confidentiality). This transparency reinforced the organisation's commitment to safeguarding, fostering greater employee trust.

An effective PSEA complaints mechanism does not only address incidents of SEA but also acts as a preventive measure, reinforcing organisational integrity and commitment to safeguarding. By integrating inclusive policies, robust protections, and accessible reporting channels, organisations can foster environments where individuals feel empowered to speak up, knowing their concerns will be taken seriously and addressed fairly.

4

MONITORING THE IMPLEMENTATION PSEAH POLICIES AT THE ORGANISATIONAL AND WORKPLACE LEVELS.

PSEAH Monitoring provides information and feedback on implementation and progress of intervention and achievements in relation to what was originally planned. It helps to improve our productivity and service delivery to the people and win public support (improving) and get useful information for evaluation. What is not monitored is usually not implemented, hence the importance of monitoring and hence the importance of developing valid, reliable and practical metrics to assess the implementation of PSEAH at organisational level.

Safeguarding Indicators Checklist:

A checklist of metrics includes both safeguarding and inclusivity indicators, tailored to an entrepreneurial and developmental context. It is a truism in life and in management that what is not monitored is usually not implemented. No matter how good a policy is, if there are no mechanisms to monitor its implementation, the policy usually ends up as a piece of decoration on an office mantelpiece. This truism underscores the importance of monitoring and thus the importance of developing valid, reliable and practical metrics to assess the implementation of PSEAH at organisational and office levels.

This chapter presents the actions, steps and processes necessary to monitor the implementation of PSEAH at the workplace. These steps involve awareness creation through training and retraining, obtaining commitment to the PSEAH across all segments of the organisation and mainstreaming PSEAH in all aspects of staff members' job descriptions and performance appraisal measures and in matters such as recruitment, induction and on-boarding. These actions, steps and strategies are listed below:

- All staff, volunteers and associated personnel sign the organisation's code of conduct, or equivalent, which includes PSHEAH.
- All staff, volunteers and associates receive induction and (where relevant) annual refresher training on PSHEAH which includes the organisation's values and how they help prevent PSHEAH.
- Staff members are aware of their obligation to report PSHEAH/misconduct and are aware that there is a policy for protection from retaliation (often called a Speak Up or Whistleblower Protection policy) in place.
- Supervision and performance appraisals include discussions on the level of understanding of PSHEAH, adherence to code of conduct and participation in trainings (or similar) that include PSHEAH.
- Secure leadership commitment within your organisation to ensure buy in and ensuring that safeguarding policies and procedures are in place to align with safeguarding practise.
- Consult with different clusters of persons with disabilities to ensure they understand the concept of safeguarding, and expectations from staff for inclusive budgeting in entrepreneurial programming.
- Ensure stakeholders understand their needs and what reporting channels would be most appropriate for them. It is likely you will need to develop a variety of reporting channels to meet diverse needs.
- Agree on an internal process for handling reports

when they come in. Who is responsible for what? How will you support survivors? Who will analyse reports? Who will give feedback?

- Ensure mechanisms are in place to ensure confidentiality during all stages of the reporting process, and information shared on a limited 'need to know' basis only. This includes senior management who might be implicated in a serious incident.
- Map local support services (e.g. financial, legal, psychosocial, medical, child protection support, law enforcement/police). Develop a plan so urgent cases can be referred to support services and identify alternatives where services are not in place.
- Train all staff on PSHEA, including Code of Conduct, identifying and mitigating risks, organisational reporting mechanisms, for example, how to prevent, recognise, receive, and respond to incidents of exploitation, abuse, or harassment.
- Ensure all materials are as accessible as possible (including using accessibility checkers for MS Office, accessible web pages, free toll lines using local sign language, etc.)
- Raise awareness with all stakeholders about your reporting and response mechanisms.
- Regularly review reporting mechanisms with clusters to ensure they remain relevant and accessible (especially if reporting is low). Adapt or establish new channels based on stakeholder's feedback.
- Document and share lessons and good practices, e.g. most used channels, monitor and evaluate progress.

How to do it

1. All staff, volunteers, and associated personnel should sign a copy of the organisation's code of conduct (or equivalent) when joining the organisation. This can be annexed to their contract and, where necessary by employment law, form a part of the contract. Note that, as an organisational policy, the Code of Conduct still applies even to staff who have for any reasons not signed it.
2. Contractors, suppliers and other personnel associated with the organisation should also be made aware of the code of conduct. See the chapter on Implementing PSHEAH requirements with partners, suppliers and contractors.
3. Staff should be briefed on their obligations in terms of PSHEAH when joining the organisation. It is not enough just to sign the code of conduct; they need to be made aware of its contents. Inductions should centre on:

- The organisational values, culture and contribution these make to PSHEAH
 - What is expected of them in terms of their own behaviour and conduct?
 - What role they play on PSHEA in their team or department (their specific responsibilities for integrating PSHEAH measures in their work)
 - What are the implications of breaching the code of conduct?
 - How to report any concerns they might have regarding PSHEA (and that staff should not attempt to investigate or resolve situations themselves).
4. Regular refresher training should be held on PSHEA, covering the above points.
 5. Awareness raising materials can also be used to remind staff of the code of conduct. These could be in the form of posters or leaflets displayed in the office and distributed to staff.
 6. Procedures such as performance review, annual appraisal and so on could include a section on adherence to the code of conduct, and participation in training.
 7. Staff should be performance-managed on whether they are implementing their role and responsibility for PSHEA effectively (see the chapter on Assigning specific responsibilities for PSHEA).
 8. Senior managers should be performance-managed on whether they are creating a culture and environment to help prevent sexual harassment, exploitation and abuse – for example modeling the organisation's values, ensuring that inductions and training are taking place, communicating to staff that they will take any complaint or concerns seriously, and following up any PSHEA issues appropriately and according to the organisation's procedures.

4.1 PSHEA Monitoring, Evaluation, Research, and Learning (MERL):

Framework for tracking the impact of safeguarding on business outcomes, such as employee retention, trust, and organisational resilience.

The different types of PSEAH monitoring are:

- Output/Input Monitoring: This category refers to the internal monitoring of financial, physical and organisational elements of PSEAH operationalisation.
- Financial monitoring: It ensures control of the inputs

and costs of the programme per activity within the pre-established categories of PSEAH expenditures.

- **Physical monitoring:** It is conducted to assess the state of progress in the delivery of PSEAH to groups of beneficiaries within and external to the organisation.
- **Context Monitoring / Risk and Assumptions monitoring:** It refers to the monitoring of institutional and structural challenges that are likely to affect the organisation's ability to produce expected results on PSEAH operationalisation. The focus here is to monitor risks factors and critical assumptions in order to reduce and mitigate them.
- **Results Monitoring:** This is a process of checking outputs, effects and impacts of the PSEAH operations on entrepreneurial development.

What do we evaluate?

PSHEA outcome

to attribute short-term changes to entrepreneurial development, projects or programmes.



PSHEA outcome

to attribute short-term changes to entrepreneurial development, projects or programmes.



Impact

to attribute long term changes to intervention, organisations and society.

organisational levels as well as in wider learning contexts.

Thus, lessons learned refers to insights, experiences, or knowledge gained during the process of monitoring and evaluating a PSEAH intervention, a project, programme, or initiative. They can be positive or negative, drawn from analysing successes, failures, challenges, and best practices encountered during implementation.

Types of learning include:

- Formal and informal
- Intentional or emergent
- New or old
- Exploration and exploitation
- Supply-side and demand-side

Therefore, learning facilitates adaptive management which involves constant data collection and analysis to generate insights where the result can be used to adapt and refine interventions, projects or programmes on a continuous basis.

4.2 Designing PSHEA Evidence-Inclusive Interventions:

Guidance on using data to tailor safeguarding interventions to the needs of diverse stakeholders, especially marginalised groups.

What should be in place?

Governance

- Promote diversity and inclusion in the governance bodies in your organisation.
- Support and reinforce accountability from management and senior leadership to ensure implementation of an intersectional approach in safeguarding policies and procedures.

Culture and leadership

- Recruit leaders, including board members, who represent diverse groups.
- Recruit leaders, including board members, who understand and base policy, procedure and practice on the intersecting risks being faced by different people.
- Reward and acknowledge leaders and colleagues who recognise and encourage diversity, acknowledge power and privilege and potential bias and lead or contribute to organisational change.

What is learning?

- Learning can be defined in many ways: "the social process by which we develop knowledge, skills, insights, beliefs, values, attitudes, habits, feelings, wisdom, shared understanding and self-awareness." (Britton, 2005).
- Learning may be an informal and unconscious process. But learning can also be a more formal and structured process, which results in the generation and recording of lessons.
- Learning takes place at individual, collective and or-

- Raise awareness and train staff and leaders on intersectionality as a core value of your organisation.
- Create “safe spaces” for specific groups to discuss and share their risks of sexual exploitation, abuse and sexual harassment (PSHEA) and other harms and abuses with each other.
- Facilitate safe conversations to challenge existing power structures and the culture within an organisation. Use anonymous intersectional analysis of staff perspectives to inform the conversations.

Human Resources

- Ensure that leaders, managers and other staff understand how certain group characteristics and structural inequalities relate to power and the risks of PSHEA and other harms and abuses being faced by different staff members.
- Ensure that performance management procedures take into account the risks of PSHEA and other harms and abuses being faced by different staff members and the need to further train staff and representative (including volunteers) to ensure effectiveness of safeguarding measures.
- Ensure the organisation’s recruitment processes foster diversity and inclusion, and challenge inequality.

How to do it

All enterprises are required to adopt their own policies in accordance with their structures and operations. However, the following steps should be considered in order to sufficiently prevent, identify, respond and manage safeguarding issues:

1. Develop organisational policies, procedures and codes of conduct for all system (internal and external) actors.
2. Screening procedures which must include detailed screening procedures for all organisation personnel and service providers. Checklist to consider could include certificate of good conduct, police reference checks or equivalent, verification that applicants are not listed in national registries of offenders; a detailed application and interview process; references who support the applicant’s integrity.
3. Acknowledgement must be received from anyone who wishes to work with the organisation. S/he will be required to sign an acknowledgment form confirming that he/she agrees to comply with the policy on safeguarding and that he/she understands that disciplinary action will be taken against anyone found guilty.
4. Training and Awareness must be instituted to ensure that all Organisational Personnel involved understand inclusive safeguarding, the risks, policies and procedures, including national laws and international instruments, as applicable. In addition, organisation

should put in place capacity building sessions to develop the capacity of all Organisational Personnel and service providers.

5. Reporting mechanisms should follow safe and confidential/anonymous methods if needed, in order to address concerns relating to their well-being, safety and protection to the organisation. Victims should also be aware of the options available to them and services to report and get redress.
6. Response and follow up should adhere strictly to organisational policies and procedures, local laws and take into account the best interests of the victim, as applicable, and endeavour to ensure no further harm comes to the victim, as applicable, as a result of any actions taken by the Organisation. After any incident or report of abuse and exploitation, proper measures will be taken to ensure organisational learning, evaluation and follow up takes place. The Organisation will retain written records of all reports, including, but not limited to the date of the report and the date of the alleged abuse; the name of the Organisational Personnel who made the report; the name of the governmental contact to whom the report was made and a clear description of the facts that led to the report; as well as any other available information.
7. Implementation, monitoring and review of the inclusive safeguarding policy should be designated to a specific employee within the organisation. The designated employee will have the duty to review the policy at regular intervals as determined necessary by the organisation, preferably at least every three ③ years, where possible.
8. Sanction and discipline of organisational personnel should be included within organisational human resources policies.

4.3 Best Practices for Sustaining Safeguarding in Entrepreneurship:

Practical tips for embedding safeguarding as an ongoing part of business operations and culture

The most renowned businesses around the globe were built on ingenuity, hard work, customers’ demand for products and services. Broadly, entrepreneurs must not only consider the impacts their companies have on society and environment; they must also ensure their finances stay sustainable. The following are a few inexhaustive tips for integrating safeguarding as an ongoing component of business operations.

1. Clearly define safeguarding roles and responsibilities within your organisation. Ensure that no single employee has absolute control over critical business processes, such as financial transactions, purchasing, and inventory management.
2. Establish a code of ethics that emphasises honesty, integrity, and ethical behaviour. Ensure employees understand the consequences of fraudulent activities and provide a clear reporting mechanism for ethical concerns.
3. Conduct periodic audits and reviews to detect any irregularities or suspicious activities. Utilise modern software tools to automate monitoring processes and flag any anomalies promptly.
4. Implement a strict authorisation process for financial transactions, including dual signatures or managerial approval. This reduces the risk of unauthorised or fraudulent activities.
5. Stay vigilant, adapt to changing fraud techniques, and foster a culture of ethics and integrity within your organisation. By prioritising fraud prevention, you can help safeguard your business's financial health, reputation, and future growth.
6. Establish continuous safeguarding awareness training to educate employees on SEAH best practices and potential threats, especially on operations, such as phishing attacks. Schedule automatic backups of your website and store them off-site.
7. Granting appropriate user privileges is essential in preventing unauthorised access to sensitive information. Adopt the principle of least privilege. Provide users with only the permissions they need to perform their job responsibilities.
8. Develop a plan to respond to safeguarding incidents and minimise the impact on your organisation.
9. Define your product/service niche, deeply understand your customers' needs and define the relationship. Stay competitive.

4.4 Learning Examples/PSHEA:

Finally, PSHEA that demonstrates the long-term benefits of effective safeguarding on entrepreneurship growth, resilience, and community relationships.

South Wales Police Commissioner:

Instigated mandatory training for police officers working in the night-time economy. This training has been opened to others working in this area, such as bar staff, hotel reception staff, taxi marshals, and street pastors.

Vulnerability Awareness Training – South Wales

Nigeria – Lagos State Domestic and Sexual Violence Response Team (DSVRT):

The Lagos State Government introduced the DSVRT to provide training for business owners, transport workers, and community leaders to identify and respond to cases of domestic and sexual violence. Their initiatives have helped improve community resilience and fostered safer environments for local entrepreneurship to thrive.

Domestic and Sexual Violence Response Training – Lagos State, Nigeria

India – Councils Initiative:

Over a third of Councils in India have introduced mandatory training for taxi and private hire drivers on child sexual exploitation. Some have used the SQA Level 2 Certificate for taxi and private hire drivers.

Level 2 Certificate in Introduction to the Role of the Professional Taxi and Private Hire Driver

**University of Bedfordshire
Collaboration:**

Worked with different departments within Councils, local business associations, and the voluntary sector to address safeguarding concerns in local business and neighbourhoods.

Responding to Safeguarding Concerns in Local Businesses and Neighbourhoods

Kenya – Training for Bodaboda Operators:

The Kenyan government and NGOs have initiated safeguarding awareness programs for bodaboda (motorcycle taxi) operators. These programs educate drivers on the risks of human trafficking and child exploitation, enabling them to act as frontline responders and improve community safety.

Safeguarding Awareness for Bodaboda Operators – Kenya

Flintshire Council, Wales:

Provided guidance on their website to tackle modern slavery in the hotel sector.

Tackling Modern Slavery in the Hotel Sector in Wales

South Africa – Tourism and Safeguarding Training:

South Africa's Department of Tourism collaborated with local businesses to train hotel and guesthouse staff on identifying signs of exploitation, especially during major events like the World Cup. These efforts have strengthened the safeguarding culture in the hospitality sector while boosting trust and tourism growth.

Hospitality Safeguarding Initiatives – South Africa

England – Safeguarding Resources for Taxi Drivers and Hotels:

Councils produced resources for taxi drivers, hotels, and takeaways to help them identify young people at risk of exploitation. These include stickers, posters, and handbooks.

Handbook for Taxi and Private Hire Drivers – West Sussex

Uganda – Safe Schools and Communities Initiative:

Through partnerships between NGOs and the Ministry of Education, training programs have been introduced to help teachers and local businesses identify and report child exploitation cases. This approach has fostered stronger community ties and created safer spaces for learning and business.

Safe Schools and Communities Initiative – Uganda

By incorporating these diverse examples, the section highlights how safeguarding measures enhance not only protection but also economic growth and social cohesion across global and African contexts.

5

CONCLUSION

Workplace harassment, particularly sexual harassment, continues to pose significant challenges to creating safe and inclusive entrepreneurial ecosystems worldwide. Despite growing awareness and increased advocacy, harassment remains pervasive, often fuelled by systemic power imbalances, cultural norms, and inadequate enforcement of legal protections. In developing countries like Nigeria, these issues are compounded by unique socio-cultural and economic dynamics, which demand tailored strategies and localized interventions.

The global #MeToo movement and initiatives in countries like Kenya and Nigeria underscore the potential of collective action and advocacy to challenge entrenched practices and promote cultural change. However, these efforts must be complemented by robust legal frameworks, proactive enforcement, and comprehensive education to ensure sustainable progress.

This handbook plays a critical role in bridging gaps by equipping entrepreneurs, business leaders, and employees with actionable tools and insights. It combines global lessons with localized strategies to address workplace harassment within the context of entrepreneurship in Nigeria and other developing nations. By fostering a culture of respect, accountability, and safety, this handbook aims to empower businesses to thrive in environments where innovation and creativity are not stifled by fear or inequality.

Effective safeguarding practices have proven to be transformative in fostering entrepreneurship growth, enhancing resilience, and strengthening community relationships across the globe. By addressing vulnerabilities and implementing targeted training and awareness programs, diverse stakeholders—governments, local councils, busi-

nesses, and civil society organizations—have successfully created safer environments that empower individuals and communities alike.

For instance, initiatives like South Wales' Vulnerability Awareness Training and India's mandatory training for taxi drivers demonstrate how embedding safeguarding principles within professional sectors can mitigate risks of exploitation while bolstering trust in public services. Similarly, programs in African nations such as Nigeria, Kenya, and Uganda illustrate the vital role of safeguarding in contexts where informal economies and close-knit communities are predominant. From tackling domestic and sexual violence in Lagos to empowering bodaboda operators in Kenya, these initiatives highlight how safeguarding efforts can simultaneously protect individuals and create conditions for economic growth.

Globally, partnerships like the University of Bedfordshire's collaboration with councils and businesses or South Africa's training programs in the hospitality sector showcase the scalability and adaptability of safeguarding strategies. These measures not only address immediate vulnerabilities but also contribute to long-term socio-economic development, proving their relevance in both developed and developing contexts.

In conclusion, safeguarding is more than a protective mechanism—it is a catalyst for resilience and prosperity. By investing in comprehensive training, fostering collaboration among stakeholders, and tailoring approaches to local realities, societies worldwide can create sustainable models of entrepreneurship and community well-being. Safeguarding, therefore, should not be viewed solely as a preventive measure but as an integral component of development strategies globally.

REFERENCES

- CHS Alliance PSEAH Handbook. Available at: PSEAH Implementation Quick Reference Handbook – Multiple Languages | CHS Alliance.
- CHS in 2018 Sphere Handbook May 2020. Available at: <https://handbook.spherestandards.org/en/sphere/#ch001>
- EDC DO NO HARM HANDBOOK_20 Feb 2024.
- Habiba Balogun Consulting, Harassment & Discrimination in the Workplace Report. Available at: <https://wiscar.ng/wp-content/uploads/2021/04/HD-IN-THE-WORKPLACE-2020-REPORT-Info-slides.pdf>.
- Ministry of Employment and Labour Relations, 2021: 14,540 people suffered abuse at Workplace in 2021 – Survey – The Ghana Guardian News
- New TUC poll: 2 in 3 young women have experienced sexual harassment, bullying, or verbal abuse at work | TUC. Available at: New TUC poll: 2 in 3 young women have experienced sexual harassment, bullying or verbal abuse at work | TUC
- Small and Medium Enterprises Development Agency of Nigeria (n.d). National Enterprise Development Programme (NEDEP).
- Stand to End Rape (STER), 2021: “Examining the prevalence, context, and impact of workplace sexual harassment in Nigeria.” Available at: <https://standtoendrape.org/workplace-sexual-harassment-in-nigeria/>.
- The Solidarity Centre and Nigeria Labour Congress (NLC), 2020: “BREAKING THE SILENCE Gender-Based Violence in Nigeria’s World of Work.” Available at: solidaritycenter.org/wp-content/uploads/2021/11/Nigeria.GBVH-in-the-World-of-Work-Nigeria.10.2021.pdf.
- Violence and harassment in the world of work: Trade union initiatives, strategies and negotiations since the adoption of the Convention on Violence and Harassment (No. 190) and its Recommendation (No. 206), 2019. Available at: Violence and harassment in the world of work_EN_web.pdf
- Zogning, F. (2023). “Financial inclusion, inclusive entrepreneurship, and alternative financing options.” Journal of Small Business & Entrepreneurship, 35(1), 8–13.

Acknowledgement

We would like to express our heartfelt appreciation to the individuals and organizations whose generous support, expertise, and contributions have been instrumental in bringing this handbook to life.

1. Nkechi-Ilochi Kanny
2. Omekedo Efemena
3. Noel Ihebuzor, UNESCO-IBE Senior Fellow, FITD, MloD, PhD, Social Development and Public Policy Expert
4. Philemon Iko-Ojo Omede, Faculty of Law, Veritas University Abuja
5. Onyinye Ojeh, Able Women HealthCare Initiative
6. Stanley Ibeku, PhD, Enterprise Development Centre, Pan-Atlantic University
7. Adeola Alafia, Enterprise Development Centre, Pan-Atlantic University
8. Paulinus Ugwu, Enterprise Development Centre, Pan-Atlantic University
9. Dr. Nnenna Ugwu, Enterprise Development Centre, Pan-Atlantic University
10. Halima Rabi, Enterprise Development Centre, Pan-Atlantic University
11. Philomena Odu, Enterprise Development Centre, Pan-Atlantic University
12. Oluseun Amusan, Enterprise Development Centre, Pan-Atlantic University
13. Abdulafeez Adebayo, Enterprise Development Centre, Pan-Atlantic University
14. Chike Osanebi, Enterprise Development Centre, Pan-Atlantic University
15. Mastercard Foundation
16. Vivian Efem-Bassey
17. Adedeji Ademefun, PhD
18. Ebelechukwu Chux-Onyekwere
19. ZiZulum Consult