



SAFEGUARDING AND PROTECTION FROM SEXUAL EXPLOITATION, ABUSE AND HARASSMENT POLICY

Document Control

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Version History

Version	Date	Description	Approved By
1.0	14/10/2019	Initial Safeguarding and PSEAH Policy	Board of Directors
2.0	27/02/2026	Expanded safeguarding, reporting, survivor-centred response and governance framework	Board of Directors



1. Purpose

The purpose of this Policy is to protect all persons who interact with The Aquaculture Consortium Limited (“TAC”) from harm, abuse, exploitation, harassment, discrimination and unsafe conduct.

TAC works with employees, farmers, MSMEs, fisherfolk, women, youth, schools, communities, suppliers, partners, portfolio enterprises and public/private institutions. Because TAC’s operations involve people in different social, economic and power positions, TAC is committed to ensuring that all activities are conducted safely, respectfully, ethically and responsibly.

This Policy also supports TAC’s commitment to ethical business conduct, ESG principles, safeguarding, donor and investor compliance expectations, human rights, responsible community engagement and institutional governance.

2. Scope

This Policy applies to:

- Directors, board members, employees, consultants, interns and contracted personnel;
- Suppliers, contractors, agents, service providers and representatives acting on behalf of TAC;
- Portfolio enterprises, subsidiaries, branches and affiliated operations where applicable;
- Farmers, MSMEs, fisherfolk, women, youth, students, community members and other stakeholders engaged through TAC programmes, operations, activities or services;
- Physical, digital and electronic conduct connected to TAC operations and communications.

All persons covered by this Policy are expected to comply with its requirements.

3. Policy Statement

TAC has zero tolerance for:

- Sexual exploitation, abuse or harassment;
- Child abuse or exploitation;
- Bullying, intimidation or threats;
- Discrimination or degrading treatment;
- Abuse of authority or unequal power relationships;



- Retaliation against persons reporting safeguarding concerns;
- Unsafe conduct toward employees, communities or stakeholders;
- Any conduct that causes physical, emotional, psychological, social or reputational harm.

All persons representing TAC must behave professionally, respectfully and safely, especially when working with vulnerable groups, including children, youth, women, economically disadvantaged communities and persons in dependent or unequal relationships.

4. Definitions

Safeguarding

Preventing harm, abuse, exploitation and unsafe conduct toward persons interacting with TAC.

Sexual Exploitation

Any actual or attempted abuse of a position of vulnerability, power or trust for sexual purposes.

Sexual Abuse

Actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

Sexual Harassment

Unwanted sexual conduct, comments, gestures, requests, messages or behaviour that creates an intimidating, hostile, degrading or offensive environment.

Child

Any person under the age of eighteen (18) years.

Vulnerable Person

Any person who may be at higher risk of harm due to age, disability, dependency, social or economic status, illness, displacement, power imbalance or other vulnerability.





Survivor-Centred Approach

An approach that prioritises safety, dignity, privacy, confidentiality and informed decision-making for persons affected by harm or abuse.

5. Prohibited Conduct

TAC prohibits:

- Sexual exploitation, abuse or harassment;
- Sexual relationships with minors;
- Abuse, neglect, exploitation or unsafe conduct involving children;
- Requesting sexual favours in exchange for jobs, payments, training, inputs, market access, opportunities or services;
- Harassment, bullying, intimidation or threats;
- Discrimination, humiliation or degrading treatment;
- Physical, emotional or verbal abuse;
- Abuse of authority or unequal power relationships;
- Retaliation against anyone who reports a safeguarding concern;
- Sharing private information, images or recordings without consent;
- Cyber-enabled harassment, exploitation or abuse;
- Any conduct that exposes employees, communities or stakeholders to avoidable harm.

6. Conduct Around Communities and Beneficiaries

All TAC representatives must act professionally, respectfully and responsibly when working with farmers, fisherfolk, MSMEs, women, youth, students and community members.

Representatives must not:

- Take advantage of persons receiving support or services from TAC;
 - Request personal favours in exchange for opportunities, support or benefits;
 - Engage in exploitative relationships with beneficiaries or programme participants;
 - Use abusive, humiliating or discriminatory language;
 - Share private information or images without consent;
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- Put children, youth or vulnerable persons in unsafe situations;
- Use TAC activities for personal, political, sexual or financial advantage;
- Engage in conduct that may damage TAC's safeguarding standards or stakeholder trust.

7. Child Safeguarding

Where TAC works with schools, students, youth groups or children, all representatives must take additional precautions to protect children from harm.

TAC representatives must:

- Treat children with dignity and respect;
- Avoid being alone with a child in isolated settings where possible;
- Obtain appropriate consent for photographs, videos or public communications involving children;
- Report any concern involving child abuse, neglect, exploitation or unsafe conduct immediately;
- Follow school, institutional, donor or partner safeguarding requirements where applicable;
- Avoid inappropriate communication, messaging or online interaction with minors.

Any suspected child abuse concern may be escalated to relevant authorities where required.

8. Reporting Safeguarding Concerns

Any safeguarding concern should be reported immediately.

Designated Reporting Contact

Compliance Officer / Compliance & Risk Office

Email: compliance@aquacultureconsortium.com

Reports may also be made to:

- Senior management;
- HR/Admin;
- Board Chairperson;
- Whistleblowing channels;



- Appropriate safeguarding focal persons where designated.

Concerns should be escalated promptly and, where practicable, within 24–72 hours of identification.

Where a concern involves immediate danger, TAC may escalate the matter to law enforcement, child protection authorities, health services or other competent bodies.

No employee, consultant, community member or reporting party acting in good faith shall suffer retaliation for reporting concerns.

9. Confidentiality and Survivor-Centred Response

TAC shall handle safeguarding reports confidentially, respectfully and sensitively.

Where a person has experienced harm, TAC shall prioritise:

- Safety and protection from further harm;
- Respect for dignity and privacy;
- Non-retaliation;
- Referral to appropriate support services where available;
- Fair and timely handling of concerns;
- Avoiding blame, intimidation or pressure on the reporting person.

Information shall only be shared with persons who need to know in order to:

- Respond appropriately;
- Protect affected persons;
- Conduct investigations;
- Comply with legal or safeguarding obligations.

10. Investigation and Action

TAC shall assess and investigate safeguarding concerns in a fair, timely and appropriate manner.

Where misconduct is confirmed, TAC may take action including:

- Disciplinary measures;



- Suspension or removal from duties;
- Termination of employment or contract;
- Reporting to law enforcement or relevant authorities;
- Referral to support services;
- Strengthening controls, training or supervision;
- Termination of supplier, contractor or partner relationships.

Investigation records shall be maintained confidentially.

The Compliance Officer may escalate material safeguarding concerns directly to senior management or the Board where appropriate.

11. Protection from Retaliation

TAC prohibits retaliation against anyone who:

- Reports a safeguarding concern in good faith;
- Supports an investigation;
- Refuses to participate in misconduct;
- Cooperates with safeguarding reviews or inquiries.

Retaliation may include:

- Dismissal;
- Threats or intimidation;
- Harassment;
- Discrimination;
- Exclusion;
- Loss of opportunity;
- Abuse or victimisation.

Any retaliation shall be treated as a serious breach of this Policy.

12. Recruitment and Partner Conduct





TAC shall take reasonable steps to ensure that employees, consultants, contractors and partners engaged in community-facing work understand and comply with safeguarding expectations.

Where appropriate, TAC may require:

- Reference checks;
- Signing of the Code of Ethics and Professional Conduct;
- Safeguarding briefings or orientation;
- Partner commitment to safeguarding standards;
- Additional controls for work involving children, youth or vulnerable persons;
- Removal of personnel who breach safeguarding obligations.

13. Images, Media and Communications

TAC shall handle photos, videos, testimonials, stories and communications responsibly.

Representatives must:

- Seek consent where appropriate;
- Avoid exploitative, degrading or misleading content;
- Protect children's privacy;
- Avoid sharing sensitive personal information;
- Ensure communications respect dignity, safety and context;
- Avoid using images or stories in a misleading or harmful manner.

Digital content and communications involving vulnerable persons must be handled responsibly and securely.

14. Training and Awareness

TAC shall provide safeguarding awareness and guidance to relevant staff, consultants and representatives, especially those involved in:

- Fieldwork and community engagement;
- Schools and youth programmes;
- Women-focused activities;





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- Communications and media;
 - Partnerships and programme implementation;
 - Recruitment and HR;
 - Community-facing operations.

Training may include:

- Safeguarding principles;
- PSEAH awareness;
- Child protection;
- Survivor-centred response;
- Reporting obligations;
- Respectful workplace conduct;
- Cyber safety and digital conduct.

15. Record Keeping and Data Protection

Safeguarding records, reports and investigation information shall be handled confidentially and retained securely.

Records containing personal or sensitive information must be managed in line with TAC's Data Protection & Privacy Policy and Records Retention Policy.

Access to safeguarding records shall be restricted to authorised persons only.

16. Monitoring and Compliance

TAC may periodically review safeguarding practices, training, reporting mechanisms and partner compliance to strengthen safeguarding effectiveness and institutional accountability.

Failure to comply with this Policy may result in corrective, disciplinary or legal action where appropriate.

17. Review






This Policy shall be reviewed at least annually or earlier where required by changes in law, operations, safeguarding risks, donor/investor requirements or community engagement activities.

18. Approval

This Policy has been approved by the Board of Directors of The Aquaculture Consortium Limited.

Name	Position	Signature	Date
Felix Omondi Osok	Board Chair		27/02/2026

Appendix A : Examples of Safeguarding Concerns

Examples include:

- Sexual exploitation or harassment;
- Child abuse or unsafe conduct;
- Abuse of authority;
- Bullying or intimidation;
- Exploitative relationships;
- Sharing private images without consent;
- Unsafe field conduct;
- Cyber-enabled harassment or abuse.

Appendix B : Safeguarding Escalation Flow

1. Safeguarding concern identified.
2. Concern escalated to Compliance Officer or designated contact.
3. Immediate safety assessment conducted where necessary.
4. Investigation or referral initiated.
5. Escalation to management, Board or authorities where appropriate.
6. Corrective action and support measures implemented.



Appendix C : Good Safeguarding Practices

Personnel should:

- Treat all persons with dignity and respect;
- Avoid exploitative or unequal relationships;
- Protect children and vulnerable persons;
- Report safeguarding concerns promptly;
- Respect confidentiality and privacy;
- Follow community and partner safeguarding requirements;
- Use images and communications responsibly.

