

# WOMEN'S UNIVERSITY IN AFRICA



**Gender and  
Diversity  
Centre**

549 Arcturus Road, Manresa  
Park, Greendale, Harare,  
Zimbabwe

Addressing gender disparity and fostering equity in higher education

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## **PROTECTION FROM SEXUAL EXPLOITATION AND ABUSE (PSEA) AND SAFEGUARDING POLICY**

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## **ACRONYMS**

ACRWC	African Charter on the Rights and Welfare of the Child
GDC	Gender and Diversity Centre
HR	Human Resources
HODs	Heads of Department
MCPR	Marketing, Communications and Public Relations Department
M&E	Monitoring and Evaluation
SRC	Student Representative Council
UN	United Nations
UNCRC	United Nations Convention on the Rights of the Child
PSEA	Protection from Sexual Exploitation and Abuse
WUA	Women's University in Africa

## 1. INTERPRETATION (DEFINITION OF TERMS)

<b>Abuse</b>	All forms of physical and emotional ill-treatment that results in actual or potential harm to a person's health, development or dignity. Within this broad definition of abuse are the following sub-types: physical abuse; sexual abuse or harassment; neglect and negligent treatment; emotional abuse; and exploitation.
<b>Beneficiary</b>	Someone who directly receives goods or services from a WUA programme.
<b>Child</b>	A child is anyone under the age of 18, in line with the United Nations Convention on the Rights of the Child (UNCRC) and the Zimbabwe Constitution.
<b>Child Labour</b>	This is work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development. It is work that: is mentally, physically, socially or morally dangerous and harmful to children; and interferes with their schooling by: depriving them of the opportunity to attend school; obliging them to leave school prematurely; or requiring them to attempt to combine school attendance with excessively long and heavy work. It is not acceptable for WUA's business units to engage anyone under the age of 18 to work.
<b>Neglect</b>	The failure to provide a child or vulnerable adult with the conditions that are culturally accepted as being essential for their physical and emotional development and well-being.
<b>Safeguarding</b>	Protecting people, including children and/or adults at risk, through a combination of policies, standards and procedures, from both intentional and unintentional harm, which may arise from coming into contact with WUA staff, Board members, interns, volunteers and/or third parties/partners working on behalf of WUA, and responding appropriately in the event of allegations and/or incidences of harm.
<b>Sexual exploitation or abuse</b>	Any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. Similarly, the term 'sexual abuse' means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.
<b>Survivor</b>	The person who has been abused or exploited. The term 'survivor' is often used in preference to 'victim' as it implies strength, resilience and the capacity to survive, however it is the individual's choice how they wish to identify themselves.

## 2. PURPOSE

WUA believes that everyone we encounter, regardless of age, gender, disability, ethnic origin (etc.) has the right to protection from all forms of harm, abuse and exploitation. Vulnerable adults, women and children are particularly at risk of sexual exploitation and abuse. WUA has a zero tolerance for sexual exploitation, abuse and harassment by or of our staff, associated personnel and partners.



The purpose of this policy is to protect people, particularly children and adults at risk, from any harm that may be caused due to their coming into contact with WUA. The policy also seeks to protect the organisation's reputation against allegations of abuse which could have serious implications and undermine our ability to achieve our mission.

This policy ensures that all WUA staff, students, associates, and partners are aware of their roles and responsibilities in keeping communities and stakeholders safe from any form of sexual exploitation or abuse. The policy clarifies definitions and responsibilities regarding prohibited behaviour and the associated Protection from Sexual Exploitation and Abuse (PSEA) and safeguarding procedures, reporting and investigation processes. It is guided by international, regional, national, and institutional policy frameworks and regulations that include:

- United Nations Convention on the Rights of the Child (UNCRC);
- United Nations (UN) Secretary General's Bulletin: Special Measures for Protection from Sexual Exploitation and Abuse;
- International Labour Standards on Child Labour and Forced Labour;
- African Charter on the Rights and Welfare of the Child (ACRWC);
- Zimbabwe Constitution;
- Zimbabwe Children's Act;
- Labour Act Chapter 28:01 as amended;
- WUA Anti-Sexual Harassment Policy;
- WUA Human Resources Policy; and
- WUA Code of Conduct.

### 3. SCOPE

This policy applies to all persons working for WUA or on the institution's behalf in any capacity, including permanent and temporary employees, Board and Council members, interns and volunteers, wherever located. The policy also extends to WUA students and third parties including consultants, contractors, suppliers, donors, implementing partners, consortium partners, and/or any other person or organisation providing services to WUA, whether paid or unpaid, wherever located. The policy applies to actions either on WUA's property or not, as well as during and outside normal work hours.

### 4. PRINCIPLES GUIDING THE POLICY

This policy is built on the following principles;

**Prevention:** WUA shall work to raise awareness and take steps to prevent any form of bullying, harassment, sexual abuse and violence of anybody that comes into contact with University work, including, but not limited to, staff, beneficiaries, children and adults at risk.

**Dignity and Respect:** WUA creates a work environment where the principles of dignity and respect for all staff, associates, and partners, in all locations are at the heart of what the



organisation does. The University shall never judge victims or complainants for their actions or decisions. WUA shall always prioritise listening to victims of bullying, harassment, sexual abuse and violence and shall be led by their wishes where possible and appropriate.

**Confidentiality:** WUA is committed to confidentiality when carrying out our work. Information shall not be shared outside the University unless it is believed that someone is in danger, or a child or adult has been or may be harmed.

**Protection:** WUA aims to protect all staff, adults at risk, children and communities we work with from instances of bullying, harassment, sexual abuse and violence. In the event that an incident takes place, the University shall act to ensure that the victim is protected and supported, and that the organisation uses the information to strengthen safeguarding practice.

**Accountability:** WUA shall ensure that there are clear lines of accountability and be transparent.

## 5. POLICY PROVISIONS

### 5.1 CHILD SAFEGUARDING

**In the course of discharging their duties, WUA employees, associated personnel, and students shall not:**

- Engage in sexual activity with anyone under the age of 18. Mistaken belief in the age of a child is not an adequate or acceptable defence;
- Sexually exploit or abuse children;
- Subject a child to neglect or physical, emotional or psychological abuse;
- Use inappropriate language or behaviour when dealing with children;
- Consume alcohol at work events where children/minors are present;
- Engage in human trafficking;
- Expose children to pornography;
- Engage in online grooming or consume, purchase or distribute child pornography;
- Abuse their power to obtain favours from children;
- Recruit or employ anyone below national legislated minimum working age;
- Behave towards a child in a way that is offensive, abusive, sexually provocative, demeaning or culturally inappropriate;
- Use children's pictures and information in a way that could put them at risk;
- Publish pictures of children without the written consent of their parents or guardians, using WUA's consent form;
- Take pictures of undressed children;
- Use any multi-media equipment or platform to otherwise exploit, harass or bully children; and
- Work with vendors who employ child labour.

**WUA employees and students must:**

- Treat children with respect at all times;



- Interact with children in a spirit of cooperation and partnership based on mutual trust and respect, value their views and take them seriously;
- Ensure that there are always two or more (female and male) staff members/adults present at WUA activities involving children and young people;
- Promote the implementation of the PSEA and Safeguarding Policy and help to create and maintain an environment that prevents safeguarding violations; and
- Report any concerns or suspicions regarding safeguarding violations by WUA staff members or associated personnel.

## **5.2 ADULT SAFEGUARDING**

### **In discharging their duties, WUA staff, associated personnel, and students shall not:**

- Infringe the dignity of an individual by their comments or behaviour. This includes sexual discrimination or harassment of members of the local community, partners, employees, vendors or individuals visiting or conducting business;
- Sexually abuse or exploit any adults;
- Subject an adult to neglect or physical, emotional or psychological abuse;
- Engage in any form of forced or unwanted sexual activity. Sexual abuse includes the use of physical force, making threats or taking advantage of a person unable to give consent. Sexual abuse also includes unwanted sexual attention that does not involve physical contact, such as sexualised comments and gestures or unwanted exposure to pornography;
- Take advantage of an imbalance of power to manipulate or coerce another person to engage in a relationship including sexual activity for the financial, sexual or political benefit of the abuser. This includes sexual exploitation taking place in person, online or a combination of both;
- Exchange money for sexual activity. This includes paying for sex with a sex worker, which is itself a form of exploitation, and applies even in countries where prostitution is legal;
- Exchange employment, goods or services for sexual activity; and
- Engage in any sexual relationships with programme beneficiaries, since such relationships are based on inherently unequal power dynamics.

### **WUA staff, associated personnel, and students must:**

- Treat everyone, especially vulnerable adults, with respect at all times;
- Work with vulnerable adults in a spirit of cooperation and partnership based on mutual trust and respect, value their views and take them seriously;
- Be aware of situations which may present risks and manage these risks;
- Promote the implementation of the PSEA and Safeguarding Policy and help to create and maintain an environment that prevents safeguarding violations; and

- Report any concerns or suspicions regarding safeguarding violations by WUA staff members or associated personnel.

### **5.3 LEADERSHIP, GOVERNANCE AND CULTURE**

- Safeguarding shall be embedded in organisational leadership, governance and culture.
- A safeguarding strategy and implementation plan shall be developed and disseminated.

### **5.4 PSEA AND SAFEGUARDING REPORTING**

- WUA shall ensure its organisational culture provides a safe environment that encourages those who have been abused or are at risk of abuse to come forward and report incidents or concerns. This includes taking all allegations seriously and reassuring the child or adult in vulnerable circumstances that they have done the right thing to speak out and are not to blame.
- It is the duty and the responsibility of all WUA staff and students, associates, and partners to report any sexual exploitation and abuse concerns as soon as possible. Failure to report may lead to disciplinary action.
- All reports shall be investigated by WUA unless the matter constitutes a criminal offence, in which case HR shall refer the matter to law enforcement.
- WUA staff should preferably report through their line manager/immediate supervisor or manager one level up. If staff members do not feel comfortable reporting to their line manager, they may report to any other appropriate staff member, such as the Workers Committee, Human Resources (HR) representative, or a Gender and Diversity Centre (GDC) representative.
- WUA students should preferably report through their programme coordinators, Campus Coordinators, a Gender and Diversity Centre representative, or the Student Representative Council (SRC).
- WUA also accepts sexual exploitation and abuse, and safeguarding complaints about WUA staff and students from external sources such as members of the public, partners, beneficiaries and official bodies. They can report through the Vice Chancellor or HR.
- Confidential, independent or third-party reporting channels (e.g. hotlines) shall be established to encourage disclosures and protect vulnerable individuals.

### **5.5 STRATEGIC AND OPERATIONAL RESPONSIBILITIES**

- The Safeguarding Focal Persons shall consist of the Deputy Registrar Human Resources and Administration and the Director, Gender and Diversity Centre. However, safeguarding complaints including sexual exploitation and abuse reports may also be reported through the following, who shall refer cases to the Safeguarding Focal Persons:
  - Heads of Departments
  - Human Resources Department Representatives
  - Gender and Diversity Centre Representatives



- Student Affairs Representatives
  - Workers Committee Representatives
  - Campus Coordinators
  - Programme Coordinators and Chairpersons
- The Vice Chancellor shall constitute Safeguarding Inquiry Committees within reasonable timeframes to investigate any safeguarding complaints, including sexual exploitation and abuse.

## 5.6 STEP-BY-STEP GRIEVANCE HANDLING PROCEDURES

### Step 1: Receipt of Complaint

The receiving authority shall:

1. Acknowledge receipt of the complaint within 24–48 hours.
2. Create a confidential case file.
3. Record key information including:
  - Date and time received
  - Who received the complaint
  - Nature of allegation
  - Parties involved
  - Immediate safety concerns
4. Offer immediate protection or support if needed.

Anonymous complaints must be accepted and processed.

### Step 2: Immediate Safety and Protection Measures

Within 24 hours, the receiving authority in liaison with HR must:

- Assess safety risks to the complainant/survivor
- Arrange immediate protective measures (e.g., separating parties, temporary reassignment)
- Ensure the survivor is not required to confront the alleged perpetrator

If there is immediate danger or criminal conduct, HR shall refer the matter to law enforcement.

### Step 3: Preliminary Assessment

Within 72 hours, the delegated officer(s) shall:

- Immediately record the dates, times and facts of the incident(s);
- Determine whether the complaint falls under PSEA/safeguarding;
- Assess credibility and potential severity;
- Ascertain the views of the complainant as to what outcome they want; and
- Decide whether:
  - (a) no investigation is required;
  - (b) an internal safeguarding investigation is initiated; or
  - (c) the case requires referral to law enforcement.

The complainant's wishes regarding investigation must be respected as long as safety or legal obligations are not compromised.

## **Step 4: Formal Investigation**

### **4.1 Establishment of an Inquiry Committee**

The Vice Chancellor shall constitute an Inquiry Committee, ensuring:

- Diversity and equal gender representation
- Relevant expertise
- No conflict of interest

### **4.2 Investigation Procedures**

The Committee shall:

- Develop an investigation plan (interviews, evidence, timelines);
- Interview the complainant/survivor (with consent, support person allowed);
- Interview the respondent (accused) ensuring fairness;
- Interview witnesses (if any);
- Collect and secure documentation, electronic evidence, etc; and
- Maintain strict confidentiality.

The investigation should ideally conclude within 30 calendar days but may be extended to 60 calendar days for complex cases.

## **Step 5: Findings and Decision**

The Inquiry Committee shall:

- Compile a report with findings, evidence, conclusions, and recommendations; and
- Submit the report to the Vice Chancellor

Possible outcomes include:

- Complaint substantiated;
- Complaint not substantiated; or
- Inconclusive (lack of evidence)

## **Step 6: Corrective or Disciplinary Action**

6.1 If the allegation is substantiated, actions may include:

- Formal warning;
- Mandatory training;
- Suspension;
- Termination of employment or contract or partnership;
- Expulsion (for students);
- Referral to the appropriate law enforcement agency or legal authority; or
- Disclosure to any prospective new employer if a member of staff is dismissed from the University because of perpetrating abuse, to prevent others being put at risk

6.2 If the allegation is intentionally false, disciplinary action shall also apply.

6.3 WUA shall take action against any staff member, student or other representative who seeks to or carries out any retaliatory action against complainants/whistle-blowers, survivors, witnesses or those who are handling a complaint, this also includes the person who is the subject of a complaint. Staff or students who are found to have done so shall be subject to disciplinary action, while termination of contract or partnership shall apply for consultants, contractors, suppliers, and implementing partners.



### **Step 7: Communication of Outcome**

The complainant and respondent shall be informed of

- Whether the complaint was upheld or not
- Actions taken (within confidentiality limits)
- Their right to appeal

Only necessary information shall be shared to protect confidentiality.

### **Step 8: Appeals Process**

Either party may appeal within 14 days on grounds such as:

- Procedural flaws
- New evidence
- Bias concerns

An Appeals Panel, constituted by the Vice Chancellor, but independent of the original Committee, shall review the appeal and issue a final decision.

### **Step 9: Documentation and Record Keeping**

HR shall securely store the following:

- Complaint records
- Investigation files
- Committee reports
- Decisions and actions taken
- Follow-up and support documentation

### **Step 10: Follow-Up and Survivor Support**

Survivors shall be offered:

- Counselling and psychosocial support
- Referral to other specialist support as needed (e.g. legal or medical support)

Support continues regardless of the investigation outcome.

## **5.7 INVESTIGATION PROCEDURES FOR ANONYMOUS COMPLAINTS**

WUA recognises that anonymous complaints may be an important and necessary reporting option, particularly where fear of retaliation, stigma, or power imbalances exist. Anonymous complaints related to sexual exploitation, abuse, and safeguarding shall therefore be accepted, assessed, and handled with the same seriousness as identified complaints, subject to the considerations outlined below.

### **Step 1. Receipt and Registration of Anonymous Complaints**

- Anonymous complaints may be received through any approved reporting channel, including written submissions, electronic platforms, hotlines, third-party reports, or verbal disclosures.
- The receiving authority shall:
  - Open a confidential case file clearly marked as *Anonymous Complaint*;
  - Record all available information, including the nature of the allegation, dates, locations, persons allegedly involved, and any supporting evidence provided; and



- Ensure the complaint is promptly referred to the Safeguarding Focal Persons.

## **Step 2. Preliminary Risk and Credibility Assessment**

- Upon receipt, the Safeguarding Focal Persons, in liaison with Human Resources, shall conduct a preliminary assessment to determine:
  - Whether the complaint falls within the scope of this PSEA and Safeguarding Policy;
  - The seriousness and immediacy of any potential safeguarding risks to individuals or the University community;
  - Whether there is sufficient information to warrant further inquiry; and
  - Whether interim protective measures are required to prevent further harm.
- Lack of identification of the complainant shall not, in itself, be grounds for dismissing a complaint.

## **Step 3. Decision to Proceed with Investigation**

Based on the preliminary assessment, the Safeguarding Focal Persons shall recommend one of the following actions:

- Proceed with an internal safeguarding investigation;
- Undertake discreet fact-finding to gather additional information before escalating to a formal investigation;
- Refer the matter to law enforcement or external authorities where the allegations suggest criminal conduct; or
- Close the case where there is insufficient information to proceed, while ensuring the complaint is properly documented for future reference should additional information emerge.

All decisions shall be documented with clear justification.

## **Step 4. Conduct of the Investigation**

- Where an investigation is initiated, the Vice Chancellor shall constitute an Inquiry Committee in accordance with Section 5.6 (Step 4).
- The Inquiry Committee shall:
  - Rely on available evidence, including documents, electronic records, witness accounts, or patterns of behaviour;
  - Conduct interviews with relevant parties, ensuring fairness, confidentiality, and respect for due process;
  - Avoid actions that could inadvertently identify the anonymous complainant;
- The subject of the complaint shall be informed of the allegations in a manner that does not compromise confidentiality or safety.

## **Step 5. Findings, Outcomes, and Institutional Action**

- Investigation findings shall be documented and submitted to the Vice Chancellor for decision-making in accordance with Step 5 and Step 6 of the grievance handling procedures.
- Where allegations are substantiated, appropriate disciplinary, corrective, or preventive actions shall be taken, regardless of the complainant's anonymity.
- Where allegations are unsubstantiated, WUA shall take steps to mitigate reputational harm while maintaining confidentiality.

## **Step 6. Record Keeping and Monitoring**



- All anonymous complaints, assessments, investigative actions, and outcomes shall be securely recorded and maintained by Human Resources.
- Trends arising from anonymous complaints shall be periodically reviewed to strengthen safeguarding measures, address systemic risks, and inform prevention strategies.

### **5.8 PREVENTION**

- WUA shall ensure that its policies, procedures and practices help to create and maintain safe environments and experiences- ensuring safe and secure physical and online spaces for all, including safe recruitment.
- Safeguarding shall be everyone's responsibility.

### **5.9 POLICY AWARENESS, TRAINING AND SUPPORT**

- On joining WUA, new staff, Board members, interns and volunteers shall receive a copy of this policy as part of their induction. They shall be asked to sign that they have read, understood and agree to abide by its contents.
- Training shall be provided to all students, staff and volunteers, empowering them to fulfil their safeguarding responsibilities, to access support and report concerns; having clear, accessible, and prompt procedures to handle complaints and suspicions of abuse;
- Ongoing education shall be provided to staff and volunteers to recognise and respond to risk, and to promote the culture of safety.
- Further training shall be provided to all staff members who have a specific responsibility for implementing this Policy or who may be involved in dealing with complaints, which arise.
- The policy shall be published on the WUA website to be known to everyone.

### **5.10 PROTECTION**

- WUA shall ensure that effective measures are in place for responding to safeguarding concerns and allegations;
- WUA shall provide appropriate care and support for those who report abuse and their families;
- WUA shall guarantee care and management of the respondent - ensuring fair and clear procedures for those against whom allegations are made.

### **5.11 SAFE RECRUITMENT**

- WUA shall not offer employment to anyone with convictions for sexual offences or any form of child and adult abuse.
- Checks shall be done to find out whether applicants applying for certain roles are known risks to children or adults at risk.
- Reference checks and other checks must be done before applicants start work.
- WUA shall not readmit a former employee/student/volunteer dismissed from the University because of perpetrating abuse.



### 5.12 COLLABORATION/TEAM WORK

- Safeguarding shall be embedded in partnerships and contracts.
- Consultants, contractors and partners shall be informed of this policy through their contractual arrangements at the time of contracting with WUA and, in signing the contract, are agreeing to abide by the policy.

### 5.13 QUALITY ASSURING COMPLIANCE

- There shall be regular reviewing and auditing of the effectiveness of safeguarding measures through the Quality Assurance Directorate.

### 5.14 MONITORING, EVALUATION AND LEARNING (M&E) FRAMEWORK

- Monitoring and evaluation of the implementation and impact of this policy is important in achieving success. Quarterly, bi-annual and annual internal reviews shall be conducted by the Safeguarding Focal Persons to assess trends, risks, and emerging issues, as well as to promote accountability, transparency, continuous learning, and strengthen institutional safeguarding systems and culture.
- The reporting indicators which shall be used to track implementation and effectiveness of the policy are provided in the M&E Matrix (Annex A).
- An annual PSEA and Safeguarding Implementation Report shall be prepared by the Director, Gender and Diversity Centre and submitted to the Vice Chancellor.

### 5.15 POLICY REVIEW

The PSEA and Safeguarding Policy shall be reviewed every three years, or earlier if there are material changes to safeguarding legislation or best practice to ensure that WUA remains accountable to children and adults at risk.

## 6 ROLES AND RESPONSIBILITIES

ROLE	RESPONSIBILITY
Management & HODs	Management and HODs hold overall accountability for this Policy and its implementation. They also have a responsibility to support and develop systems that maintain an environment where all parties involved with WUA understand how to behave, how to raise complaints and concerns, and what action shall be taken.
Human Resources Department	HR shall ensure that new staff, Board members, interns and volunteers shall receive, read, and sign a copy of this policy as part of their induction.  They shall also follow safe recruitment procedures as stipulated in the policy
Marketing, Communications and	MCPR Department shall be responsible for publishing the policy on the WUA website.


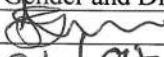


Public Relations (MCPR)  
Department

Gender and Diversity  
Centre (GDC)

The Centre shall spearhead training and awareness raising of this policy.

## 7 DOCUMENT VERSION MANAGEMENT AND CONTROL

Document Name	PSEA and Safeguarding Policy	
Version Reference	1.0	
Document Owner	Gender and Diversity Centre	
Approved by		
Date of Approval	01/04/2026	
Review Date		

**ANNEX A: MONITORING AND EVALUATION (M&E) MATRIX FOR THE PSEA AND SAFEGUARDING POLICY**

<b>Monitoring Area</b>	<b>Indicator</b>	<b>Data Source / Means of Verification</b>	<b>Frequency</b>	<b>Responsible Unit / Person</b>
<b>Policy Awareness and Compliance</b>	% of staff, students, volunteers, and contractors who have signed the PSEA and Safeguarding Policy	Signed policy acknowledgement forms	Bi-annually	HR; Student Affairs; Procurement Department
<b>Induction and Training</b>	Policy publicly accessible on WUA platforms	WUA website	Annually	M CPR Department
	% of new staff and students receiving safeguarding induction	Induction attendance registers; training reports	Bi-annually	HR; GDC
	% of staff with safeguarding roles receiving specialised training	Training reports; certificates	Annually	GDC; HR
	Number of safeguarding awareness activities conducted	Event reports; attendance registers	Bi-annually	GDC
<b>Reporting Mechanisms</b>	Number of safeguarding/PSEA complaints received (disaggregated by type where safe to do so)	Safeguarding case register; HR records	Quarterly	Safeguarding Focal Persons
<b>Response and Case Management</b>	Availability of multiple reporting channels (internal and anonymous)	Policy review; reporting mechanism logs	Annually	Safeguarding Focal Persons
	% of complaints acknowledged within 24-48 hours	Case files; acknowledgement records	Quarterly	Safeguarding Focal Persons
	% of cases where immediate safety measures were implemented when required	Case management records	Quarterly	Safeguarding Focal Persons
<b>Investigations and Accountability</b>	% of investigations completed within prescribed timelines	Inquiry Committee reports; investigation records	Quarterly	HR; Inquiry Committees
	% of substantiated cases with corrective or disciplinary action taken	HR disciplinary records; VC decisions	Quarterly	HR

Monitoring Area	Indicator	Data Source / Means of Verification	Frequency	Responsible Unit / Person
<b>Survivor Support</b>	% of survivors offered psychosocial and/or referral support	Support referral records; GDC reports	Quarterly	GDC
	Follow-up support provided regardless of case outcome	Case follow-up documentation	Quarterly	HR; GDC
<b>Prevention and Risk Mitigation</b>	Identified safeguarding risks addressed through mitigation actions	Risk assessments; management action plans	Annually	Safeguarding Focal Persons; Management
	Safeguarding audits conducted	QA audit reports	Annually	Quality Assurance Directorate
<b>Reporting and Governance</b>	Annual safeguarding implementation report submitted to Vice Chancellor	Annual PSEA & Safeguarding Report	Annually	GDC; HR
	Evidence of leadership review and action on safeguarding reports	Council/Management minutes	Annually	Vice Chancellor



## ANNEX B

# WOMEN'S UNIVERSITY IN AFRICA

Gender and  
Diversity  
Centre



549 Arcturus Road, Manresa  
Park, Greendale, Harare,  
Zimbabwe

*Addressing gender disparity and fostering equity in higher education*

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## STANDARD OPERATING PROCEDURES (SOPs) FOR THE PROTECTION FROM SEXUAL EXPLOITATION AND ABUSE (PSEA) AND SAFEGUARDING POLICY

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### 1. PURPOSE

These SOPs aim to operationalise the WUA PSEA & Safeguarding Policy by detailing clear, step-by-step procedures for prevention, reporting, response, investigation, disciplinary action, survivor support, and monitoring. They explain how the policy is implemented in practice ensuring consistent, timely, survivor-centred, and legally compliant handling of all PSEA and safeguarding matters

### 2. SCOPE

These SOPs apply to all WUA staff, management, Board members, students, interns, volunteers, contractors, consultants, partners, and service providers. They also apply to incidents occurring on or off WUA premises where WUA affiliation exists.

### 3. KEY ROLES AND RESPONSIBILITIES (OPERATIONAL)

#### 3.1 Safeguarding Focal Persons

- Deputy Registrar Human Resources and Administration
- Director, Gender and Diversity Centre (GDC)

#### Responsibilities:

- Receive and coordinate all safeguarding complaints
- Ensure immediate protection measures
- Recommend investigations or referrals
- Maintain confidentiality
- Survivor referral and staff welfare support

#### 3.2 Human Resources (HR)

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- Case management and record keeping
- Referral to law enforcement where criminal thresholds are met
- Disciplinary processes

### **3.3 Vice Chancellor**

- Constitutes Inquiry and Appeals Committees
- Approves findings and disciplinary actions

### **3.4 Staff, Students, and Partners**

- Mandatory reporting of concerns
- Cooperation with investigations

## **4. SOP 1: PREVENTION AND RISK MITIGATION**

### **4.1 Awareness and Training**

- Mandatory induction on PSEA and Safeguarding for all new staff and students
- Annual refresher training coordinated by GDC
- Specialised training for investigators and focal persons

### **4.2 Safe Recruitment Procedures**

- Background and reference checks for all staff and high-risk roles
- Declaration of past misconduct
- Automatic disqualification for confirmed sexual offences

### **4.3 Risk Assessment**

- Departments to conduct annual safeguarding risk assessments
- Findings submitted to GDC, HR and Quality Assurance Directorate

## **5. SOP 2: REPORTING MECHANISMS**

### **5.1 Who Can Report**

- Survivors
- Witnesses
- Third parties (anonymous or identified)

### **5.2 How to Report**

Reports may be made via:

- Line managers or HODs
- HR representatives
- GDC representatives
- Programme/Campus Coordinators
- Student Representative Council
- Vice Chancellor
- Confidential hotline / third-party reporting system

### **5.3 Mandatory Reporting Obligation**

Failure to report known or suspected PSEA incidents constitutes misconduct.

#### **6. SOP 3: RECEIPT AND INITIAL RESPONSE (0-48 hours)**

Responsible Officer:

- Any receiving authority

Actions:

- Acknowledge receipt
- Open confidential case file
- Record key details
- Assess immediate safety risks
- Refer to Safeguarding Focal Persons

#### **7. SOP 4: IMMEDIATE PROTECTION MEASURES (WITHIN 24 HOURS)**

Responsible Officers:

- HR and Safeguarding Focal Persons

Actions:

- Risk assessment
- Separation of survivor and alleged perpetrator
- Temporary reassignment or suspension if necessary
- Referral to law enforcement for criminal matters
- Survivor consent prioritised where legally possible

#### **8. SOP 5: PRELIMINARY ASSESSMENT (WITHIN 72 HOURS)**

Responsible Officers:

- Safeguarding Focal Persons

Actions:

- Confirm policy applicability
- Assess severity and credibility
- Determine survivor wishes
- Decide on:
  - No further action
  - Internal investigation
  - Referral to police or external authority

#### **9. SOP 6: FORMAL INVESTIGATION**

##### **9.1 Establishment of Inquiry Committee**

- Constituted by the Vice Chancellor
- Gender-balanced, skilled, and conflict-free

##### **9.2 Investigation Process (30–60 Days)**

- Develop investigation plan



- Survivor interview (support person allowed)
- Respondent interview (right to be heard)
- Witness interviews
- Evidence collection
- Confidentiality assurance

## **10. SOP 7: FINDINGS AND DISCIPLINARY ACTION**

### **10.1 Outcomes**

- Substantiated
- Unsubstantiated
- Inconclusive

### **10.2 Possible Actions**

- Warning
- Training
- Suspension
- Termination / Expulsion
- Referral to law enforcement
- Contract termination

Zero tolerance applies to retaliation.

## **11. SOP 8: COMMUNICATION OF OUTCOMES**

Responsible Officer:

- HR

Actions:

- Inform complainant and respondent
- Maintain confidentiality
- Explain appeal rights

## **12. SOP 9: APPEALS PROCESS**

Timeframe:

- 14 days from outcome notification

Process:

- Appeals Panel constituted by Vice Chancellor
- Independent from original committee
- Final binding decision issued

## **13. SOP 10: ANONYMOUS COMPLAINTS HANDLING**

- Anonymous complaints accepted without prejudice
- Preliminary risk and credibility assessment
- Investigation proceeds where sufficient information exists
- Patterns monitored for systemic risks

## **14. SOP 11: SURVIVOR SUPPORT AND REFERRAL**



Survivors offered:

- Counselling and psychosocial support
- Medical referral
- Legal referral
- Academic or workplace accommodations

Support continues regardless of investigation outcome.

#### **15. SOP 12: DOCUMENTATION AND CONFIDENTIALITY**

Custodian:

- Human Resources Department

Records:

- Complaints
- Investigations
- Decisions
- Disciplinary actions

Data stored securely with restricted access.

#### **16. SOP 13: MONITORING, REVIEW, AND CONTINUOUS IMPROVEMENT**

- Annual safeguarding review
- Trend analysis of complaints
- Quality Assurance audits
- SOPs reviewed every 2–3 years or as needed

