

# AGRI FINANCE FACILITY (PTY) LTD

## Safeguarding Against Sexual Exploitation, Abuse and Harassment (SEAH) Policy

Version 1.0 | 1 October 2025

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### 1. Policy Statement

Agri Finance Facility (Pty) Ltd (“AFF”) has **zero tolerance** for **Sexual Exploitation, Abuse and Harassment (SEAH)** in any form. AFF is committed to preventing and responding robustly to all incidents of SEAH, and to creating a culture of dignity, equality, safety, and accountability across its operations, investments, partnerships, and supported communities.

AFF recognises that its work in the **agriculture and rural development sector** involves **power dynamics** that may put vulnerable individuals—especially women, children, and historically disadvantaged communities—at increased risk of SEAH. This policy sets out AFF’s safeguarding responsibilities in alignment with:

- a. **UN Protocol on Allegations of Sexual Exploitation and Abuse.**
- b. **South African law**, including the **Children’s Act (2005)**, **Sexual Offences Act (2007)**, and **Protection from Harassment Act (2011)**.
- c. **Foreign, Commonwealth & Development Office (FCDO) Safeguarding Standards.**

### 2. Scope

This policy applies to:

- a. All AFF staff, Board members, interns, and consultants.
- b. AFF partners, grantees, suppliers, financial intermediaries, and service providers.
- c. All funded projects, investments, and non-financial support activities.
- d. Any individual representing AFF or accessing its services or platforms.

### 3. Definitions

Term	Definition
<b>Sexual Exploitation</b>	Any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes.
<b>Sexual Abuse</b>	Actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.
<b>Sexual Harassment</b>	Unwanted sexual advances, requests for sexual favours, or other verbal or physical conduct of a sexual nature.
<b>Survivor</b>	A person who has experienced SEAH.
<b>Perpetrator</b>	A person found or alleged to have committed SEAH.
<b>Safeguarding</b>	Measures to protect people from harm, including SEAH, in the delivery of AFF’s activities.

## 4. Policy Commitments

AFF commits to:

- a. **Prevent SEAH** through awareness, training, robust due diligence, and safe programming.
- b. **Respond promptly and sensitively** to all SEAH concerns or allegations.
- c. **Support survivors** with confidentiality, dignity, and access to services.
- d. **Report and investigate** incidents transparently, in line with donor and legal requirements.
- e. **Hold perpetrators accountable** and take disciplinary or legal action where necessary.
- f. **Maintain a culture of zero tolerance, trust, and accountability.**

## 5. Roles and Responsibilities

Role	Responsibility
Board of Directors	Oversight of safeguarding and policy compliance.
Designated Safeguarding Lead (DSL)	Focal point for SEAH prevention, reporting, and response.
Human Resources Department	Ensure SEAH clauses are in contracts, lead recruitment screening.
All Staff and Contractors	Uphold this policy and report concerns without delay.
Partners and Grantees	Required to adopt SEAH measures and cooperate with investigations.

AFF will appoint a **Designated Safeguarding Lead (DSL)** who is trained, independent, and accessible.

## 6. Prevention Measures

### 6.1 Safer Recruitment

- a. All staff and contractors must undergo:
  - i. **Reference checks.**
  - ii. **Criminal record checks** where appropriate.
  - iii. Signing of the **Disciplinary Code and Procedure**, which includes SEAH commitments.

### 6.2 Training and Awareness

- a. Mandatory SEAH training for:
  - i. All new staff during induction.
  - ii. Annual refresher sessions for all employees and partners.
- b. Awareness sessions in **local languages** for project beneficiaries.

### 6.3 Partner and Supplier Due Diligence

- a. All implementing partners must:
  - i. Undergo SEAH screening.
  - ii. Commit to their own SEAH policies or adopt AFF's.
  - iii. Include SEAH clauses in MoUs and contracts.

### 6.4 Community Safeguarding

- a. Ensure AFF's financing and services are designed to **do no harm**.
- b. Involve communities, especially women and youth, in planning.
- c. Communicate **safeguarding rights and complaint mechanisms** to all beneficiaries.

## 7. Reporting Mechanisms

### 7.1 Internal Reporting

Anyone can report SEAH concerns through:

- **In-person:** To the Designated Safeguarding Lead (DSL)
- **The report is escalated to the Chair of the Board/Audit Committee as considered appropriate.**

Reports can be **anonymous** and made by staff, partners, or community members.

### 7.2 External/Independent Reporting

AFF will establish access to an **independent third-party reporting service** for whistleblowing on SEAH-related incidents.

## 8. Responding to SEAH Allegations

### 8.1 Immediate Actions

- a. Prioritise survivor safety and wellbeing.
- b. Provide access to medical, psychosocial, and legal support.
- c. Maintain strict confidentiality and data protection.

### 8.2 Investigation Process

- a. **Initial assessment** by DSL within 24–72 hours.
- b. If credible, refer to:
  - i. **Internal investigation** team.
  - ii. **External investigation**, if required.
- c. Cases involving criminal conduct will be referred to:
  - i. **South African Police Service (SAPS).**
  - ii. **National Prosecuting Authority (NPA).**

### 8.3 Survivor-Centred Approach

- a. Consent-based response: no action taken without survivor’s informed consent.
- b. Support options may include:
  - i. Counselling and mental health services.
  - ii. Legal aid.
  - iii. Alternative accommodation or relocation.

## 9. Confidentiality and Data Protection

- a. All SEAH reports and investigations are handled with strict **confidentiality**.
- b. Access is limited to those directly involved in the case management.
- c. Personal data is stored securely and in line with **POPIA**.

## 10. Disciplinary Action and Sanctions

- a. Disciplinary action for policy breaches may include:
  - i. Dismissal or termination of contract.
  - ii. Blacklisting from future engagement with AFF.
  - iii. Legal action where applicable.
- b. AFF will report all confirmed SEAH incidents to:

- i. **Regulatory or legal authorities** where required.
- ii. **FCDO and other relevant donors**

## 11. Monitoring and Evaluation

- a. SEAH implementation is tracked through:
  - i. **Quarterly safeguarding reports** to the Board and donors.
  - ii. **Annual independent safeguarding audit.**
- b. AFF will track KPIs such as:
  - i. Number of staff trained.
  - ii. Number of SEAH cases reported and resolved.
  - iii. Percentage of partners with SEAH policies in place.

## 12. Policy Review

This policy will be reviewed:

- a. **Annually**, or
- b. After any significant SEAH incident or change in law.
- c. Revisions will be approved by the **Board of Directors**.

## 13. Alignment with Donor Requirements

AFF's SEAH Policy is aligned with:

- a. International Development Committee (IDC) recommendations on safeguarding.
- b. OECD DAC Recommendation on Ending SEAH in Development Co-operation.
- c. FCDO's **"Enhanced Due Diligence for Safeguarding against SEAH"**

## 14. Policy Ownership

Role	Responsibility
<b>Board of Directors</b>	Final approval and strategic oversight
<b>Designated Safeguarding Lead</b>	Operational lead on SEAH policy implementation
<b>All AFF Staff and Partners</b>	Compliance and proactive safeguarding actions

### Approved by:

Board of Directors

Agri Finance Facility (Pty) Ltd

**Date of Approval:** 6 October 2025

**Next Review Date:** September 2026