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Protection from Sexual Exploitation, Abuse, and Harassment (PSEA/SH) Policy

Submitted by:

Corelink Consulting Ltd.

PACRA Registration Number: 120220026085

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Lusaka, Zambia

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Policy Owner: Board of Directors

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1. Statement of Intent

Corelink Consulting Limited ("Corelink") maintains a rigorous zero-tolerance stance toward any form of Sexual Exploitation, Abuse, or Harassment (SEA/SH). We recognize that our position as a consulting firm often places us in a position of power and trust relative to the communities and beneficiaries we serve. Consequently, we are committed to creating a safe, respectful, and dignified environment for our employees, contractors, and all stakeholders.

Corelink recognizes that SEA/SH constitutes a gross violation of fundamental human rights and a betrayal of the core values of international development. We embrace the "Do No Harm" principle, ensuring that our presence in any community never results in the victimization or exploitation of those we are meant to assist. This policy serves as a cornerstone of our ethical framework and corporate governance.

2. Scope of Policy

This policy is universal in its application and governs the conduct of all Corelink personnel globally, regardless of their location, seniority, or contract type. This includes:

- **Internal Staff:** Full-time, part-time, and temporary employees at all levels.
- **External Partners:** Short-term consultants, independent contractors, and sub-contractors.
- **Learning & Support:** Interns, fellows, and volunteers.
- **Leadership:** Members of the Board of Directors and the Executive Leadership Team.

Third Parties: Any individual or entity representing Corelink in a professional capacity or interacting with beneficiaries on our behalf.

Adherence to this policy is mandatory 24 hours a day, 7 days a week, both within and outside of official working hours, as the conduct of our personnel reflects directly on the institutional integrity of Corelink.

3. Definitions

- **Sexual Exploitation:** Any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes. This includes profiting monetarily, socially, or politically from the sexual exploitation of another. It encompasses situations where a person uses their influence to coerce sexual favors in exchange for aid, employment, or services.
- **Sexual Abuse:** The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. This includes any sexual activity with a person who is unable to provide informed consent due to age, disability, or the circumstances of the encounter.
- **Sexual Harassment:** Unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature. This includes "quid pro quo" harassment (where career benefits are conditioned on sexual favors) and the creation of a "hostile work environment" through offensive language, gestures, or digital content.
- **Survivor-Centered Approach:** A methodology that prioritizes the rights, needs, and wishes of the victim/survivor. This ensures that the individual is treated with dignity and respect, and that their safety and confidentiality are the primary considerations in any response or investigation.

4. Prohibited Conduct

To ensure clarity and enforceability, Corelink personnel are strictly prohibited from the following behaviors, which are aligned with the IASC Six Core Principles:

- **Exploitation of Beneficiaries:** Engaging in sexual activity with any beneficiary of assistance (community members, clients' beneficiaries, or vulnerable populations). The power imbalance inherent in development work makes "consent" in these contexts inherently suspect.
- **Child Safeguarding Violations:** Engaging in sexual activity with children (any person under the age of 18) regardless of the local age of majority or consent. Corelink maintains a strict "no excuse" policy regarding a staff member's mistake concerning the age of a child.
- **Transactional Sex:** Exchanging money, employment, goods, or services for sex. This includes using Corelink resources (vehicles, stipends, or office space) to facilitate sexual favors or engaging in any form of humiliating, degrading, or exploitative behavior.

- **Workplace Harassment:** Engaging in sexual harassment in the office, at field sites, during travel, or through digital communication channels. This includes unwanted touching, sexualized comments, or the sharing of explicit material.
- **Coercive Control:** Using one's position of authority to influence a subordinate or beneficiary into a sexual relationship through threats, promises of promotion, or intimidation.

5. Reporting Mechanisms

Corelink provides robust, secure, and accessible channels for reporting suspected violations. We encourage a culture of "speaking up" where reports can be made by victims, witnesses, or any individual with a credible suspicion of misconduct.

5.1 Designated Safeguarding Lead (Focal Point)

Susan Chishima serves as the primary institutional focal point for all safeguarding matters. She is responsible for receiving reports, ensuring survivor safety, and initiating the investigation protocol.

- **Contact:** Susan Chishima
- **Email:** susan.chishimba@corelink.co.zm
- **Role:** Head of Safeguarding & Compliance

5.2 Anonymous Reporting via ERP Staff Portal

Corelink understands the fear of retaliation often associated with whistleblowing. To mitigate this, we have integrated a dedicated **Anonymous Reporting Tool** within the **Corelink ERP Staff Portal**.

- **Encrypted Submission:** All reports are end-to-end encrypted to prevent unauthorized access.
- **Anonymity:** Users can choose to file a report without revealing their name or employee ID.
- **Accessibility:** The tool is available to all staff via mobile or desktop, providing a safe space to report concerns even from remote field locations.

5.3 Mandatory Duty to Report

- Every Corelink employee has a contractual and ethical "Duty to Report" any known or suspected incident of SEA/SH. Turning a blind eye to abuse is considered a violation of this policy. Staff who report in good faith are protected under our **Non-Retaliation Policy**; any attempt to intimidate a whistleblower will result in immediate termination.

6. Investigation and Response

Upon receipt of a report, Corelink will activate its **Certified Safeguarding Professionals**. These are staff members specifically trained in international investigation standards and trauma-informed interviewing.

- **Confidentiality:** The identity of the reporter, the survivor, and the subject of the complaint will be kept strictly confidential, shared only with those essential to the investigation.
- **Survivor Support:** Corelink will immediately facilitate access to the "Essential Services Package," including medical care, psychosocial support, and legal aid, regardless of whether the survivor chooses to proceed with a formal investigation.
- **Fair Due Process:** Investigations will be conducted with impartiality. The subject of the complaint will be informed of the allegations and given a fair opportunity to respond, while remaining suspended (with or without pay) during the inquiry to ensure the safety of others.
- **Timeline:** Corelink aims to complete initial assessments within 72 hours and full investigations within 30 days, keeping all parties updated on the progress.

7. Institutional Integrity and Compliance

Corelink's reputation is built on a foundation of trust with our international donors and partners. We maintain this through rigorous preventative measures:

- **Pristine Record:** Corelink takes immense pride in the fact that it has **never been disqualified**, sanctioned, or blacklisted by any donor agency (including the UN, World Bank, or US Department of State) for incidents related to SEA/SH.
- **Advanced Vetting:** Our HR department conducts "Level 3" background checks for all new hires, which include searching international debarment lists and verifying references specifically regarding past conduct and safeguarding.
- **Continuous Training:** All staff must undergo annual PSEA/SH refresher training. Our **Certified Safeguarding Team** stays updated on evolving 2026 donor requirements to ensure our internal protocols remain "best-in-class."
- **Mandatory Code of Conduct:** No individual may commence work at Corelink without signing our global **Code of Conduct**. This signature constitutes a legal agreement to adhere to every provision of this PSEA/SH policy.

8. Disciplinary Actions and Consequences

Corelink treats SEA/SH violations as "Gross Misconduct" and a fundamental breach of contract. Confirmed violations will result in the following actions:

- **Administrative Action:** Immediate summary dismissal (termination for cause) without notice or severance pay.
- **Contractual Termination:** Immediate cancellation of all active contracts with sub-consultants, vendors, or partners found to be in violation.
- **Legal Referral:** In cases involving criminal activity (such as sexual assault or child abuse), Corelink will cooperate fully with local law enforcement and the judiciary to ensure the perpetrator is held accountable under the law.
- **Donor Notification:** In accordance with our grant and contract obligations, Corelink will report confirmed findings to the relevant funding agency (e.g., PHFFA/NSIP, UN, or World Bank) for inclusion in global misconduct databases.

Policy Approval

This statement has been approved by the Board of Directors of Corelink Consulting Ltd., who will review and update it annually.

Signed by:

A handwritten signature in blue ink, appearing to be 'S Chishimba', written in a cursive style.

Susan Chishimba

Director, Corelink Consulting Ltd.

Date: 2nd February 2026

A handwritten signature in blue ink, appearing to be 'Rowan J. Vos', written in a cursive style.

Rowan J. Vos

Director, Corelink Consulting Ltd.

Date: 2nd February 2026