



Safeguarding Policy &

**Protection from Sexual Exploitation and Abuse (PSEA)
Nexify Technology Development Pvt. Ltd. Co.**

Simplified EdTech™

Version: 1.0

Effective Date: January 11, 2025

Approved by: Executive Committee

1. Introduction

Nexify Technology Development PLC ("Nexify Technology") is an education technology and digital solutions company working at the intersection of **schools, communities, and humanitarian contexts**, including **formal schools, remote learning environments, refugee camps, and IDP (Internally Displaced Persons) settings**. Our work involves **direct and indirect engagement with children, youth, parents, teachers, school leaders, and vulnerable adults**, both **physically on-site and remotely through digital platforms**.

Safeguarding is therefore not optional it is a **core ethical, professional, and operational responsibility**. Nexify Technology is committed to ensuring that **no harm comes to any individual** as a result of our staff, partners, systems, technologies, or activities.

This Safeguarding & PSEA Policy establishes Nexify Technology's **zero-tolerance approach** to:

- Sexual exploitation, abuse, and harassment (SEAH)
- Abuse or neglect of children and vulnerable adults
- Abuse of power, trust, or authority
- Any behavior that undermines dignity, safety, or human rights

The policy applies equally to **physical environments (schools, offices, camps, field visits)** and **digital environments (LMS platforms, mobile apps, SMS systems, online training, virtual meetings)**.

2. Purpose of the Policy

The purpose of this policy is to:

- Protect **children, youth, women, and vulnerable adults** from all forms of harm
- Prevent sexual exploitation and abuse in **school-based, community-based, and humanitarian programs**
- Define clear **standards of behavior** for staff, partners, and associates
- Establish **safe, accessible, and confidential reporting mechanisms**
- Ensure **survivor-centered, ethical, and lawful responses** to safeguarding concerns
- Embed safeguarding into Nexify Technology's **culture, systems, and digital products**

3. Guiding Principles

Nexify Technology's safeguarding approach is guided by the following principles:

3.1 Zero Tolerance

Nexify Technology has **zero tolerance** for sexual exploitation, abuse, harassment, or any safeguarding violation. Any breach constitutes **gross misconduct** and may result in termination and legal action.

3.2 Survivor-Centered Approach

All responses prioritize the **safety, dignity, rights, and choices of survivors**, without blame, coercion, or retaliation.

3.3 Do No Harm

All programs, technologies, and interactions must minimize risk and avoid unintended harm—especially in **refugee and IDP contexts** where power imbalances are heightened.

3.4 Best Interests of the Child

In all decisions affecting children, the **best interests of the child** are the primary consideration.

3.5 Confidentiality & Data Protection

Safeguarding information is handled on a **strict need-to-know basis**, with secure storage and respect for privacy—both offline and online.

3.6 Shared Responsibility

Safeguarding is the responsibility of **every individual** associated with Nexify Technology.

4. Scope of the Policy

This policy applies to:

- All Nexify Technology employees (full-time, part-time, contract)
- Board members and advisors
- Consultants, trainers, content developers, and researchers
- Volunteers and interns
- Implementing partners, vendors, and subcontractors
- Visitors, donors, and field observers

The policy applies **at all times**, including:

- During work and non-work hours
- In offices, schools, refugee/IDP camps, and field locations
- During travel, events, and trainings
- In all **digital interactions and platforms** operated or facilitated by Nexify Technology

5. Definitions (Key Terms)

- **Child:** Any person under 18 years of age
- **Youth:** Persons aged 18–35
- **Vulnerable Adult:** An adult at increased risk due to disability, displacement, poverty, trauma, or power imbalance
- **Safeguarding:** Measures to prevent and respond to harm, abuse, or exploitation
- **Sexual Exploitation:** Abuse of power for sexual purposes, including transactional sex
- **Sexual Abuse:** Any sexual act without consent or involving a child
- **Sexual Harassment:** Unwanted sexual behavior, verbal or physical
- **Survivor:** A person who has experienced abuse or exploitation
- **Complainant:** A person reporting a safeguarding concern

6. Code of Conduct (Safeguarding Standards)

All Nexify Technology personnel **must never**:

- Engage in sexual activity with a child (under any circumstance)
- Exchange money, favors, grades, access, jobs, or services for sex
- Develop exploitative or inappropriate relationships with beneficiaries
- Use degrading, sexualized, or abusive language
- Be alone with a child without safeguards or visibility
- Share or store images of children or refugees without consent
- Use digital platforms to harass, groom, or exploit
- Ignore or conceal safeguarding concerns

Special care is required when working with:

- Children with disabilities
- Refugee and IDP populations
- Survivors of trauma or conflict

7. Safeguarding in Digital & Remote Environments

Nexify Technology recognizes that **digital systems can also create safeguarding risks.**

Safeguards include:

- No private messaging with children without oversight
- No collection of unnecessary personal data
- Secure LMS, SMS, and app systems
- Ethical use of images, data, and learning analytics
- Clear moderation and reporting tools in platforms

8. Reporting Safeguarding & PSEA Concerns

Anyone may report concerns, including:

- Program participants
- Parents and caregivers
- Staff and partners
- Community members

Reports can be made through:

- Designated Safeguarding Focal Person
- HR or Line Manager
- Confidential email or phone channel
- Trusted community or school focal points

Reports may be **verbal, written, or anonymous**.

Retaliation against reporters is strictly prohibited.

9. Responding to Reports

Upon receiving a report, Nexify Technology will:

1. Prioritize immediate safety
2. Respect survivor wishes and consent
3. Provide referrals for medical, psychosocial, or legal support
4. Conduct impartial investigation
5. Take disciplinary or legal action where substantiated

Suspension of alleged perpetrators may occur as a **precautionary measure**, not a presumption of guilt.

10. Roles & Responsibilities

All Staff & Associates

- Uphold this policy
- Report concerns immediately
- Protect confidentiality

Managers & Team Leads

- Model ethical behavior
- Ensure safe supervision
- Enable reporting mechanisms

Human Resources

- Enforce safe recruitment
- Maintain safeguarding records
- Integrate safeguarding into contracts and performance

Safeguarding Focal Person / Committee

- Manage reports and case response
- Ensure survivor-centered handling
- Monitor compliance and learning

11. Safe Recruitment & Screening

Nexify Technology applies safer recruitment practices:

- Safeguarding clauses in job ads
- Behavioral interview questions
- Reference and background checks
- Signed Code of Conduct & Safeguarding Declaration
- Mandatory safeguarding induction

12. Training & Awareness

- Mandatory safeguarding induction for all staff
- Regular refresher training
- Awareness sessions for schools, parents, and communities

- Context-specific training for refugee and IDP programs

13. Monitoring, Review & Accountability

- Annual policy review
- Incident trend analysis
- Partner compliance monitoring
- Continuous improvement and learning

14. Policy Statement of Commitment

Nexify Technology Development PLC affirms its unwavering commitment to **protecting children, youth, women, and vulnerable adults**. Safeguarding is fundamental to our mission, our technology, and our impact.

Every person associated with Nexify Technology shares responsibility for ensuring that our work **empowers, protects, and respects human dignity always**.

Approved by: Executive Committee, Nexify Technology Development PLC

Effective Date: January 11, 2026

Next Review: Annual

Annex A: Safeguarding Commitment Statement

Safeguarding Commitment Statement

Nexify Technology Development PLC affirms its unwavering commitment to safeguarding and the protection of children, youth, women, and vulnerable adults across all its operations.

We work in **schools, communities, refugee and IDP settings**, and through **digital and remote learning platforms**. We recognize that our work may involve power imbalances and heightened vulnerability. We therefore commit to the highest standards of ethical conduct, accountability, and care.

Nexify Technology maintains **zero tolerance** for sexual exploitation, abuse, harassment, neglect, discrimination, or any form of harm. Safeguarding is a shared responsibility and a core condition of employment, partnership, and engagement with our organization.

We commit to:

- Putting the **safety, dignity, and rights** of all people first
- Acting in the **best interests of the child** at all times
- Applying a **survivor-centered approach** in all responses
- Ensuring **safe, accessible, and confidential reporting** mechanisms
- Preventing harm in both **physical and digital environments**
- Holding ourselves and our partners **accountable**

Every individual associated with Nexify Technology is expected to uphold this commitment and take immediate action when safeguarding concerns arise.

Safeguarding is not optional. It is fundamental to our mission, our technology, and our impact.

Approved by: Executive Committee, Nexify Technology Development PLC

Effective Date: January 11, 2026

Annex B: Safeguarding Code of Conduct

Safeguarding Code of Conduct

This Code of Conduct defines the minimum behavioral standards expected of all Nexify Technology staff, partners, consultants, volunteers, and representatives.

All personnel MUST:

- Treat all children, youth, and adults with **respect, dignity, and fairness**
- Maintain **professional boundaries** at all times
- Obtain **informed consent** before collecting data, images, or stories
- Use Nexify digital platforms responsibly and ethically
- Report safeguarding concerns immediately

All personnel MUST NEVER:

- Engage in sexual activity with a child (under 18), under any circumstance
- Exchange money, gifts, grades, access, services, or opportunities for sex
- Abuse a position of power, authority, or trust
- Use sexualized, humiliating, threatening, or discriminatory language
- Be alone with a child without visibility or safeguards
- Share images or personal data of children or refugees without consent
- Engage in online grooming, harassment, or inappropriate messaging
- Ignore, conceal, or retaliate against safeguarding reports

Special Protection Contexts

Extra care must be taken when working with:

- Refugee and IDP populations
- Children with disabilities or special needs
- Survivors of trauma or conflict

Breaches of this Code constitute **gross misconduct** and may result in disciplinary action, termination, and/or legal proceedings.

All personnel are required to sign this Code as a condition of engagement.

Annex C: Digital Safeguarding & Online Learning Safety

Purpose

This annex establishes safeguards for Nexify Technology’s **digital platforms, LMS, mobile apps, SMS systems, and online learning environments.**

Key Digital Safeguarding Principles

- Safety applies equally **online and offline**
- Children and vulnerable users must be protected from digital harm
- Data privacy and consent are fundamental

Mandatory Digital Safeguards

1. Online Interaction Rules

- No private, unsupervised messaging with children
- All digital communication must be professional and transparent
- Group-based or monitored channels are preferred

2. Data & Privacy Protection

- Collect only necessary personal data
- Secure all systems with appropriate access controls
- Never store sensitive data on personal devices

3. Images, Audio & Video

- Obtain informed consent from participants and guardians
- Avoid identifiable images of children in humanitarian contexts
- Never use images that compromise dignity or safety

4. Platform Design & Moderation

- Clear reporting and blocking mechanisms
- Moderation of forums, chats, and comments
- Safeguarding-by-design in system architecture

5. Cyberbullying & Online Abuse

- Zero tolerance for cyberbullying, harassment, or grooming
- Immediate reporting and response required

6. Staff & User Awareness

- Digital safeguarding training for staff
- Age-appropriate guidance for learners and parents

Accountability

Any digital safeguarding breach will be treated as a safeguarding incident and handled under Nexify Technology's Safeguarding & PSEA Policy.