

# Safeguarding Policy

Version	1
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## Our vision

We envision a world where movements for gender justice have transformed power and privilege for a few into equity and equality for all.

## Our mission

Our mission is to fund and strengthen bold and ambitious gender justice movements to create lasting meaningful change.

## What do we mean by safeguarding?

“Safeguarding” means protecting people from harm and keeping people safe. Harm includes any form of bullying, harassment, exploitation, coercion, and abuse.

As an organization working to advance gender justice, Global Fund for Women sees harassment, abuse, and exploitation as manifestations of power inequalities which are deeply rooted in inequitable gender dynamics. We also recognize these dynamics are compounded across multiple identity dimensions for example age, disability, nation of origin, social-economic status, race, or religious beliefs. As an organization of staff largely based in the global North and working internationally, we must be particularly attuned to these intersecting power inequalities and the harm that can arise from them.

We acknowledge that children, young people, and adults may be at risk of a range of harms and that all people, regardless of age, disability, gender, race, religious beliefs, or sexual identity or orientation, have the right to equal protection from harm and abuse.

We also recognize that some of our partners work in extremely complex, dangerous and fragile environments, which can also expose them to threats of state-sponsored violence. These situations require specific attention from Global Fund for Women to understand the risks and vulnerabilities they face to inform development of appropriate risk mitigation measures and strategies.

As a feminist fund, we seek to play a positive role in addressing inequitable power dynamics. We do this by supporting gender justice movements that build grassroots people power to transform systems that perpetuate injustice and by providing both financial and non-financial support based on movements’ needs.

Global Fund for Women will protect the confidentiality of any person(s) bringing forth any concerns to the extent possible. We assure that any staff member who report any concerns will not be retaliated against or punished in any manner (including firing, demotion, suspension, harassment, promotion, or any other kind of discrimination).

## Scope

The policy applies to:

- Global Fund for Women and Global Fund for Women UK (collectively referred to as Global Fund for Women)
- Individuals who are performing work for Global Fund for Women on a

contract basis

- All Global Fund for Women associated personnel, including:
  - o All individuals who carry out work, paid or unpaid, in the name of Global Fund for Women. This includes board members, board committee members, advisors, volunteers, interns, and consultants
  - o All agencies or organizations employed to deliver services on behalf of Global Fund for Women
  - o All Global Fund for Women visitors, including media personnel, donors, and any other individual attending events or field visits related to Global Fund for Women in any capacity
- All Global Fund for Women grantee partners, i.e., organizations in receipt of Global Fund for Women funding

While this policy applies to both Global Fund for Women and Global Fund for Women UK, each entity has its own safeguarding governance structure and compliance obligations.

This policy covers all forms of physical abuse, emotional abuse, sexual abuse, neglect, commercial or other exploitation that results in actual or potential harm. This includes harm which is caused intentionally or unintentionally, directly or indirectly.

This policy should be read in conjunction with the following policies (available upon request by emailing the Designated Safeguarding Leads):

- Global Fund for Women Whistleblowing Policy
- Global Fund for Women's Policy Against Discrimination, Harassment and Retaliation
- Global Fund for Women's Grievance Policy
- Global Fund for Women UK's Whistleblowing Policy
- Global Fund for Women UK's Disciplinary and Grievance Policy and Procedure

## Purpose

To inform all Global Fund for Women staff, associated personnel, and grantee partners of:

- The overarching principles and procedures that direct our approach to safeguarding
- Their contractual and moral responsibilities to safeguard people, including children, young people, and adults at risk, in all areas of Global Fund for Women's activities. This includes but is not limited to harm arising from:

- o The conduct of Global Fund for Women staff, Global Fund for Women associated personnel, or grantee partners in receipt of Global Fund for Women funding; and
- o The design and implementation of Global Fund for Women-funded programs and activities
- How to protect people, including children, young people, and adults at risk, from harm and how to respond and report if they witness abuse
- How to protect digital privacy, security, and safety of children and adults when developing or managing digital applications, platforms or services and when collecting, using, and analyzing digital data or content belonging to, or about them
- Their rights and protections as whistleblowers

Lastly, this policy's purpose is also to inform those we work with of our responsibilities to prevent and respond to any actions or behaviors of Global Fund for Women staff, associated personnel, and grantee partners.

### Safeguarding in practice

Global Fund for Women will implement eight interlinked and mutually reinforcing standards. No standard can be considered in isolation and each standard must be given equal weight and importance across the organization.

Standard 1. Accountability

Standard 2. Recruitment

Standard 3. Code of conduct

Standard 4. Grantmaking

Standard 5. Participation of children, young people, and adults at risk

Standard 6. Communications, storytelling, and data protection

Standard [7. Fundraising and partnerships](#)

Standard 8. Reporting and response procedures

## Standard 1. Accountability

### Who is this standard for?

- Global Fund for Women's board members
- Global Fund for Women staff

### We know this standard is being met when ...

#### **1.2 Board members (including UK Trustees) are provided with regular reports on safeguarding, including reporting of serious safeguarding incidents.**

- A Safeguarding Summary Report will be produced on a monthly basis and this will be included for discussion in the monthly meetings of the Executive Committee of Global Fund for Women's Board of Directors, as well as in the monthly meetings of Global Fund for Women UK Board of Trustees. The report will contain an overview of all safeguarding cases and actions taken to date to address them.

#### **1.3 There are Designated Board Members for Safeguarding.** The

Designated Board Member for Safeguarding will...

- Act as a point of contact within the respective Boards for any issues relating to safeguarding
- [Global Fund for Women] In conjunction with the Chief Executive Officer (CEO) and Designated Safeguarding Leads, ensure that board members are fully informed of safeguarding issues across the organizations and contribute to maintaining safe practice across all our operations
- [Global Fund for Women UK] In conjunction with Executive Director/Designated Safeguarding Lead, ensure that board members are fully informed of safeguarding issues across the organizations and contribute to maintaining safe practice across all our operations
- Meet with the Designated Safeguarding Leads on a regular basis to maintain an overview of all safeguarding measures across the organizations
  - Be informed of and contribute to decisions on high-risk cases and maintain oversight of any follow up to help ensure that all risks are appropriately managed and governance and risk duties are fulfilled
- Support Global Fund for Women's Executive Team or Global Fund for Women UK Executive Director in managing any safeguarding concerns or investigations

#### **1.4 There is one Designated Safeguarding Lead and at least one Deputy Safeguarding Lead.** The Designated Safeguarding Leads will...

- Respond to a concern as soon as it is raised, and within one business day of the concern being made
- Take all details of the concern raised and determine the best course of action.

- o The first priority here is to ascertain whether the child, young person, or adult in question is still potentially at risk of harm and take action on that issue.
- o The second priority is to decide what form of investigation or other course of action is relevant.
- Take advice from relevant authorities in the countries in question
- Ensure the investigation is carried out as fairly, thoroughly, and promptly as possible
- Act on the investigation, including any further action to protect the child, young person, or adult in question from harm, and any disciplinary action that may be needed
- Inform the person who raised the safeguarding concern of the investigation findings and actions, as appropriate
- Maintain clear and compliant records of any safeguarding concerns that are reported and the actions taken to address these concerns
- Prepare a Safeguarding Summary Report to the Executive Team, Global Fund for Women’s Board Executive Committee and Global Fund for Women UK Board of Trustees on a monthly basis, which provides an overview of all safeguarding cases and actions taken to date to address them
- Promote awareness of the safeguarding policy among staff and board members and monitor its implementation
- Act as a source of support and information for staff on safeguarding issues
- Identify training needs and provide capacity building where needed
- Conduct an annual review of safeguarding implementation and effectiveness across the organization

**1.5 The Executive Team actively contributes to a positive safeguarding culture and is fully informed of safeguarding issues across the organizations.** The Executive Team...

- Is informed immediately of any reported cases, contributes to decision making, and ensures appropriate follow up to manage and reduce risk
- Reviews and discusses the Safeguarding Summary Report on a monthly basis during the Executive Team meetings

**1.6 An internal review of Global Fund for Women’s safeguarding policy and its implementation will be conducted annually. An external review will be commissioned every 3 years.**

- The implementation and effectiveness of the Safeguarding Policy are reviewed annually by an internal team; the results of the review are reported to the Executive Team, the Global Fund for Women Board, and Global Fund for Women UK Board of Trustees
- Gaps in safeguarding are addressed through an appropriately resourced action plan

- The Safeguarding Policy is updated based on the findings; the updated policy is approved by the Global Fund for Women Board and Global Fund for Women UK Board of Trustees
- An independent evaluation of safeguarding procedures is commissioned every three years

### Tools for implementation

Appendix A. Terms of Reference for the Designated Board Member for Safeguarding

Appendix B. Sample Job Description for the Designated Safeguarding Leads



## Standard 2. Recruitment

### Who is this standard for?

- Global Fund for Women Executive Team members, HR, and any staff responsible for hiring staff or consultants

### We know this standard is being met when ...

#### **2.1 Safeguarding practices are transparent through the employee life cycle.**

#### **2.2 We conduct fair and robust recruitment processes including safer recruitment checks of all employees.**

- Global Fund for Women values an understanding of feminist, anti-racist power analyses in recruitment, and includes this within job specifications. We ensure that core recruitment questions ask specifically about experience with, and actions on, reports of abuse and exploitation.
- As part of our recruitment approach we will add an explicit statement on our commitment to safeguarding and the checks that we will undertake to all our job posts. We will include questions around safeguarding as part of the interview process for any role that is likely to have contact with children, young people, or adults at risk, and as part of our referencing processes.
- We conduct these checks to enable Global Fund for Women to make informed decisions around hiring, but we will not use them to reinforce discrimination. We will provide all applicants a fair chance at employment including by delaying background checks until later in the hiring process.
- We will not provide references for anyone who has been dismissed for breaches of our safeguarding and/or anti-sexual harassment policies and will continue to investigate even if people resign. We will not utilize communications to undermine our safeguarding work including by praising any individual who has breached our policy.

#### **2.3 All job descriptions that involve any contact with children, young people, or adults at risk are categorized as requiring HR review. This includes:**

- Direct contact with children, young people, and adults at risk
- Indirect contact through access to personal data on children, young people, and adults at risk
- Responsibility for the design or management of initiatives that engage children, young people, and adults at risk (both directly or indirectly)
- The level of background checks undertaken correspond to the categorization for the position
  - Where specific checks have not been obtained, there is a documented rationale with appropriate authorization from the Director of HR

- Reference checks are clearly documented, available on all personnel files, and compliant with data protection and privacy

**2.4 All consultants whose work involves direct or indirect contact with children, young people, or adults at risk are held to the same standard, specifically:**

- Consultants provide Global Fund for Women with two independent references, which are verified by telephone or email; references cannot be family members and must have known the candidate for longer than 3 years
- A background check obtained in the past 3 years<sup>1</sup> is produced for those working directly with children, young people, or adults at risk
  - If one is not in place, Global Fund for Women will ensure a background check is completed prior to any contact with children, young people or adults at risk
  - Where such checks are not available, Global Fund for Women reserves the right to call references to seek further information about the candidate's practice in relation to children, young people or adults at risk
- The level of background checks undertaken correspond to the categorization for the post-holder
  - Where specific checks have not been obtained, there is a documented rationale with appropriate authorization from Global Fund for Women's Chief Human Resources Officer or Global Fund for Women UK Executive Director as applicable
- Reference checks are clearly documented and available on all consultant files

**2.5 All orientation and onboarding of new staff and consultants includes training on our safeguarding policies and practices.**

- The training will include information about power dynamics and clarify the emphasis Global Fund for Women places on promoting systemic change and bringing our values to life internally and externally.
- All orientation and onboarding clarifies and outlines our commitment to completion of all disciplinary proceedings, even if a person resigns, to ensure accountability to employers and to promote organizational learning.

**2.6 Safeguarding is an essential part of our performance management approach for all senior manager positions, relevant roles, and people who travel.** Outputs of this will be monitored and included within the discussions within our safeguarding forum.

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<sup>1</sup> Global Fund for Women UK will request a DBS check.

## Standard 3. Code of conduct

### Who is this standard for?

- All Global Fund for Women staff
- All Global Fund for Women associated personnel

### We know this standard is being met when ...

- 3.1 All staff have read and signed a copy of the Code of Conduct, and know when and how to report breaches of the Code of Conduct. Signed copies of the Code of Conduct are retained on personnel files**
- 3.2 All contractors have read and signed commitment to Global Fund for Women's Safeguarding Policy which includes the Code of Conduct.**
- 3.3 All visitors attending events or field visits related to Global Fund for Women in any capacity sign a Safeguarding Agreement which includes the Code of Conduct.**
- 3.4 All partners working directly with children, young people, or adults at risk sign a Safeguarding Agreement which includes the Code of Conduct.**
- 3.5 Age appropriate versions of the Code of Conduct are developed to reflect children's own expectations of staff and other Global Fund for Women representatives. These are displayed in spaces where children are engaged in activities.**
- 3.6 Children and their parents or legal guardians know when and how to report breaches of the Code of Conduct.**
- 3.7 Age appropriate Community Guidelines are developed and displayed on Global Fund for Women's digital platforms where users are commenting or sharing their own information, ideas, photos and stories. These explain the expected behaviors when posting on the site and consequences for any violation.**

### Tools for implementation

Appendix C. Code of Conduct

Appendix D. Workplace conduct

Appendix E. Global Fund for Women's Safeguarding Commitment Form for contractors

Appendix F. Global Fund for Women's Safeguarding Agreement for visitors

Appendix G. Global Fund for Women’s Safeguarding Agreement for partners

Appendix H. Age appropriate versions of the Code of Conduct

Appendix I. Age appropriate Community Guidelines

## Standard 4. Grantmaking

### Who is this standard for?

- All Global Fund for Women grantee partners

### We know this standard is being met when ...

#### **4.1 Safeguarding practice is actively monitored through the grant life cycle.**

- We consider safeguarding to include ensuring the protection of all people that our grantee partners work or come in contact with from any abuse or harassment, either directly by anyone from the grantee partner organization or indirectly as a result of their work in the community.
- We will carry out safeguarding due diligence of the organizations that we grant funds to, both before a grant is awarded and then for the duration of the grant through regular monitoring. This includes grantee's self-assessment, and additional virtual and/or in-person assessment conducted by Global Fund for Women of selected grantees.
- Depending on the context, we review and assess if the grantee partner has appropriate policies and processes in place to safeguard their own staff and communities they work with. We also discuss issues that may arise based on work to be undertaken and apply appropriate measures to manage the identified risks.
- We will review and assess if grantee partners working with or in contact with children, young people, and adults at risk have appropriate and effective child safeguarding measures.
- If a grantee partner does not have an effective safeguarding policy and process, we will work with them to decide the most appropriate way to strengthen their safeguarding efforts.

#### **4.2 Recognizing that effective safeguarding requires constant commitment, learning and resources, we will provide a range of support to help grantee partners develop and implement effective safeguarding measures.** They include but are not limited to:

- Providing training webinars on how to create, implement and monitor a safeguarding policy
- Providing additional funding to support their safeguarding efforts

Global Fund for Women will work with each grantee partner to develop a timeline for strengthening their safeguarding efforts. If they do not have appropriate safeguarding policies and procedures in place according to the agreed timeline, their grant could be suspended or terminated.

#### **4.3 Grantee partners are contractually required to report all safeguarding incidents, with the communities they work with or their own staff, to Global Fund for Women immediately.**

- As part of their grant contract, our grantee partners are required to notify Global Fund for Women of any safeguarding incident, including any incidents by implementing partners' staff or representatives. This includes reporting:
  - o Allegations of harm, abuse, or misconduct which have resulted in an internal investigation and/or referral to a relevant authority such as social services, the police, or other regulatory body
  - o There has been an incident where someone has been abused or mistreated (alleged or actual) and this is connected with the activities of the grantee partner
  - o Any serious breach or failure in safeguarding procedures or policies which may have put the communities they work with at risk and/or have resulted in a referral to any regulatory body or relevant authority such as social services or the police
  - o Following a notification, Global Fund for Women may request information or may arrange an in person visit either by a Global Fund for Women staff member or by an independent expert of our choice from the grantee partner to better understand the issues and their response.
- We recognize that suspending or withdrawing funding can have a negative impact on the communities they work with but where we determine there is a safeguarding risk we may suspend funding while the harm is addressed. If the grantee partner is unable or unwilling to sufficiently address concerns, funding may be terminated.

### Tools for implementation

Appendix J. Updated due diligence process in the Grantmaking Manual

Appendix K. Global Fund for Women training webinar for grantees on how to create, implement and monitor a safeguarding policy

## Standard 5. Participation of children

### Who is this standard for?

- All Global Fund for Women staff
- All Global Fund for Women associated personnel
- All Global Fund for Women grantee partners

### We know this standard is being met when ...

#### **5.1 All those covered by the policy have read and signed a copy of the Code of Conduct and commit to respecting, promoting, upholding and protecting, at all times the rights of the child as set out in the UN Convention on the Rights of the Child.**

- Age-appropriate versions of the Code of Conduct are developed, which reflect children's own expectations of staff and Global Fund for Women associated personnel and are inclusive to ensure that children with disabilities can also access the information. These are displayed in spaces or shared where children are engaged in activities.
- Children and their parents or legal guardians know when and how to report breaches of the Code of Conduct.
- Personal conduct outside of work or engagement with Global Fund for Women that is seen to contradict this policy will be considered a violation of the policy. Global Fund for Women staff are required to adhere to principles of the Safeguarding Policy both at work and outside work.

#### **5.2 Risk assessments are conducted prior to any activities, digital campaigns, or other initiatives involving children, and result in a Risk Management Plan which addresses all aspects of child safety, including digital safety.**

- Where the participation of children takes place within the community, key members of the community are informed and available to provide support. When publishing content on topics that might make children uncomfortable, we will provide a list of organizations external to Global Fund for Women who can provide support, advice, and services to ensure children can access any additional help that they need.

#### **5.3 Children are provided with information in advance which explains the initiative and the role they are being asked to fulfill.**

- They are given time to consider the request and it is made clear that their participation is voluntary. Where children agree to participate, an age-appropriate and inclusive written agreement is produced outlining Global Fund for Women's expectations of them, the support they can expect from us and the limit/extent of their ongoing involvement. The agreement is signed by the child and their parent or legal guardian, confirming their informed consent to participate in the Global Fund for Women initiative.
- Children participating in Global Fund for Women initiatives receive a briefing on safety measures. This includes advice on how to keep

themselves safe and where to go for help. They are provided with age-appropriate and inclusive version of reporting procedures.

- Any decision to invite children to attend international events must be taken in their best interest with serious consideration given to both the positive and negative impact of their involvement. Additional safeguarding measures are put in place including risk assessment, an approved chaperone system, a pre-departure briefing, contact details for 24-hour emergency support and a debrief upon return home.

**5.4 Staff and consultants are provided with tools and guidance to enable them to work effectively with children.**

- This includes, as a minimum, training on the safeguarding measures to be implemented throughout the initiative, how to engage children using age-appropriate and inclusive approaches, and what steps should be taken to prevent or respond to safeguarding concerns.

**5.5 We assess, monitor, and support grantee partners working with or in contact with children, young people, and adults at risk to ensure that they have appropriate and effective safeguarding measures.**

**5.6 Safe communications and storytelling includes every precaution to preserve the privacy and dignity of children.**

- Children are enabled to give their own accounts and personal narratives, rather than have people speak on their behalf. When using content created by children, Global Fund for Women shares media ownership with them as long as it does not place them at risk.
- The maximum information given about a child should be their first name and the name of the district in which they live. Information or images that could be used to identify the individual's specific location (such as village or community names, school, parish, etc.) must not be used without their explicit consent and that of their parent/guardian. Where children are survivors of violence or human rights violations, their faces are not displayed and no information is shared which could lead to their identification without their consent and that of their parent/guardian. Content will clearly stipulate when names and locations have been changed for protection and privacy purposes.
- All content, publications, and presentations featuring children are reviewed by Global Fund for Women's Communications and Engagement Team to ensure no individual is put at undue risk. Where doubts exist, content decisions should be discussed with the Designated Safeguarding Leads.
- Age-appropriate Communication Guidelines are displayed on Global Fund for Women's digital platforms where users are commenting or sharing their own information, ideas, photos, and stories. These include guidance on sharing personal information and preventing risks of harm.
- Online discussions are moderated by relevant Global Fund for Women staff or consultants to maximize safety and privacy and minimize risks.

**5.7 Reporting and response follows the procedures in Standard 8 of the Safeguarding Policy with special consideration for children.**



- Children have the right to have alleged incidents recognized and taken seriously, to be involved in any reporting process as appropriate and to be informed of the outcome. They have the right to receive fair and respectful treatment throughout.
- Age appropriate and inclusive reporting processes are developed and displayed in spaces or shared where children are engaged in activities.

#### **5.8 Adapting procedures to different contexts**

- A key element in making appropriate and effective responses to safeguarding concerns for children is having a clear picture of the local context so that responses are made in line with legal, social welfare and any other considerations. In every project where Global Fund for Women staff or associated personnel directly engage children, we will conduct an assessment of local contexts and create a local adaptation of this standard, followed by tailored information sessions for Global Fund for Women staff and associated personnel.

#### **Tools for implementation**

Appendix L. Age appropriate reporting procedures

Appendix M. Age appropriate Communication Guidelines

## Standard 6. Communications, storytelling, and data protection

### Who is this standard for?

- All Global Fund for Women staff
- All Global Fund for Women associated personnel
- All Global Fund for Women grantee partners
- Everyone Global Fund for Women collects data on and/or stores data on

### We know this standard is being met when ...

#### **6.1 Global Fund for Women has clear filming, photography, and content-gathering guidelines that are strictly adhered to.**

- Global Fund for Women aims to take an ethical approach to the collection and use of all our images, quotes and materials gathered for communication and engagement which follow the principles of safeguarding, upholding dignity of contributors, accuracy, privacy, equality, and diversity.
- Safeguarding is integrated into the risk assessment, approval and planning of project visits where media assets are to be obtained. Anyone (contractor, photographer, freelancer etc.) collecting content on behalf of Global Fund for Women must adhere to this safeguarding policy.

#### **6.2 Consent is obtained for all assets & meets General Data Protection Regulation (GDPR) requirements (informed consent, withdrawal of consent, secure storage & destruction)**

- Consent is not simply ensuring a form is signed. It is a process through which we provide clear information to contributors and confirm informed and voluntary consent at different points in the process. Consent can be withdrawn at any point.
- Consent must be obtained from all contributors prior to the collection of images, film or other content (such as quotes, etc.). For photography, consent is obtained from the subject photographed. In addition, written consent must be provided by the parent or guardian for children under the age of 18. Where an adult lacks the capacity to provide informed consent (e.g. due to age, illness or disability) consent must be obtained from a family member or, where one is unavailable, from a senior member of project staff who has responsibility for the contributor's well-being. No asset will be used without informed consent and will be destroyed if this is not secured.
- Consent may be obtained through a signature on a consent form, video/audio recorded consent, or digital confirmation of consent. In all circumstances, consent must demonstrate that the participant understands:
  - o How their photo/information will be used and for how long, and by whom
  - o Who the intended audience is

- o How their privacy will be upheld
- o That their consent is voluntary, they have the right to decline, and they can withdraw at any stage in the process by informing any Global Fund for Women staff member of their decision.
- Consent for use of images or stories is distinct from other forms of consent (e.g. consent to participate in activities, research). Staff should ensure that any images of children shared by grantee partners are approved by the grantee organization and that they in turn have gained written or verbal consent of children and their legal guardians.
- Pictures taken for personal use may not be shared on Global Fund for Women or staff's personal social media or in any publications or presentations without consent. Consent is provided to Global Fund for Women and not to any individual.
- Consent documentation is stored alongside the data, stories, photos or other digital assets. Images and stories are held securely in line with GDPR and access restricted to the minimum number of people necessary.

**6.3 Digital applications, platforms, and services are safe, secure, and GDPR-compliant. They do not result in inappropriate or unethical capture and/or use of data.<sup>2</sup>**

- Ensuring digital privacy, security, and safety includes:
  - o Do no harm: data collected on grantees, staff, donors and any other party will be used in ways that respect their privacy and minimizes risks of harm.
  - o Data minimization: only data that is directly relevant and necessary to accomplish Global Fund for Women's stated purposes will be collected.
  - o Privacy by design: ensuring privacy is our default setting when designing digital applications, services, or platforms.
- Age appropriate Communication Guidelines are displayed on Global Fund for Women's digital platforms of products. These explain expectations regarding posting or commenting on the site and establish consequences of misuse.
- Online discussions are moderated to maximize safety and privacy and minimize risks.
- Specific precautions are taken to securely collect, use, transmit, manage and store data of children, young people, and adults by ensuring that:
  - o A written agreement is in place to control and authorize the release of information on children (data, images) to partner organizations, the Internet, the public domain, or any third party
  - o Hard copies of confidential and sensitive child data are disposed of or destroyed in a secure manner

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<sup>2</sup> Global Fund for Women is currently developing a GDPR policy and implementation plan. This standard (6.3) will be implemented when the GDRP policy is approved and implemented.

- o Loss of data on children, young people or adults (e.g. lost laptops, pen drives, etc.) is immediately reported to the Designated Safeguarding Lead and Global Fund for Women's Data Breach Policy is implemented

### Tools for implementation

Appendix N. Photography and content gathering guidelines

Appendix O. Photography and content gathering consent form

Appendix P. Global Fund for Women's GDPR implementation plan

## Standard 7. Fundraising and partnerships

### Who is this standard for?

- Global Fund for Women financial donors, supporters, and partners who come into direct contact with our work in any capacity and in any location
- Global Fund for Women staff, particularly those who interact regularly with donors, supporters, and partners

### We know this standard is being met when ...

#### **7.1 Agreements to govern conduct are in place with donors on visits to grantee partners and advisors (Visitors).**

- Include information on safeguarding in briefing materials and in the verbal briefings provided to Visitors prior to visits
- Ensure all Visitors read and sign Global Fund for Women's Safeguarding Agreement for Visitors before engaging with children and adults in communities
- Provide a debrief after every visit to allow a discussion about our work, to address any concerns the Visitor may have and to ensure that they are clear about the processes that have to be followed if they are going to share information about the visit on social media or other platforms
- Where Visitors want to use images of Global Fund for Women's work for professional purposes, these must be approved by Global Fund for Women and appropriate, specific consent from subjects must be in place

#### **7.2 Safeguarding is integrated into partnerships and included in all contracts.**

To ensure that safeguarding is a primary consideration in all our partnerships, Global Fund for Women will:

- Ensure that safeguarding is included as criteria to be explored in our due diligence and background checks before approving a new partnership
- Discuss the importance of safeguarding at an appropriate stage in the development of the relationship at the discretion of the Primary Contact Manager (PCM)
- In cases where the PCM determines that the partnership will entail situations where safeguarding issues may arise (i.e., donor travel or site visits, content for stories or photographs for communications purposes), then we would ensure that safeguarding clauses are incorporated in contracts with those partners
- Where PCMs have knowledge that partners directly engage with children, young people, and/or adults at risk as part of their core business, we will request and review their safeguarding policies
  - Where partners do not have specific safeguarding policies in place, we will ensure that safeguarding clauses are incorporated in contracts with those partners

- Whenever partners are visiting Global Fund for Women grantee partners and/or advisors, when possible, they must be accompanied by Global Fund for Women staff, and all visitors must sign Global Fund for Women's Safeguarding Agreement for Visitors
- Where partners want to use images of Global Fund for Women's work, these must be approved by Global Fund for Women and appropriate, specific consent must be in place

### Tools for implementation

Appendix F. Global Fund for Women's Safeguarding Agreement for Visitors

## Standard 8. Reporting and response procedures

### Who is this standard for?

- All Global Fund for Women staff
- All Global Fund for Women associated personnel
- All Global Fund for Women grantee partners

### We know this standard is being met when ...

**8.1 Global Fund for Women responds appropriately and effectively to all allegations and suspicions of abuse both current and historical, through reporting mechanisms that are simple, clear, fair, and accessible to all stakeholders, including children.**

**8.2 There is a mandatory obligation on all Global Fund for Women staff and associated personnel to report concerns, suspicions or allegations that indicate actual or potential abuse of children, young people, or adults at risk to the designated Safeguarding Lead.** If the Safeguarding Lead is unavailable or may have a conflict of interest or loyalty in relation to the matter, the deputy should be contacted in the alternative. If the deputy is also unavailable or may have a conflict of interest or loyalty, the designated Board Member for Safeguarding should be contacted.

**8.3 All staff have a responsibility to report. Failure to report will be considered a serious breach of GFW safeguarding policy.**

**8.4 Any staff reporting will be protected by Global Fund for Women's whistleblower policy.**

**8.5 Investigations will be objective, transparent, and will be guided by external professional expertise and support when required.** To the extent that is practical, Global Fund for Women will strive to maintain confidentiality of affected individuals subject to its goal of engaging in a thorough investigation and to engage the survivor in the response to the extent that is possible. We may, however, be required to disclose the allegations or result of the investigation to the authorities.

**8.6 A central register of all safeguarding incidents is maintained. The data is anonymized but is analyzed regularly by the Safeguarding Leads to evaluate the effectiveness of response, identify gaps in resources and knowledge and develop methods to improve practice.**

### Equal right to protection

Mandatory reporting relates to harm caused to any individual regardless of their relationship with Global Fund for Women and irrespective of age, disability, religious

belief, nation of origin, gender, race, or socio-economic status. Concerns about harm or abuse must be internally reported where:

- The alleged perpetrator is a Global Fund for Women staff member, associated personnel or grantee partner
- The alleged perpetrator is a member of the child's family, community or is unknown to the child
- The alleged perpetrator is also a child, although responses should take in to account the protection and safety of both the child victim and the alleged child abuser
- The abuse is historical; most abuse is not disclosed until many years after it has occurred but the risks of harm to children may persist and require investigation
- The report is anonymous, as this does not automatically mean that it bears less substance but may indicate fear of reprisal, shame or other barriers to disclosure; anonymous reports should be taken seriously as 'named' reports although the extent to which they can be investigated may be limited by the anonymity

### **Duty of Care**

Global Fund for Women has a legal and moral obligation to respond to cases of harm and abuse when these are identified through our engagement with children or adults. We must not, however, initiate interventions or offer advice that requires a specialist with professional expertise as this is outside our area of competence and could inadvertently result in further harm to the individual.

When cases of abuse are identified, Global Fund for Women's duty of care encompasses:

- Listening and providing re-assurance to the child or adult
- Providing details of recognized, child-friendly agencies who can provide protection (e.g. police when called for) or additional advice and support (e.g. recognized telephone helpline, a local child protection agency, a local adult protection agency)
- Ensuring concerns relating to Global Fund for Women staff, associated personnel or grantee partners are fully investigated and action is taken
- Only sharing information with relevant individuals and/or agencies following the process set out in this safeguarding policy

### **Guidelines for reporting and response procedure**

- A safeguarding concern may arise in several ways. For example:
  - o You may witness harm taking place
  - o A child, young person, or adult may tell you that they have suffered harm
  - o You may notice behavior which gives rise to a suspicion that a child, young person, or adult has been harmed or is at risk of harm



- Listen carefully and calmly to the allegations and ask questions to clarify the allegation. Confirm what steps (if any) have already been taken to ensure the safety of the reporter. Remember, your role is to clarify facts NOT to conduct an investigation.
- Where the report comes directly from a child, young person, or adult, ask them what they feel would help keep them safe, what they would like to happen next and try to identify a trusted adult in their lives who can be contacted to support them and help to keep them safe.
- Never promise to keep secrets. Internal reporting is mandatory within Global Fund for Women and the concern may have to be reported to other agencies as well. You can tell the person reporting that you will only tell people who need to know in order to keep them safe and that you will discuss with them the best way to share information (e.g. who they would like to be told, whether they want to tell the person themselves etc.).
- Before taking any further action, you must immediately contact the Global Fund for Women designated Safeguarding Lead to discuss next steps.

### **Reports made through media or digital channels**

If it is not possible to discuss the allegation with the person concerned, providing specific advice without sufficient understanding of the individual's situation may place the individual at additional risk. Responses should be limited to:

- Acknowledging the child, young person, or adult for taking an important step towards disclosing harm or abuse
- Re-affirming the individual's right to protection
- Encouraging the individual to share their concerns with a trusted adult

### **How to report when you have a safeguarding concern**

- If you believe you have a safeguarding concern or wish to file a report about a Global Fund for Women employee or associated personnel, please follow Chart 1.
- If you believe you have a safeguarding concern about a child, young person, or adult you come into contact with through your work, or a child, young person, or adult you come into contact with through your work makes a disclosure of possible abuse to you, please follow Chart 1.
- If you believe you have a safeguarding concern about a grantee partner, please follow Chart 2.

Chart 1.

If you have a safeguarding concern or wish to file a report about a Global Fund for Women employee or associated personnel

If you have a safeguarding concern about a child, young person, or adult you come into contact with through your work, or a child, young person, or adult you come into contact with through your work makes a disclosure of possible abuse to you

If the child, young person, or adult or someone else may be in immediate danger, call the police / ambulance or both (provided no further harm will be caused)

- Immediately report the concern to the Safeguarding Lead.
- If the Safeguarding Lead is unavailable or may have a conflict of interest or loyalty in relation to the matter, the deputy should be contacted in the alternative.
- If the deputy is also unavailable or may have a conflict of interest of loyalty, the designated Board Member for Safeguarding should be contacted.

- Safeguarding Lead or Deputy to conduct an investigation and make contact with local authorities where warranted and only with the consent of the survivor wherever possible.
- We recognize that it might not feel safe or appropriate for survivors to report via legal channels and will work with the survivor to gain consent to make a legal complaint and for actions to be informed by their assessment of their own safety whenever possible.

Chart 2.

If you have a safeguarding concern about a grantee partner



- Immediately report the concern to the Safeguarding Lead.
- If the Safeguarding Lead is unavailable or may have a conflict of interest or loyalty in relation to the matter, the deputy should be contacted in the alternative.
- If the deputy is also unavailable or may have a conflict of interest or loyalty, the designated Board Member for Safeguarding should be contacted.



If the a child, young person, or adult or someone else may be in immediate danger, call the police / ambulance or both (provided no further harm will be caused)



- Safeguarding Lead or Deputy to contact the person with responsibility for safeguarding at that grantee partner organization if it is safe and appropriate to do so.
- Based on the above, Safeguarding Lead or Deputy to conduct further investigation and make contact with local authorities where warranted and only with the consent of the survivor wherever possible.
- We recognize that it might not feel safe or appropriate for survivors to report via legal channels and will work with the survivor to gain consent to make a legal complaint and for actions to be informed by their assessment of their own safety whenever possible.

## Investigation

- Safeguarding incidents that are related to Global Fund for Women UK will be reported promptly to the Charity Commission in accordance with its Serious Incidents guidance, and to donors as required under grant agreements.
- In most circumstances, Global Fund for Women will only pursue an investigation in cases relating to Global Fund for Women staff, associated personnel, and grantee partners.
- Where allegations against Global Fund for Women staff, associated personnel, and grantee partners are reported to the police or other statutory authorities, these agencies should lead the investigation.

- Global Fund for Women will cooperate with any investigation that is undertaken.
- In countries where there is doubt about the integrity and/or competence of statutory authorities and/or reporting may lead to reprisal or re-victimization for the child, young person, adult or their family, all potential risks should be assessed before any actions are taken. Any decision must take in to account the legal obligations as failure to report may, in some countries, constitute a legal offence. Any decision not to report cases to the relevant local authorities must be documented and authorized by the Designated Safeguarding Lead (or in their absence, the Deputy), the CEO, and the Designated Board Member for Safeguarding.
- In circumstances where the incident is not reported to the police or other statutory authorities or where they decline to investigate the matter, Global Fund for Women should conduct its own investigation. Any decision to undertake an internal investigation must be made by the Designated Safeguarding Lead (or in their absence, the Deputy), the CEO and the Designated Board Member for Safeguarding.
- Formal investigations should be undertaken by appropriately trained individuals. This may involve bringing in an external professional to conduct or advise on the investigation.

### **Documentation**

- The person receiving the initial safeguarding report must complete a Safeguarding Concern Report form within 24 hours and share this with the Designated Safeguarding Lead (or in their absence, the Deputy). The information recorded should be as factual and objective as possible and personal opinion should be avoided.
- The form should be signed and dated.
- The Designated Safeguarding Lead (or in their absence, the Deputy) is responsible for documenting all subsequent actions, communications with external agencies and the outcome of any investigation.
- All documents (soft and hard copies) must be kept confidential. Digital/electronic information must be password protected, and hard copies filed in lockable storage. Data must be encrypted before it is transmitted electronically.

### **Tools for implementation**

Appendix Q. Safeguarding Concern Report form

## Glossary of Terms

### Adult at Risk<sup>3</sup>

A person who is or may be in need of care by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.

*-UK Government Department of Health (abridged)*

### Best Interest Decisions

Decisions that affect children or young people should be made based on consideration of their physical and psychological well-being and the need to prevent harm to them or others. Best interest decisions should be reached in consultation with both the child/young person and those responsible for their care.

### Child

A person below the age of 18 years as defined by UN Convention on the Rights of the Child.

### Direct contact with Children, Young people, and Adults at risk

Being in the physical presence of a child, young person, or adult at risk in the context of Global Fund for Women's work, whether the contact is occasional or regular, short or long term. Direct contact also includes interaction with children, young people, and adults at risk via the internet or telephone, even if a physical meeting never takes place.

### Duty of Care

Global Fund for Women has a legal and moral obligation to respond to cases of harm and abuse when these are identified through our engagement with children, young people, and adults at risk. We must not, however, initiate interventions or offer advice that requires specialist child protection expertise as this is outside our area of competence and could inadvertently result in further harm to the child.

When cases of abuse are identified, Global Fund for Women's duty of care encompasses:

- Listening and providing re-assurance to the child, young person or adult at risk
- Helping the child, young person or adult at risk to share their concerns with a trusted adult who can help them decide what further action to take (e.g. parent/ legal guardian)
- Providing details of recognized, child-friendly agencies who can provide protection (e.g. police when called for) or additional advice and support (e.g. recognized telephone helpline, a local child protection agency)

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<sup>3</sup>Global Fund for Women is using adults at risk rather than vulnerable adults because "the abuse of adults links to circumstances rather than the characteristics of the people experiencing the harm. Labelling groups of people as inherently 'vulnerable' is seen to be disempowering." (Ann Craft Trust <https://www.anncrafttrust.org/resources/safeguarding-adults-at-risk-definitions/>)

- Ensuring concerns relating to Global Fund for Women staff, associated personnel or grantee partners are fully investigated and action is taken

### Global Fund for Women Associated Personnel

Anyone who comes into contact with a child, young person, or adult at risk as a result of Global Fund for Women's work, but who is not employed by Global Fund for Women, including:

- All individuals who carry out work, paid or unpaid, in the name of Global Fund for Women. This includes board members, board committee members, advisors, volunteers, interns and consultants
- All agencies or organizations employed to deliver services on behalf of Global Fund for Women
- All Global Fund for Women visitors. This includes journalists, media personnel, donors and any other individual attending events or field visits related Global Fund for Women in any capacity

### Global Fund for Women Staff Member

Anyone who is contractually employed by Global Fund for Women or Global Fund for Women UK, whether permanently or on a freelance contract

### Harm

Psychological, physical, and any other infringement of an individual's rights

### Indirect Contact with Children, Young people, and Adults at risk

Having access to personal information (data) on children, young people, and adults at risk in the context of Global Fund for Women's work such as names, locations, responses to research questions, photographs, videos or case studies. This also includes data generated or shared by children and young people via digital applications, tools or platforms.

### Personal Data

Personal data is any information relating to an individual, whether it relates to his or her private, professional or public life. It can be anything from a name, photo, e-mail address, phone number, posts on social media or responses to surveys. Data can be numerical, descriptive or visual.

### Emotional or psychological abuse

Emotional or psychological abuse, including (but not limited to) humiliating and degrading treatment such as bad name calling, constant criticism, belittling, persistent shaming, solitary confinement, interrogation, excessive pressure to perform or pose for cameras, excessive repeat interviews around emotionally disturbing experiences, and isolation.

### Safeguarding

Safeguarding is the responsibility that organizations have to make sure their staff, operations, and programs do no harm to children and adults at risk, and that is that they do not expose them to the risk of harm and abuse.

## Sexual Abuse

The term “sexual abuse” means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

*-UN Secretary-General’s Bulletin on Special measures for protection from sexual exploitation and sexual abuse (ST/SGB/2003/13)*

## Sexual Exploitation

The term “sexual exploitation” means 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.

*-UN Secretary-General’s Bulletin on Special measures for protection from sexual exploitation and sexual abuse (ST/SGB/2003/13)*

## Sexual Harassment

There are two distinct categories of sexual harassment: (1) Sexual harassment occurs when submission to or rejection of unwelcome sexual conduct by an individual is used as a basis for employment decisions affecting that individual. This form of harassment occurs when submission to sexual conduct is made a condition for receiving concrete employment benefits; (2) Sexual harassment also occurs when unwelcome sexual conduct unreasonably interferes with an individual’s job performance or creates an intimidating, hostile or offensive working environment, even if such conduct does not lead to tangible or economic job consequences. Sexual harassment includes, but is not limited to, unwelcome sexual advances, requests for sexual favors and lewd, vulgar or obscene remarks, jokes, derogatory posters or cartoons, and any unwelcome touching, pinching, massaging or other physical contact. Sexual harassment also includes continuing to express sexual or social interest after being informed directly that the interest is unwelcome.

## Survivor

A 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.

## Young People

For the purposes of this policy, a “young person” is defined as anyone aged 18 - 25. All guidance and procedures contained within this policy also apply to our engagement with young people.

## Appendices

Appendix A. Terms of Reference for the Designated Board Member for Safeguarding

Appendix B. Sample Job Description for the Designated Safeguarding Leads

Appendix C. Code of Conduct

Appendix D. Workplace conduct

Appendix E. Global Fund for Women's Safeguarding Commitment Form for contractors

Appendix F. Global Fund for Women's Safeguarding Agreement for visitors

Appendix G. Global Fund for Women's Safeguarding Agreement for partners

Appendix H. Age appropriate versions of the Code of Conduct

Appendix I. Age appropriate Community Guidelines

Appendix J. Updated due diligence process in the Grantmaking Manual

Appendix K. Global Fund for Women training webinar for grantees on how to create a safeguarding policy

Appendix L. Age appropriate reporting procedures

Appendix M. Age appropriate Communication Guidelines

Appendix N. Photography and content gathering guidelines

Appendix O. Photography and content gathering consent form

Appendix P. Global Fund for Women's GDPR implementation plan

Appendix Q. Safeguarding Concern Report form