

SAFEGUARDING POLICY

Version	3
Policy Owner:	Chief Strategy and Legal Officer
Date of First Approval by Board:	December 2014
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Date of Most Recent Review:	March 2021
Date of Next Review:	March 2022

1. Introduction

- 1.1. GIF is committed to proactively safeguarding and promoting the welfare of GIF's beneficiaries and staff and to taking reasonable steps to ensure those who come into contact with GIF and/or GIF-funded programmes do not, as a result, come to harm.
- 1.2. This policy sets out GIF's commitment and approach to safeguarding children and adults at risk in particular (which may include Staff and any other person that comes into contact with GIF's work). It includes a safeguarding code of conduct, which must be signed by all Staff. Given GIF funds the work of other organisations rather than directly carrying out any humanitarian aid or other front-line functions itself, Staff may not come into direct contact with children or vulnerable adults on a day-to-day basis. However, this policy sets out the high safeguarding standards that must govern any such interaction and shape GIF's culture.
- 1.3. GIF's wider safeguarding and protection measures are also implemented through GIF's Environmental, Social Responsibility and Governance Policy (**ESG Policy**), Anti-Corruption and Integrity Policy, Data Protection Policy, Whistleblowing Policy and various HR policies.
- 1.4. Questions in relation to this policy should be directed to the Chief Strategy and Legal Officer of GIF.

2. Scope of Policy

- 2.1. This policy applies to GIF and its subsidiaries and affiliates (collectively referred to as **GIF**) and every member, trustee/director and employee (which for these purposes includes temporary or contract staff, consultants, agents, secondees and representatives) of GIF (**Staff**).
- 2.2. The ESG Policy sets out GIF's requirements of recipient organisations in ensuring the safety and protection of children and adults at risk who are in contact with those recipient organisations as part of their programme implementation.
- 2.3. If you are GIF Staff, this policy does not apply to complaints or concerns relating to your own personal circumstances, such as the way you have been treated at work and/or by colleagues, or information which relates to suspected wrongdoing, dangers at work or general misconduct (unless it relates to children and adults at risk). In those cases, you should use the grievance or anti-harassment policies set out in GIF's Employee Handbook or GIF's Whistleblowing Policy as appropriate. If you are uncertain whether something is within the scope of this policy you should seek advice from the GIF Designated Safeguarding Officer.
- 2.4. This policy is publicly available on the GIF website and will be provided to any party on request.

3. Compliance and Review

- 3.1. Compliance with this policy is monitored by the Legal and ESG Team.
- 3.2. The Board of Trustees is responsible for reviewing and approving this policy annually, when there are changes in best practice or UK law, when GIF makes a significant change to its work (including working in a new area), or following a safeguarding concern being reported to the Charity Commission as a serious incident, whichever occurs first.

4. Definitions

In this policy, the following terms have the following definitions.

Abuse or **harm** are used to encompass all types of harm and abuse, including neglect and exploitation. See the Safeguarding Code of Conduct for further information.

Adult at risk means any person aged 18 or over who is or may be in need of care and support (e.g. health care, relevant personal care or social care) and is experiencing or is at risk of abuse or neglect and, as a result of this, is unable to protect themselves from either the risk or experience of neglect or abuse. GIF is aware that it may have Staff (including trustees), beneficiaries and/or other connections who are adults at risk.

Child means anyone under the age of 18 irrespective of the age of majority in the country where a child is located, or in their home country.

Safeguarding refers to actions taken to promote the welfare of, and prevent abuse, harm or neglect of, children, adults at risk and other persons, including staff or volunteers, who come into contact with GIF and GIF's operations. This policy relates only to Safeguarding children and safeguarding adults at risk. Other policies and procedures (e.g. grievance policy, health and safety, whistleblowing) provide for reasonable steps to be taken to protect those who work for or with GIF or otherwise come into contact with it from harm.

Safeguarding adults at risk means taking reasonable steps in connection with protecting an adult's right to live in safety, free from abuse and neglect. It is about people and organisations working together to prevent and stop both the risks and experience of abuse or neglect, while at the same time making sure that the adult's wellbeing is promoted including, where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action. This must recognise that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear or unrealistic about their personal circumstances.

Safeguarding children means taking reasonable steps in connection with protecting them from maltreatment, preventing impairment of their health or development, ensuring that they grow up in circumstances consistent with the provision of safe and effective care and acting to enable all children to have the best outcomes. The welfare of the child is paramount, which means no other considerations should be allowed to override the duty to protect children from harm.

Sexual abuse means the actual or threatened physical intrusion of a sexual nature whether by force or under unequal or coercive conditions.

Sexual exploitation means any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes, including profiting monetarily, socially, or politically from the sexual exploitation of another.

Sexual harassment means unwelcome sexual advances (without touching). It includes requests for sexual favours, or other verbal or physical behaviour of a sexual nature, that may create a hostile or offensive environment.

5. Policy Statement and Principles

- 5.1. GIF is committed to the safety and protection of all children and adults at risk and others who come into contact with GIF. It recognises that children and adults at risk may be at risk of harm in a variety of ways, and that all people, regardless of age, disability, gender, racial heritage, religious beliefs, or sexual orientation or identity, have the right to equal protection from harm and abuse. GIF will do all it reasonably can to make sure that the children and adults at risk who come into contact with GIF, GIF Staff or GIF-funded programmes do not, as a result, come to harm.
- 5.2. While GIF does not carry out any humanitarian aid or other front-line international development functions, it funds the work of others who do. The following principles that underpin GIF's

approach to safeguarding in its investment due diligence, contracting, monitoring and safety management:

- a) **Zero tolerance:** We have zero tolerance of abuse or harm to children and adults at risk, or any other person who comes into contact with GIF or an organisation funded by GIF, or to wider communities.
- b) **Collective responsibility:** Safeguarding vulnerable groups is everyone's responsibility. Safeguarding matters are a standing item on the agenda for meetings of GIF's Board of Trustees. The Safeguarding Lead Trustee takes responsible for having oversight of safeguarding arrangements and is responsible for keeping the Board apprised of safeguarding matters as and when appropriate, but all trustees are individually and collectively responsible for being aware of safeguarding risks and issues relating to GIF.
- c) **Proportionality:** GIF recognises that activities may carry varying degrees of risk in relation to children and adults at risk (as well as to those who work for and with GIF) and that organisations have a responsibility to ensure that risks are minimised as far as possible and using an approach that is proportionate and appropriate in the circumstances.
- d) **Best interests:** GIF recognises that the 'best interests' of children and adults at risk are the paramount consideration in any decision-making that affects them and where possible, working in partnership with children, young people, adults at risk, their carers and relevant agencies is essential to promoting their welfare. In the case of sexual exploitation, abuse or harassment, GIF will place the rights, needs and wishes of victims and survivors at the centre of reporting, investigation and response.
- e) **Risk management:** Identifying, assessing and managing risk, especially to vulnerable groups, is an integral part of all key business processes.
- f) **Culture:** It is important to GIF to implement an organisational culture that prioritises safeguarding, so that it is safe for those affected to come forward and report incidents and concerns with the assurance they will be handled sensitively and properly. GIF will take a zero-tolerance approach to ignoring, covering up or mishandling cases of harm or abuse of children or adults at risk.

6. Safeguarding Measures

- 6.1. GIF will promote the welfare of children and adults at risk we are in contact with, directly or indirectly, through the following measures.
- 6.2. **Safe recruitment:** When appropriate based on the role, GIF will carry out appropriate safe recruitment checks on Staff, including the highest level of criminal record check (or equivalent) that GIF is entitled at law to carry out for that role. This may mean carrying out a DBS (Disclosure and Barring Service) check or an equivalent check in a country outside the UK and will otherwise include all of the checks set out in GIF's relevant recruitment policies in relation to verifying appropriate candidates' identities, qualifications, obtaining references and considering gaps in employment history. All roles will be risk-assessed to determine if they are eligible for a DBS check and at what level. The level of the relevant check will depend on the nature of the activity being carried out by the Staff member and, in some cases, the site where the relevant activity is performed. For those positions where a DBS check is identified as necessary, all application forms, job adverts and recruitment briefs will contain a statement that an application for a criminal record check certificate will be submitted in the event of the individual being offered the position, together with requiring two formal written references from previous employers.
- 6.3. **Due Diligence:** GIF expects that the principles and approaches already shared with partnership organisations and grant recipients (for example, in the ESG policy) mean that they will fully support the values and commitments set out in this policy. GIF will carry out appropriate due diligence on all partners and grant recipients, ensuring they have appropriate controls and safeguarding measures in place (including relating to safe recruitment) and meet any applicable standards in carrying out their activities, and integrating safeguarding and onward reporting

requirements in partnership or funding-related agreements, taking account of the Charity Commission's guidance.

- 6.4. **Code of Conduct:** All GIF Staff and contractors are required to read, understand and sign the Safeguarding Code of Conduct (see Schedule 1). GIF will ensure all Staff are aware of this policy and their duties under it.
- 6.5. **Designated Safeguarding Officer and Lead Safeguarding Trustee:** The Chief of Staff will be the designated contact person for safeguarding issues at GIF (the **GIF Designated Safeguarding Officer** or **DSO**). The Deputy Designated Safeguarding Officer (**Deputy DSO** or **deputy**) will be the Chief Strategy and Legal Officer. The Safeguarding Lead Trustee will be the chairperson of the Human Resources Committee. The GIF DSO and Deputy DSO can be contacted at concerns@globalinnovation.fund.
- 6.6. **Staff education:** GIF will provide appropriate training to Staff on this policy and their duties and ensure that all Staff know how to recognise, respond to, report and record a concern in accordance with this policy. GIF will ensure the key individuals within GIF (the DSO, the Deputy DSO and the Safeguarding Lead Trustee) have appropriate training in order to appropriately lead on safeguarding.
- 6.7. **Communication guidelines and data protection:** GIF will ensure that the management of information, documentation and photography is handled in accordance with GIF's relevant data protection policies and privacy notices. In addition, the values of human dignity, respect and truthfulness underlie GIF's communications and guide internal policies and procedures.
- 6.8. **Reporting and responding to child and adult at risk protection concerns:** GIF requires that Staff immediately report concerns, suspicions, allegations and incidents that indicate actual or potential abuse of children or adults at risk to the DSO/Deputy DSO. Organisations receiving funding from GIF are also required to report to any such concerns to GIF. GIF takes seriously and promptly investigates all safeguarding concerns or allegations and takes appropriate action if this policy is not complied with. GIF reports safeguarding incidents, allegations or concerns to external authorities and regulators as appropriate and in accordance with applicable laws and best practice. Prior to making any such report, GIF will assess the risk associated with making the report, including the risks of further harm to individuals involved and other unintended consequences.
- 6.9. **Learning and improvement:** GIF will use the records of safeguarding incidents (including reports to the Board of Trustees) to learn lessons from past incidents/concerns and implement any learning points that arise, whether relating to how the incident was handled or to how to prevent it occurring in the first place.

7. Reporting Safeguarding Concerns

- 7.1. GIF is committed to providing safe, appropriate and accessible means for reporting safeguarding concerns raised by Staff, beneficiaries, GIF funding recipients, or other external sources such as members of the public or official bodies. GIF is also committed to responding effectively and sensitively to all allegations and suspicions of abuse.
- 7.2. A safeguarding concern may arise in several ways. For example:
 - a) you may witness abuse taking place;
 - b) a child or adult at risk may tell you that they have suffered harm;
 - c) you may notice behaviour which gives rise to a suspicion that a child or adult at risk has been harmed or is at risk of harm.
- 7.3. In line with GIF's principle of 'zero tolerance', it is essential that Staff immediately report any concerns, suspicions, allegations and incidents that indicate actual or potential abuse or issues

regarding the safety or welfare of a child or adult at risk to the DSO or deputy (including the possibility of GIF Staff, recipient organisations or members of the public posing a threat).

7.4. If someone tells you that they or a third party have been harmed or are at risk of harm:

- a) Listen carefully.
- b) Avoid asking detailed or leading questions, but do try to confirm basic information about who, when, where, what, but not why.
- c) Explain to them:
 - you (and GIF) take what they are saying seriously;
 - you cannot keep the information a secret and anything they say will likely need to be shared with others;
 - their report will only be shared on a need to know basis.
- d) **If you are concerned someone is at immediate risk**, assess the risk and use common sense to take steps to ensure the person is not in immediate danger. For example, it may be appropriate to contact local emergency medical services if the person needs immediate medical attention. Where possible, take all steps in consultation with the DSO.
- e) In most circumstances, you should not intervene directly to attempt to rescue someone in vulnerable circumstances (e.g. a victim of trafficking or someone who has expressed suicidal thoughts) or provide them with personal contact details, etc. You are not trained to do so, and you may put yourself or the other person in danger. In this circumstance, make clear that while you cannot personally intervene, you will contact someone at GIF who may be able to help. The DSO may be able to signpost to appropriate bodies and/or specialist organisations that are better able to help.
- f) Prepare a written record using the designated form in Schedule 3 and send that report to the DSO as soon as possible and no later than within 24 hours of being informed of the concern.
- g) To the extent that the DSO is unavailable or may have a conflict of interest or loyalty in relation to the matter, the Deputy DSO should be contacted in the alternative. If the Deputy DSO is also unavailable or may have a conflict of interest or loyalty, the Safeguarding Lead Trustee should be contacted.
- h) You **should not investigate** any safeguarding concern yourself, as you may cause further harm.

7.5. Confidentiality must be maintained at all stages. Reports must be shared only with the DSO, the Deputy DSO and the Safeguarding Lead Trustee. Information relating to the concern should not be shared with anyone else in GIF or externally. The DSO will share information on a limited 'need to know' basis only. The written report and all related documents must be kept confidential and secure.

7.6. This policy should not be used for complaints or concerns relating to your own personal circumstances, such as the way you have been treated at work and/or by colleagues, or information which relates to suspected wrongdoing, dangers at work, or general misconduct that does not relate to children and adults at risk. In those cases, you should use the grievance or anti-harassment policies set out in GIF's Employee Handbook or GIF's Whistleblowing Policy as appropriate. If you are uncertain whether something is within the scope of this policy you should seek advice from the DSO.

8. DSO Responsibilities Following Complaint

8.1. Subject to any specific advice or guidance that may be given by the relevant authorities, GIF's Designated Safeguarding Officer (or Deputy DSO) will take the following steps as appropriate:

- a) Clarify that the child or adult at risk is safe.
- b) Address any gaps in the information provided to the extent that it is appropriate to do so at that stage.
- c) For adults at risk (but not children), check that their views have been clearly sought and recorded and that they are aware what action will be taken. In the event that a person's wishes are being overridden, check that this is appropriate and that the adult understands why.
- d) If the report relates to a GIF funded organisation or other third party organisation, the DSO should, if it is appropriate and safe to do so, notify the safeguarding lead or other appropriate person in that organisation as soon as possible.
- e) Co-operate appropriately in the provision of information to any relevant local or international agencies, and assist any agency investigation to the fullest extent practicable. If criminal offending is apprehended or suspected, then escalation to the authorities must be a priority.

However, GIF notes that in some situations it may not be in the child or vulnerable adult's best interests to report to the local authorities (for example, if this could put them at risk of further harassment, victimisation or harm). In deciding when to report to local authorities, the alleged victim's best interests will be the overriding consideration and will always be paramount to any perceived loyalty to an alleged abuser, any political or financial expediency or in respect of GIF's reputation. All decisions in this regard must be carefully recorded, with reference to the matters taken into account.

- f) Decide who should inform the child/vulnerable adult's family or carer (if appropriate) and when they should be informed, taking advice from relevant authorities as appropriate.
- g) All disclosures to external agencies must be undertaken in accordance with the requirements of GDPR and other data protection legislation. It is noted that these requirements are not a barrier to the sharing of information, but a framework within which to do so.
- h) Liaise with the HR department, if necessary who may advise on whether information needs to be shared with any other member of staff e.g. in some circumstances the DSO may need to report to the manager of the team where the concern has arisen.
- i) Carry out any investigations in an objective, transparent manner which is guided by external professional expertise and support when required.

Under no circumstances should GIF undertake an investigation or take any action whatsoever before an initial report is made to the relevant authority (if appropriate per paragraph 8.1(e) above) and their advice is sought as to next steps. GIF will fully co-operate with relevant authorities and provide all reasonably practicable assistance during the course of any external authority's investigation. Staff must not do anything that may compromise any authority's investigation but must ensure that any immediate action required to remove the child/adult at risk from harm is sensitively taken.

- j) Consider whether any referral needs to be made to the Disclosure and Barring Service (or other appropriate agency) and keep this under review.
- k) The DSO must report to GIF's CEO and the Safeguarding Lead Trustee as appropriate (such as in an anonymised or pseudonymised format, if the context requires), to enable prompt and appropriate reporting of any serious incidents to the Board of Trustees, Charity Commission and/or insurers and/or donors.¹ Any serious incident reports to the Charity Commission will be made by the Company Secretary in consultation with the Safeguarding Lead Trustee and on behalf of, and copied to, the Board.

¹ Refer to the Charity Commission's serious incident guidance for more information: <https://www.gov.uk/guidance/how-to-report-a-serious-incident-in-your-charity>. The Commission has also published supplementary guidance setting out its expectations in relation to reporting incidents in partner organisations: <https://www.gov.uk/guidance/reporting-a-serious-incident-in-your-charity-when-it-involves-a-partner>.

- l) If necessary and appropriate, plan what to say to individuals/organisations connected to GIF and to the media and liaise with any relevant stakeholders as required (e.g. the Communications Team). It is noted that any external communications should be as open and transparent as possible, while suitably respectful of data privacy.
- m) Safeguarding reports and notifications received from GIF funded organisations must also be reported to the CEO and Safeguarding Lead Trustee.
- n) Record the information received and all actions and decisions.

9. Supporting Those Involved in Safeguarding Matters

- 9.1. The welfare of a child or adult at risk is of prime importance to GIF. If any abuse is proven or suspected by GIF Staff in connection with GIF activities, every practicable effort is to be made to assist the child/adult at risk in coping with any trauma or guilt he or she may be experiencing. This may include psychological counselling or another form of assistance deemed necessary and appropriate.
- 9.2. GIF will ensure that the DSO will be available to support children, adults at risk, Staff and other relevant persons concerning issues of actual or potential abuse, and disclosure of the same. The DSO (and Deputy DSO) will receive appropriate training and support for this role.
- 9.3. We aim to encourage openness and will support Staff and contactors who raise genuine concerns under this policy, even if they turn out to be mistaken. However, any staff member found to have made false accusations maliciously will face disciplinary action. GIF (or contracting organisations) may take legal or other appropriate action in the circumstances.

10. Risk Management

- 10.1. GIF already operates extensive risk management processes to make sure that a wide range of risks across GIF are addressed. Through the safeguards in this policy (as well as the ESG Policy, which specifies safeguards for GIF recipient organisations that receive GIF funding), GIF will work to assess and mitigate harm to children and adults at risk through GIF-funded activities. Where appropriate, assessing and mitigating the risk of harm to children and adults at risk as a result of any GIF funded activity is incorporated into GIF's organisational and portfolio risk registers. Additionally, the Board receives a quarterly report from the DSO and Deputy DSO covering recent safeguarding concerns and related issues. This will enable the Trustees to identify common concerns and any risks or gaps that need to be addressed.

11. Associated Policies

- 11.1. This policy specifically relates to safeguarding children and adults at risk and does not cover treatment of staff, volunteers, beneficiaries, or others who come into contact with GIF who are not children or adults at risk.
- 11.2. The following other GIF policies and procedures may need to be consulted in relation to a safeguarding concern, as relevant in the circumstances:
 - a) Whistleblowing Policy;
 - b) ESG Policy;
 - c) various data protection policies and privacy notices;
 - d) GIF Employee Handbook, including sections on:
 - bullying and harassment;
 - health and safety;
 - disciplinary policy;
 - grievance procedure.

SCHEDULE 1

SAFEGUARDING CODE OF CONDUCT

Part A: Preamble

This Code of Conduct (**Code**) provides expected standards of behaviour of GIF Staff and GIF contractors towards children and adults at risk such that any contact is positive and appropriate and keeps children and adults at risk safe.²

The principle is that Staff and contractors should avoid actions or behaviour that may constitute poor practice or potentially offensive, harmful or abusive behaviour, as well as being open and transparent such that actual or potential breaches of the Code may be challenged.

The Code applies to conduct in the professional role, but GIF expects everyone to also apply these good practice principles in their personal lives as well. **In situations where GIF Staff are making project site visits and staying in communities that are not their own, they will never be entirely 'off duty' and so high standards of behaviour must still be observed.**

For example, if concerns arise regarding a Staff member's behaviour outside their professional role towards a child or adult at risk that would constitute a breach of the GIF Safeguarding Policy and this Code, the matters will be treated very seriously and GIF may consider follow up action, including possible disciplinary action.

Child and adult at risk protection in the context of the Safeguarding Policy and this Code refers to the responsibility of individuals working with children and adults at risk to take all reasonable measures such that the risks of harm to the welfare of children and adults at risk are minimised and, where there are concerns about the welfare of children, young people and adults at risk, to take appropriate actions to address those concerns, working to agreed local policies and procedures and in partnership with other local agencies.

In addition, it incorporates our responsibility to make sure that where there are concerns over the welfare of a child or adult at risk or where a child or adult at risk has been subject to abuse, actions are taken to address this, i.e. concerns are reported and responded to appropriately in line with the relevant global and local procedures, whether the abuse may have happened within or external to our organisation.

Part B: Behaviour and Conduct

When working with children and adults at risk **GIF STAFF MUST ALWAYS:**

- treat children and adults at risk with respect regardless of race, colour, gender, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status;
- avoid working alone with children or adults at risk and plan your work so that at least two adults are present at any time³;
- avoid inappropriate physical contact with a child or adult at risk⁴;

² This code of conduct applies to GIF Staff only. The ESG Policy specifies safeguards for GIF recipient organisations that receive GIF funding.

³ If working alone is unavoidable, you should move to an area where other adults can see both you and the child/adult at risk.

⁴ If a child is hurt or distressed, do your best to comfort or reassure her/him without compromising her/his dignity or doing anything to discredit yourself. Aim to understand local norms around physical contact between children and adults and make sure that any appropriate physical contact, such as holding hands, is initiated by the child. Cease any physical contact that appears to make the child and/or others around the child feel uncomfortable.

- behave appropriately; make sure that language is moderated in their presence and refrain from jokes or comments that may cause discomfort or offence;
- be sensitive to local norms and standards of behaviour towards children and adults at risk;
- conduct interactions with children and adults at risk that are safe, appropriate and sensitive to the feelings of the child or adult at risk;
- be aware of situations that may present risks and manage these;
- be familiar with the procedures for reporting concerns or incidents at GIF and the recipient organisation with which you are working, including how to contact the GIF Designated Safeguarding Officer and any equivalent at the recipient organisation; and
- immediately report any concerns relating to the safety or welfare of a child or adult at risk you are in contact with to the GIF Designated Safeguarding Officer.

When working with children and adults at risk **GIF STAFF MUST NEVER:**

- hit or otherwise physically assault, harm or abuse them;
- develop physical/sexual relationships with them;
- develop relationships with them that could in any way be deemed exploitative or abusive;
- act in ways that may be abusive or may place them at risk of abuse;
- use language, make suggestions or offer advice that is inappropriate, offensive or abusive;
- behave verbally or physically in a manner that is inappropriate or sexually provocative;
- have a child or adult at risk with whom you are working stay overnight at your home or other personal accommodation in which you are staying;
- do things for a child or adult at risk of a personal nature that they can do for themselves;
- condone, or participate in, behaviour of a child or adult at risk that is illegal, unsafe or abusive;
- act in ways intended to shame, humiliate, belittle or degrade children or adults at risk, or otherwise perpetrate any form of emotional abuse, discriminate against, show differential treatment, or favour particular children or adults at risk to the exclusion of others;
- allow allegations made by a child or adult at risk or concerns expressed by others about their welfare, to go unrecorded or not acted upon;
- use any computer or other electronic device to view, download, distribute or create indecent or inappropriate images of children or adults at risk; or
- hire children for domestic or other labour which is inappropriate given their age or developmental stage, which interferes with their time available for education and recreational activities, or which places them at significant risk of injury.

Staff are also prohibited from carrying out any actions constituting sexual exploitation, abuse or harassment as defined in the Safeguarding Policy and GIF also agrees with the following principles on the prevention of sexual exploitation and abuse:

- Sexual exploitation and abuse by Staff constitute acts of gross misconduct and are therefore grounds for termination of employment and/or contract.
- Sexual activity with children or adults at risk is prohibited regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of a child or adult at risk is not a defence.
- Exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour, is prohibited, even if

paying for sex is legal in a country in which Staff are working. This includes exchange of any assistance that is due to children and adults at risk with whom we work.

- Sexual relationships between Staff and beneficiaries are strongly discouraged, as well as other relationships that are based on inherently unequal power dynamics.
- Staff who have concerns or suspicions regarding sexual abuse or exploitation by a fellow Staff member or worker from a related organisation must report such concerns.
- Staff are obliged to create and maintain an environment that prevents sexual exploitation and abuse and promotes the implementation of this Code. Managers at all levels have particular responsibilities to support and develop systems and culture that maintain this environment.

Part C: Recognising the Signs of Harm and Abuse

Recognising the occurrence or risk of harm is not always easy and it is not GIF's responsibility to decide whether harm has occurred. However, it is GIF's responsibility to look out for signs of abuse and act if there are any concerns.

You should therefore ensure you are aware of the risks of harm/abuse which include (Note: The below does not constitute an exhaustive list of abuse and its indicators):

- **physical abuse:** including hitting, slapping, punching, burning, misuse of medication, inappropriate restraint;
- **domestic abuse:** including psychological, physical, sexual, financial, or emotional abuse. It also covers so-called 'honour' based violence;
- **sexual abuse:** including rape, indecent assault, inappropriate touching, exposure to pornographic material, abuse of a position of trust;
- **psychological or emotional abuse:** including belittling, name calling, threats of harm, intimidation, isolation;
- **financial or material abuse:** including stealing, selling assets, fraud, misuse or misappropriation of property, possessions or benefits;
- **modern slavery:** covering slavery (including domestic slavery), human trafficking and forced labour. Traffickers and slave masters use whatever they can to pressurise, deceive and force individuals into a life of abuse and inhumane treatment;
- **neglect and acts of omission:** including withholding the necessities of life such as medication, food or warmth, ignoring medical or physical care needs;
- **self-neglect:** covering a wide range of behaviour which shows that someone isn't caring for their own personal hygiene, health or surroundings. It includes behaviour such as hoarding;
- **discriminatory abuse:** including racist, sexist, that based on a person's disability and other forms of harassment, slurs or similar treatment;
- **institutional or organisational abuse:** including regimented routines and cultures, unsafe practices, lack of person-centred care or treatment;
- **extremism and radicalisation;**
- **forced marriage;**
- **human trafficking;**
- **female genital mutilation;**
- **commercial exploitation;**

- **bullying or harassment** (including cyber abuse).

Abuse may be carried out deliberately or unknowingly. Abuse can be a one-off incident or repeated on-going ill treatment. People who behave abusively come from all backgrounds and walks of life. They may be in a senior position of trust, or an individual whose role means they only have menial responsibilities. They may also be relatives, friends, neighbours or people who are benefitting from the same GIF funded programme as the person experiencing abuse.

It may not always be easy to identify signs of abuse but the following are some significant ones to be aware of:

- unexplained bruising or injuries;
- sexually explicit language or behaviour, inappropriate to age or development;
- sudden changes in behaviour e.g. becoming withdrawn or aggressive;
- comments or disclosure by a child or vulnerable adult;
- a noticeable change over a period of time such as weight loss, poor hygiene or unkempt appearance;
- signs of bullying or intimidation.

Part D: Declaration

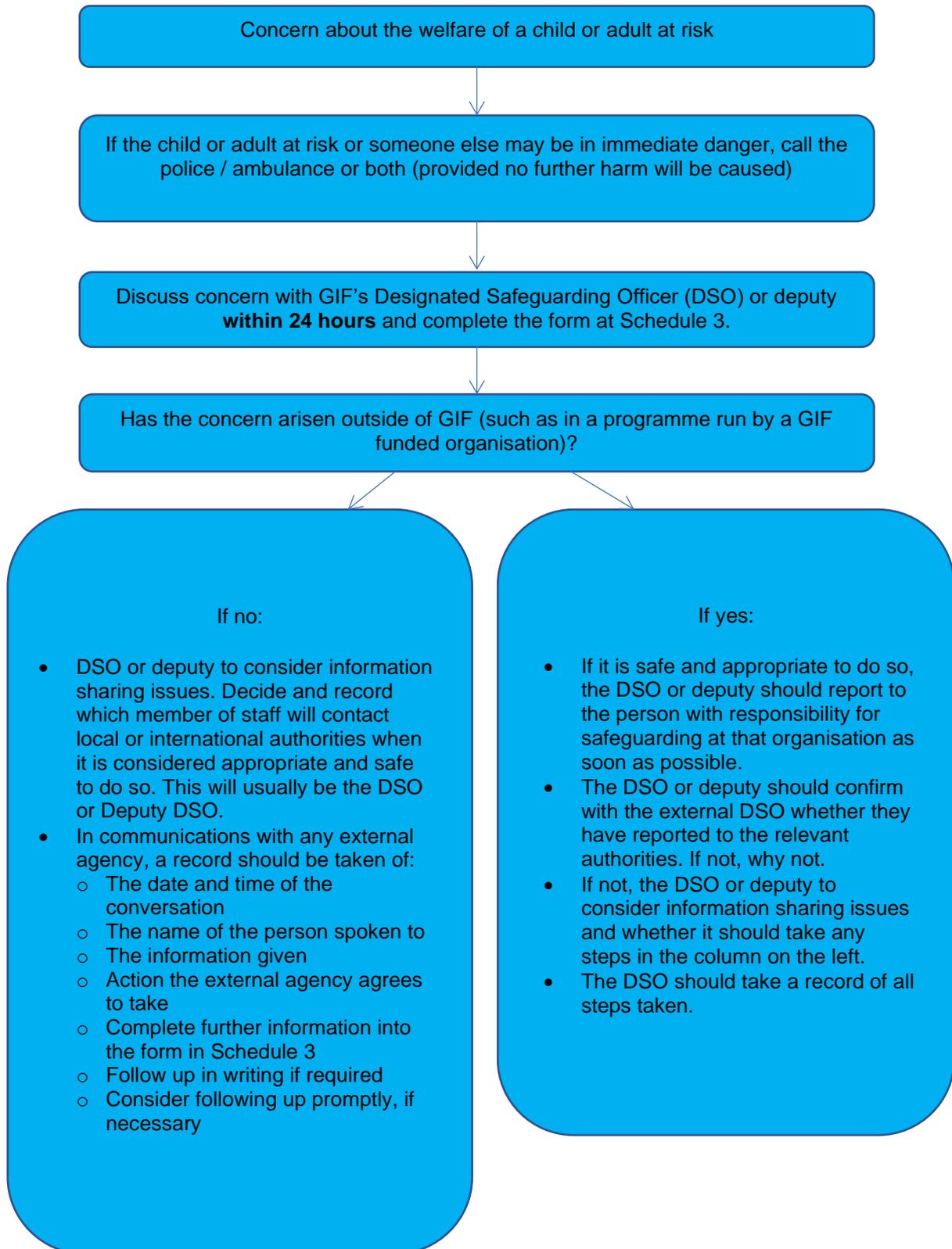
I _____ fully understand and agree to abide by the above Safeguarding Code of Conduct and GIF's Safeguarding Policy (as amended from time to time). I understand that any breaches of the above Code and/or the Policy will be reported to the GIF Designated Safeguarding Officer (or deputy) and appropriate action will be taken in accordance with the relevant policies and procedures.

In addition, I confirm that there is no reason why I should be excluded from working with children and adults at risk.

Signature: _____ **Date:** _____

SCHEDULE 2

REPORTING PROCEDURE DIAGRAM (Read in conjunction with sections 7 and 8 above)



SCHEDULE 3
REPORT FORMAT

Part One: About You	
Name	
Your role in or relationship to GIF	
Details of any other organisation involved	
Your relationship to the child/children or adult(s) at risk concerned	
Part Two: About the Child/Children or Adult(s) at Risk	
Name(s)	
Gender	
Age	
Address	
Who does the child or adult at risk live with?	
Part Three: About Your Concern	
How did you come to have a concern - was abuse observed, suspected or disclosed? Was an allegation made?	
Date, time and place of any incident(s)	
Details of any alleged offender, i.e. name, nationality, occupation	
Nature of concern/allegation	
Observations made by you (e.g. reporter's emotional state, any physical evidence)	
Write down exactly what the child or adult at risk said and what you said. Continue on a separate sheet if necessary	
Any other relevant	

information? (E.g. disability? Language?)	
Were other children or adults at risk involved or aware?	
Have you reported to parents or carers or any other staff or Agencies, e.g. police?	
<i>If yes:</i>	
Time and date of reporting	
Person(s) to whom report was made	
Advice given	
Action taken	
Official: To be completed by the DSO or Deputy DSO	
Action taken (e.g. reports to relevant authorities; parent/carer informed)	
Date reported to CEO and/or Safeguarding Lead Trustee (if appropriate)	
Any follow up actions required	

SCHEDULE 4

TEXT SUMMARISING SAFEGUARDING AND WHISTLEBLOWING PROCEDURE ON GIF'S WEBSITE

Reporting Concerns

Last updated: March 2021

At Global Innovation Fund, we are committed to carrying out our work ethically, responsibly and sustainably and to maintaining the highest possible standards of honesty, integrity and transparency.

We encourage any person (including GIF staff or those working with GIF or with GIF-funded organisations) to report concerns they may have about the conduct of GIF, its staff or representatives, or about GIF-funded organisations. The below information provides guidance about the types of concerns that should be reported and how reports can be made.

Whistleblowing

Although we expect all GIF staff and organisations funded by GIF to maintain high standards of behaviour and integrity, we understand that all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. We strive to maintain a culture of openness and accountability in order to prevent such situations occurring and to assist us in addressing them if they do occur.

Our Whistleblowing Policy encourages GIF staff to report any suspected wrongdoing as soon as possible, reassures employees that genuine concerns can and should be raised without fear of reprisal and sets out the process for reporting and investigating concerns. GIF equally welcomes reports from outside of the organisation, in relation to GIF and those it funds, to allow appropriate action to be taken promptly.

A whistleblowing concern could relate to (but is not limited to): criminal activity; failure to comply with any legal or professional obligation or regulatory requirements; miscarriages of justice; danger to health and safety; damage to the environment; bribery; fraud or financial mismanagement; conduct likely to damage GIFs reputation or financial wellbeing; unauthorised disclosure of confidential information; negligence; and/or the deliberate concealment of any of these matters.

If you are not a GIF employee, but suspect wrongdoing and/or have concerns about the conduct of a GIF staff member or representative or a GIF-funded organisation or project, please report your concerns to the Whistleblowing Officer using the contact details below.

We do not encourage people to make disclosures anonymously, as proper investigation may be more difficult or impossible if we cannot obtain further information from you. However, if you want to raise your concern confidentially, we will make every effort to keep your identity secret.

Safeguarding

We fund the work of other organisations through direct investments rather than directly carrying out any humanitarian aid or other front-line functions ourselves. We are committed to proactively safeguarding and promoting the welfare of GIF's beneficiaries and staff and to taking reasonable steps to ensure those who come into contact with GIF and/or GIF-funded programmes do not, as a result, come to harm.

Our policy commitments and safeguarding processes that are designed to protect children and adults at risk are set out in our Safeguarding Policy.

As part of this policy, all GIF staff and contractors are required to comply with our Safeguarding Code of Conduct. In addition, we require all investees and contractors engaging in GIF-funded activities to

work in ways that are consistent with best practice, relevant local laws and the safeguarding principles and practices described in our Safeguarding Policy.

Our Safeguarding Policy requires GIF staff and contractors to report immediately any concerns they may have regarding the safety and welfare of a child or vulnerable adult they are in contact with, either directly or indirectly. This includes any suspicions or concerns that a child or vulnerable adult has been or may be subject to abuse, exploitation, neglect or other harm by a GIF staff member or in connection with a GIF-funded organisation or project (including suspected historical abuse).

Even if you do not work at GIF, if you are concerned about the treatment of a child or vulnerable adult in connection with GIF or a GIF-funded project, or if you are concerned that a GIF staff member may have failed to comply with the GIF's Safeguarding Policy or Safeguarding Code of Conduct, please report your concerns as soon as possible to the GIF Designated Safeguarding Officer (**DSO**) using the contact details set out below.

Please do not investigate the suspicion or allegation yourself and ensure that information is shared strictly on a need to know basis. We will treat all concerns seriously and take appropriate steps, such as informing the relevant authorities, removing any person from a risk of harm and/or collating required information.

Contact Information

The GIF Whistleblowing and Designated Safeguarding Officer (**DSO**) is Garreth Spillane, Chief of Staff and the Deputy Designated Safeguarding Officer (**Deputy DSO**) is Amelie Baudot, Chief Strategy and Legal Officer. GIF's designated email address for reporting concerns is concerns@globalinnovation.fund, to which the GIF Whistleblowing Officer and DSO and the Deputy DSO have access, and this should be your first point of contact.

The GIF Safeguarding Lead Trustee (the Trustee Board member who has oversight of safeguarding arrangements and who ensures that the Board is aware of safeguarding/whistleblowing matters as appropriate) is the chair of the Human Recourses Committee, Katie Kaufman.

If you are not comfortable with submitting your report via email to that address, please call 0207 971 1078 and ask to speak with the relevant person (without giving any details about the purpose of the call to the person who answers the phone).

If you are unsure which policy applies to your concern or have any feedback about our safeguarding and/or whistleblowing policies, please contact the GIF DSO/Whistleblowing Officer via concerns@globalinnovation.fund.

Please do share any information with us that can assist us in securing the safety of our beneficiaries, staff and those who come into contact with our charity and the projects it funds.