

SAFEGUARDING POLICY

Policy Owner:	General Counsel
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Review Schedule:	Annually by the Board
Date of Most Recent Review:	March 2024
Date of Next Review:	March 2025

1. Introduction

- 1.1. Global Innovation Fund (**GIF**) is committed to proactively safeguarding and promoting the welfare of its 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. 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 are unlikely to come into direct contact with the ultimate beneficiaries of GIF funding. Regardless, this policy sets out the high safeguarding standards that GIF expects of its Staff, as well as its Partners, and that must govern any action taken by Staff. GIF is committed to ensuring a robust culture of safeguarding is embedded at all levels of its organisation.
- 1.3. GIF's wider safeguarding and protection measures are also implemented through the following GIF policies and procedures, which may need to be consulted in relation to a safeguarding concern, as relevant in the circumstances:
 - a) Whistleblowing Policy;
 - b) Environmental, Social Responsibility and Governance Policy (**ESG Policy**);
 - c) Anti-Corruption and Integrity Policy
 - d) Data Protection Policy and privacy notices;
 - e) GIF Employee Handbook, including sections on:
 - i. bullying and harassment;
 - ii. health and safety;
 - iii. disciplinary policy; and
 - iv. grievance procedure.
- 1.4. Questions in relation to this policy should be directed to the General Counsel (or the appropriate senior representative of the Legal Team) 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, interns and representatives) of GIF (**Staff**).
- 2.2. The ESG Policy and Recipient Code of Conduct sets out GIF's requirements of recipient organisations in ensuring the safety and protection of the beneficiaries of 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 a safeguarding incident). 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 (**DSO**).
- 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 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 Schedule 1, 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.

Partner means any organisation which receives funding from GIF, which collaborates with GIF to deliver GIF-funded programmes or activities, or which is otherwise associated with GIF's name and brand. This policy is intended to work alongside the equivalent policies of GIF's Partners, where appropriate. GIF expects that the principles and approaches already shared with Partners mean that they will fully support the values and commitments set out in this policy and will comply with the safeguarding provisions in the written agreement between the Partner and GIF].

Safeguarding means the range of measures in place to protect the people who come into contact with GIF through its work from abuse and mistreatment of any kind (including neglect). While safeguarding principally refers to the prevention of harm and abuse, it also encompasses practices to handle incidents and/or complaints.

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.

Serious incident means an adverse event, whether actual or alleged, which results in or risks significant:

- (a) harm to GIF's beneficiaries, Staff, volunteers or others who come into contact with GIF through its work;

- (b) loss of GIF's money or assets;
- (c) damage to GIF's property; or
- (d) harm to GIF's work or reputation.

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 those who come into contact with GIF and its work. It recognises, in particular, that children and adults at risk may be at risk of harm in a variety of ways. GIF also recognises 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 all those 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 underpin GIF's approach to safeguarding in all its work, including in its investment due diligence, contracting, monitoring and safety management:
 - a) **Zero tolerance:** We have zero tolerance of abuse or harm to any person who comes into contact with GIF or an organisation funded by GIF.
 - b) **Collective responsibility:** Safeguarding 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 (see paragraph 6.5 below) is 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 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, adults at risk and any other beneficiary or potential beneficiary of GIF or GIF-funded programmes are the paramount consideration in any decision-making that affects them and where possible, working in partnership with children, adults at risk, carers, other beneficiaries 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.

6. Safeguarding Measures

- 6.1. GIF will promote the welfare of all those it comes into contact with 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 Partners 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 Partner 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 Safeguarding Lead Trustee:** The GIF Designated Safeguarding Officer will be the designated contact person for safeguarding issues at GIF (the **GIF Designated Safeguarding Officer** or **DSO**), and will be supported by the Deputy Designated Safeguarding Officer (**Deputy DSO**). These individuals will be appropriate members drawn from the legal, ESG and/or executive teams of GIF. 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 safeguarding concerns:** GIF requires that Staff immediately report safeguarding concerns, suspicions, allegations and incidents to the DSO/Deputy DSO. As per their requirements in the Recipient Code of Conduct, organisations receiving funding from GIF are also required to report 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 person may tell you that they have suffered harm;
 - c) you may notice behaviour which gives rise to a suspicion that someone coming into contact with GIF has been harmed or is at risk of harm as a result of that contact.
- 7.3. However, in the context of GIF's work, it is much more likely that a safeguarding concern will be reported by a GIF-funded organisation, either in the aftermath of a safeguarding incident or in the regular reports GIF requires organisations to submit to it. This section is designed with that in mind.
- 7.4. In line with GIF's principle of 'zero tolerance', it is essential that, upon becoming aware of a safeguarding concern by any means, Staff immediately report any concerns, suspicions, allegations and incidents that indicate actual or potential safeguarding issues to the DSO or Deputy DSO (including the possibility of GIF Staff, recipient organisations or members of the public posing a threat).
- 7.5. **If you as a member of Staff are informed by a GIF-funded organisation that someone coming into contact with their work has been harmed or is at a risk of harm (or you have concerns or suspicions that this might be the case):**

- a) Immediately notify the DSO (or, the extent that the DSO is unavailable or may have a conflict of interest or loyalty in relation to the matter, the Deputy DSO; if the Deputy DSO is also unavailable or may have a conflict of interest or loyalty, the Safeguarding Lead Trustee should be contacted).
 - b) Prepare a written record using the designated form in Schedule 2 and send that report to the DSO as soon as possible.
 - c) In consultation with the DSO/other appropriate person, communicate with the notifying organisation to address any gaps in the information provided to the extent that it is appropriate to do so at that stage.
 - d) The DSO/other appropriate person will then take appropriate action, as outlined in paragraph 8.1 below.
- 7.6. 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. Any written report and all related documents must be kept confidential and secure.
- 7.7. In paragraph 7.5 above, harm or risk of harm includes historical harm or risk of harm.

8. DSO Responsibilities Following Complaint

- 8.1. Subject to any specific advice or guidance that may be given by the relevant authorities, GIF's DSO or Deputy DSO will take the following steps as appropriate:
- a) 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 (if they are not already aware). The DSO or Deputy DSO should confirm with the external DSO whether they have reported to the relevant authorities. If not, it should be ascertained why not and whether such reporting should be made by GIF or the third-party organisation.
 - b) Clarify that the subject(s) of the report is/are safe from immediate danger.
 - c) Address any gaps in the information provided to the extent that it is appropriate to do so at that stage. Schedule 2 should be referred to as a quick reference guide for the types of information that should be sought.
 - d) For adults (including adults at risk), 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.
 - 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 suspected, then escalation to the authorities must be a priority.
 - f) However, GIF notes that in some situations it may not be in someone'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.

- g) If the report relates to a child/adult at risk, and their family/families or carer/carers have not been informed, decide who should inform the child's/adults at risk's family/families or carer/carers (if appropriate) and when they should be informed, taking advice from relevant authorities as appropriate.
- h) 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.
- i) In the case where the report does not relate to a GIF-funded organisation, 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.
- j) Carry out any investigations in an objective, transparent manner which is guided by external professional expertise and support when required.
- k) Under no circumstances should GIF undertake an investigation outside the scope of its rights and obligations under the agreements and policies that govern its grant-making 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 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.
- l) Consider whether any referral needs to be made to the Disclosure and Barring Service (or equivalent or other appropriate agency) and keep this under review.
- m) 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 serious incidents to the Board of Trustees, Charity Commission and/or external authorities (as appropriate) and/or insurers and/or donors. Schedule 5 should be referred to as a quick reference guide for incidents that are potentially reportable to the Charity Commission, and the DSO should be aware of this when reporting to the CEO and the Safeguarding Lead Trustee. Any serious incident reports to the Charity Commission will be made by the Company Secretary in consultation with, and with the approval of, the Safeguarding Lead Trustee and on behalf of the Board. Decisions to report to external authorities (including reports to local law enforcement agencies outside of the UK) will be fully risk assessed and anonymisation/pseudonymisation considered when necessary. The Board will receive a copy of all serious incident reports submitted to the Charity Commission and other external authorities in other countries and any updates thereto in its quarterly safeguarding update.
- n) 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.
- o) Record the information received and all actions and decisions.

9. Supporting Those Involved in Safeguarding Matters

- 9.1. The welfare of those it comes into contact with is of prime importance to GIF. If any abuse is proven or suspected in connection with GIF or GIF-funded activities, every practicable effort is to be made to assist the alleged victim in coping with any trauma or guilt they may be experiencing. This may include psychological counselling or another form of assistance deemed necessary and appropriate, funded by GIF.

- 9.2. GIF will ensure that the DSO will be available to support anyone affected by issues of safeguarding. The DSO (and Deputy DSO) will receive appropriate training and support for this role.
- 9.3. We aim to encourage openness and will support those 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 GIF-funded 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 through GIF-funded activities. Where appropriate, assessing and mitigating the risk of harm 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.

SCHEDULE 1

SAFEGUARDING CODE OF CONDUCT

Part A: Preamble

This Code of Conduct (**Code**) provides expected standards of behaviour of GIF Staff towards those who come into contact with GIF through its work such that any contact is positive and appropriate and keeps everyone safe.¹

The principle is that Staff 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 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

GIF STAFF MUST ALWAYS:

- treat everyone 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 time;
- avoid inappropriate physical contact;
- behave appropriately; make sure that language is moderated and refrain from jokes or comments that may cause discomfort or offence;

¹ This code of conduct applies to GIF Staff only. The ESG Policy and Recipient Code of Conduct specifies safeguards for GIF recipient organisations that receive GIF funding.

- be sensitive to local norms and standards of behaviour;
- conduct interactions that are safe, appropriate and sensitive to the feelings of the person(s) in question;
- 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 safeguarding concerns relating to the safety or welfare of a person you are in contact with to the GIF Designated Safeguarding Officer.

GIF STAFF MUST NEVER:

- hit or otherwise physically assault, harm or abuse anybody;
- develop physical/sexual relationships with children or adults at risk;
- develop relationships that could in any way be deemed exploitative or abusive;
- act in ways that may be abusive or may place anyone 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 person with whom you are working of a personal nature that they can do for themselves;
- condone, or participate in, behaviour that is illegal, unsafe or abusive;
- act in ways intended to shame, humiliate, belittle or degrade those with whom you are working, or otherwise perpetrate any form of emotional abuse, discriminate against, show differential treatment, or favour particular persons to the exclusion of others;
- allow safeguarding allegations to go unrecorded or not acted upon;
- use any computer or other electronic device to view, download, distribute or create indecent or inappropriate images;
- 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;
- offer cigarettes or alcohol to children or adults at risk;
- show favouritism towards particular beneficiaries in GIF's activities; or
- give personal gifts or cash to beneficiaries.

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 those with whom we work.
- Sexual relationships between Staff and other 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;
- 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 DSO) 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

TEMPLATE - REPORT TO THE DESIGNATED SAFEGUARDING OFFICER

Part One: About You	
Name	
Your role in or relationship to GIF (if externally reported, include your relationship to the reporter, eg. portfolio manager)	
Your relationship to the person(s) concerned (if any)	
Part Two: About the reporter (if externally reported)	
Name	
Organisation (if any)	
Relationship to the person(s) concerned (if any)	
Part Three: About the subject of the safeguarding concern	
Name(s)	
Gender	
Age	
Address	
If a child or adult at risk, who do they live with?	
Part Four: About the concern itself	
<p>Notification</p> <p>How did you/the reporter come to have a concern – was abuse observed, suspected or disclosed? Was an allegation made?</p> <p>If externally reported, how (and how long after the incident) did the reporting organisation contact you?</p>	
<p>Location</p> <p>Date, time and place of any incident(s)</p>	

Offender Details of any alleged offender, i.e. name, nationality, occupation	
Incident details Nature of concern / allegation (include details of the incident)	
Evidence of allegation eg. Any physical evidence, observations made by you/the reporter, subject of concern's emotional state	
Correspondence Write down exactly what was said by all involved, or if externally reported, save correspondence with reporter and insert links here	
If externally reported:	
Immediate action taken by reporting organisation	
Follow-on action taken (or to be taken) by organisation (ie. measures to prevent future incidents happening such as trainings, change in policies, etc.)	
Other:	
Any other relevant information? (E.g. disability? Language?)	
Were any (other) children or adults at risk involved or aware?	
Have you/the reporter 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	
Any follow up actions required	

SCHEDULE 3

TEMPLATE - DSO CHECKLIST

Dealing with a Safeguarding Incident: Designated Safeguarding Officer (DSO) Checklist

(Paragraph 8 of the Safeguarding Policy)

This document forms part of the record of the actions and decisions of GIF's Designated Safeguarding Officer in respect of any report of an actual or potential safeguarding incident for the purpose of paragraph 8.1(n) of the Safeguarding Policy. It will be updated regularly as the DSO deals with the report.

Note that all internal and external reports and disclosures must be made in the appropriate manner (such as in an anonymised or pseudonymised format) and in compliance with GDPR.

Incident: [insert]

Initial Report to DSO: Here [insert link]

Checklist and record of steps taken (to be updated regularly):

Paragraph 8	N/A or Relevant Actions
(a) Communication with external organisation: Notify the safeguarding lead or other appropriate person in that organisation as soon as possible.	
(b) Safety of victim: Clarify the child or adult at risk is safe.	
(c) Information: Address gaps in information.	
(d) Communicate with victim: For adults at risk (but not children), check that their views have been obtained and that they are aware of actions to be taken. In the event that a person's wishes are being overridden, check that this is appropriate and that the adult understands why. (see also paragraph (f))	
(e) Report to local authorities: Report to appropriate local authorities or international agencies as appropriate. In case of suspected criminal offending, report to authorities ASAP unless it is	

<p>not in the child's or adult's at risk best interests (eg. if it could put them at risk of further harm).</p> <p>Record the factors considered in making this decision.</p> <p>(see also paragraph (h))</p>	
<p>(g) Inform family:</p> <p>If the report relates to a child/adult at risk, and their family or carer have not been informed, decide who should inform the child/ adult's at risk family or carer (if appropriate).</p>	
<p>(i) Reporting to GIF staff:</p> <p>Internal incidents: Discuss with HR whether any GIF staff members should be informed, eg. the manager of the team where the concern has arisen.</p> <p>External incidents: Inform the relevant deal team or other staff as necessary.</p>	
<p>(j) / (k) Investigations:</p> <p>Ensure GIF cooperates with any external agency's investigation and any GIF-led investigations are objective and transparent and guided by external professional expertise.</p> <p>GIF will not investigate or take any action whatsoever before reporting to the authorities (if appropriate) and the authorities have advised on next steps.</p> <p>GIF 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.</p>	
<p>(j) DBS:</p> <p>Consider whether any referral needs to be made to the Disclosure and Barring Service (or other appropriate agency) and keep this under review.</p>	
<p>(m) GIF reporting:</p> <p>Report to GIF's CEO and Safeguarding Lead Trustee.</p> <p>Consider whether a serious incident should be reported to the Charity</p>	

<p>Commission. If so, the Company Secretary will do so promptly in consultation with the Safeguarding Lead Trustee and on behalf of, and copied to, the Board.²</p> <p>Consider whether GIF needs to inform its donors.</p> <p>Consider whether GIF needs to inform its insurers.</p>	
<p>(o) Media:</p> <p>Consider whether any communication needs to be made to the media. Any external communications will be open and transparent, subject to data privacy.</p>	

² 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>.

SCHEDULE 4

TEXT SUMMARISING SAFEGUARDING AND WHISTLEBLOWING PROCEDURE ON GIF'S WEBSITE

Reporting Concerns

Last updated: March 2024

At GIF, 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 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 staff that genuine concerns can and should be raised without fear of reprisal, and sets out the process for reporting and investigating concerns.

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; facilitation of tax evasion; financial fraud or 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.

Although GIF's Whistleblowing Policy only applies to GIF's staff, 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.

If you are not a GIF staff member, 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 and Designated Safeguarding Officer using the contact form 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.

Important: GIF staff and representatives will never ask you for money or personal information in exchange for awarding you a grant. If you receive a communication from a person who is unknown to you and claims to be from GIF, informing you that you have been awarded a grant and asking you for money or personal data in order to unlock the grant, this may be fraudulent. We recommend you do not respond and report the communication to your local authorities. All legitimate GIF staff are listed on GIF's website and funding applicants will be in contact with GIF staff for several weeks, including through email and formal video calls, before receiving notice of GIF's decision to fund.

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 are set out in our Safeguarding Policy.

As part of this policy, all GIF staff 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 to immediately report any concerns they may have regarding the safety and welfare of those GIF comes into contact with, either directly or indirectly. This includes any suspicions or concerns that a person 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 a person's treatment 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 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 form 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 Cillian Moynihan, General Counsel. 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.

Please use the form below if you suspect wrongdoing and/or have concerns about the conduct of a GIF staff member or representative or a GIF-funded organisation or project.

SCHEDULE 5

CHARITY COMMISSION SERIOUS INCIDENT REPORTING PROCEDURE³

WHERE GIF IS NOTIFIED OF AN INCIDENT AT A PORTFOLIO COMPANY

1. **Internal Assessment:** If GIF would have reported the incident if it had happened internally, it should *carefully consider* reporting the incident.

2. **Reputational Assessment:** where the partner uses GIF's branding to the extent that the public may identify them as the same entity, there may be a *significant impact on GIF's reputation* because the public may not distinguish between the two organisations.

KEY CONSIDERATIONS:

Whether the incident poses a significant **(a) reputational risk**, and/or **(b) impact on GIF's ability to deliver services to its beneficiaries**

³ 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 Charity 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>. Remember, there may be other agencies to which an incident should be reported in addition to, or instead of, the Charity Commission.

IS THE INCIDENT REPORTABLE?

YES:

DSO or Deputy DSO in consultation with the Safeguarding Lead Trustee will notify the Charity Commission via its serious incident reporting form on behalf of, and copied to, the Board. This should be done as soon as is reasonably possible after the incident happens or immediately after GIF becomes aware of it.

NO:

Record and responsibly store information in line with data protection and retention policies. Decisions made by others within GIF should be reported back to the Board (particularly where incidents were 'borderline' and making a report was considered but it was decided not to make one). Decide if non-reportable incidents should warrant any action, including changes to GIF's internal processes and systems.

EXAMPLES:

1. Has or could the incident result in significant harm to those who come into contact with GIF through its work?

INCIDENTS TO REPORT:

- A beneficiary or other individual connected with GIF's activities has/alleges to have suffered serious harm.
- Allegation that a staff member has physically or sexually assaulted or neglected a beneficiary whilst under GIF's care.
- GIF's Chief Executive has been suspended pending the outcome of an investigation into their alleged sexual harassment of a fellow member of staff.
- Allegation that a trustee, staff member or volunteer has been sexually assaulted by another trustee, staff member or volunteer.
- A staff computer is found to contain images of child pornography.
- An internal investigation has established that there is a widespread culture of bullying within GIF.
- A beneficiary or individual connected with GIF's activities has died or been seriously harmed; a significant contributory factor is GIF's failure to implement a relevant policy.
- GIF failed to carry out DBS checks which would have identified that a member of staff or trustee was disqualified from holding that position.
- Repeated medication errors to beneficiaries in a care home indicating a systemic problem.
- GIF discovers that an employee or volunteer coming into contact with children or adults at risk is on the sex offenders register.
- The number and nature of staffing incidents indicate there are widespread or systematic issues connected to sexual harassment, abuse and/or other misconduct.
- Other incidents of abuse or mistreatment (alleged or actual) of people who come into contact with GIF, which have resulted in or risk significant harm to them and are connected to GIF's activities.
- Breaches of procedures or policies at GIF which have put people who come into contact with it at significant risk of harm, e.g. failure to carry out relevant vetting checks.
- Failure to properly handle non-reportable incidents in line with policies, procedure and legal requirements, resulting in harm to the person concerned.

INCIDENTS NOT TO REPORT:

- Minor unusual/aggressive behaviour by a beneficiary towards a member of staff.
- Police called to GIF premises because a beneficiary is drunk and disorderly.
- GIF becomes aware of allegations of abuse or neglect of a beneficiary that occurred outside GIF; GIF has reported the allegations to the appropriate agencies, and there is no harm to GIF's reputation.
- A beneficiary in a care home received the wrong medication as a 'one-off' error and there was no significant harm.
- Logged accident book reports where there was no significant harm to individuals.
- Details of reports under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 where there has been no significant harm to individuals.
- Minor accidental injury to a charity service user e.g. slipping on a wet floor.
- A staff member who is not in a senior position or position of specific responsibility (e.g. head of safeguarding) has bullied or harassed a fellow staff member. There is no indication of a widespread culture of bullying or harassment within GIF and the incident is dealt with by minor disciplinary action (for example, the staff member responsible has not been suspended or dismissed).