

Global Fund for Children Global Safeguarding Policy

September 2020

Introduction

Global Fund for Children (GFC) invests in local organizations working with children and youth around the world. Our global grantmaking programs address a wide range of social justice issues, including education, gender equity, youth empowerment, and freedom from violence and exploitation.

GFC has a strong commitment to protecting those most at risk and to acting as a role model for child- and youth-serving organizations. Although children and youth may be extremely resourceful and resilient, they are also particularly vulnerable to abuse due to their lack of status and power, their stage of development, and their reliance on adults.

We recognize that:

- Organizations and professionals working or in contact with children and youth have a duty to ensure safety and well-being.
- The welfare of the child is a paramount consideration, as enshrined in the UN Convention on the Rights of the Child.
- All children and youth have an equal right to protection, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation, or gender identity.
- It is our responsibility to minimize the harm that may be done as a result of our activities, including where any activities may lead to re-traumatization.

This Global Safeguarding Policy reflects our commitment to respect, promote, uphold, and protect the rights of the child as set out in the UN Convention on the Rights of the Child and in line with GFC values.

Accountability

Safeguarding is the responsibility of all. The procedures and processes contained in this Policy apply equally to:

- The Global Fund for Children (reg: North Carolina)
- The Global Fund for Children UK Trust (UK charity number 1119544)
- Foundation for Rebuilding Childhood (PAN NO: AADCF0437E)
- All GFC directors, trustees, and committee members
- Senior leadership team
- All staff
- Volunteers and interns
- Associates of GFC (see definition of Associates below)

All GFC visitors, including journalists and media personnel, and any individual visiting GFC's work or GFC-supported work in any capacity at GFC's request or instruction, are expected to comply with this Policy (see below).

All grassroots partners of GFC must have their own safeguarding policies and procedures in place that are consistent with this Policy within one year of the commencement of our partnership. This requirement must be included in the applicable Letter of Agreement for each grassroots partner. In extreme cases, GFC may consider an extension, but this will be closely managed with the partner and appropriate regional team to ensure safeguarding expectations are being met. Any partners who do not have a policy at the beginning of the partnership with GFC must commit to comply with this Policy whilst their own safeguarding policies and procedures are under development.

To guarantee the effectiveness of this Policy, GFC will ensure that:

- There is a designated director for safeguarding on the Global Board.
- There is a global designated safeguard lead (DSL), supported by a designated safeguard officer (DSO)
- There is a Global Safeguarding Team that meets at least three times per year, ahead of Global Board meetings, to monitor organizational safeguarding practices and promote learning.
- An update on safeguarding is given by the designated director at each Global Board meeting and board of trustees meeting.
- Implementation and effectiveness of this Policy is reviewed annually and the Policy is updated annually based on findings and/or whenever there is a relevant change in the law.
- A safeguarding report is presented to the Global Board and the UK board of trustees on an annual basis.

GFC will treat any breach of this Policy seriously. Failure to comply with this Policy may incur sanctions ranging from disciplinary action (including possible dismissal) to termination of contracts or partnerships, and where appropriate, may result in referral to the police or other relevant authorities.

Safeguarding Roles and Responsibilities

Designated Board Member/Trustee for Safeguarding

- To be the point of contacts within the Global Board and UK board of trustees, respectively, for any issues relating to safeguarding
- To support the senior leadership in managing any safeguarding concerns/investigations that may affect the reputation and standing of the organization
- To report any serious global safeguarding incidents to the Charity Commission in the UK and/or regulatory authorities and/or police in-country, as appropriate or required by applicable law or this Policy

Global Designated Safeguard Lead (DSL)

- To lead and oversee the safeguarding function at GFC, and promote awareness of the Global Safeguarding Policy internally and externally, where relevant
- To act as a source of support and information for staff and others who are required to comply with this Policy, and where appropriate, grassroots partners, on safeguarding issues
- To work alongside the Designated Director for Safeguarding to ensure Board compliance and understanding of safeguarding at GFC
- To oversee the annual policy review

Designated Safeguard Officer (DSO)

- To promote awareness of this Global Safeguarding Policy and monitor its implementation
- To act as a source of support and information for staff and others who are required to comply with this Policy, and where appropriate, grassroots partners, on safeguarding issues
- To identify training needs and provide capacity development where needed
- To maintain clear records of any child protection concerns that are reported and the actions taken to address these concerns
- To report any in-country issues or concerns to the regional program director and the Global Safeguarding team

Global Safeguarding Team

Key individuals within GFC make up the Global Safeguarding Team. These are the DSL, DSO, the designated director and trustee for safeguarding, the President and CEO (person responsible for safeguarding), the vice president of programs and the designated staff member on the Governance Committee. The aims of the team are:

- To promote consistency in the implementation of the Global Safeguarding Policy across the organization
- To analyze data on safeguarding incidents and to generate learning and improve practice
- To develop tools and training to support the implementation of the Global Safeguarding Policy
- To conduct an annual review of safeguarding implementation and effectiveness across the organization
- To coordinate an annual report on safeguarding for the GFC Global Board and the UK board of trustees

CONTACT DETAILS

Global DSL

Hayley Roffey

hroffey@globalfundforchildren.org

Person Responsible for Safeguarding

John Hecklinger

jhecklinger@globalfundforchildren.org

DSO

Bri LaTendresse

blatendresse@globalfundforchildren.org

Anonymous Reporting Email

GFCSafeguarding@lighthouse-services.com

Definitions

Children

While the definition of a child varies around the world, this Policy refers to an individual under the age of 18, in line with the UN Convention on the Rights of the Child.

Youth

An individual between the ages of 18 and 24, in line with the upper age limit in the UN definition of youth.

Unless otherwise noted below, all references to children in this Policy should be read as a reference to children and youth.

Safeguarding

Child and youth safeguarding is the responsibility that an organization has to develop and implement policies and procedures designed to ensure that its staff, operations, and programs do not harm children and youth; that they do not expose children or youth to the risk of harm or abuse; and that any concerns the organization has about children or youth's safety within the communities in which it works are reported to the appropriate authorities, as appropriate.¹

Safeguarding means:

- Protecting children from abuse and maltreatment
- Preventing harm to children's health or development
- Ensuring that children are provided with safe and effective care
- Taking action to enable all children to have the best outcomes²

Child protection is part of the safeguarding process. It focuses on protecting individual children identified as suffering or likely to suffer significant harm. This Policy includes response and reporting procedures, which detail how to respond to concerns about a child. GFC acknowledges that the safeguarding context is different in each region in which we operate and that local context will be considered when making safeguarding decisions.

Harm and Abuse

According to the World Health Organization "child abuse" or "maltreatment" constitutes "all forms of physical and/or emotional ill-treatment, sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the child's health, survival, development or dignity in the context of a relationship of responsibility, trust or power." It is important to recognize, however, that definitions of abuse vary significantly across locations. Harm may also be caused to children or youth in ways that do not meet the threshold of "abuse" or do not fit easily within traditional definitions.

For the purposes of this Policy, staff of GFC and others required to adhere to this Policy should be alert to any actions that may cause harm to children or youth, whether these reach the threshold of abuse or not and whether the harm is caused intentionally or unintentionally, or directly or indirectly.

¹ Keeping Children Safe, "Child Safeguarding Standards and How to Implement Them," 2014.

² Safeguarding definition based on HM Government, "Working Together to Safeguard Children, 2015.

Safeguarding within Human Resources

Safe Recruitment

GFC seeks to recruit staff who are committed to the highest standards of personal and professional conduct. This goes beyond simply complying with protocols and extends to ensuring that individuals have an appropriate set of personal and professional values and are committed to promoting the safety and well-being of children and youth.

Recruitment of Staff

- All staff are required to provide three references (phone and email references), as well as proof of identity and employment eligibility, which includes a copy of an official photo ID, and these items are stored securely in personnel files.
- For staff roles that include contact with children and youth, questions are included in interviews relating to safeguarding.
- Compliance with the Global Safeguarding Policy is a contractual requirement for each staff member.
- The level of background check is determined by the following:
 - The type of activity the individual is engaged in at GFC and the level of potential risk this poses to children and youth, and
 - The frequency of unsupervised contact with children and youth at GFC.
- To the extent available (taking into account cost and other factors) jurisdictional background checks shall be obtained
- These steps should be taken and our standards should be strictly adhered to even in a remote working environment when physical interviews are not possible. GFC has suitable facilities in place to carry out recruitment activities online.

Board of Directors, Board of Trustees, and Committee Members

In order to support our Boards in understanding safeguarding, this Global Safeguarding Policy is included as part of the Board Orientation Manual and all Board members are required to watch the GFC Board training video and are invited to attend further training should they wish to. An acknowledgement of receipt of this Global Safeguarding Policy is included in the onboarding forms that directors/trustees sign when joining the Boards. All directors/trustees are required to provide at least one reference (reference names and contact information), as well as a copy of an official photo ID as proof of identity, and these items are stored securely in confidential files.

Staff Training and Support

GFC shall provide training and support designed to ensure that staff and others required to comply with this Policy understand their safeguarding responsibilities and have the knowledge and skills necessary to fulfill their obligations:

- Compliance with this Policy is a requirement for all GFC team members.
- All staff receive an induction on safeguarding within the first three months of work. If they are regional staff, they also receive context-specific induction delivered by their regional program director, supported by the DSL.
- Capacity development on safeguarding is provided across the organization on an annual basis, including mandatory training detailing the new policy changes within three months of the Global Safeguarding Policy being updated.

- Staff with specific responsibilities for child or youth safeguarding receive regular specialist capacity development and have access to the resources and tools necessary to execute their responsibilities.
- Supervision of staff and volunteers shall be provided where appropriate.

Volunteers and Interns

Volunteers and interns follow safe recruitment processes based on the nature of their engagement. As the majority of GFC's volunteers and interns are with the organization for short periods of time, do not directly interact with partners or program participants, and work on research-based projects the need for Safeguarding Training will be determined at the discretion of their supervisor, unless:

- The volunteer or intern will have any direct unsupervised interactions with partner organizations or their program participants (including, but not limited, to unsupervised contact in person or via email, phone, video chat, or social media)
- The volunteer or intern's expected or actual term with GFC exceeds three months, which is in line with the maximum staff requirement for Safeguarding Training

Associates

- Associates include consultants, contractors and service providers whose work for GFC involves direct or indirect contact with children and youth (to the extent such contractors or providers are legal entities, then the references to Associates shall refer to those individuals whose work for GFC through such entities involves direct or indirect contact with children and youth).
- Associates are provided with a copy of this Policy prior to work commencing, which they must read and sign a commitment to adhere to.
- Expectations with regard to safeguarding are explained in induction prior to undertaking assignments that involve direct or indirect contact with children and youth.
- Contracts for Associates include a clause requiring compliance with this Policy and the consequences of a breach.
- Associates of GFC partners must adhere to the partner organization's own safeguarding policies during the duration of the partnership.
- Background checks are completed on Associates contracted by GFC to work directly with GFC partners where they may come into contact with children and youth:
 - All Associates whose work involves direct or indirect contact with children and youth must provide GFC with two independent references that are verified by telephone or email. References cannot be family members and must have known the candidate for longer than three years.
 - For all Associates whose work involves direct or indirect contact with children and youth, a DBS, FBI, or other government background check obtained in the past three years must be produced. If one is not in place, GFC will ensure that one is completed prior to any contact with children or youth. Where such checks are not available, GFC reserves the right to call references to seek further information about the candidate's practice in relation to children.

Visitors

When GFC guests participate in partner visits with our staff, we will ensure that:

- There is a clear purpose and reason for their visit (e.g., donor visiting a project, volunteer from a corporate partner offering a brief training session).
- We provide a review of relevant local context and customs.
- We provide them with a copy of this Global Safeguarding Policy and they are briefed on any additional safeguarding measures required by the partner.
- GFC will make every effort to ensure that visitors commit in writing to comply with the Policy and partner specific safeguarding measures. We acknowledge that there are certain circumstances where a written confirmation might not be possible (ex. Large events, events open to the public, co-sponsored events where GFC does not manage registration, etc.). In these circumstances, the Global Safeguarding Policy will still be distributed to or displayed for all participants.
- They are not left unsupervised at any time with children and youth.

GFC Safeguarding Code of Conduct

All GFC personnel should be aware of their impact in their local context and should familiarize themselves with different cultural norms prior to going out into the field. This Safeguarding Code of Conduct outlines the behavior we expect of all our directors/trustees, senior leadership team, staff, Associates, volunteers and interns, and others visiting GFC programs or GFC-supported programs at GFC's request or instruction. It aims to help us protect children and youth from abuse but also serves to protect from allegations of inappropriate conduct.

Any breach of this code will be taken seriously and investigated. This may result in disciplinary action (including termination) and/or referrals to relevant authorities such as the police or social services.

Responsibility

- Ensure that you have read and follow GFC policies and procedures at all times.
- Never engage in any action that harms or exploits children or youth.
- Never engage in illegal activities or use illegal substances.
- Never behave in ways that are contrary to the values and mission of GFC or could negatively affect the organization's reputation.
- Never smoke or consume alcohol while on site at GFC funded partner organizations or during an off-site convening session during working hours.
- GFC staff, consultants, interns, and volunteers will use their best judgement when consuming alcohol during events where GFC is a host or co-host and where alcohol is provided or sponsored (including fundraising Galas, post-convening celebratory meals, awards ceremonies, etc.).
- It is expected that all GFC personnel behave in a manner that will uphold the reputation and values of the organization at all GFC supported events.
- Report all allegations or suspicions of abuse immediately, using the GFC reporting procedures outlined at the end of this Policy.

Rights and Respect

- Respect differences and never discriminate on the grounds of gender, sexual orientation, culture, race, ethnicity, disability, and religious belief systems.
- Never act in a way that could be perceived as threatening, including the use of physical punishment or physical force to manage children or youth.
- Listen to children and youth and take their contributions seriously.
- Never make sarcastic, insensitive, derogatory, or sexually suggestive comments or gestures to or in front of children and youth.
- Respect a child or youth's right to personal privacy and use caution when discussing sensitive topics.

Relationships with Children and Youth

- Ensure that there is more than one adult present during direct interactions with children and youth.
- Avoid spending excessive time with any one child or youth or otherwise showing favoritism.
- Never give money or a gift of any kind to individual children, youth, or their families. If you wish to give a gift to a child or youth, this must be agreed upon with the project staff in advance.
- Never give children or youth your personal contact details (cell number, email, or address) or have contact with them via a personal email, phone or social media account.

- All email communication with minors must be for a valid work related reason, must be via your official GFC work email address, and must include at least two GFC team members on the email chain.
- Never take a child or youth to your home, hotel, or any other private space.
- Never engage in any form of sexual contact with a child or youth. Mistaken belief regarding the age of a child or youth is not a defense³

Social Media Use and Communicating Online

The following rules must be followed by all GFC personnel to help ensure behavior is not open to misinterpretation and to safeguard both themselves and the children and youth GFC personnel communicate with:

- Never directly post images or stories about children or youth who are engaged with GFC and/or our partners on your personal social media accounts. Consent, when obtained, is given to GFC as an organization and not to the individual for personal use.
- When posting on behalf of GFC, identifying information about a child or youth (such as their name, address, images of their face, or any other information that could identify the child or youth) should only be posted where express consent has been received and only ever in accordance with this policy, in particular the below section: ‘Safeguarding GFC Storytelling.’”
- Never accept contact requests or engage via personal social media with children or youth you have met through GFC or our partners, and please report and forward requests to the DSO.
- Always think twice about what you post/share and what implications this may have for the organization.
- Never upload or post any racist, defamatory, obscene, or abusive content.
- GFC personnel may only communicate with children and youth through pre-authorized channels of communication.
- GFC personnel should set appropriate online communication boundaries with partner organizations – including but not limited to channels of communication, hours of communication, and content of communications. Given the global nature of GFC’s work, the appropriate communication channels and hours are flexible. Personnel should use their best judgement or ask their supervisor when there is a question.

Upholding This Safeguarding Code of Conduct

If you become aware of any breaches of this code, please follow the procedure below:

- Report to your direct supervisor.
- Confidential reports can be made to the DSO, DSL or through the whistleblower anonymous line.
- If the breach is not promptly addressed, escalate to the DSL, or if necessary to the President, CEO (person responsible for safeguarding).

A person may report on an anonymous basis, although that may impede GFC’s ability to thoroughly investigate the allegations. No person who makes a report in good faith will be subject to retaliation of any sort. In this regard, any report shall be subject to the protections afforded by the GFC Whistleblower policy.

³ This is consistent with the standard set out in the UN Secretary General’s bulletin “Special Measures for Protection from Sexual Exploitation and Sexual Abuse” (ST/SGB/2003/13, section 3, para. 3.2 (5)).

Program Management

Grantmaking

GFC has a legal and moral obligation to take all reasonable steps to prevent foreseeable harm in any activity or interaction it is responsible for. This includes a responsibility to ensure that partners receiving our grants have the competence to fulfill their obligations safely and have the policies and procedures in place to prevent harm or abuse to children and youth.

GFC is legally accountable for ensuring that the organization's funds are used properly and that due diligence checks are conducted to identify and verify who our partners are, to ascertain that they have the capacity and skills to deliver initiatives safely, and to monitor their activities and conduct. This responsibility is delegated to the vice president of programs, the director of global grantmaking, and the regional program directors for each region.

To ensure that our grantmaking function is working to safeguard children and youth, the following measures are in place:

- Due diligence checks of all prospective partners are completed, including a review of the policies, procedures, and processes that are in place to safeguard children and youth.
- Partners must fulfill the terms of their Letter of Agreement, which includes having a safeguarding policy in place by the end of the first full year of funding and committing to comply with this Policy in the interim.
- Where personally identifiable data, including research involving children and youth, is shared between GFC and the partner, a written data-sharing agreement is developed that covers the standard guidelines for ethical research of human subjects, including informed consent where relevant (for more information on how GFC handles personal information, please see GFC's Privacy Policy here: <https://globalfundforchildren.org/privacy-policy/>).
- Where necessary, GFC provides additional capacity development to ensure the appropriate safe practices and policies are in place to ensure children and youth are safeguarded.

Visits to Partners

When visiting GFC partner organizations, GFC personnel must adhere to the partner's own safeguarding and child protection policies and processes for the entire duration of the visit, as well as this Policy, including the GFC Safeguarding Code of Conduct, while in the field. It is recommended that this information be requested prior to the visit wherever possible, to ensure adequate preparation is made.

Should our partners be concerned about the behavior of GFC staff or others subject to this Policy, they can report their concerns by:

- Emailing the DSL
- Emailing the DSO
- Emailing the Person in Charge of Safeguarding
- Emailing the Anonymous Reporting Email

GFC will investigate all reports, and the fact of notifying GFC of concerns will not impact the funding relationship between GFC and the partner organization.

Adaption to the Local Context

When working in different areas of the world, GFC believes that:

- Every child and youth has the right to be protected from all forms of violence, abuse, and maltreatment, irrespective of their nationality, race, religion, or socioeconomic status.
- Respect for local laws and customs is critical in following the appropriate reporting and response procedures when working with our partners to keep children and youth safe in diverse contexts.

We understand that each country in which we operate has a different approach and understanding of what safeguarding means. Our regional programs teams will play a key role in supporting our partners to ensure that they are meeting the local context, as well as in ensuring that the GFC Global Safeguarding Policy remains fit for purpose within the context of local law and customs.

No matter where our staff, consultants, volunteers or interns are in the world when visiting our partner organizations, if they see something that makes them feel uncomfortable or they become worried about someone's safety, they must report directly to the DSL or DSO and, if appropriate, to the person responsible in the partner organization. If the concern is about the partner, then this must be reported immediately to the DSL. If a child or youth is in immediate danger, GFC staff, consultants, volunteers and interns must call the relevant local authorities and then report immediately to the DSL or DSO (see Reporting and Response Procedures on page 16).

Supporting Our Partners in Upholding Their Safeguarding Practices

GFC recognizes that there is an inherent power dynamic between funder and partner. We want to create relationships that enable organizations to discuss with us, without fear of recrimination or of their funding being suspended, any safeguarding concerns they have, whether with GFC personnel, within their organization, or about other organizations (including foundations and other donors). Through our capacity development resources, we aim to support our partners in developing robust safeguarding practices and help where they face challenges.

Children and Youth Participation

The United Nations Convention on the Rights of the Child establishes children's right to participate and to have their views taken into account in matters that affect them. For the purposes of this Policy, participation is understood to be activities or initiatives where GFC invites children or youth to take an active role in the delivery of our initiatives or to share their views, ideas, and experiences as part of our work.

Risk assessments are conducted prior to any long-term participatory activities involving children or youth that addresses all aspects of child safety, including digital safety.

No participant will be obliged to participate in any GFC event where they (or in the case of children or youth, their parent(s)/guardian(s)) have concerns about their health or safety. The choice of an individual or of a group of individuals to not participate in any event or marketing and communications campaign will in no way influence future funding decisions.

Participation

- In order to safeguard their needs, children and youth (and their parents/guardians) are provided with information in advance that explains the initiative and the role they are being asked to fulfill. They are given time to consider the request, and it is made clear that their participation is voluntary.
- Children and youth volunteers should be reminded that they are able to withdraw their participation at any time.
- Where children or youth agree to participate, a written agreement is produced outlining GFC's expectations of them, the support they can expect from GFC, and the extent/limit of their ongoing involvement. The agreement is signed by the child/youth and their parent/guardian, confirming their informed consent to participate. Separate consent is obtained for the use of any information provided by children and youth.
- Children and youth should not incur costs as a result of their participation (e.g., travel, materials, meals, refreshments). They are reimbursed in advance for any costs related to participation.
- Children and youth are given clear feedback on the impact of their involvement, the outcome of any decisions, next steps, and the value of their involvement. Feedback is sought about their satisfaction with the participation process and ways in which it could be improved.

Facilitators of Children and Youth Participation

- Staff and consultants facilitating participation by children and youth are provided with appropriate training and tools to enable them to work effectively with children and youth. This includes, at a minimum, training on the safeguarding measures to be implemented throughout the initiative.
- Staff and consultants are expected to review this Policy before any involvement in child or youth participation to ensure they are confident in their knowledge of the reporting procedures.
- GFC personnel and facilitators should take special consideration for events where children and youth are participants to ensure that, to the best of our abilities, content does not cause unintended harm. Specifically, content should be age-appropriate and consider the possibility of re-traumatization.
- The DSO should be notified before any child or youth participation is due to take place to ensure that staff and consultants are fully supported to carry this out safely.

Safeguarding GFC Storytelling

In our marketing and communications, GFC believes in:

- **The best interests of the child/youth:** The public use of images and stories of children and youth inevitably poses potential risks. Where there is a risk of potential negative consequences for children and youth, we make decisions that favor their safety and protection.
- **Dignity:** In our communications, we uphold the rights and dignity of the child or youth, their family, and the wider community. We do not use language or images that stereotype, degrade, or shame children and youth.
- **Privacy:** GFC upholds every child and youth's right to privacy. The sharing of information is kept to the minimal necessary to achieve wider goals, and we never share information that could put a child or youth at risk.
- **Accuracy:** The organization's portrayal of individuals or groups must not be manipulated or sensationalized in any way, but instead should provide a balanced depiction of their life and circumstances.

We keep children and youth safe in our storytelling by following these guidelines:

- Where children or youth are survivors of violence or human rights violations, both the child/youth (and, if they are under 18, their parent/guardian) and the GFC partner must give informed consent to their story being told. Where consent is given, photos may be taken of the child or youth and used only where the child or youth's safety should not be jeopardized if identified.
 - Use an alias for children and youth featured in stories or photographs, unless you have gotten informed consent from the child and parent to use the child's real first name. When using an alias, include a footnote such as *Names have been changed. Always use an alias if the child is a survivor of violence or abuse, or if their safety could be in jeopardy if identified. One exception is for survivors over the age of 18 who give written consent to use their real first names.
- Consent must be obtained before taking photographs of children and for images to be used on social media, in recognition of the specific risks associated with posting imagery on the internet. Consent via partner is acceptable if the partner has consent for images to be taken from participants and/or their parents/guardians.
- All content, publications, and presentations featuring children or youth are reviewed by at least one staff member on the communications and marketing team, to ensure that no child or youth is put at risk. Where doubts exist, content decisions will be discussed with the DSL.
- Images that could be considered sexually provocative or where children or youth are not fully clothed are not used.
- GFC obtains informed consent from partners when using their own imagery and the partner must confirm that it has obtained appropriate consent from the children and youth pictured.
- Consent documentation is stored by the marketing and communications team.
- If we receive a request to remove a photo from our archives, we will do this promptly.

GFC takes its responsibilities relating to the handling of personal information very seriously. Please see GFC's Privacy Policy (<https://globalfundforchildren.org/privacy-policy/>) for more information on how GFC collects, handles and retains personal information.

Children's Voice in Storytelling

Whenever possible, children and youth are given the opportunity to provide their own accounts and personal narratives, rather than having people speak on their behalf. When using content created by children and youth, we share the right to use it with the partner involved provided we have received any necessary consents to do so.

Refusing to Participate

GFC partners can refuse to participate in marketing activity if this has a safeguarding consequence for their organization. This will not impact the funding relationship with GFC, nor will it prevent the partner from being involved in marketing at a later date.

Reporting and Response Procedures

When a child safeguarding concern is brought to your attention – ACT.

- Act on your concerns. If in doubt, speak out!
- Child-centered. The protection of children is the most important consideration.
- Time counts. Ensure timely, effective, confidential, and appropriate responses to child safeguarding issues⁴

It is the responsibility of all to take seriously any concerns, complaints, allegations, suspicions, or incidents involving children and youth. Reporting these concerns to the DSL or DSO is a GFC mandatory requirement. Failure to report will be considered a serious breach of GFC's Global Safeguarding Policy and could result in termination. There shall be no retaliation of any sort against any GFC personnel reporting in good faith in accordance with the policies of the GFC in effect from time to time.

Please follow the GFC reporting and response procedures on page 19.

GFC Internal Safeguarding Procedures

Concerns about harm or abuse must be internally reported where:

- You observe concerning behavior/abuse to a child or youth.
- The alleged perpetrator is a GFC staff member, visitor, or associate, or a member of the staff of a partner organization.
- The alleged perpetrator is a member of the child's family or community, or is unknown to the child.
- The alleged perpetrator is also a child, although responses should take into account the protection and safety of both the child victim and the alleged child abuser.
- The abuse is historical. Most abuse is not disclosed until many years after it has occurred, but the risks of harm to children or youth may persist and require investigation.
- The report is anonymous, as this does not automatically mean that it bears less substance but may indicate fear of reprisal, shame, or other barriers to disclosure.

Duty of Care

GFC has a legal and moral obligation to respond to cases of harm and abuse when these are identified through our engagement with children and youth. We must not, however, initiate interventions or offer advice that requires specialist child protection expertise as this is outside our area of competence and could inadvertently result in further harm to the child. Details of concerns are treated with the highest degree of confidentiality and only shared with the minimum number of people necessary to ensure the safety of the child and consistent with our legal obligations. The responsibility for decisions and actions rests with GFC as an organization and not with any individual. Staff, Associates, volunteers and interns must not act in isolation but must consult with GFC's DSL and/or their direct supervisor before taking any action in response to child protection concerns (except in the case where a child or youth is in immediate danger, in which case call the police and/or relevant authorities immediately or if there are legitimate concerns around the appropriateness of reporting to authorities take in-country advice on appropriate steps).

⁴ From Plan International, Child Protection Policy *Reporting and Responding to Child Protection Issues in Plan*

GFC understands the need to make decisions that are appropriate and effective in the local context and take into account local laws, culture, etc. Generally, the local partner organization will take the lead in decision-making, following their safeguarding procedures, unless it is a concern about the partner, in which case local expertise/advice may be sought via GFC contacts/network.

A central database of all safeguarding incidents is maintained. The data is anonymized and reviewed in the DSL and Global Safeguarding Team's annual report to the Board. In this review, the DSL, Global Safeguarding Team, and Board evaluate the effectiveness of response, identify gaps in resources and knowledge, and develop methods to improve practice. Access to confidential records is limited to the DSL and Global Safeguarding Team, but is shared with other GFC personnel to appropriately respond to safeguarding concerns as deemed necessary by this policy and with written permission from the DSL.

Managing Disclosures

GFC staff may find they are the recipient of a disclosure by a child or a partner in the field. These bullet points should offer some direction in how to receive this disclosure safely and appropriately and follow the correct next steps:

- Is the child safe? If not, how can we ensure their safety?
- Reread the Global Safeguarding Policy.
- Think about what you might say/do and how you might present before it happens.
- Try to be available to be spoken to. The child/youth may not be ready when you are.
- Listen carefully without interrupting. When it is appropriate, ask questions to clarify the allegation, but remember you are there to clarify facts, not to conduct an investigation.
- Take any disclosures seriously, even if you cannot see any injury that would support the story.
- Be sensitive—arrange a safe and private environment.
- Stay calm—don't show shock or horror.
- Be reassuring—tell the child/youth that they were right to tell and have done nothing wrong.
- Be responsive—acknowledge how difficult it was for the child/youth to tell, explain what needs to happen next.
- Be honest—don't make promises that you can't keep.
- Be supportive—put arrangements in place for initial support.
- Don't promise confidentiality.
- Don't delay action in response to a disclosure.
- Don't be afraid of being wrong or be concerned about starting an investigation.
- Don't pre-judge what you are told or make assumptions.
- Before taking any further action, immediately contact the DSL or, if unavailable, your supervisor to discuss next steps. They will work with you to decide who should be informed in the child's network.
- At the earliest opportunity, make a written record.

Decisions about referrals of the child/youth to wider agencies (e.g., for counseling or psychosocial support) should be led by the child/youth, the partner organization (if applicable), and/or a trusted adult they identify, not GFC. GFC will, however, provide details of support services that have been vetted as child-friendly by either GFC, our consultants, our partners, or a recognized child protection agency (e.g., UNICEF, Save the Children).

Concerns involving GFC staff, Associates, consultants and volunteers

- DSL informed immediately.

- DSL informs the designated Board member/trustee for safeguarding and the CEO.
- Regardless of region, the designated Board member/trustee informs the US regulator and/or the UK Charity Commission, as appropriate.
- The staff member may be suspended, pending investigation.
- Where the individual is a UK national or resident, the DSL reports the matter to the LADO in the area where they live in the UK if appropriate. This is in addition to any official in-country reporting.

Reporting and Response Procedure

The below flowcharts detail the procedures for reporting and responding to safeguarding concerns.

