

Global Fund for Children Safeguarding Policy

Approved by the GFC Global Board of Directors and
the UK Board of Trustees on October 29, 2024

GFC's Safeguarding Policy

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Safeguarding is the responsibility of all. This Policy applies equally to:

- The Global Fund for Children (reg: North Carolina)
- The Global Fund for Children UK Trust (UK charity number 1119544)
- All GFC directors, trustees, and committee members
- All staff
- Volunteers and interns
- Associates of GFC (consultants, contractors and service providers)
- 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.

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

Approved by the GFC Global Board of Directors and the UK Board of Trustees on October 29, 2024

Definition

GFC defines “Safeguarding” as the actions taken to prevent harm, abuse or exploitation and promote the welfare and wellbeing of anyone who comes into contact with the organization.

This includes:

- **Promotion:** adopting policies and practices which promote a culture of dignity, respect and safety. This includes addressing behaviours that can potentially cause any form of harm.
- **Prevention:** proactive steps to prevent all forms of harm, abuse or exploitation connected to the organization and its operations. This includes endeavouring to establish policies or other measures to limit the use of power imbalances and structural inequalities to place groups or individuals at greater risk of harm.
- **Protection:** timely action to address any actual or suspected harm, abuse or exploitation connected to the organization and its operations. This also includes ensuring relevant agencies and authorities are informed of harm, abuse or exploitation occurring outside the organization.

Safeguarding is an umbrella term and includes Child Protection and Protection from Sexual Exploitation, Abuse and Harassment (PSEAH).

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.

This policy sets out GFC’s approach to preventing harm, exploitation, abuse and harassment within the organization, with partners and with wider communities.

Safeguarding encompasses GFC’s responsibilities as an employer and this policy should be read in conjunction with:

- The staff handbook and employment policies, including those specifically mentioned below
- GFC Health & Safety policy (UK only)
- Employee code of conduct
- GFC modern Slavery Statement
- Whistleblower Policy
- Anti-Bullying & Harassment Policy
- Grievance & Disciplinary Procedure
- Conflicts of Interest Policy
- Privacy Policy



Policy Statement

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

Global Fund for Children has a zero-tolerance policy towards harassment, exploitation, and abuse. At GFC, we believe all people have a right to live their lives free from violence and any abuse of power regardless of age, gender, sexuality, sexual orientation, disability, religion, political beliefs, or ethnic origin.

We recognize that there are unequal power dynamics across the organization and in relation to the local community organizations that we fund and support. We recognize that these power dynamics can increase the risk of some people exploiting their position of power for personal gain. GFC commits to acknowledging and challenging unequal power dynamics as well as improving safeguarding capacity, accountability, reporting and responses.

We recognize that:

- Organizations and professionals working or in contact with children, youth and adults at risk 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.
- Everybody has an equal right to protection, regardless of age, disability, gender, racial heritage, religious belief, political beliefs, sexual orientation, or gender identity.
- It is our responsibility to endeavor to minimize reasonably expected harms, if any, that may be done as a result of our activities, including where one is aware that any such activities may lead to re-traumatization.



This Global Safeguarding Policy reflects our commitment to respect, promote, uphold, and protect all people that we work with:

We recognize that our strategic partners and donors around the world are subject to different Safeguarding laws, operate in different Safeguarding contexts, and have diverse Safeguarding practices. We will share and learn from these differences; work with them to come to mutual agreement on the safeguarding approach for specific programs and/or partnerships we undertake together; and ensure we are compliant within all relevant safeguarding laws and reporting requirements.

We recognize that our staff and partners across the world will have different experiences and understanding of safeguarding. We are committed to prioritizing the safety of children, youth, communities, and colleagues in a culturally and contextually relevant way that is meaningful to everyone involved. We are committed to working with partners to create safer cultures, policies and practices and will not place unrealistic or inappropriate expectations or demands on them. We approach safeguarding in our grantee relationships through the principles of trust-based philanthropy, our core value of putting partners first, and a respect for each organization's autonomy and diverse accountabilities.

Safeguarding Roles

Everyone has a role to play to ensure that an organization has a strong safeguarding culture in every area of GFCs work and the Safeguarding Policy is upheld and implemented. For a full breakdown of Safeguarding roles, visit our Safeguarding Handbook.

Our Safeguarding Roles outline what people should be considering in their day-to-day work to ensure that Safeguarding is front and centre of an organization.

All employees should uphold the Safeguarding Policy and the Safeguarding Code of Conduct at all times. Raise any concerns about harm or risks to the Safeguarding Team as soon as possible. Keep GFC's values front and always centre. Be willing to learn from moments that haven't worked in Safeguarding and be part of the solution to improve approaches.

Leadership: Anyone who has leadership or management responsibilities has additional responsibilities to embed Safeguarding into their team at GFC. This includes supporting team members to raise concerns without fear of retribution, ensure that poor practice is challenged and ensure that Safeguarding is considered when any programs, convenings or any other activities associated with GFC are being designed and delivered. Ensure Teams have the necessary Safeguarding Training.

Safeguarding Champions in each department promote GFC's Safeguarding policy and procedures and disseminate information in their Department/Team.

Global Designated Safeguard Lead (GDSL) leads and oversees the safeguarding function at GFC.

Global Safeguarding Team support the Global Designated Safeguarding Lead to promote consistency in the implementation of the Global Safeguarding Policy across the organization. The Safeguarding Team is the Co-CEO, Vice President of Programs and Vice President of Operations.

Designated Board Member/Trustee for Safeguarding act as the point of contact within the Global Board Members and UK Board of Trustees, respectively, for any issues relating to safeguarding and 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.

For names and contacts – see APPENDIX 1



Reporting and Response Procedures

What is a safeguarding concern?

A safeguarding concern is a concern that someone connected with our work (child or adult) may be at risk or may have experienced harm, abuse, exploitation, or harassment. This may include:

- A direct disclosure where someone tells you they have experienced some form of harm, abuse, exploitation, or harassment.
- An allegation, concern or complaint alleging any form of harm, abuse, exploitation, or harassment by staff member, volunteer, board member or associate within GFC or one of our grantee partners.
- You see or hear something which indicates unsafe practice within GFC or one of our grantee partners which has the potential to cause harm or put people at risk of harm, even where this is not intentional.
- You see or hear something that indicates that a staff member, volunteer, board member or associate of GFC is acting contrary to the Safeguarding Policy or in breach of the Code of Conduct.

For any Staff Welfare concerns, please contact the GFC HR team. For any safety and security concerns, please contact the GFC Operations team.

If you are unsure if your concern relates to Staff Welfare or Safeguarding, please contact anyone in either HR or Safeguarding and they will be able to support you and co-ordinate next steps.

Every concern or question is valid, no matter how small, and will help us ensure the safety of everyone connected with our work. If you are unsure whether something constitutes a safeguarding concern, you must still raise this with your manager and/or the Global Designated Safeguarding Lead ("GDSL") and they will determine what action, if any, is required.

If someone is at imminent and serious risk of harm or immediate danger, you should take any reasonable steps within your role to protect any person from immediate harm, for example, by calling the emergency services. You should always ensure your own health and safety and never place yourself or others at risk of harm when considering what action to take. As soon as possible, you must contact the GDSL to make them aware of the situation so that they can provide support and decide what further action is required.

Who should I tell about safeguarding concerns?

Staff, Board members, associates, volunteers and interns must not act in isolation but must consult with GFC's GDSL and/or their direct supervisor, who will then discuss with the GDSL, before taking any action in response to any safeguarding concerns. You must notify the GDSL within 24 hours of being aware of a concern/incident. You can email safeguarding@globalfundforchildren.org. You can also email www.safecall.co.uk/report to raise concerns anonymously.

If the GDSL is unavailable and does not respond to your e-mail notification within 24 hours or the concern relates to the GDSL, you can raise your concern with the Co-CEO, Hayley Roffey, hroffey@globalfundforchildren.org. If your concern is about the Co-CEOs, please contact our Safeguarding Trustee or Global Board Member – see Appendix 1.

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What happens after I report?

- Your report will be acknowledged **within 24 hours** of receipt by the GDSL.
- The GDSL and relevant others will decide a plan of action **within 72 hours** and notify the Senior Leadership Team and the Board, where necessary.
- The GDSL and others will undertake referrals or an investigation depending on the type of concern.
- The GDSL will update you with progress made within **two weeks**.
- The GDSL will endeavour to ensure any concern is resolved safely and thoroughly as soon as possible.
- A learning review will take place after any incident to reflect on what could have been done differently and if there are any changes needed in the Safeguarding Policy and/or Procedures.

In all responses to a safeguarding concern, the obligation to act may be limited dependent upon GFC's role. In particular, when acting as, or on behalf of, a funder of an entity or individual under a programme and GFC is not controlling or managing such entity or individual, GFC's obligation to respond is more limited than it would be if GFC were also controlling or managing such entity or individual. We must not initiate interventions or offer advice that is outside our area of competence or role. Responses may vary from Programme to Programme depending on GFC's role and conditions it imposes as a funder, and it is important that the limits on our role are considered in the Programme Planning stage and in our commitment to fund.

GFC believes in the importance of making decisions that are appropriate and effective and consider context. Where an incident is reported by a partner organization, they will take the lead in decision-making, following their safeguarding procedures. GFC will, however, provide support where needed to identify appropriate referral options and in some cases access to our emergency grants to be able to support the survivor and the partner organization.

If there is a concern about a partner organization, local expertise/advice may be sought via GFC contacts/network.



The responsibility for decisions and actions rests with GFC as an organization and not with any individual.

We will fulfil our duty to comply with mandatory reporting of serious safeguarding incidents in line with the Charity Commission for England and Wales guidelines or in line with other jurisdictional requirements.

If GFC makes a serious incident report to the Charity Commission for England and Wales or another of our regulatory bodies, we will notify any identifiable funders of that programme that are also subject to the same regulatory guidelines.

GFC will seek to share the high-level outcome of any investigation and subsequent actions, at the nearest scheduled reporting opportunity to the investigation concluding. However, under extraordinary circumstances, for example, where it becomes clear that funders or partners may receive this information from other sources, GFC will consider whether to share confidential top-level information during an active investigation or at an earlier point.

GFC is committed to maintaining appropriate confidentiality during and at the conclusion of an investigation and will limit any information sharing to a high-level overview of findings and actions.

Do I need to document any safeguarding concerns?

Our ability to keep people safe depends on creating a culture where everyone feels able to raise any concerns or questions about safeguarding, no matter how small. You can discuss safeguarding issues with the GDSL at any time.

If the GDSL feels that this constitutes a safeguarding concern, they may ask you to record what you have been told in order that GFC has an accurate record of the concern. This will include:

- the name and role of the person raising a concern
- the names of others involved, such as the person experiencing harm, any witnesses, and if relevant, the subject of concern
- the account of what is alleged to have happened (when, where etc.)
- a summary of any actions taken so far
- a summary of the wishes of the survivor

How do they share this?

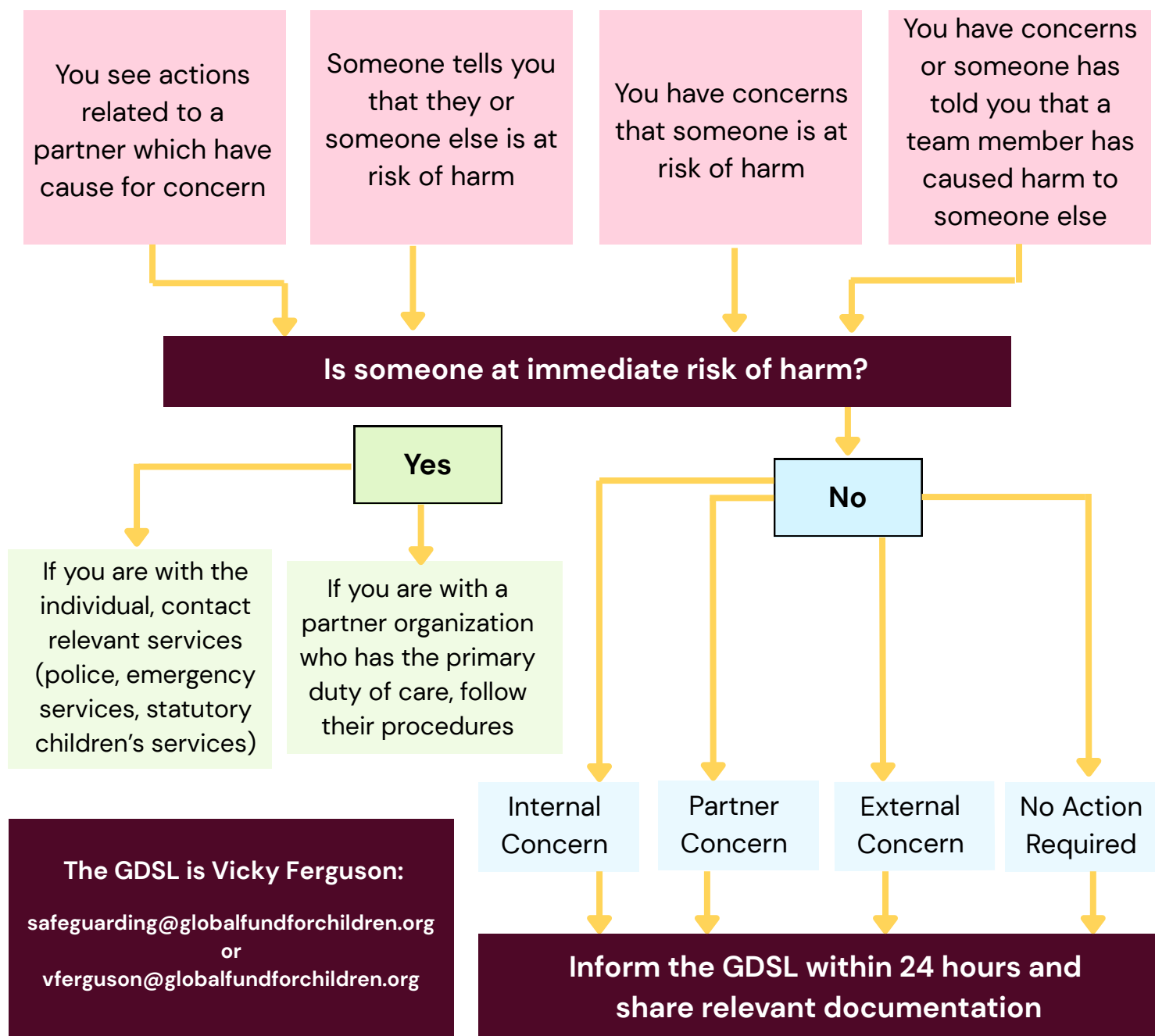
A central secure database of all safeguarding incidents is maintained. Access to confidential records is limited to the GDSL and Global Safeguarding Team but is shared with other GFC personnel to appropriately respond to safeguarding concerns as deemed necessary by this policy and with written permission from the GDSL. This is reviewed annually to evaluate the effectiveness of response, identify gaps in resources and knowledge, and develop methods to improve practice.

What do I do if I am concerned that GFC will not/didn't take any action?

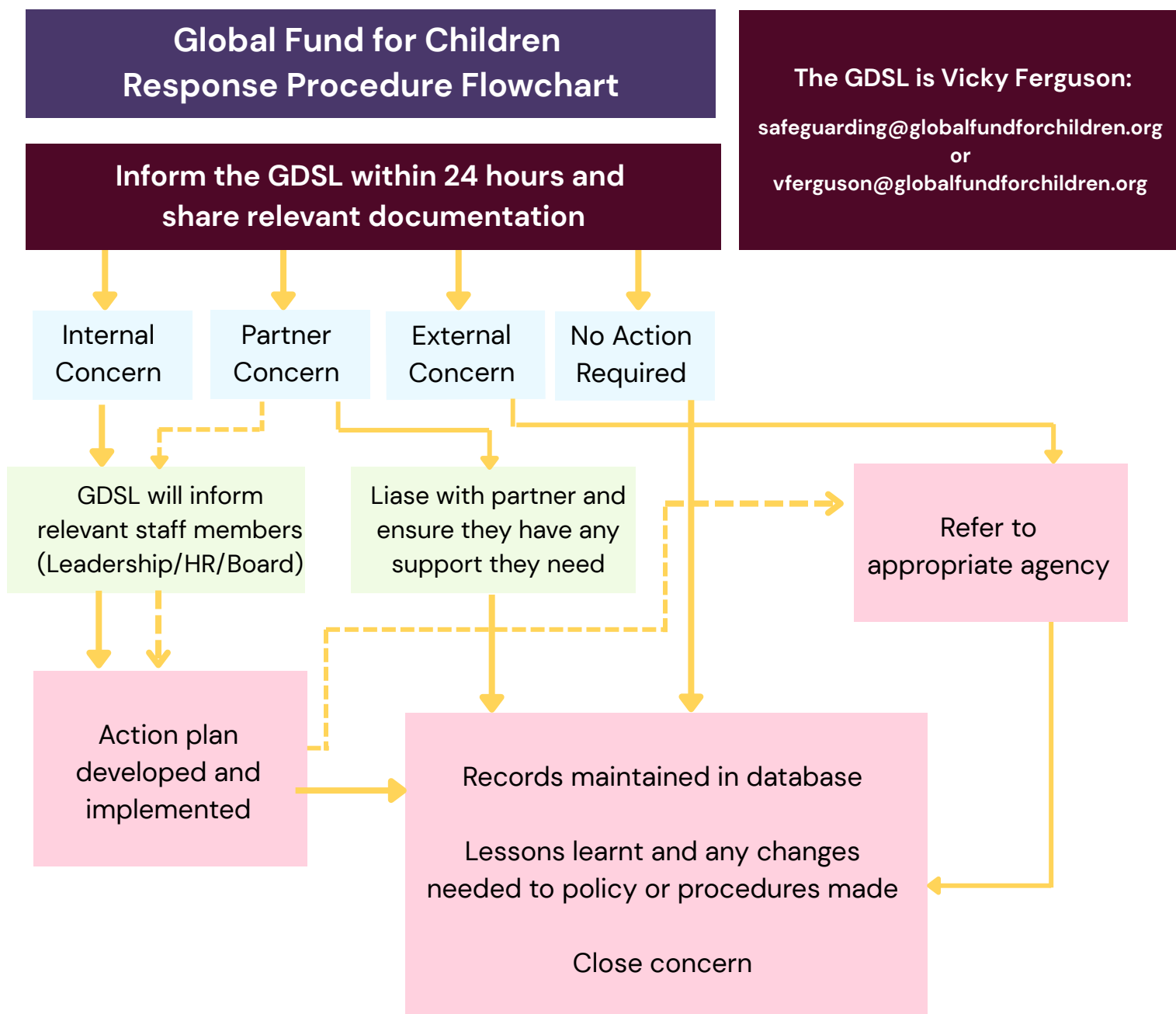
- Where we can give feedback, we will. However, it is important to note that in some cases we will be unable to share due to the confidential nature of safeguarding concerns.
- If you are concerned about the response, you can contact the GDSL or the co-CEO Hayley Roffey
- You can also raise a concern through the GFC Whistleblower Policy

Reporting Flowchart

Global Fund for Children Reporting Procedure Flowchart



Response Procedure



Definitions

GFC has a glossary of Safeguarding definitions which can be found in the Safeguarding Handbook

Safer Recruitment

GFC's Safer Recruitment procedure is a critical part of creating a safer environment for children, youth, grantee partners and staff.

GFC is committed to recruiting 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, youth, grantee partners and colleagues.

GFC follows its Safer Recruitment Checklist and Procedure for all employees, consultants, Board members and volunteers which is followed from Advertising to Introductory Period.

Code of Conduct

All staff, Board members, volunteers and associates are expected to uphold the GFC [Safeguarding] Code of Conduct. This [Safeguarding] Code of Conduct is mandatory for anyone working for or with GFC. It is each employee's responsibility to know and uphold the GFC [Safeguarding] Code of Conduct. For the [Safeguarding] Code of Conduct see Appendix 2.



Safeguarding GFC Communications

You will find more information and guidance on Safer Storytelling in the Safeguarding Handbook. For more information on our data storage please see our [Privacy Policy](#).

We keep contributors safe in our storytelling by following these guidelines:

Any contributor (and, if they are under 18, their parent/guardian) and the GFC partner they are currently connected to either currently or in the past, must give informed consent to their image being taken and their story being told.

Consent must be obtained before collecting any content. Consent via partner is acceptable if the partner has consent for images to be taken from participants and/or their parents/guardians but GFC should store a copy of that consent.

Additional risks should be considered when children, youth or adults in high-risk situations are being discussed. Where doubts exist, content decisions will be discussed with the GDSL.

Our preferred approach is to use real first names in our communications materials. However, we will always use an alias if the child is a survivor of violence or abuse, where this is disclosed or we are aware, 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.

Images that could be considered sexually provocative or where children under 18 are not fully clothed are not used. Fully clothed is where only the head and body from elbow to hand or knee to foot can be seen.

The Marketing and Communications team should always seek advice from the GDSL if they are unsure about the appropriateness of an image.

Where GFC obtains informed consent from partners when using their own imagery, the partner should confirm that it has obtained with appropriate consent from the contributor and a copy should be shared with GFC and stored securely online by the marketing and communications team.

If we receive a request to remove a photo from our archives, we will strive to do this within 72 hours.

GFC takes its responsibilities relating to the handling of personal information very seriously. Please see GFC's [Privacy Policy](#) for more information on how GFC collects, handles, and retains personal information.

Social Media Use and Communicating Online

The following rules must be followed by all GFC personnel related to their own personal social media channels and external communications they produce in their own name.

This will help to ensure GFC personnel's behaviour is not open to misinterpretation and to safeguard both themselves and the communities 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.
- Always delete any photos taken on behalf of GFC on personal phones.
- Never accept contact requests or engage via personal social media with children or youth you have met through GFC or our partners, unless they are Youth Leadership Council (YLC) members or YLC Alumni member GDSDL.
- 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 on work or personal social media channels.
- GFC personnel may only communicate with children and youth through pre-authorized channels of communication.
- Only members of the Marketing and Communications team can post external content on behalf of GFC. Therefore, 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.
- For further details please refer to the Code of Conduct

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. There should never be an assumption that a member of GFC's team will join a WhatsApp group that includes partners or young people; if any pressure to do so is felt they should immediately report this to HR/GDSDL. Given the global nature of GFC's work, the appropriate communication channels and hours are flexible. Please refer to the Online Communications Guide or reach out to the Safeguarding Team for support.

Working with Grantees

GFC has a legal and moral obligation to take all reasonable steps to prevent harm or abuse in any activity or interaction it is responsible for. This includes a responsibility to monitor that partners receiving our grants fulfil their obligations to lead safer organizations that prevent harm or abuse to children, youth, staff and communities.

GFC takes the approach to fund innovative organizations that are typically in the early stages of their development. Because of that, we strive to provide and channel resources and support to all our partners to enable the development or creation of robust safeguarding practices that are culturally and contextually relevant and to support them where they face challenges. GFC is legally accountable for ensuring that our funds are used properly, that due diligence checks are conducted to identify and verify who our partners are, to understand how they deliver initiatives safely, and to promote safer conduct. This responsibility is delegated to the Vice President of Programs, the Director of Global Grant Making, and the Regional Program Directors for each region.

GFC recognizes that there is an inherent power dynamic between the funder and partner. We want to create relationships that enable organizations to discuss with us, without fear of recrimination 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). We also recognise that Safeguarding is a construct created in the UK/Europe. Many countries do not have a translation for the word 'safeguarding' and so it is critical to work with and from existing culturally and contextually relevant concepts, such as safety, security, well-being, care, and protection, in facilitating meaningful conversations with partners. Our approach to Safeguarding is about learning and listening to partners about what they already do within challenging situations to keep people safer.

Our regional programs teams play a key role in supporting our partners to fully ground their safeguarding approaches to their own local cultures and contexts, as well as in ensuring that the GFC Global Safeguarding Policy remains fit for purpose within the context of local law and customs.

Each programme GFC delivers will vary, and so will the programmes approach to Safeguarding. Each programme is requested to complete the Safeguarding Plan to outline which activities will be completed to address Safeguarding within the programme and with the programmes' Grantee Partners and what requirements will be made as part of the Letter of Agreement.

What is a Safeguarding Plan?

A Safeguarding Plan is agreed between the GDSL and the Programme Manager. This plan will identify the specific risks of that programme and the mitigation measures. It will cover what the GFC Team will do to reduce the risks and what safeguarding requirements this programme will have for funded partners. The requirements must be proportional and relevant to the scope of work and the context of the work.

Working directly with children and young people

Each programme at GFC will look different and will work with different groups of people. However, GFC has begun to work more frequently with children and youth directly. Working with children and youth directly holds specific risks in terms of Safeguarding that need to be considered at programme inception and should be thought through in the Safeguarding Programme Plan.

GFC has guidance documents to support this work including:

- Online Safeguarding Guidelines
- Lone Working procedures
- Convening Guide

For further information or guidance on anything within the Global Fund for Children Safeguarding Policy or the Safeguarding Handbook, you can contact the Safeguarding Team at safeguarding@globalfundforchildren.org or contact the Global Designated Safeguarding Lead directly at vferguson@globalfundforchildren.org

Appendix 1 – Safeguarding Contacts

The GDSL is Vicky Ferguson, vferguson@globalfundforchildren.org

The Safeguarding Team is the Co-CEO – Hayley Roffey, Vice President of Programmes – Corey Oser and Vice President of Operations – Palmer Shepherd

The Safeguarding Trustee for the UK Trust is Muna Wehbe

The Safeguarding Global Board Member is Joan Lombardi

Appendix 2 – GFC Safeguarding Code of Conduct

All Global Fund for Children (GFC) staff should be aware of their impact in their local context familiarize themselves with different cultural norms prior to visiting partners or grantees in other countries/contexts. GFC is an International Organization, and therefore this Code of Conduct is developed in line with international and UN standards. GFC personnel are required to uphold local law wherever they operate, except where the Code of Conduct is more stringent, in which case the Code applies and must be adhered to.

We encourage the Code of Conduct to be interpreted in a spirit of transparency and common sense with the best interests of every child, young person, colleague, partner and community as the primary consideration.

This Code of Conduct outlines the behaviour we expect and require of all our directors/trustees/staff, associates, volunteers and interns, and others visiting GFC programs or GFC-supported programs at GFC's request or instruction. Throughout the Code of Conduct where the word "staff" is used, this should be taken to include all the above-mentioned people.

The Code of Conduct is a binding document and is mandatory under all circumstances. It is to be upheld during and outside of working hours.

GFC has a zero-tolerance approach to abuse and exploitation of any kind – physical, verbal, emotional or sexual. Any breach of this code will be taken seriously and investigated. This may result in disciplinary action (including summary dismissal) and/or referrals to relevant authorities such as the police or other relevant organizations.

Responsibility

- You should be mindful of the power and privilege that you hold in relation to other staff, community members and partners you work with.
- GFC does not intend to dictate how staff conduct their personal lives, however, unlawful or other behaviours, as outlined within this Code, by GFC staff which may bring GFC's reputation into disrepute, or which may jeopardize its position, or the security of GFC and its staff whether during or after office hours will be considered as non-compliance of this Code and will be subject to performance management and or disciplinary procedure.
- Ensure that you have read, understood, and committed to following GFC policies and procedures. It is your responsibility to clarify any sections of the Code of Conduct you do not understand.
- The GFC Code of Conduct is a guiding document on how you work within the organization, and you should review it regularly to remain up to date on the requirements and the responsibilities that you must adhere to.

Approved by the GFC Global Board of Directors and the UK Board of Trustees on October 29, 2024

Responsibility contd...

- Line managers should ensure team members are aware of the Code of Conduct.
- Never engage in illegal activities.
- 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.
- Never consume any non-medically required drugs while on-site at GFC funded partner organizations or during an off-site convening session at any time [Consumption of non-medically required drugs is not permitted at any time].
- 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 in the Safeguarding Policy.

Rights and Respect

- Never engage in any form of abusive, degrading or exploitative behaviour.
- Never sexually abuse, exploit, or harass anyone.
- Never pay for sexual services, of any kind, with anyone, of any age.
- Never exchange money, employment, goods, or services for sex, including sexual favours.
- Never engage in sexual relationships with adults participating in or linked with GFC-funded or supported programs. You can find more information about this in the Conflict-of-Interest Policy
- We ask staff to recognize that there is an inherent conflict of interest and potential abuse of power in having sexual relations with colleagues or grantee partners. Should you find yourself in such a relationship, we ask that you notify your manager immediately and resolve any conflict of interest without delay.
- Always be aware of the inherent power dynamic in funder/grantee relationships and avoid taking any advantage this may provide.
- 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 verbal threats, the use of physical punishment or physical force to manage children or youth.
- Never make sarcastic, insensitive, derogatory, or sexually suggestive comments or gestures to or in front of children and youth.
- Staff should be aware of appropriate boundaries with colleagues and partners.
- Never use the organization's computers or other equipment to view, download, create or distribute inappropriate material, including but not limited to, pornographic, defamatory, abusive, sexist, prejudice or racist messages.

Direct Interactions with Children and Youth

- Be respectful of children's rights, background, culture, and beliefs as set out in the UN Convention on the Rights of the Child.
- In line with international standards, never engage in sexual activity with children under the age of 18, regardless of the age of consent, local customs, or the law in effect in the country you are in.
- Never engage in any commercially exploitative activities with children or at-risk adults including child labour or any form of trafficking.
- Never watch, publish, produce, or share pornography showing children, and / or show such material to children.
- Ensure the use of the 'Two-Adult Rule'. This means, when interacting with children and youth try to ensure that another adult is always present or within reach. If the two-adult rule is not possible the safety and dignity of the child or young person remain paramount. If you find yourself alone with a child and young person, let a colleague know this has happened and if there was anything about the interaction that concerned you. For further information, you can refer to the Lone Working Guidelines and the Online Communication Guidelines
- Respect a child or youth's right to personal privacy and use caution when discussing sensitive subjects. Avoid spending excessive time with any one child or youth or otherwise showing favouritism.
- 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 young person, this must be agreed upon with the programme manager or grantee partner in advance.
- Never give children or a young person 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. You should also request parental consent if the child is under 18. For further information refer to the Online Communication Guidelines
- 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 defence.
- Never watch, publish, produce, or share pornography showing children, and/or show such material to children.

Social Media Use and Communicating Online

The following rules must be followed by all GFC personnel to help ensure behaviour 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. You can share GFC or partner posts.
- 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, unless they are YLC members or YLC Alumni member GDSL.
- 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.

For further guidance you can refer to the Safer Communications Guidelines.

Upholding this Code of Conduct

You are obligated to immediately bring to the attention of your line manager any potential incident, abuse, or concern that you may witness, you are made aware of or suspect which appears to breach the expectations contained in this Code. Confidential reports can be made to the GDSL or through the anonymous reporting line – www.safecall.co.uk/report

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.

You may face disciplinary action if you witness or suspect a breach of the Code of Conduct or of GFCs Policies and do not report it to your line manager, HR, the GDSL or a member of the Executive Team.

Any false accusations about a colleague could lead to disciplinary action (See Disciplinary and Whistleblowing Policy).



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