

END MODERN SLAVERY INITIATIVE FOUNDATION
d/b/a GLOBAL FUND TO END MODERN SLAVERY
A District of Columbia Nonprofit Organization

Safeguarding Policy

POLICY STATEMENT

1. GFEMS is committed to ensuring the safety of its staff and of all those impacted by its work. GFEMS aims to avoid doing harm by ensuring that our work does not result in exacerbating unequal power relations, reinforcing social exclusion and predatory institutions, exacerbating conflict, contributing to human rights risks, and/or creating or exacerbating resource scarcity, environmental damage, and/or increasing communities' vulnerabilities to shocks and trends.
2. GFEMS expects all of those working for and with GFEMS to demonstrate the same commitment and to ensure that safeguarding is considered as part of the design, implementation, monitoring and review of all projects supported by GFEMS.

ABOUT THIS POLICY

3. The purpose of this policy is:
 - a. To set out GFEMS' commitment to implementing and enforcing effective systems and procedures to ensure the safety of its staff and of all those impacted by its work; and
 - b. To provide information and guidance to those working for and with GFEMS on how to recognize and report safeguarding issues.
4. This policy applies to all of those working for and with GFEMS, including all GFEMS staff, whether temporary staff, permanent staff, contract staff or volunteers, and all partner organizations, including third party contractors and recipients of sub-awards and their staff and volunteers.
5. This policy should be read in conjunction with GFEMS' Anti-Trafficking, Equal Employment Opportunity, Anti-Discrimination and Anti-Harassment, Anti-Sexual Exploitation, Child Protection Policy, and Whistleblower policies, all of which are contained within GFEMS' Code of Conduct.
6. GFEMS recognizes that:
 - a. GFEMS has a responsibility to ensure that its work does no harm to the individuals, communities and environments with which it is likely to come into contact in fulfilling its mission;
 - b. GFEMS and all of those working for and with GFEMS have a responsibility to consider and identify the social and environmental factors which may present a risk in any project, including the impact on gender equality pursuant to the obligations

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outlined in the International Development Act 2002, as amended by the International Development (Gender Equality) Act 2014; and

- c. Any social and environmental safeguards shall be monitored, mitigated against and reassessed throughout the life of each project supported by GFEMS, calibrated to the degree of risk assigned to each project; and
 - d. An internal Senior Safeguarding Officer must be appointed as the internal party responsible for quality assuring enactment of this policy.
7. Those working for and with GFEMS should identify safeguard risks which are particular to the context, objectives and intended beneficiaries of each project supported by GFEMS, and proactively monitor these as part of the organization's overall monitoring and reporting plan. (Where projects are identified as presenting a high level of risk, mitigating actions such as engaging with local stakeholders and communities should be considered as part of the design, implementation and monitoring of that project.) In doing so, consideration should be given to a range of safeguards, as listed in this policy's addendum. This list should be considered a starting point for considering the safeguard risks associated with a project; it is not an exhaustive list. Reference should also be made to the documents governing the terms and conditions of the funding for each project supported by GFEMS.

MITIGATION

8. Recruiting
 - a. For all recruiting efforts: Job descriptions will include GFEMS' commitments to safeguarding and potential hires will be asked about and evaluated on their existing knowledge and opinion of safeguarding practices. For roles to be located in countries with laws that may lead to safeguarding violations, potential employees will also be asked about and evaluated on their views on said laws.
 - b. For all candidates who progress to final interview rounds: Candidates will be required to complete a Self-Assessment form that asks about any historical allegations or violations, and reference checks (at least two) will include questions about historical allegations or violations.
 - c. Acceptance of job offers will require staff to review and accept GFEMS' Code of Conduct, by way of signature, and be contingent on clean criminal background checks on convictions related to crimes against children or vulnerable adults, sexual assault or abuse, domestic abuse and other violence crimes, and fraud.
9. Training
 - d. As part of an onboarding process, all GFEMS staff will be provided with training on this policy and how to identify, assess and mitigate safeguarding risks, including how to address reports of harm and how to respond to and support those affected.

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Training will be provided for all new staff and repeated at regular intervals not to exceed twelve months.

- e. All partner organizations, including recipients of sub-awards, are required to train all project staff on how to comply with the requirements of this policy. This will include training on how to identify, assess and mitigate against safeguarding risks, including how to address reports of harm and how to respond to and support those affected. Training should be provided for all new project staff and repeated at regular intervals not to exceed twelve months.

10. Contractual relationships

- f. In all third-party contracting scenarios, potential partners will be required to complete a Self-Assessment as part of their proposal package. Responses to the Self-Assessment will form the basis of GFEMS' evaluation of the potential partners' capacity to implement robust safeguarding practices. Organizations deemed unable to implement robust safeguarding practices will be ineligible for funding from GFEMS.
- g. Agreements with all third-party partners (e.g., contracts and grant agreements) will include language committing the partner to comply with the Organization's Code of Conduct and Safeguarding policies, which will be included as appendices to the agreement.
- h. Regular monitoring and reporting by third-party partners will also require said partners to outline how they have proactively managed and mitigated any safeguarding risks identified.

REPORTING

- 11. Protecting and ensuring the safety and well-being of all of those affected by GFEMS' work is a key priority for GFEMS. GFEMS encourages anyone working for or with GFEMS on a GFEMS project to report any concerns about safeguarding to GFEMS as soon as possible.
- 12. All GFEMS staff and third-party partners are required to report any concerns over safeguarding misconduct promptly, to allow proper handling. Concerns should be reported in accordance with the Organization's Whistleblower Policy, included in the Code of Conduct: to the Organization's chief employed executive or Chief Executive Officer of the Board of Directors; if both of those persons are implicated in the complaint, report or inquiry, it should be directed to the Organization's outside legal counsel.
- 13. All reports of concerns over safeguarding issues will be treated seriously and with sensitivity. Concerns may include reports of rumors of harm or reasonable suspicions of harm occurring. All reports of concerns will be investigated at least by the Board of

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Directors and, where appropriate, also by GFEMS' outside legal counsel. Information received in confidence will be treated sensitively. GFEMS may be obliged to report the outcome of any investigation into safeguarding to external organizations, such as funding partners.

14. Anyone reporting safeguarding concerns will be protected from retaliation by GFEMS in line with the GFEMS Whistleblower Policy. Support will be offered to those who have suffered harm or been affected by a safeguarding issue arising from a GFEMS project. This may take the form of a referral to a suitable local support group, support in reporting issues to the appropriate authorities or other suitable form.

VIOLATIONS

15. Substantiated violations of this policy will subject employees and contractual partners to disciplinary action, up to and including immediate termination of relationship. GFEMS may also be obliged to report the outcome of any investigation into safeguarding to relevant law enforcement agencies, who may require additional disciplinary or legal action.

REVIEW

16. This policy shall be reviewed annually by the Board of Directors and updated where necessary.

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ADDENDUM: GUIDANCE ON ASSESING SAFEGUARDING RISKS

Illustrative Safeguarding Issues	Illustrative Safeguarding Questions to Consider
Children	<p>Does the project involve working with children directly?</p> <p>If so, are there adequate policies and procedures in place to ensure that every child, regardless of their age, gender, religion or ethnicity, can be protected from harm?</p>
Violence, exploitation and abuse	<p>Is there a risk that involvement with a project may put someone at risk of physical or emotional violence or abuse or sexual or financial exploitation?</p> <p>If so, are there adequate policies and procedures in place which expressly prohibit exploitation and abuse and to receive and address reports of such acts?</p>
Bio diversity and natural habitats, including forestry	<p>Is there a risk that the GFEMS project may impact upon key natural resources and/or areas of important wildlife?</p> <p>If so, are there adequate policies and procedures to put conditions on the use of harmful environmental practices (e.g., pesticides, logging)?</p>
Vulnerable groups including indigenous peoples and/or special social groups or people with protected characteristics	<p>Is there a risk that the project impacts negatively on the well-being of vulnerable groups, such as indigenous people, people with protected characteristics, other vulnerable groups and/or their land?</p> <p>If so, how can the project be adapted so that those groups are included in the project and given opportunities to benefit from it?</p>
Cultural heritage	<p>Is there a risk that the project is likely to impact upon the traditions or cultural practices of a group of people?</p> <p>If so, how can the project be adapted so that those groups are included in the project and given opportunities to benefit from it?</p>
Land and People whose access to land or other resources will be impacted by the investment	<p>Is there a risk that the project impacts upon the land rights of communities?</p> <p>If so, how can violations of people’s human rights and legitimate other rights be avoided? How will this be managed and communicated?</p>

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Health and Safety	<p>Is there a risk that the project will create safety concerns for people living and working in affected communities or contracted workers involved in development projects?</p> <p>Is there a risk that the project will create a negative impact on community health through exposure to hazardous materials or increased exposure to communicable or non-communicable diseases which could result from project activities?</p> <p>If so, how are these risks being assessed and mitigated?</p> <p>Conversely, how can the project improve health and safety for those involved in it?</p>
Modern Slavery	<p>Is there a risk that the project could create conditions that lead to the use of modern slavery in any part of the supply chain?</p> <p>Does the project partner comply with the Transparency in Supply Chains (TiSC) reporting requirements?</p>
Local Laws	<p>Do local laws exist which present safeguarding risks? How do relevant local laws affect how violations of safeguarding should be reported, when doing so may result in human rights violations? If so, how are these risks being assessed and mitigated?</p>