

GLOBAL FUND TO **END MODERN SLAVERY**

# **SAFEGUARDING POLICY**

Effective October 1, 2021

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## Purpose

The purpose of this policy is to articulate the Fund's commitment to the prevention of harm and the promotion of wellbeing across our operations.

## Introduction

We believe all people have a right to live their lives free from sexual harassment, exploitation and abuse, and that no person should be subjected to abuse of any form. We believe that sexual harassment, exploitation and abuse, and child abuse, are more likely to be exerted over particular groups of people due to inequalities and vulnerabilities, particularly those experienced by women, vulnerable adults, and children. We recognize that there is unequal power between GFEMS Personnel and the people we partner and work with throughout our programs, and also between people within our organization. We expect that our power will not be used to advantage ourselves or cause harm to others.

GFEMS recognizes we have a responsibility to protect people we work with, and who work for us, and we will continuously strive to prevent sexual harassment, exploitation and abuse, and child abuse from happening. This includes a responsibility to prevent inaction or inadequate action or response by GFEMS personnel and board members in the face of abuse. We take seriously all reports of sexual harassment, exploitation and abuse, and child abuse. Our actions are informed by our Code of Conduct, our Values Statement, and a survivor-centered approach, which means that the needs and wishes of survivors guide our response, that survivors are treated with dignity and respect, and the rights of survivors to privacy and support are prioritized.

Although GFEMS may not come into contact directly with the particular groups mentioned above, we support and fund organizations that do. Therefore we recognize both our responsibility and duty of care to safeguard and protect people working with or in contact with our third-party partners.

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.

The Fund has committed to a zero tolerance approach when any person associated with our work is found guilty of sexual or physical abuse or exploitation - of a child or adult. GFEMS expects all of those working for and with GFEMS to demonstrate the same zero-tolerance commitment.

GFEMS personnel and third-party partners must ensure that protection principles are considered as part of the design, implementation, monitoring, and review of all projects supported by GFEMS. Further, protection principles should be considered as part of all GFEMS day to day operations and business practices.

To that end, this policy includes procedures that should be followed to ensure the safety of GFEMS staff, target communities, and others directly impacted by the Fund's work.

Additionally, this policy provides information and guidance to those working for and with GFEMS on how to recognize and report safeguarding issues.

This policy should be read in conjunction with the Fund’s Code of Conduct and Values Statement.

## Values

The [Fund’s Safeguarding Values](#) are congruent with internationally accepted safeguarding values and principles. The table below illustrates how these align with our overall Organizational Values.

Value	Principle(s)
<p><b>Focus on Our Mission</b> We build programs and undertake research focused on ending modern slavery.</p>	<p><b>Survivor led:</b> Allow the Modern Slavery field to be informed, centered, and led by those who have first-hand experience with the systems we seek to dismantle.</p>
<p><b>Learn Continuously</b> We seek out the knowledge and perspectives of others, especially those whom we seek to serve and empower.</p>	<p><b>Recognition of Power imbalances:</b> Acknowledge that differences in power occur in all individual, organizational, local, national, and international relationships.</p> <p><b>Self-identification:</b> Survivors and members of other vulnerable groups have the right to identify and/or to not identify at any and all times. Previous identification does not mean future identification in different locations and environments. Survivors can choose what term they wish to use when referring to themselves and allies should confirm how survivors prefer to be referenced in every setting.</p>
<p><b>Bet Big and Build Together</b> We build and co-develop bold, transformative programs designed to achieve unprecedented systems change, emphasizing innovation and scale.</p>	<p><b>Effective, innovative, and accessible technology and media engagement:</b> Engage with the media and utilize technology in a way that has the greatest impact while still providing safety and anonymity, wherever appropriate.</p> <p><b>Localization and partnership:</b> Acknowledge that local communities have great knowledge and a vested interest in preventing, detecting, and reporting neglect and abuse, and should lead the process, wherever possible.</p>
<p><b>Execute with Excellence and Integrity</b></p>	<p><b>Prevention:</b> Address concerns before they escalate into problems</p>

<p>We are committed to implementing with efficiency, effectiveness, and real-time adaptability, while maintaining the highest standards of business ethics and compliance.</p>	<p><b>Trauma-informed:</b> All those working within the Modern Slavery field should receive training on trauma and should assume that everyone has experienced some degree of trauma.</p> <p><b>Confidentiality:</b> Confidentiality is required for all safeguarding matters, especially investigations.</p> <p><b>Timeliness:</b> Do not delay action.</p> <p><b>Proportionality:</b> Prioritize the least intrusive response appropriate to the risk presented.</p> <p><b>Accountability:</b> Ensure that GFEMS personnel and third-party partners are responsible for their actions.</p>
<p><b>Share what we know</b> We eagerly share successes and lessons learned to bolster the field, build the evidence base and catalyze a coherent global strategy.</p>	<p><b>Commonality:</b> Develop and utilize appropriate and common language, definitions, and tools that seek to measure effectively and efficiently while preventing harm.</p> <p><b>Evidence-based:</b> Utilize evidence-based and evidence-informed practices and contribute lessons learned to the Modern Slavery field.</p>
<p><b>Create Sustainable Impact</b> We identify and leverage shared goals among diverse stakeholders to secure co-investment and build programs that are self-sustaining.</p>	<p><b>Shared strategy:</b> Establish and work together towards shared goals and a shared understanding of safeguarding success at the international, national, regional, and local levels.</p>
<p><b>Value Our People</b> We provide a supportive, respectful, and equitable environment for our team to advance the Fund's mission.</p>	<p><b>Promotion of wellbeing:</b> Encourage flourishing of all personnel, participants, and those impacted by our work.</p> <p><b>Prioritization of the most vulnerable:</b> Promote, listen, and take direction from those in greatest need.</p> <p><b>Intersectional inclusion and accessibility:</b> All people have different profiles that include vulnerabilities and strengths. This intersectionality must be considered when devising safeguarding approaches.</p>

## Definitions

1. Child is defined as any individual under the age of 18, irrespective of local country definitions of when a child reaches adulthood. (Definition of child from the U.N. Inter-Agency Standing Committee (IASC) Guidelines to implement Minimum Operating Standards for Protection from Sexual Exploitation and Abuse by UN and non-UN Personnel, March 2013.)

2. Harm means physical, sexual, or emotional harassment, exploitation or abuse, including abuse of power, and bullying. Please refer to GFEMS Code of Conduct for further information on appropriate standards of behavior.
3. Physical abuse is intentionally inflicting bodily injury, including but not limited to hitting, slapping, punching, kicking, hair-pulling, biting, pushing, physical punishments, or making someone purposefully uncomfortable.
4. Safeguarding means protecting people from harm that arises from coming into contact with our staff or associated personnel, activities, or programs.
5. Sexual exploitation means any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes.
6. Sexual abuse means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

## Applicability

This policy shall be applicable to all GFEMS personnel and third party partners. GFEMS personnel includes Members of the Board, employees (full and part-time), independent contractors, interns, and volunteers. Third party partners include contractors or other service providers, and recipients of awards or subawards and their board members, employees, interns, and volunteers.

## Policy Statement

GFEMS recognizes that:

- a. The Fund 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 outlined in the International Development Act 2002, as amended by the International Development (Gender Equality) Act 2014; and
- c. Safeguarding risks 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. The Accountability Manager, Director of Grant Programs, Associate Director for HR, and Associate Director for Compliance and Operational integrity are jointly appointed as the internal parties responsible for quality assuring enactment of this policy.
- e. A Safeguarding Task Force composed of members of GFEMS representing different teams, genders, and seniority will meet regularly to discuss operations, impact, and

any updates related to safeguarding risks and procedures across the organization and suggest improvements to this policy or procedures. The Safeguarding Task Force is responsible for:

- i. Promoting consistency in the implementation of this Safeguarding Policy across the organization;
  - ii. Analyzing data on safeguarding incidents and to generate learning and improve practice;
  - iii. Developing tools and training to support the implementation of this Safeguarding Policy;
  - iv. Conducting reviews of safeguarding implementation and effectiveness across the organization; and
  - v. Preparing an annual report on safeguarding for the Board and leadership.
- f. Those working for and with GFEMS should identify safeguarding risks which are particular to the context, objectives, and intended target communities of each project supported by GFEMS pre-award, 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. See Appendix 1 for an overview of the types of questions to ask organizations pre-award and during implementation. This list of questions should be considered when conducting pre-award due diligence and application review on any project and is a supplement to the Safeguarding questions posed by GFEMS to potential recipients as part of the pre-award due diligence process; 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.
- g. Instances of trafficking or re-trafficking of GFEMS funded project participants are handled with particular care and attention. The Fund determines if each instance is a safeguarding violation as defined in this Safeguarding Policy,. If no policy violation has occurred, the Fund follows its protocol regarding re-trafficked participants, which is reviewed and amended as needed. If it is found there is a safeguarding violation, the procedures in this policy shall be applied. In some instances, GFEMS may engage a third-party to engage with affected participant(s) to learn more about the drivers that caused trafficking/re-trafficking.

While GFEMS seeks to protect people from all types of harm, as defined above, we recognize there are particular manifestations of harm and specific groups that may be at heightened risk. As such, special attention in this policy is given to the following:

## Protection from Sexual Exploitation and Abuse

In order to safeguard the health and safety of the people we work with or who work for us, GFEMS personnel and third party partners are prohibited from engaging in abusive or

exploitative behaviors<sup>1</sup>. While the Fund prohibits abusive or exploitative behaviors, sexual exploitation and sexual abuse constitute particular acts of serious misconduct and are therefore grounds for disciplinary measures, including summary dismissal in the case of employees or Board Members or termination of contracts in the case of all others.

Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally. Mistaken belief in the age of the child is not a defense.

Exchange of money, employment, goods, or services for sex, including sexual favors or other forms of humiliating, degrading, or exploitative behavior is prohibited. This includes the exchange of assistance that is due to program participants, as funded through GFEMS.

Sexual relationships between participants of programs funded GFEMS and GFEMS representatives or its third-party partners are strongly discouraged. Such relationships take place in the context of unequal power dynamics and thus undermine the credibility and integrity of the Fund's work. Should a sexual relationship occur between participants and GFEMS representatives or its third-party partners, the occurrence should be disclosed to the relevant GFEMS Manager or reported inline with the reporting procedures included herein.

Employees are obliged to create and maintain an environment that prevents sexual exploitation and sexual abuse. Managers at all levels have a particular responsibility to support and develop systems that maintain this environment.

The standards set out above are not an exhaustive list. Other types of sexually exploitive or sexually abusive behavior may be grounds for administrative action or disciplinary measures, in accordance with this Policy.

## Child Protection

In order to protect children from harm and ensure the integrity of the Fund's work, GFEMS commits to the minimum standards outlined immediately below. These standards apply to GFEMS personnel regardless of whether they are on or off the clock and to those working with the Fund including third party partners as defined in this policy. Any violation of these standards is a serious concern and will result in disciplinary action.

- Treat children with respect regardless of race, color, sex, language, religion, political or other opinions, national, ethnic or social origin, property, disability, birth or other status.
- DO NOT hire children for domestic or other labor that is inappropriate given their age or developmental stage, that interferes with their time available for education and recreational activities, or that places them at significant risk of injury.
- DO NOT use language or behavior towards children that are inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
- DO NOT engage children in any form of sexual activity or acts, including paying for

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<sup>1</sup> Abusive and exploitative behaviour recognized by GFEMS is informed by the types and indicators of abuse published by the Social Care Institute for Excellence (SCIE)  
<https://www.scie.org.uk/safeguarding/adults/introduction/types-and-indicators-of-abuse#neglect>



sexual services or acts.

- Wherever possible, ensure that another adult is present when working in the proximity of children.
- DO NOT invite unaccompanied children into your place of residence, unless they are at immediate risk of injury or in physical danger.
- DO NOT sleep close to unsupervised children.
- Use any computers, mobile phones, or video and digital cameras appropriately, and never exploit or harass children or access child pornography through any medium.
- Refrain from physical punishment or discipline of children (excluding own children).
- Comply with all relevant legislation, including labor laws in relation to child labor.
- Avoid photographing or filming a child for non-work related purposes.
- When photographing or filming a child for work-related purposes:
  - comply with local traditions or restrictions for reproducing personal images,
  - obtain informed consent from the parent or guardian of the child, before photographing or filming a child, explaining how the photograph or film will be used,
  - ensure photographs, films, videos, and DVDs present children in a dignified and respectful manner and not in a vulnerable or submissive manner,
  - ensure children are adequately clothed and not in poses that could be seen as sexually suggestive,
  - ensure images are honest representations of the context and the facts, and
  - ensure file labels do not reveal identifying information about a child.

The standards set out above are not an exhaustive list. Other types of exploitive or abusive behavior towards children may be grounds for administrative action or disciplinary measures. Additional guidelines may be found in the Fund's Ethical Storytelling Guidelines.

## Procedures

### PREVENTION

#### 1. Recruiting

- a. For all recruiting efforts: Job descriptions and scopes of work will include the Fund's commitments to safeguarding. 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 offer less protection in preventing 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 Personal Standards Questionnaire that asks about any historical allegations or violations, current standards of behavior, and reference checks will include questions about historical allegations or violations.

- c. Acceptance of job offers will require personnel to review and accept this policy and the Fund's 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 violent crimes, and fraud (subject to permissibility in local jurisdictions).

## 2. Training

- a. As part of an onboarding process, all GFEMS personnel 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. Training, education, or awareness will be provided for all new personnel and repeated at regular intervals.
- b. All third-party partners are required to train all project staff on how to comply with the requirements of this policy, as well as their own internal Safeguarding/Protection and Code of Conduct policies. A combination of the most stringent practices from the Fund's and third-party partners' policies that provide the widest protection should be applied. 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, education, or awareness should be provided for all new project staff and repeated at regular intervals.
- c. As part of certain funding co-creation processes, GFEMS may provide training on Community Feedback Mechanisms (CFMs) to third-party partners and require that they set up CFMs in their respective projects. It should be noted however that the primary purpose of a CFM is **not** to serve as or replace a safeguarding incident reporting mechanism or practices. While a CFM may pick up feedback about serious safeguarding/protection issues that get reported through its channels, its primary purpose is to receive generic operational feedback about project activities, outcomes, and goals. Safeguarding is a much broader topic; it's about the whole environment and work culture that ensures that staff and participants feel safe and respected. To this end, GFEMS expects third-party partners to have a separate safeguarding incident reporting mechanism whenever feasible, and robust policies, practices, and procedures within their organizations that exist prior to and beyond the Fund's funded programming. This will be assessed during the due diligence phase carried out before awards are granted.

## 3. Data Protection and the Protection of Human Subjects during Research

- a. Data collection, analysis, storage, sharing, and dissemination of research and knowledge products play a vital part in the operations of GFEMS. GFEMS respects the rights of individuals and the dignity of research participants through the entire data processing lifecycle, and is committed to a high level of data security. To this end, GFEMS also has various guidance documents related to data collection and security that contribute to the mitigation of data safeguarding risks. These documents are as follows: the Responsible Data Management Guidance, Information Security Guidelines, Protection of Children during Research, and the Fund's Ethical Photography and Storytelling Guidelines. These should also be referred to and adhered to in conjunction with this policy and the Code of Conduct. Research contractors will often have their own Institutional Review Board[s] ("IRB[s]") while also utilizing local IRBs at the same time. Before contracting any research organizations, GFEMS verifies

their data collection methods and processes. For recipients, subrecipients and sub-sub recipients who may not be associated with a university or have their own IRB, GFEMS will assist in identifying a local IRB and/or reviewing information through the GFEMS Ethical Review Board.

#### 4. Contractual relationships

- a. In all third-party contracting scenarios, potential partners will be required to complete a due diligence process including a self assessment that contains a specific set of inquiries related to Safeguarding. Responses to the Due Diligence Assessment will form the basis of the Fund's evaluation of the potential partners' capacity to implement robust safeguarding practices. Organizations deemed unable to implement robust safeguarding practices commensurate to the level of interaction with, and responsibility to, vulnerable populations will be ineligible for funding from GFEMS. Appendix 1: Safeguarding Questions contains a part of the scope of the due diligence review undertaken by the Fund.
- b. Agreements with all third-party partners will include language committing the partner to comply with the Fund's Code of Conduct and Safeguarding policies, or their own- so long as their own policies are consistent with and no less stringent than the Fund's.
- c. Regular monitoring and reporting by third-party partners will also require third-party partners to outline how they have proactively managed and mitigated any safeguarding risks identified.
- d. GFEMS may issue funding that flows further downstream. When GFEMS issues funding to third-parties who are responsible for re-granting or subcontracting those funds further downstream, recipients are required to demonstrate their commitment to safeguarding under the project by going through all required actions in section 4 of these procedures and:
  - engage in an open dialogue about safeguarding with further downstream partners and clearly present safeguarding requirements;
  - demonstrate adequate safeguarding arrangements in place, including support to downstream partners;
  - ensure that any safeguarding expectations are included in the agreements with further downstream partners
  - agree on a clear procedure for the reporting of any safeguarding concerns

#### 5. GFEMS Representatives

When GFEMS representatives (donors, sponsors, board members, or other visitors and/or stakeholders) participate in project visits with GFEMS personnel or the personnel of our third-party partners, we will ensure that:

- a. 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).
- b. A review of relevant local context and customs is provided.
- c. A copy of this Safeguarding Policy is provided and they are briefed on any additional safeguarding measures required by the third-party partner.
- d. GFEMS will make efforts to ensure that representatives commit in writing to comply with this Policy and third-party 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 GFEMS does not manage registration,

etc.). In these circumstances, this Safeguarding Policy may still be distributed to or displayed for all participants.

- e. Representatives will not be left unsupervised, at any time, with children or adults who are participants of any GFEMS funded project.
- f. Representatives will be made aware of the communication policy concerning photos and media of vulnerable populations.

## REPORTING, RESPONDING, AND INVESTIGATING

6. Protecting and ensuring the safety and well-being of all of those affected by the Fund's work is a key priority for GFEMS. Everyone working for or with GFEMS is encouraged to report any concerns about safeguarding to GFEMS as soon as possible.
7. Consistent with its Values, GFEMS encourages complaints, reports, or inquiries about illegal practices or violations of the Fund's policies, including illegal or improper conduct by the organization itself, by its leadership, or by others on its behalf. Appropriate subjects to raise under this policy would include:
  - Any form of exploitation including sexual exploitation
  - Sexual misconduct
  - Sexual harassment
  - Child exploitation or neglect
  - Safeguarding Policy or Code of Conduct violation
8. The Fund's policy on speaking up is designed to build the confidence of personnel and Board members to report genuine concerns about fraud, bribery, or other types of misconduct. For many cases of misconduct, a report is the only way it will be discovered and dealt with. A genuine concern is sincerely felt and based on information the reporting person believes to be true or trustworthy. Upon further investigation, a genuine concern may or may not turn out to be true. The motivation of the person reporting a genuine concern is not relevant to its definition as a genuine concern or not. A genuine concern should be reported when there is evidence or a strong suspicion of misconduct.
9. All GFEMS personnel and third-party partners are required to report any concerns over safeguarding misconduct promptly, to allow proper handling. Report concerns directly to your manager or to the Fund's Accountability Manager, Director of Grant Programs, the Fund's CEO, or the Associate Director for Compliance and Operational Integrity and any member of the GFEMS board. You may also report using the GFEMS hotline, IntegrityCounts that allows for direct or anonymous reporting to the Fund in many of the languages spoken by our stakeholders both internal and external. It is accessible 24 hours per day, 7 days per week, 365 days per year on a computer or smartphone device, or via toll-free telephone number. Personnel and third-party partners are encouraged to use our hotline to raise a concern anytime other reporting mechanisms stated above are not preferred. The report can be made through email ([gfems@integritycounts.ca](mailto:gfems@integritycounts.ca)) or website ([www.integritycounts.ca/org/gfems](http://www.integritycounts.ca/org/gfems)). Local phone numbers are listed on the website.
10. If a manager receives a report of an actual or potential safeguarding issue or violation, the report must be shared with the Fund's Accountability Manager, Director of Grant Programs, and the Associate Director for Compliance and Operational Integrity immediately

11. All personnel and Board members as well as third parties must promptly report genuine concerns using any of the above reporting channels. They should report as much detail as possible, including who, when, where, and how, and whether they have evidence or the basis for their suspicion.
12. Concerns may be reported anonymously, but people are encouraged to give their names and / or contact details as it is easier to investigate allegations when it is possible to follow up for more details.
13. GFEMS will conduct a prompt, discreet, and objective review or investigation in accordance with the Fund's Internal Review Procedures. Where necessary, the Fund will involve external counsel and outside experts to support a review or investigation. The Fund may be unable to fully evaluate a vague or general allegation, complaint, report or inquiry that is made anonymously. The reviewers will note the following:
  - The immediate safety of any relevant parties involved; for example, those that are the subjects of the safeguarding allegation or other individuals that the individual has contact with through work or family.
  - What information to share with the individual who is the subject of the safeguarding allegation and with any other known employer of the individual, and when to do so. The subject of an investigation has the right to know that they are being investigated and what the allegation is.
  - Whether any immediate decision is to be taken to suspend the individual subjected to allegation, pending further inquiries and/or investigation.
  - Delegation of particular tasks to nominated safeguarding representatives.
  - Any records that need to be secured or locked down, or any equipment removed from the individual who is the subject of the concern.
  - Whether the criteria are met for referral to the local authority and/or the police.
  - If the initial review reveals that a safeguarding allegation might involve criminal activity, GFEMS must make a referral within one (1) working day to:
    - the local authority (normally where the incident occurs) if the allegation is about behavior towards a specific individual; and
    - the Police where the victim lives if the allegation is about behavior but with no identifiable victim.
  - Any further information that may be required for clarification.
  - Anyone else who is aware of the safeguarding allegation and who has been spoken to should be identified.
  - Whether any advice should be sought from the relevant local authority or helpline.
  - Arrangements to support the person who is the subject of the safeguarding allegation, the person who raised the allegation and the alleged victim should be made.
14. 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. Information received in confidence will be treated sensitively. GFEMS may be obliged to report the outcome of any investigation into safeguarding to external parties, such as donors. In some instances, reporting may also be required to local law enforcement or other agencies.
15. Reporting is monitored in two ways. GFEMS may receive reports through the Fund's hotline, Integrity Counts which is managed by WhistleBlower Security, a third party service provider. GFEMS may also receive reports via email, phone, video-conference or in-

person meeting as stated in section 9 of this Policy. All reports will be reviewed in accordance with the Fund's Internal Review Procedures.

16. When a report concerns GFEMS-funded activities implemented by third-party partners, autonomy may be given to those third parties to manage any related review or investigation in accordance with their established procedures. The Fund should be kept updated on any such review or investigation managed by a third-party partner.
17. Anyone reporting safeguarding concerns will be protected from retaliation by GFEMS in line with the GFEMS Whistleblower Policy as part of the Code of Conduct. Support will be offered to those who have suffered harm or been affected by a safeguarding issue arising from a GFEMS-funded 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 forms.
18. There may be circumstances where allegations are about poor business practice rather than child or adults at risk of abuse, for example, the member of staff has not adhered to elements within this policy. Where there is any doubt, the Manager should consult with the Associate Director of HR or Associate Director of Compliance and Operational Integrity. If the internal review shows that the allegation is clearly about poor business practice, GFEMS will determine how best to remedy this e.g., as part of the disciplinary procedure, depending on the nature and seriousness of the practice.

## LEARN AND REVIEW

19. This policy shall be reviewed in accordance with the Fund's Adoption and Authorization of Policies, Policy by members of the Safeguarding Task Force at the operational level, by Board Members at the governance level, and updated where necessary. Learnings from regular project operations, other global developments, and best practices in the industry shall be taken into consideration in reviewing this policy.

## Violation

GFEMS will take appropriate action against any GFEMS personnel and third party partners who are found to be in violation of this policy. Such action may include immediate termination of employment or engagement at the Fund's sole discretion. Violations also may result in civil or criminal penalties beyond GFEMS discipline, including prosecution to the fullest extent permitted under the law. GFEMS may also be obliged to report the outcome of any investigation into safeguarding to relevant law enforcement agencies, donors and other external stakeholders, who may require additional disciplinary or legal action.

## Appendix 1: Safeguarding Questions

This list of questions and related document review should be considered when conducting pre-award due diligence and application review on any project and is a supplement to the Safeguarding questions posed by GFEMS to potential recipients as part of the pre-award due diligence process; it is not an exhaustive list.

**Applicant organizations will be subject to the following when GFEMS performs pre-award due diligence:**

- a. Background check
- b. Review of past performance history including a review of materials they produce
- c. Review of organizational safeguarding policy, training and/or knowledge
- d. Review of Human resources policy for staff care including fair wages, fair working hours, whistleblowing policies, adequate vacation and health benefits
- e. Review of responses to the Safeguarding inquiries as part of the Fund's pre-award due diligence questionnaire
- f. Review of Technical knowledge
  - i. benchmarked against technical experts
  - ii. reviewed by technical experts
- g. Review of past safeguarding incidences
- h. Review of local trust and local reputation
  - i. Establishment in country
  - ii. Registered in country
  - iii. In-country staff
- i. Analysis of logistical feasibility (how and where the organization operates on the ground)

**Safeguarding Questions for GFEMS Partner Organizations related to a submitted concept note, proposal, or other application for funding**

**2. Have you (potential partner organization) assessed the intervention/project for safeguarding risks and provided mitigation strategies?**

- a. Who are the direct participants of the intervention?
- b. Who are the secondary participants?
- c. Who are the indirect participants?
- d. Who else could be affected by this intervention?
- e. Who is the most vulnerable among these groups and why?
  - i. People with protected characteristics including children, people experiencing trauma, people with physical or mental disabilities, people of marginalized ethnicities/races, oppressed castes, elderly, LGBTQ, etc.
- f. How will the organizations' strategies differ to accommodate the most vulnerable?
- g. Have the materials that the organization has produced been reviewed by safeguarding, trauma-informed, technical and local experts?
- h. What is the risk of physical, emotional, sexual, or financial abuse, violence or exploitation of anyone involved in this project?
- i. What is the risk of modern slavery in any part of the supply chain?
- j. When applicable, does the project partner comply with the Transparency in Supply Chains (TiSC) reporting requirements?
- k. Does the organization have a safeguarding hotline?
- l. Does the organization have a whistleblower protection policy?
- m. Is the organization aware of Accountability to Affected Populations including creating information provision, participation/consultation and feedback mechanisms that provide different strategies depending on the vulnerability profiles of various participants?



- n. If they are not aware of AAP, are they willing to take the steps to set up and track AAP mechanisms including hiring staff if necessary?
- o. What are the safety concerns for people living and working in affected communities?
- p. What are the community health risks including exposure to communicable diseases or hazardous material?
- q. What are the risks to community land rights?
- r. What are the risks to key natural resources and/or important wildlife?
- s. What risks or challenges do local laws present to safeguarding?
- t. What are the human rights risks?
- u. What are the risks to traditions and/or cultural practices?

**Survivor Questions for GFEMS Partner Organizations related to a submitted concept note, proposal, or other application for funding**

**3. Are survivors leading, included and/or informed of the organization/intervention?**

- a. Are employees who identify as survivors employed at your organization?
  - i. Do employees who identify as survivors hold decision-making positions or roles?
  - ii. Has their feedback been incorporated into the organization at all levels?
- b. Are people who identify as survivors sitting on the IRB for your research?
  - i. Do they hold decision-making positions or roles?
  - ii. Has their feedback been included or incorporated?
- c. Are survivors being adequately compensated for their work?
- d. Does the organization have a survivor inclusion plan?
- e. Have third-party people (advisors, consultants, contractors) that identify as survivors or third-party organizations that employ people that identify as survivors?
- f. Does the organization include an Accountability to Affected Populations (AAP) strategy?
  - i. Are survivors identified as one of the vulnerable groups within AAP?
    - 1. Is the vulnerability profile of survivors intersectional? (Does the vulnerability profile include protected status, age, gender, ethnic background, language, race, disability status, sexual orientation, migrant status, family status, hidden disabilities, socio-economic status, caste)
    - 2. Does the AAP outreach strategy include different methods for outreach to survivors and feedback from survivors given the complexity of their vulnerability profile?
    - 3. Does the AAP outreach strategy include anonymous and safe mechanisms that allow survivors to self-identify if they choose?
    - 4. Does the AAP outreach strategy coerce or induce people to identify themselves as survivors and/or victims even if they don't feel comfortable doing so?