1. Introduction and purpose

The Freedom Fund’s vision is a world free of slavery. We identify and invest in the most effective frontline efforts to eradicate modern slavery in the countries and sectors where it is most prevalent.

The aim of this policy is to outline our commitment to safeguarding and to the protection of all those in contact with the Freedom Fund’s work from deliberate or inadvertent actions and failings that place them at risk of abuse, sexual exploitation, injury or any other harm. We firmly believe it is unacceptable to abuse power and positions of trust. Equally, each Freedom Fund staff member or associated individual must have the opportunity to contribute to our work in a safe and dignified environment.

The policy and procedures described in this document apply to all the Freedom Fund’s staff, board members, interns, researchers, outside consultants, interpreters, partner staff, and outside visitors such as individual donors, that have direct or indirect contact with program participants of the Freedom Fund including children. For the remainder of this document, the phrase “associated individuals” will be used to refer to all of these groups of people.

This policy was formally approved and adopted by the Board of the Freedom Fund on 11/08/2020. It will be reviewed annually.

2. Guiding principles and values

This policy has been developed in line with our key values of excellence, agility, courage and respect.

As the Freedom Fund takes on the critical task of ending global slavery, it is essential to recognise the deep vulnerability of people with lived experience of slavery and other forms of exploitation, in addition to the general vulnerability of children. The Freedom Fund Safeguarding Policy begins with the notion that we must first “Do No Harm”. All our decisions and actions prioritise the safety and well-being of those connected with our work.

This Policy also reflects our commitment to uphold relevant international and national standards which seek to protect children and vulnerable people, including particularly the UN Convention on the Rights of the Child (1989) and the UN Statement for the Elimination of Sexual Abuse and Exploitation (2006). We also expect our contractual partners to adhere to those standards, to undertake everything possible to prevent maltreatment or abuse and to respond and report if maltreatment occurs.
3. The Freedom Fund’s commitment to the protection from sexual exploitation and abuse (SEA)

The Freedom Fund has zero Tolerance on SEA and will not tolerate its employees, consultants, partners or any other individuals associated with the delivery of its work carrying out any form of sexual harassment, sexual abuse or sexual exploitation. The Freedom Fund maintains standards that reiterate and reinforce obligations under the UN Secretary General’s bulletin on SEA available at https://undocs.org/en/ST/SGB/2003/13

Everyone, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, has the right to equal protection from all types of harm or abuse.

The Freedom Fund is committed to an open and transparent organisational culture, and encourages dialogue on safeguarding.

4. Scope

All associated individuals of the Freedom Fund are required to comply with the prevention, responsive action and reporting procedures outlined in the sections below. The term “child” is any persons under the age of 18 and is separately identified to recognise the greater level of vulnerability of children in general, whether or not they are survivors of slavery or a program participant of the Freedom Fund. Recognising this, the Freedom Fund requires that all associated individuals of the Freedom Fund follow the guidelines of this Policy during their interactions with any child, whether or not such interaction is related to professional work with the Freedom Fund.

The term “program participant” refers to any child or adult currently in slavery or who is a survivor of slavery who is involved in some manner in a project or program funded by the Freedom Fund. Associated individuals of the Freedom Fund are required to act according to this policy when: interacting with program participants in any project work; utilising program participants’ knowledge for publicity or for formal or informal research; observing program participants for any purposes; and interfacing with program participants in any other situation.

For the purposes of this document, the term “abuse” will refer to: all forms of physical and emotional ill-treatment, sexual abuse, neglect, and exploitation that results in actual or potential harm to the program participant’s health, development or dignity (WHO definition). Subtypes of abuse can be distinguished as:

- **Sexual abuse** means the actual or threatened physical intrusion of a sexual nature whether by force or under unequal or coercive conditions.
- **Sexual exploitation** means any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, sexually or politically from the sexual exploitation of another.
- **Physical injury** means actual or likely physical injury to anyone or a failure to prevent physical injury or suffering.
- **Neglect** means the persistent or severe neglect of a child or the failure to protect a child from exposure to any kind of danger, failure to carry out important aspects of care resulting in the impairment of the child’s health or development.
- **Emotional abuse** means the actual or likely severe adverse effect on the emotional and behavioural development of a program participant caused by persistent or severe emotional ill-treatment or rejection. All abuses involve emotional ill-treatment.
5. Prevention

5.1 The Freedom Fund staff and board members

These individuals must read this Safeguarding Policy and be given an opportunity to ask questions and receive adequate responses about the measures outlined in this document.

The Freedom Fund is aware of the importance of careful screening of new employees and associated individuals to avoid the risk of maltreatment of children or vulnerable adults. The Freedom Fund will undertake all measures deemed necessary and/or corresponding to best practice in order to evaluate a candidate, including assessing posts for safeguarding requirements and conducting relevant background checks. Candidates will be informed about the Freedom Fund’s Safeguarding Policy and will be asked about safeguarding at their job interview. Candidates may also be asked to disclose any previous criminal convictions as part of the application process.

The Freedom Fund staff member responsible for distributing this policy to these individuals will be the Business Operations Manager. This will occur during the process of formalising an individual’s relationship with the Freedom Fund (e.g. hiring, contracting, etc.) or at the point that this policy is formally approved and adopted by the Freedom Fund.

All staff will receive basic training in safeguarding and prevention of SEA as part of their induction (within 1 week of appointment) and periodic refresher training every 2 years. Staff with specific responsibilities (e.g. Focal Points, those with direct access to children and vulnerable adults) will receive more in-depth training appropriate to their role (within 3 months of appointment).

The Board has designated a Focal Point for safeguarding and will receive regular reports on safeguarding at Board meetings. The Managing Director, Finance and Administration and the Director of Programs are the Focal Points within the Senior Management Team. The Freedom Fund have a dedicated Safeguarding Manager responsible for the management and implementation of the Safeguarding Policy. Safeguarding Focal Points are appointed at field level for each hotspot.

5.2 Partners

The Freedom Fund partner organisations include those organisations with which we hold formal short-term or long-term partnerships e.g. grassroots NGOs, advocacy NGOs, NGO implementing partners and among others.

During the development of the formal partnership agreement between the Freedom Fund and its partners, the Freedom Fund requires that organisations have a Safeguarding Policy that informs their work and interactions with children and vulnerable adults.

The components of the Safeguarding Policy should adhere to best practices and be in conformity with the UN Convention on the Rights of the Child, the UN Secretary General’s Bulletin on SEA, other relevant international conventions and sector standards, including the Freedom Fund’s Safeguarding Policy. This includes at least the following:

- A clear organisational statement of principles on safeguarding and protection;
- A clear organisational statement on the prevention of sexual exploitation and abuse;
• A process for raising awareness and achieving buy-in on these principles within the organisation. This should include, at the least, organisational staff, board members and volunteers;
• A reporting process for enabling open communication about suspected incidences of abuse;
• A disciplinary action process with clear guidelines in terms of who holds responsibility for making disciplinary decisions and how those decisions will be made.

If the partner organisation does not have a safeguarding policy and procedure in place to prevent or properly address the problem of child and vulnerable adult abuse, the partner must develop such a policy and procedure by an agreed-upon date to be determined on a case-by-case basis. This requirement will form part of the partner grant agreement. In addition to this, the Freedom Fund will use the Due Diligence Checklist and partner monitoring to ensure the partner organisation’s policies and procedures protect children and vulnerable adults from abuse.

If a staff member or associated individual of a partner organisation is found to have committed abuse, the Freedom Fund will need to determine whether to terminate the relationship with the organisation. This will be based upon both the partner organisation’s response and its expected ability to prevent such future abuses. The Freedom Fund expects that partner organisations will implement their own safeguarding policies to handle cases in which their own staff and other associated individuals who come into contact with children and vulnerable adults are implicated in an abusive act.

5.3 External contractors (including researchers, suppliers, interpreters, journalists, photographers, non-program consultants)

On occasion, the Freedom Fund commission external contractors to undertake work on our behalf. This may include researchers, suppliers, interpreters, journalists, photographers and consultants. The Freedom Fund’s Safeguarding Policy extends to all external contractors and we set clear requirements to ensure practices reflect our safeguarding procedures and prioritise the well-being of program participants, staff and associated individuals whom contractors may come into contact with. These requirements are:

• All contracts contain a clause requiring adherence to the Freedom Fund’s Safeguarding Policy. Failure to comply could result in a termination of the contract and may affect the payment of agreed fees;
• Where external contractors are expected to travel or have direct contact with program participants, additional pre-departure safeguards must be undertaken prior to travel.

The following safeguarding measures must be in place:

Where external contractors are expected to have no access to children and/or vulnerable adults:

• Appointing managers must ensure that external contractors read, sign and agree to adhere to the Safeguarding Policy and Code of Conduct (Annex 1)
• Relevant background screening checks for individuals and companies must be undertaken, including, but not limited to, reference checks or checks against Refinitive OneWorld.

Where external contractors are expected to have accompanied access to children or vulnerable adults:

• Appointing managers must ensure that external contractors read and formally agree to the principles set out in the ‘Visitor Guideline & Agreement (Annex 5) prior to the initiation of the visit.
These individuals must be given an opportunity to ask questions and receive adequate response from the Freedom Fund staff.

- Relevant background screening checks for individuals and companies must be undertaken, including, but not limited to, reference checks or checks against Refinitive OneWorld;
- Appointing managers must ensure that a safeguarding briefing is given upon arrival in the hotspot by a Freedom Fund Program Advisor, Freedom Fund Program Manager or Freedom Fund Senior Program Manager.

**Where external contractors are expected to have un-accompanied access to children or vulnerable adults:**

- Appointing managers must ensure that external contractors read and formally agree to the principles set out in the ‘Visitor Guideline & Agreement (Annex 5) prior to the initiation of the visit. These individuals must be given an opportunity to ask questions and receive adequate response from the Freedom Fund staff.
- Enhanced background screening checks for individuals and companies must be undertaken, including, but not limited to, reference checks or checks against Refinitive OneWorld
- Appointing managers must ensure that a safeguarding orientation is given upon arrival to the hotspot by a Freedom Fund Program Advisor, Freedom Fund Program Manager or Freedom Fund Senior Program Manager;
- Appointing managers must ensure contractors conduct risk mitigation exercises (such as completing risk assessments and/or ethical reviews) prior to travel;
- Appointing managers must ensure any relevant monitoring measures are put in place to ensure program participants are kept safe from harm.

6. **Parents / Caregivers**

The Freedom Fund does not consider parents and caregivers to be “associated individuals” for the purposes of this policy. This means that if it is suspected that a parent or caregiver is abusing a child or vulnerable adult, the concern will be reported to the relevant authorities.

7. **Recognising Abuse**

The Freedom Fund understands that it may be difficult to assess whether a child or vulnerable adult is being abused. Beyond obvious indications such as marks of physical abuse, other signs may include: anxiety, reduction of contact with others, reduced self-esteem, aggressive behaviour, self-damaging behaviour or activities, and intellectual impairment. It is also necessary to recognise that some children and vulnerable adults may be at relatively more risk, such as children and adults with disabilities, individuals subject to power differences and individuals from minority ethnic or religious communities.

There are some clear signs, which immediately obligate you to report potential abuse:

- Physical marks or symptoms of abuse.
- A child or vulnerable adult's own disclosure to someone.
- Word of mouth evidence that is overheard or directly provided.
If you have received information from an individual who is concerned about possible abuse of a child or vulnerable adult, you should respond in the manner described below. This is especially crucial if it is a child that is divulging personal information to you.

- Listen and allow the child, vulnerable adult or other individual to explain the situation in his or her own words.
- Reassure the individual that they have not done anything wrong.
- Maintain a positive and supportive attitude.
- Provide the individual with information on what is likely to happen next.
- Do not promise confidentiality, instead inform the individual that you will need to tell someone who can help. You must not promise a child or vulnerable adult or another individual who has provided you with information about abuse that you will keep the information secret. Rather, you must discuss the Safeguarding Policy process and safeguards with the individual and listen to the individual’s concerns. You should only reveal the concern or report of abuse to the appropriate person as described in the reporting process outlined in this document [section 11.1]. The disclosure should otherwise be treated as strictly confidential. This is a vital component of the process.
- If it is a child, do not ask direct or detailed questions at this time.
- If the concern relates to internal allegations of harassment or bullying within the Freedom Fund, please follow the procedures outlined in the Anti-Discrimination and Harassment Policy in the Staff Handbook.

8.1. The process for recording concerns or cases of potential program participant abuse for Freedom Fund staff, is:

1. Write down in detail what you observed and any related conversations that you have had.
2. Report the case to the Safeguarding Focal Point within 24 hours. If you are not the person that had the initial suspicion, but rather, someone confided in you, you are still required to report the concern to the Freedom Fund.
3. Avoiding any delay, the Safeguarding Manager should immediately inform the Managing Director of Finance and Administration, the Director of Programs and the Managing Director of Programs. In the case of serious incidents, the Managing Director of Finance and Administration will also inform the CEO and the Board Focal Point about the concern. A serious incident is defined as an incident that causes significant harm.
4. The Safeguarding Manager will maintain full records of these conversations. Information will only be passed to those people who need to be aware of the case as described in this procedure. Extreme vigilance must be exercised in protecting confidential information.
5. The Freedom Fund will follow up safeguarding reports and concerns according to policy and procedure, and legal and statutory obligations, including recommending if any onward referrals need to be made.

All Freedom Fund staff, and associated individuals have a duty and right to report suspected or witnessed incidents of abuse. It is the responsibility of all associated individuals of the Freedom Fund to raise any safeguarding concerns. You do not have to decide whether abuse, harassment or exploitation has occurred. Failing to report concerns can result in disciplinary action or breach of contract.
9. Reporting

Anyone can raise a concern to the Freedom Fund about an incident they have experienced, witnessed or have had disclosed to them. This can be done verbally or to the designated Safeguarding Focal Point/Safeguarding Manager within 24 hours, alternatively you can report directly to the Managing Director of Finance and Administration or to your line manager. [Refer to appendix 2 for reporting flowchart].

9.1 Procedure for the Freedom Fund staff and associated individuals (board members, interns, researchers, consultants and interpreters):

All Freedom Fund staff, and associated individuals should report safeguarding concerns (suspected or actual) to the Safeguarding Manager in person, telephone (+ 44 (0)203 777 2200) or via the safeguarding email address (safeguarding@freedomfund.org). Alternatively, they can report to their line manager, who should escalate to the Safeguarding Manager or Managing Director of Finance and Administration.

9.2 Procedure for the Freedom Fund Partners:

In the first instance, partners should follow safeguarding reporting mechanisms as outlined in their individual policies, however, should the concern be in relation to a Freedom Fund program, partners should immediately report any credible suspicion of, or actual incidents of abuse and exploitation to the Freedom Fund’s Safeguarding Focal Point in the hotspot. Special consideration must be given to the following concerns, which must be reported to the Freedom Fund immediately:

- Any concerns about or reports of inappropriate behaviour or abuse/ harassment by the Freedom Fund staff;
- Individual reports of sexual exploitation and abuse of adults in project locations / community by the Freedom Fund staff, partner staff, or associated individuals of the Freedom Fund;
- Individual reports of all forms of abuse/exploitation of children by the Freedom Fund staff, partner staff or associated individuals of the Freedom Fund.

Partners can report to the relevant Freedom Fund Program Advisor or directly contact the Safeguarding Manager at HQ confidentially on safeguarding@freedomfund.org or + 44 (0) 203 777 2200.

All other concerns that do not fall into this category are still required to be reported to the Freedom Fund via standard monitoring and evaluation processes such as: communication with Program Advisors over the phone or email or during office and community visits, as well as through periodic reporting. All reports should be discussed with Program Advisors during monitoring visits summarising action taken and any onward referrals that were made.

Examples include but are not limited to:
- Protection concerns that arise within the community;
- Individual reports of abuse within the community;
- Reports on general inappropriate comments or behaviour in the workplace;
- Individual concerns or reports of workplace sexual harassment.

Partners are expected to investigate these concerns and take follow-up action. If any advice or guidance is needed to that partners are able to investigate any concerns adequately and before a monitoring visit, partners can contact their hotspot Safeguarding Focal Points.
The Freedom Fund will follow up safeguarding reports and concerns according to policy, procedure and legal and statutory obligations. Confidentiality shall be maintained at all stages of the process when dealing with safeguarding concerns. Information relating to the concern and subsequent case management shall be shared on a need to know basis only and kept secure and confidential at all times. Our safeguarding framework aims to be survivor-focused and we will offer support to survivors of harm caused by staff or associated personnel.

10. Disciplinary Action

If it is determined by the Freedom Fund that a staff member has breached the Safeguarding Policy, disciplinary action will be taken in accordance with the Freedom Fund’s disciplinary procedures as outlined in the Staff Handbook. In making a decision about whether and what form to take disciplinary action, the following factors must be considered:

- The nature of the policy breach;
- The intent of the individual charged;
- The context and nature of the abuse;
- The harm to the child or vulnerable adult;
- Other factors as deemed relevant.

Disciplinary action may result in termination of the relationship between the Freedom Fund and the individual whether through formal dismissal, termination of contract or otherwise. The Freedom Fund may also determine that the case is such that criminal prosecution should be sought against the individual and the appropriate external authorities will be informed.

Disciplinary action taken against partner staff, will be determined by the partner organisation through their internal measures and procedures.

11. Framework for Safeguarding Implementation and Oversight

Implementing the procedures included in this policy requires commitment and oversight at every level of the organisation. Although safeguarding is the responsibility of all staff and associated individuals of the Freedom Fund, specific responsibilities are designated to staff at different levels of the organisation to ensure that safeguarding measures are monitored regularly and that any new risks are identified and addressed promptly. The Freedom Fund has a designated **Safeguarding Manager** who is responsible for:

- Providing inductions and training to all staff and relevant associated individuals;
- Receiving all concerns about the conduct of Freedom Fund personnel and associated individuals that constitute a breach of this policy; where there is a concern/disclosure of harm or abuse of a child or vulnerable adult, whether or not it may be criminal in nature and require notification to external agencies;
- Monitoring the safeguarding@freedomfund.org mailbox;
- Maintaining clear records of any concerns that are reported and the actions taken to address these concerns;
- Promoting awareness of the policy and processes throughout the organisation;
- Managing internal safeguarding investigations and supporting those investigations carried out by external agencies;
- Monitoring implementation of the policy and escalating any issues or concerns to the Managing Director of Finance and Administration;
- Suggesting updates to safeguarding policy and procedures where necessary;
- Identifying training needs and developing, commissioning and/or delivering training where required;
- Acting as a source of support and information for all staff on safeguarding issues;
- Act as the Chair of the Safeguarding Working Group (see 13.1);
- Providing technical support and guidance to Safeguarding Focal Points;
- Ensuring that confidentiality is maintained at all stages of any process when dealing with safeguarding concerns, and ensuring information relating to subsequent case management are shared on a need to know basis only.

The Safeguarding Manager shall support the Managing Director of Finance and Administration and the Senior Management Team (SMT) in order to ensure that all safeguarding measures are implemented, adhered to and periodically reviewed to satisfy legal and regulatory requirements.

Specific responsibilities are assumed by the Managing Director of Finance and Administration who is responsible for:

- Managing the Safeguarding Manager;
- Overseeing the Safeguarding Action Plan and all concerns that are reported and the actions taken to address these concerns;
- Reporting any serious safeguarding incidents involving Freedom Fund personnel or associated individuals to the Charity Commission or any other external agency in the UK and/or abroad;
- Overseeing safeguarding investigations;
- Receiving concerns about the practice of the Safeguarding Manager.

The Managing Director of Finance and Administration is the Designated Safeguarding Lead (DSL) for the Freedom Fund and shall inform and consult the CEO on serious incidents, acting as a link between operational staff and the Board of Trustees on safeguarding concerns/disclosures.

The Charity Commission guidelines require the trustees of a charity to maintain oversight of safeguarding across the organisation and prioritise the safety and well-being of those who benefit from, or work with, the charity. Within the Freedom Fund, the functions of the Nominated Trustee for Safeguarding include:

- Acting as a point of contact within the Board for the CEO, the Managing Director of Finance and Administration and the Safeguarding Manager;
- Receiving and responding to any concerns that relate to the CEO;
- Informing the Board of Trustees of any safeguarding concerns/investigations, which may affect the reputation, and standing of the organisation.

11.1 Safeguarding Working Group (SWG)

The Freedom Fund's global network of Safeguarding Focal Points form the organisation’s Safeguarding Working Group (SWG) and support the SMT to prevent and respond to abuse and exploitation. The SWG shall meet periodically to ensure that best practice is developed, implemented and reviewed across all Freedom Fund hotspots.
11.2 Safeguarding Focal Points

The implementation of the Freedom Fund’s Safeguarding Policy requires all program teams to appoint a **Safeguarding Focal Point** for their hotspots. Designated Safeguarding Focal Points are responsible for:

- Implementing the Freedom Fund’s Safeguarding Policy and procedures in all projects implemented in their hotspot;
- Supporting implementing partners to have robust, accessible, reporting mechanisms in place;
- Referring hotspot safeguarding concerns and complaints (from partners and program participants) to headquarters via the established reporting system;
- Carrying out mapping exercises of referral mechanisms, local laws and cultural practices that could support management of safeguarding and prevention of SEA concerns (in particular child safeguarding concerns) and the relevant authorities who can support in the event of a case;
- Acting as the representative of their hotspot on the Freedom Fund’s Safeguarding Working Group;
- The Safeguarding Focal Point may be the first point of contact in the event of a case of reported concern in that hotspot.

Additional responsibilities will be assumed by the Program Managers who will:

- Ensure that each hotspot and hotspot partners identify a Safeguarding Focal Point;
- Allocate support and resources to Safeguarding Focal Points in order to carry out their role;
- Ensuring safeguarding is implemented in hotspot strategy plans and budgets for hotspots;
- Ensure that the Safeguarding Policy and procedures are kept up to date and exercised by all hotspot staff.

12. Monitoring and evaluation

This policy shall be reviewed and updated in accordance with any regulatory and legal requirements as and when required or as a result of any periodical review process. The staff declaration form shall be renewed to reflect any policy changes.

The Freedom Fund commits to ensuring adequate resources are allocated at headquarters and hotspots, to ensure safeguarding implementation, monitoring and capacity building. This includes resources to provide training to all staff, and partner organisations who work directly with children and vulnerable adults.

The Board of Trustees shall be periodically updated on the progress and implementation of this policy and the Safeguarding Action Plan.
1. Safeguarding in Media, Communications and Photography

1.1 The use of sounds, images and program participant-related data.

The Freedom Fund have clear guidelines for safeguarding program participants in our media, communications and photography. The best interests of program participants are prioritised over opportunities for increased funding, positive public profile and advocacy. When recording, photographing, or filming a program participant for work-related purposes or using survivor-related data, staff and associated persons should adhere to the following codes of practice:

1. To undertake informed consent procedures to ensure that our contributors fully understand the implications and outcomes of their contribution and are enabled freely to give (or withhold) their consent.
2. Before recording, photographing or filming a program participant, assess and endeavour to comply with local traditions or restrictions for reproducing personal images.
3. Before recording, photographing or filming a program participant, obtain verbal consent from those featured. After recording, photographing or filming a program participant, obtain written consent from those featured, and in the case of a child, a parent or guardian, to use images and stories for publicity. In some instances, such as with group photos, it may be sufficient to obtain the written consent of the community leader. Prior to use of images or stories, ensure that there would be no repercussions when the individual is featured publicly.
4. Refrain from photographing program participants or using their photographs in program or promotional materials without following the Safeguarding Policy.
5. Ensure recordings, photographs, films, videos and DVDs present children and vulnerable adults in a dignified and respectful manner and not in a vulnerable or submissive manner. Contributors should be adequately clothed and not in poses that could be seen as sexually suggestive.
6. Ensure recording and images are honest representations of the context and the facts.
7. Ensure file labels do not reveal identifying the information about a program participant when sending images electronically.
8. Ensure data and images are securely stored, as outlined in the Staff Handbook.
9. Respect a program participant’s decision to refuse to be interviewed or photographed.
10. Avoid negative, degrading or stigmatising images of participants, avoiding perpetuating negative stereotypes.
11. Adhere to the ‘do no harm’ principle when gathering and using images and stories and sharing data. Fully assessing and responding to, the risks to contributors.

2. Social Media

2.1 The Freedom Fund’s social media accounts

- Use only social media platforms sanctioned by the Freedom Fund and refrain from private use of program participant images or posting them on personal social media.
- Always ensure that informed written consent was obtained before publishing any photos, videos or personal information.
- Consent is given to ‘The Freedom Fund’ as an organisation and not to the individual for personal use.
• Usage of the Freedom Fund’s official social media channels are restricted to the Communications Manager and Operations Manager.

2.2 Personal social media accounts

• Keep your personal and professional life separate, including on social media. In your role as a representative, never befriend a program participant on your personal social media platforms.
• Never directly post images or stories about people who are supported by the Freedom Fund on your personal social media accounts.
• If you wish to promote the work of the Freedom Fund, associated individuals are encouraged to share information that has been posted on the Freedom Fund website or social media platforms by sharing/re-tweeting information on their personal social media accounts.
• Always think twice about what you post/share and what implications this may have for the Freedom Fund.
• Never upload or post any racist, defamatory, obscene, or abusive content.
• Always inform the Safeguarding Manager if you observe or read content from the Freedom Fund associated individuals which breaches these guidelines and the Safeguarding Policy.

2.2 Partners’ use of social media:

• Where a partner organisation has posted images or stories about program participants that make them identifiable and may put them at risk, discuss this with the partner organisation as soon as possible and agree a way forward that prioritises the safety of children and vulnerable adults.
• Always inform the Safeguarding Manager if you observe or read content from The Freedom Fund partners (especially in relation to supported programs) which breaches this code or Safeguarding Policy.

Declaration

I have read the Safeguarding Policy and Code of Conduct and agree to abide by it at all times to protect the children and vulnerable adults I may come into contact with through my work for and/or association with the Freedom Fund.

Name and signature: ___________________________ Date: ___________________________
As a representative of the Freedom Fund, employees and associated individuals must commit to abiding by this Code of Conduct which requires all individuals to:

- Maintain high standards of personal and professional conduct.
- Be aware of potential abuses by maintaining dialogue with program participants.
- Encourage program participants to raise concerns about abuse by clarifying the procedure which they should take to do so.
- Affirm the dignity of program participants and such that they are listened to, respected, understood and valued, even when rigid societal structures (caste, class, etc.) or societal norms (gender, age, etc.) suggest otherwise.
- Guarantee that program participants fully understand the nature of their participation in any projects or programs.
- Promote an organisational culture in which abuses do not go unchallenged and complicity in violation of these codes is condemned as outlined in the Freedom Fund’s whistleblowing policy. Managers have a particular responsibility to support and develop systems that maintain such an environment.
- Organise and plan workplace spaces and activities to minimise risks.
- Implement a reporting procedure which enables staff and associated individuals, as well as associated individuals, to raise concerns about abuse or breach of policy.
- Take seriously any concerns raised about abuse, support any individual who raises such a concern, and comply fully with investigations of abuse.
- Ensure the protection of program participants who may be the subject of this abuse and seriously take into account the needs and wishes of the survivor of abuse.
- Relationships at work: Employees must not allow a personal relationship with a colleague to influence their conduct at work. Should a relationship give rise to a conflict of interest, result in an unfair advantage or disadvantage, or breach of confidentiality, employees are required to disclose to the Managing Director of Finance and Administration.

2. Limitations on behaviour

Employees and associated individuals must not:

1. Hit or otherwise physically abuse program participants.
2. Develop physical/sexual relations with program participants. 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 a child is not a defence.
3. Exchange money, employment, goods or services for sexual favours.
4. Use language or give suggestions which are inappropriate, abusive or offensive with children or program participants.
5. Behave in a sexually provocative manner.
6. Develop inappropriate relationships with program participants that may be considered exploitive. Sexual exploitation constitute acts of serious misconduct and are therefore grounds for disciplinary measures, including dismissal.
7. Accept bribes or significant gifts from governments, program participants, donors, suppliers or others.
8. Place a program participant in a risky situation.
9. Spend excessive time alone with a child. – If staff or associated individuals need to consult with a child as part of a project activity or feedback session, they must ensure that they observe appropriate boundaries in their contact.

10. Take a program participant home with you, especially to stay overnight and especially if nobody else will be present.

11. Share a bed or room with a program participant.

12. Do things for program participants of a personal nature that they can do for themselves.

13. Condone, or participate in, illegal, unsafe or abusive behaviour of program participants.

14. Act in a manner which shames, humiliates, belittles or degrades program participants or otherwise perpetrates emotional abuse.

15. Discriminate against or favour particular programme participants to the exclusion of others.

16. Make promises to program participants that you cannot fulfil.

17. Use the organisation’s computer or other equipment to view, download, create or distribute inappropriate material.
Program Participant disclosures:
Gathering information at the time of reporting is a crucial element of the process. The report should be objective and precise, focusing on the facts and relevant information that will help when it is time to act. When a program participant discloses maltreatment or abuse, make sure to ask the questions needed to have a clear understanding of what the program participant is saying and to ensure the security and welfare of the individual.

- Inform the complainant that all information relating to the concern shall be shared on a need to know basis only and kept secure at all times.
- Be receptive of the complainant and listen to what they have to say.
- Write a clear record of what is said by the complainant in their own words. If a direct discourse, take the time to cross-check with the complainant that you understand everything before writing.
- If the disclosure has been disclosed to you directly, allow the complainant to read what you have written. If the complainant is illiterate, read out the text to ensure that what you have written is what they meant. Ask the person if they are satisfied with what you have written. If they are not, correct the text with them.

DATA PROTECTION – Ensure that this form, once completed, is stored in a locked file and/or is destroyed once the information is no longer needed.

Complainant information

<table>
<thead>
<tr>
<th>Full name:</th>
<th>Date of disclosure</th>
</tr>
</thead>
<tbody>
<tr>
<td>Telephone:</td>
<td>Address: (if they want to disclose)</td>
</tr>
</tbody>
</table>

The complaint (Use the complainant’s own words and ask questions to get as much important information as possible. At a minimum, the complainant should indicate who, what, how, where and when the complaint is about.)

<p>| Date of the incident (when): |
| Date of disclosure: |
| Full name of the survivor (who) – fill only if consent is given: |
| Age of the survivor: |
| Where: |
| What happened: |</p>
<table>
<thead>
<tr>
<th>Was the concern:</th>
<th>Observed</th>
<th>Reported by a child/adult</th>
<th>Reported by a Third Party</th>
</tr>
</thead>
<tbody>
<tr>
<td>If reported by a third party, please state their name &amp; relationship to the child/adult:</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Information about the alleged perpetrator**

| Name of accused: | | | |
|-----------------|--------------------------|---------------------------|
| Position held by accused: | | | |
| Organisation for which the accused work(s): | | | |
| Relationship to the survivor (if any): | | | |
| Current residence of the accused (if known): | | | |
| Gender: | | | |
| Physical description of accused: | | | |

**Service provision**

<table>
<thead>
<tr>
<th>Has the survivor been informed of the available medical and psychosocial care?</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>If yes, has the survivor sought medical or psychosocial treatment after the incident?</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>If yes, who provided treatment?</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

*If no, provide information to the complainant regarding the nearest medical care and psychosocial support services, or get the consent of the survivor to pass on their details to refer them.*
If a criminal offence has occurred, has the survivor (or representative of the survivor) contacted police?

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
</table>

If yes, what has been done?

Has the survivor sought legal advice?

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
</table>

**Consent, confidentiality and next steps**

Explain to the complainant that you are under an obligation to report allegations of safeguarding and sexual exploitation and abuse to donors but that identifying information about the complainant, the survivor and the name of the alleged perpetrator will not be shared *unless otherwise indicated*. However, for the purposes of an internal investigation, the name and contact details of the complainant will be necessary.

Complainant consents to sharing name and contact details for investigation purposes:

Yes   No

Inform the complainant that the organisation conducting the investigation will keep in contact with them to keep them informed of the progress of the complaint.

<table>
<thead>
<tr>
<th>Name of the Safeguarding Focal Point:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Job title:</td>
</tr>
<tr>
<td>Location:</td>
</tr>
</tbody>
</table>
Annex 3: Reporting Flowchart: THE FREEDOM FUND INTERNAL PROCEDURE.

A Safeguarding incident has occurred or is alleged to have occurred

Report to Safeguarding Focal Point (or alternatively, to line manager) within 24 hours

Safeguarding Focal Point logs incident in incident register

Safeguarding Focal point(s) and/or Senior Management determine next steps

Report to external bodies e.g. Police, CEOP, DBS, Donors

Internal investigation (where appropriate)

Refer survivor to local relevant services

No further action required

Report to Board
Inform Complainant
Ongoing reporting and liaising with regulatory bodies where required
Ongoing survivor support
A Safeguarding incident has occurred or is alleged to have occurred

Report to your organisation’s Safeguarding Focal Point (or alternatively, to line manager) within 24 hours

Safeguarding Focal Point logs and escalates. *If the incident is related to a Freedom Fund program, program participant or staff, the partner must inform the Freedom Fund immediately

The following incidents MUST be reported to the Freedom Fund immediately:

- Any concerns about, or reports of inappropriate behaviour or abuse/harassment by the Freedom Fund staff
- Individual reports of sexual exploitation and abuse of adults in project locations/community by staff, partners, volunteers
- Individual reports of all forms of abuse/exploitation of children by staff, partners, volunteers

*All other concerns are required to be reported to the Freedom Fund via standard M&E operating procedures such as; quarterly progress reports, annual activity reports and partner monitoring tools.

The Freedom Fund liaise with Partner organisation to determine next steps

Report to external bodies e.g. local Police, Donors

Internal investigation (where appropriate)

Refer survivor to local relevant services

No further action required

Report to Partner and Freedom Fund board
Inform Complainant
Ongoing reporting and liaising with regulatory bodies where required
Ongoing survivor support
Overview

The Freedom Fund is committed to the welfare of children and adults and their protection from abuse and exploitation. Every person who shares in the work of the Freedom Fund - including staff, contractors, visitors, volunteers and grantees - also shares in the responsibility to take every precaution to protect the children, adults and families we serve.

For the purposes of this document, the term “program participant” refers to any child or adult survivor of slavery or at-risk individual involved in some manner in a project or program related to the Freedom Fund. “Child” specifically refers to any program participant under the age of 18.

As a visitor to the Freedom Fund’s programs, you will have the opportunity to see and experience our work and the work of our partners, and in some instances to interact directly with children and/or adult program participants. In order to ensure you can fully learn from and enjoy these visits, while also ensuring that program participant’s’ safety and wellbeing, we ask that you read and sign this document. For more information, and to learn more about our guidelines for Freedom Fund staff and others, please request to see our full Safeguarding Policy.

Communications guidelines

Visitors should refrain from developing personal relationships with program participants, exchanging contact details or pursuing relationships outside of the program environment. These policies are in place to minimise the risk of harmful relationships developing. All visits should be arranged with the permission of the Freedom Fund and/or Freedom Fund partner organisations. Communication with individual program participants is discouraged; however, if the need arises, any communication should be directed through the Freedom Fund and/or Freedom Fund partner organisation.

Generally, visitors are welcome to engage in light photography for personal commemoration of the trip. However, we must ask for your consideration and sensitivity when meeting with slavery survivors, project participants, and implementing partner personnel. Depending on the situation, the partner organisation may request that no photos or videos are taken during a visit. We will brief you verbally about guidelines for each visit.

Respect for program participant’s’ personal dignity, privacy, and safety is paramount in all interactions. Please make sure to always ask permission before getting cameras out, even if members of the community are taking your picture with their mobile phones.

Survivors of trafficking, exploitation, and slavery may be at risk of being further ostracised or discriminated against. People affected by slavery are often subjected to violence and threats of retaliation and may fear for their own safety and that of their loved ones. Due to cultural considerations and power dynamics, they may be reluctant to say no to a request for a photograph, even when they would prefer not to have one taken. We ask that you carefully consider these realities before asking a community member for permission to take their photograph. If you would like guidance on these or other considerations during the trip, please consult with a Freedom Fund or Freedom Fund partner organisation staff member.

Visitors should always:

- Follow the instructions of the Freedom Fund and/or Freedom Fund partner organisation regarding whether recording photo/video is appropriate during a visit.
- **Refrain from taking any photos of children** and consult with the Freedom Fund and/or Freedom Fund partner organisation if a program participant’s age is in question.
- Obtain consent from program participants before taking photographs and images.
- Ensure that any images or videos depict program participants in a respectful manner and do not present them as victims, vulnerable or submissive.
• Refrain from using photography or videography for public use—blogs, websites, and social media including Twitter, Facebook, and Instagram—unless arranged in advance with the Freedom Fund and/or Freedom Fund partner organisations. In particular, visitors should never use images in any way which reveals the identity or location of program participants or their families.

Guidance on appropriate behaviour

The following guidelines have been put in place to ensure program participants’ protection and respect their needs and dignity. In addition, they serve to minimise the risks to visitors and ensure that those visiting have a shared understanding of appropriate behaviour. By agreeing to be a visitor you are agreeing to abide by this guidance with the understanding that your visit will be terminated if you do fail to adhere to it.

As a Freedom Fund visitor, I will:
• Always arrange my visits through the Freedom Fund.
• Follow the directions and instructions of the Freedom Fund and/or Freedom Fund partner staff member(s) who are accompanying me on my visit.
• Treat children, their families and communities with equality and respect their privacy.
• Take photographs and videos in line with the practices detailed earlier in this guide.
• Discuss any concerns I have regarding the wellbeing of a program participant with a Freedom Fund and/or Freedom Fund partner staff member.

I will never:
• Physically abuse program participants.
• Use language or give suggestions which are inappropriate, abusive or offensive.
• Behave physically in an inappropriate or sexually provocative manner; for example, touching program participants in an inappropriate or culturally insensitive way.
• Spend time alone with a program participant away from others.
• Treat a program participant in a shaming, degrading, humiliating or otherwise emotionally abusive manner.
• Make promises to program participant that I cannot fulfil.
• Condone or participate in behaviour with program participants which is illegal, unsafe or abusive.
• Assist a program participant to leave their community, even with the consent of a child’s parents/carers or offer them the chance to visit my country of residence.
• Exchange personal contact details with a program participant.
• Arrange to stay overnight or share a room or bed with a program participant.
• Introduce other visitors to the community without permission from the Freedom Fund and/or Freedom Fund partner.
• Return to the community without permission from the Freedom Fund and/or Freedom Fund partner.

I confirm that I have read and understood the visitor guide and agree to abide by its contents.

Date

________________________________________

Full name  Signature