



Safeguarding Policy

1. About this Policy

1. Global Partners Governance (GPG) is an independent consultancy based in London, established in 2005 to strengthen political institutions and improve the quality of political representation. Our staff and expert associates work closely with partners in parliaments, governments and other institutions across the world including members of parliament, senior parliamentary staff and ministers to help make them more effective in their core tasks.
2. GPG, and its board members are committed to providing a safe and trusted environment for our beneficiaries, all staff and associates. Safeguarding children, adults at risk and all staff is an important priority for GPG.
3. This policy applies to all employees, GPG's board members, interns, associates, consultants, sub-contractors, programme delivery partners, programme visitors including journalists, and politicians, and anyone working on behalf of GPG. The parties to which this applies will be referred as GPG staff, associated personnel, and Third Parties (including anyone who acts on behalf of GPG.)
4. A copy of this policy will be supplied to all staff on induction, and to the Third Parties as appropriate. Children, parents and adults at risk are informed of this policy as appropriate. This policy is also made publicly available on our website alongside the reporting mechanism.
5. As a consultancy providing political support, GPG has limited direct contact with vulnerable beneficiaries: its staff are predominantly based in London with representative offices in Amman and Cairo. GPG's work does not normally bring them into contact with children or adults at risk; GPG only employs individuals aged 18 and over; it rarely offers work experience to individuals aged under 18; and it does not currently employ or engage the services of any adults at risk.
6. There may be other circumstances in which vulnerable beneficiaries are brought into direct contact with GPG. For example: in Ukraine a day in the Parliament was organised for school children as part of our ongoing project. The organisation of this event was handled by a local partner who has its own safeguarding policies. Also, it is possible that an adult at risk may work for GPG from time to time. GPG's staff members may come into contact with children or adults at risk as a result of their work overseas.

2. Purpose

1. The purpose of this policy is to communicate GPG's safeguarding commitments clearly, to acknowledge GPG's responsibilities, to protect vulnerable groups, particularly children, at risk adults and beneficiaries of assistance, from any harm that may be caused due to their coming into contact with Global Partners Governance (GPG), its staff, associated personnel, and the Third Parties. This includes harm arising from:
 - The conduct of GPG's staff, associated personnel, and the Third Parties
 - The design and implementation of GPG's programmes and activities

2. The policy lays out the commitments made by GPG and informs staff and associated personnel of their responsibilities in relation to safeguarding.

3. What is safeguarding?

1. In the UK, safeguarding means protecting peoples' health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect, especially that of sexual exploitation to any individual.
2. In the context of GPG's work, we understand it to mean protecting people, including children and at-risk adults, from harm that arises from coming into contact with our staff or programmes.
3. Further definitions relating to safeguarding are provided in the glossary below.

4. Policy Statement

1. GPG believes that everyone we come into contact with, regardless of age, gender identity, disability, sexual orientation or ethnic origin has the right to be protected from all forms of harm, abuse, neglect and exploitation. GPG will not tolerate abuse and exploitation by staff, associated personnel or the Third Parties.

This policy will address the following areas of safeguarding: child safeguarding, adult safeguarding, and protection from sexual exploitation and abuse. These key areas of safeguarding may have different policies and procedures associated with them (Associated GPG Policies: Code of Conduct Policy; Disciplinary Procedure; Grievance Procedure; Harassment, Bullying & Victimisation Policy; Recruitment Policy; Equality & Diversity Policy; Duty of Care Policy; Whistleblowing Policy and Ethical & Anti Bribery Policy; Modern Slavery Statement).

2. GPG commits to addressing safeguarding throughout its work, through the three pillars of prevention, reporting and response.

5. Prevention

1. GPG will:
 - Ensure all staff, associated personnel and the Third Parties have access to, are familiar with, and know their responsibilities within this policy;
 - Design and undertake all its programmes and activities in a way that protects people from any risk of harm that may arise from their coming into contact with GPG. This includes the way in which information about individuals in our programmes is gathered and communicated;
 - Implement stringent safeguarding procedures when recruiting, managing and deploying staff and associated personnel and/or engaging with the Third Parties;
 - Ensure staff and where necessary associated personnel and the Third Parties receive training on safeguarding at a level commensurate with their role in the organisation;
 - Record and monitor all reported safeguarding complaints and concerns;
 - Promptly report in writing any complaints, concerns and incidents regarding sexual exploitation, abuse or harassment, or any attempted or threatened sexual exploitation, abuse or harassment to GPG's clients and donors, and where necessary to the appropriate authorities; and
 - Where needed, put in place local procedures that are consistent with this policy which outline the reporting requirements and the manner in which they are escalated within each GPG entity and teams.

6. Responsibilities of staff and associated personnel

Child safeguarding

1. GPG staff and associated personnel must not:
 - Engage in sexual activity with anyone under the age of 18;
 - Sexually abuse or exploit children;
 - Subject a child to physical, emotional or psychological abuse, or neglect; and
 - Engage in any commercially exploitative activities with children including child labour or trafficking.

Adult safeguarding

2. GPG staff and associated personnel must not:
 - Sexually abuse or exploit at risk adults; and
 - Subject an at risk adult to physical, emotional or psychological abuse, or neglect.

Protection from sexual exploitation and abuse

3. GPG staff and associated personnel must not:
 - Exchange money, employment, goods, or services for sexual activity. This includes any exchange of assistance that is due to beneficiaries of assistance; and
 - Engage in any sexual relationships with beneficiaries of assistance since they are based on inherently unequal power dynamics.
4. Additionally, GPG staff and associated personnel are obliged to:
 - Contribute to creating and maintaining an environment that prevents safeguarding violations and promotes the implementation of the Safeguarding Policy. Such environment should respect the rights of adults and children to be safe; treat everyone with respect; respect a person's right to privacy; recognise and allow for the needs of people with learning difficulties and/or disabilities; be watchful for, and aware of, signs that a child or adult at risk may be in need of additional help, suffering or likely to suffer harm and report any concerns in accordance with this policy.
 - Report any concerns or suspicions regarding safeguarding violations by an GPG staff member, associated personnel and/or Third Parties to the designated safeguarding lead (see below in section 9.1); their line manager, or through the GPG Whistleblowing policy.
 - Seek guidance and advice if unsure about a potential breach of this policy.
 - Notify GPG of any criminal prosecutions during or prior to employment or engagement with GPG.

Breach of this code may lead to disciplinary action.

7. Responsibilities of the Third Parties:

The Third Parties that engage with GPG must take reasonable measures to ensure that their personnel do not:

- Engage in sexual activity with any person under the age of 18, regardless of the local age of consent or any mistaken belief held concerning the age of the person
- Engage in transactional sex when working in the international aid context, and specifically within the context of GPG's operations, which shall include but not be limited to the exchange of money, employment, goods or services for sex, irrespective of it being engaged in outside work hours. For the purposes of this policy, "Sex" includes sexual favours or any form of humiliating, degrading or exploitative behaviour of a sexual nature.
- Sexually exploit, abuse or harass another individual.
- Engage in any commercially exploitative activities with children including child labour or trafficking.
- Engage in any sexual relationships with beneficiaries of assistance since they are based on inherently unequal power dynamics.

8. Reporting a concern or allegation

1. GPG will ensure that safe, appropriate, accessible means of reporting safeguarding concerns are made available to staff and the communities we work with.
2. Any staff reporting concerns or complaints through formal whistleblowing channels (or if they request it) will be protected by GPG's Whistleblowing Policy.
3. GPG will also accept complaints from external sources such as members of the public, partners and official bodies as set out in Section 9 of this policy.

9. How to report a safeguarding concern

1. Where a member of staff (this includes interns and associates, as defined above), and/or the Third Parties has a concern:
 - that a child may be being abused or at risk of harm;
 - that an adult at risk may be being abused or at risk of harm; or
 - that an adult working with children or adults at risk (whether at GPG, a school or a sub-grantee or programme delivery partner) may pose a risk of harm to those children or adults at risk;
 - they should report it immediately to their line manager. Alternatively, GPG employees, associated staff and the Third Parties have a responsibility to report any actual or suspected wrongdoing related to safeguarding to the safeguarding lead either by sending an email to reportingconcerns@gpgovernance.net (which is monitored by GPG's safeguarding lead and Director) at the earliest possible opportunity or by filling in the incident reporting form to ensure confidentiality. An incident reporting form is available in Annex for guidance purposes. For the reporting purposes as much detail as possible should be provided.
2. Subject to the below, the above rule applies regardless of where the concern or allegation arises and where the child or adult lives.
3. The exceptions to the above rule are:
 - Where the concern relates to a pupil or member of staff of a school in the United Kingdom, GPG's member of staff should normally raise the concern with the school's Safeguarding Lead in the first instance (unless to do so would put a child at further risk of harm), and with

GPG's Safeguarding Lead as above shortly thereafter. Where in doubt, staff should seek advice from GPG's Director.

- Where the concern is about Safeguarding Lead, it should be reported to GPG's Director on emily@gpgovernance.net.

10. Responding to a safeguarding concern

1. Once a safeguarding concern has been reported, as a first priority, the safeguarding lead in receipt of the complaint will make sure that the person affected by the alleged abuse is at no risk of further harm and has any urgent needs met before following the steps outlined in this policy.
2. The safeguarding point of contact will acknowledge receipt to the survivor/complainant and contact the relevant reporting line depending on the persons involved in the case.
3. Within 72 hours, Safeguarding lead informs the stakeholders of the case as needed, including the funder where relevant.
4. GPG Safeguarding Lead will start the investigation and if needed internal and/or external case support will be acquired.
5. GPG Safeguarding Lead will submit the investigation report based on safeguarding reports and concerns according to policy and procedure, and legal and statutory obligations.
6. GPG will apply appropriate disciplinary measures to its employees and/or associated staff found in breach of policy which could result in dismissal for gross misconduct. In the event a violation is found to involve a criminal act, this could result in referral to the relevant authorities where it is reasonably considered to be safe to do so.
7. Where any Third Party violates their responsibilities as also set out in the Section 7 above, GPG will be entitled to:
 - terminate its contracts with the Third Party with immediate effect by written notice;
 - recover from the Third Party with immediate effect by written notice;
 - recover from the Third Party any loss sustained as a result of any breach of this policy, whether or not the contract is terminated.
8. GPG will offer support to survivors of harm caused by staff or associated personnel, regardless of whether a formal internal response is carried out (such as an internal investigation). Decisions regarding support will be led by the survivor.
9. GPG's Safeguarding Lead will take all concerns and allegations of abuse seriously and will respond appropriately to these. Where the concern relates to a child or adult in the United Kingdom, this may require a referral to children's social care services, adult's safeguarding services, the Local Authority Designated Officer (LADO) and occasionally the police.
10. The Safeguarding Lead must report all allegations of abuse against staff working in the United Kingdom to the LADO within 24 hours of the allegation coming to light. An allegation may relate to a person who works with children who has:
 - behaved in a way that has harmed a child, or may have harmed a child;
 - possibly committed a criminal offence against or related to a child; or
 - behaved towards a child or children in a way that indicates they may pose a risk of harm to children.

11. Where GPG becomes aware of a concern or allegation of abuse relating to a member of staff working overseas, or an adult working for a programme delivery partner or contractor based overseas, referrals may need to be made to relevant local agencies. The Safeguarding Lead will take advice on the most appropriate course of action in order to ensure the safety of children and adults at risk who come into contact with GPG outside the United Kingdom.
12. The Board Members will be informed of all allegations of abuse involving a member of staff (as defined above) at GPG, a subcontractor or programme delivery partner.
13. GPG will ensure that lessons learnt from the incidence throughout the organisation.

11. Confidentiality

1. It is essential that confidentiality is maintained at all stages of the process when dealing with safeguarding concerns. Information relating to the concern and subsequent case management should be shared on a need to know basis only, and should be kept secure at all times.

12. Glossary of Terms

1. **Beneficiary of Assistance** - Someone who directly receives goods or services from GPG's programme. Note that misuse of power can also apply to the wider community that the NGO serves, and also can include exploitation by giving the perception of being in a position of power.
2. **Child** - A person below the age of 18
3. **Harm** - Psychological, physical and any other infringement of an individual's rights
4. **Psychological harm** - Emotional or psychological abuse, including (but not limited to) humiliating and degrading treatment such as bad name calling, constant criticism, belittling, persistent shaming, solitary confinement and isolation.
5. **Protection from Sexual Exploitation and Abuse (PSEA)** - The term used by the humanitarian and development community to refer to the prevention of sexual exploitation and abuse of affected populations by staff or associated personnel. The term derives from the United Nations Secretary General's Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse (ST/SGB/2003/13)
6. **Safeguarding** - In the UK, safeguarding means protecting peoples' health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect.
7. **Sexual abuse** - The term 'sexual abuse' means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.
8. **Sexual exploitation** - The term '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, socially or politically from the sexual exploitation of another. This definition includes human trafficking and modern slavery.
9. **Survivor** - The person who has been abused or exploited. The term 'survivor' is often used in preference to 'victim' as it implies strength, resilience and the capacity to survive, however it is the individual's choice how they wish to identify themselves.

- 10. At risk adult** - Sometimes also referred to as vulnerable adult. A person who is or may be in need of care by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.
- 11. Safeguarding Lead:** The designated person at GPG who is acting as a focal point for safeguarding concerns and complaints. The safeguarding lead can be contacted at reportingconcerns@gpgovernance.net.
12. In our sector, we understand it to mean protecting people, including children and at risk adults, from harm that arises from coming into contact with our staff or programmes. One donor definition is as follows:
- Safeguarding means taking all reasonable steps to prevent harm, particularly sexual exploitation, abuse and harassment from occurring; to protect people, especially vulnerable adults and children, from that harm; and to respond appropriately when harm does occur.
13. This definition draws from our values and principles and shapes our culture. It pays specific attention to preventing and responding to harm from any potential, actual or attempted abuse of power, trust, or vulnerability, especially for sexual purposes.
14. Safeguarding applies consistently and without exception across our programmes, partners and staff. It requires proactively identifying, preventing and guarding against all risks of harm, exploitation and abuse and having mature, accountable and transparent systems for response, reporting and learning when risks materialise. Those systems must be survivor-centred and also protect those accused until proven guilty.
15. Safeguarding puts beneficiaries and affected persons at the centre of all we do.

Annex - Incident Reporting Form

Please fill in all the sections to the best of your knowledge. We recommend that you leave your contact details in case we need to contact you again for further information at a later stage of the investigation.

Region	
Location	
Client/Donor	
Project	
Reported by (your name, role, contact details)	
Reported about	
Complaint recipient	
Type of complaint (state the relevant policy area e.g. safeguarding, code of conduct etc.)	

Date(s) of the incident(s)	
Summary of facts	
Action taken to date	
Contact Details (you are strongly encouraged to leave your contact details, as the investigator may need to touch base with you for more details throughout the investigation process).	
Other comments	