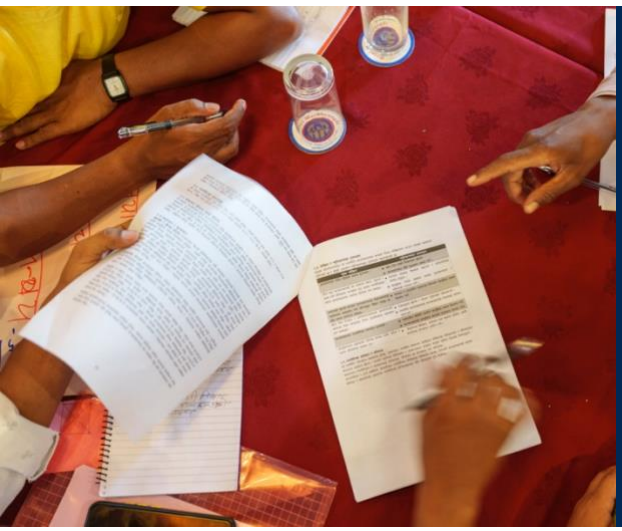
SAFEGUARDING POLICY

Revised June 2023



The Freedom Fund takes the safeguarding of both the people we serve and our own staff incredibly seriously. We have established systems to ensure that power isn't being abused and vulnerability isn't exploited. The comprehensive Safeguarding Policy in this document is compliant with the International Standards for Safeguarding and is reviewed and updated every three years. We also ask all of our funded implementing partners to use versions of this policy that suit their jurisdictions. In addition, we have a Safeguarding Manager, based in our London headquarters, and Safeguarding Focal Points in each geography where we work, to ensure that all our safety measures are understood, implemented, and regularly reviewed and updated by grantees.

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 team member or associated individual must have the opportunity to contribute to our mission in a safe and respectful work environment.

Safeguarding is the set of internal facing, business critical, policies, procedures, and practices that organisations employ to ensure that their organisations are safe. Safeguarding extends to protecting people, including children and adults in vulnerable circumstances, from harm that arises from coming into contact with the organisation's team members, associated individuals or activities.

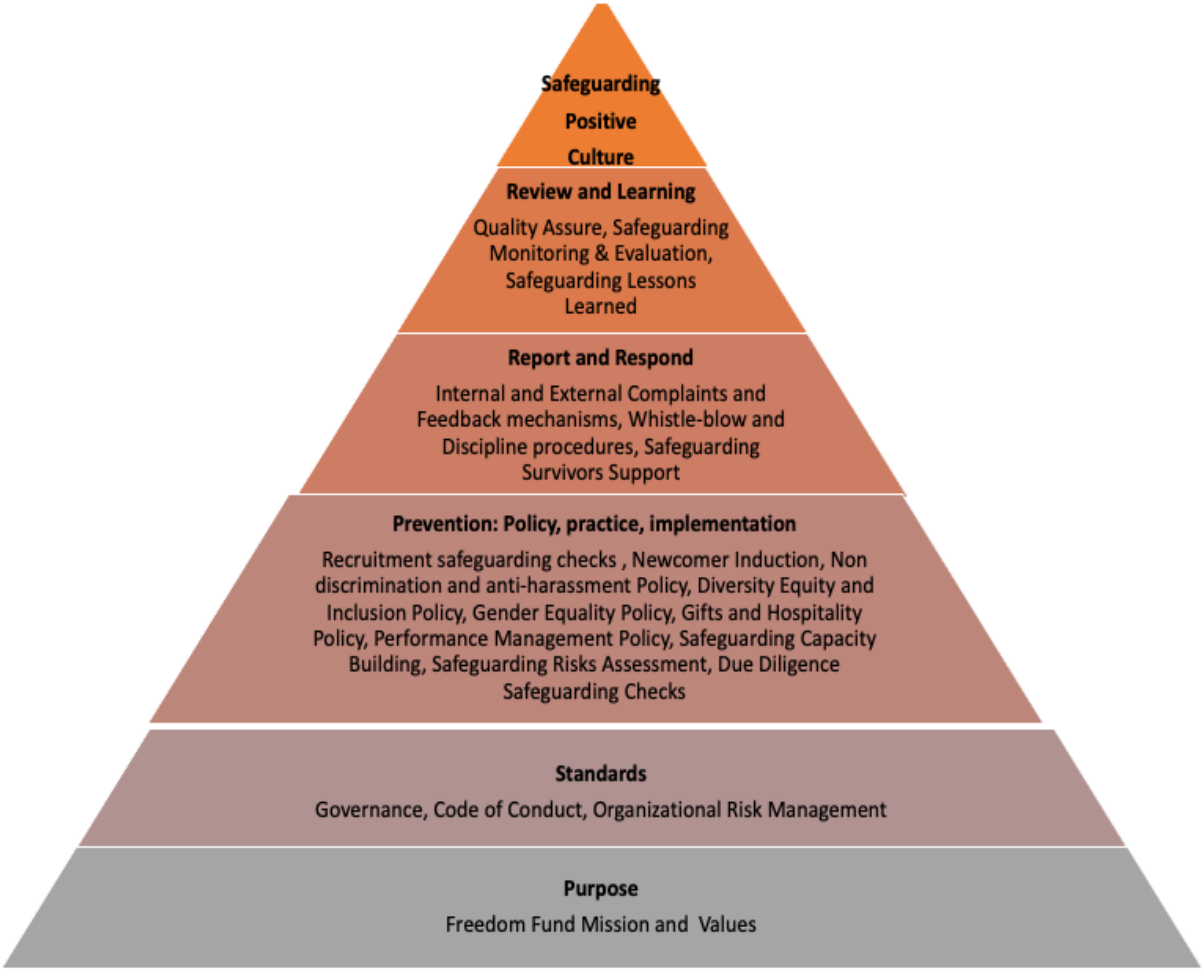
The policy and procedures described in this document apply to all the Freedom Fund's team members, board members, interns, researchers, outside consultants, contractors, interpreters, partner staff, and outside visitors such as individual donors, that have direct

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or indirect contact with one another, program participants and overall communities in which the Freedom Fund operates, 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 sits within a policy and governance framework that is underpinned by our values, what we stand for and intend to achieve. We aim to identify and minimise risks and deter and remove opportunities for abuse to occur. This is done by upholding high standards, putting in place stringent monitoring mechanisms, and investing in continuous learning in order to strengthen and grow the organisational positive safeguarding culture.

FREEDOM FUND SAFEGUARDING FRAMEWORK



This version of the policy was approved and adopted by the Senior Leadership Team of the Freedom Fund in March 2023. The next revision is planned for 2026.

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

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forms of exploitation, in addition to the general vulnerability of children. The Freedom Fund's 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 and representing it.

The safeguarding policy is committed and guided by the principle of "Mandatory Compliance". Therefore, Freedom Fund associated individuals must ensure they understand the Safeguarding Policy, their responsibilities and how to report any wrongdoing or concerns. This policy, and its accompanying appendices where relevant are mandatory for all Freedom Fund associated individuals and no exceptions will be made.

The Freedom Fund complies with reporting requirements from donors and relevant bodies such as the UK Charity Commission on Safeguarding concerns.

The Freedom Fund operates a zero-tolerance approach to abuse and exploitation. Under no circumstances will any abuse by Freedom Fund associated individuals be tolerated, all concerns shall be investigated without delay, and each case will be dealt with fairly and professionally according to Freedom Fund disciplinary procedures and referred to local authorities, if required.

Zero tolerance of inappropriate behaviour applies whether a proven incident happens in or out of working hours. The Freedom Fund safeguarding approach prevails in all stages of our operations, projects and activities, thus ensuring the organisation does not harm anyone.

The Senior Leadership Team (SLT) has a particular responsibility to uphold the highest standards, to set a good example, and to create a working environment that supports and empowers staff. All team members have a responsibility to understand and promote the policy. Team members must do all they can to prevent, report and respond appropriately to any concern or potential breach of the policy.

The Board provides support and advice to the Chief Executive and SLT in managing any concerns relating to safeguarding which may affect the reputation and standing of the organisation. The board members must ensure that any serious safeguarding incidents involving the organisation's team members and other associated individuals, paid or unpaid, are reported to the Charity Commission or other regulatory bodies or donors as required.

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.

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3. 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. Recognising this, the Freedom Fund requires that all associated individuals of the Freedom Fund follow the guidelines of this Policy during their interactions with anyone and in particular any child, whether or not such interaction is related to professional work with the Freedom Fund. The term "child" is any person 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.

The term "program participant" refers to any child or adult currently in slavery, at risk of exploitation 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 anyone, with particular attention 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 adult in vulnerable circumstances or the failure to protect from exposure to any kind of danger, failure to carry out important aspects of care resulting in the impairment of the child or vulnerable adult'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.

In particular the Freedom Fund would like to highlight and reinforce that has a zero-tolerance policy with respect to SEAH, and will not tolerate its team members, 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 SEAH, available at https://undocs.org/en/ST/SGB/2003/13

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Further definitions can be found in Annex 1.

4. PREVENTION

4.1 The Freedom Fund team and board members

These individuals must read this Safeguarding Policy and be given opportunities to ask questions and receive adequate responses about the measures outlined in this document. Particular attention should be given to the Code of Conduct (Annex 2) stating what is to be considered appropriate and not appropriate behaviour for the Freedom Fund.

The Freedom Fund is aware of the importance of careful screening of new team members and associated individuals to avoid the risk of maltreatment of anyone, in particular children and adults in vulnerable circumstances. The Freedom Fund will undertake all measures deemed necessary whilst 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 are also asked to disclose any previous criminal convictions as part of the application process.

The Freedom Fund team member responsible for distributing this policy to these individuals will be the Senior HR and 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 team members will receive basic training in safeguarding as part of their induction (within 1 month of appointment) and periodic refresher training every 2 years. Team members with specific responsibilities (e.g., Focal Points, those with direct access to program participants and communities) will receive more in-depth training appropriate to their role (within 3 months of appointment).

The Board has designated the Chair of the Finance, Audit and Risk Committee as the focal point[1] for safeguarding issues, with this Board sub-committee receiving regular reports on safeguarding at their meetings. The Managing Director of Finance and Administration is the Focal Point within the Senior Leadership Team. The Freedom Fund has 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 and the USA. Safeguarding Champions are appointed for each Freedom Fund department.

[1] TORs for the Board Safeguarding Focal Point are available on the Freedom Fund Safeguarding Dropbox folder.

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4.2 Hotspot 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 or first six months[2] of the formal partnership agreement between the Freedom Fund and its partners, the Freedom Fund requires that organisations have a Safeguarding Policy and Code of Conduct that informs their work and interactions in particular, but not only, with children and adults in vulnerable circumstances.

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 as well as the Freedom Fund's Safeguarding Policy. This includes at least the following:

- A clear organisational statement of principles on safeguarding and protection;
- 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 incidents 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 harm, the partner must develop such a policy and procedure within the first six months of partnership. 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 anyone from abuse, children and adults in vulnerable circumstances included.

If a team 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 are implicated in an abusive act.

[2] For more information about the Freedom Fund and Hotspots Partners Safeguarding Approach, please refer to the related document on the Freedom Fund Safeguarding Dropbox folder.

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In conjunction with the Safeguarding Policy and Code of Conduct, hotspots partners are requested to have a safeguarding risk assessment (Annex 3) for their riskiest activities and to appoint a safeguarding focal point [3].

4.3 External contractors (including researchers, suppliers, vendors, interpreters, journalists, photographers, technical program consultants)

On occasion, the Freedom Fund commissions external contractors (individuals, companies, or non-governmental organisations) to undertake work on our behalf. This may include researchers, suppliers, vendors, interpreters, journalists, photographers, and other types of technical 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, communities, team members and other 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 and Code of Conduct. 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 and communities, additional pre-departure safeguards must be undertaken prior to travel, such as DBS checks or equivalent.

The following safeguarding measures must be in place:

Where external contractors are expected to have <u>no access</u> to communities (children and/or adults in vulnerable circumstances included):

- Appointing managers must ensure that external contractors read, sign, and agree to adhere to the Safeguarding Policy and Code of Conduct (Annex 2);
- 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 <u>accompanied</u> access to communities (children or adults in vulnerable circumstances included):

- Appointing managers must ensure that external contractors read and formally agree to the principles set out in the 'Visitor Guideline & Agreement (Annex 7) 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;

[3] For other safeguarding requirements associated with corporate or movement buildings grantees, please refer to the Freedom Fund Safeguarding Dropbox Folder

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- Appointing managers must ensure that a safeguarding briefing is given upon arrival in the hotspot by the hotspot Freedom Fund Safeguarding Focal Point or a Freedom Fund Program Advisor, Freedom Fund Program Management.

Where external contractors are expected to have unaccompanied access to communities (children or adults in vulnerable circumstances included):

- Appointing managers must ensure that external contractors read and formally agree to the principles set out in the 'Visitor Guideline & Agreement (Annex 7) 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 team members;
- 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 the hotspot Freedom Fund Safeguarding Focal Point or a Freedom Fund Program Advisor, Freedom Fund Program Management or Freedom Fund Senior Program Manager;
- Appointing managers must ensure points are discussed with contractors regarding risk mitigation exercises (such as completing safeguarding 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.

5. RECOGNISING ABUSE

The Freedom Fund understands that it may be difficult to assess whether anyone (children or adults in vulnerable circumstances included) 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 people may be at relatively more risk, such as children and adults with disabilities, individuals subject to power differences and individuals from minority ethnic, LGBTIQA+ or religious communities.

There are some clear signs, which immediately obligate you to report, using the organisational reporting channels and/or local authorities, potential abuse:

- Physical marks or symptoms of abuse.
- A child or adult's own disclosure to someone.
- Word of mouth evidence that is overheard or directly provided.

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6. RESPONDING TO A DISCLOSURE

If you have received information from an individual who is concerned about possible abuse of anyone in relation to an associated individual or activity of the Freedom Fund, 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, or adult 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 secrecy, instead inform the individual that you will need to tell someone who can help (need to know principle). You must not promise anyone 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 8]. The disclosure should otherwise be treated as strictly confidential. This is a vital component of the process;
- Do not ask leading 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 Employees Handbook.

6.1. The process for recording concerns or cases of potential abuse for Freedom Fund associated individuals, is:

1. Fill in the Freedom Fund Safeguarding Concern Form (Annex 4). Write down in detail what you observed and any related conversations that you have had.
2. Report the case to the Safeguarding Focal Point or the Safeguarding Manager within 24 hours. The report could also be made by email (anonymous or not) to safeguarding@freedomfund.org. 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. 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.

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All Freedom Fund team members and other 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. Anonymous reporting is also allowed via email.

7. 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 by email to the designated Safeguarding Focal Point/Safeguarding Manager within 24 hours, alternatively you can report directly to the Managing Director of Finance and Administration, your line manager or to safeguarding@freedomfund.org. Refer to annex 5 and 6 for reporting flowchart.

7.1 Procedure for the Freedom Fund team members and associated individuals:

All Freedom Fund team members, and other associated individuals should report safeguarding concerns (suspected or actual) to the Safeguarding Manager in person or by email, or via the safeguarding email address (safeguarding@freedomfund.org). Alternatively, they can report to the relevant Safeguarding Focal Point or to their line manager, who should escalate to the Safeguarding Manager or Managing Director of Finance and Administration.

7.2 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 Freedom Fund team members;
- Individual reports of sexual exploitation and abuse of adults in project locations / community by the Freedom Fund team members, partner staff, or associated individuals of the Freedom Fund;
- Individual reports of all forms of abuse/exploitation of children by the Freedom Fund team members, 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.

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

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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 so that partners are able to investigate any concerns adequately and/or before a monitoring visit, partners can contact their hotspot Safeguarding Focal Points.

The Freedom Fund will follow up with 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 team members or other associated individuals or activity.

8. DISCIPLINARY ACTION

If it is determined by the Freedom Fund that a team member has breached the Safeguarding Policy, disciplinary action will be taken in accordance with the Freedom Fund's disciplinary procedures as outlined in the Employee 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 impact on the victim and potential ramifications;
- The context and nature of the abuse;
- The kind of harm to anyone (child and adult in vulnerable circumstances);
- Other factors as deemed relevant.

Disciplinary action may result in termination of the relationship between the Freedom Fund and the individual(s) 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(s) and the appropriate external authorities will be informed.

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

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9. 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 team members and other associated individuals of the Freedom Fund, specific responsibilities are designated to team members 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 team members 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 anyone (children or adults in vulnerable circumstances included), 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 team members on safeguarding issues;
- Act as the Chair of the Safeguarding Working Group (see 13.1);
- Providing technical support and guidance to Safeguarding Focal Points, Safeguarding consultants and Safeguarding Champions;
- 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 Leadership Team (SLT) 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 framework and all concerns that are reported and the actions taken to address these concerns;

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- Reporting any serious safeguarding incidents involving Freedom Fund team members 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** are carried out by the Chair of the Finance, Audit and Risk Committee and 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.

9.1 Safeguarding Working Group[4] (SWG)

The Freedom Fund's global network of Safeguarding Focal Points form the organisation's Safeguarding Working Group (SWG) and support the SLT 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.

9.2 Safeguarding Focal Points

The implementation of the Freedom Fund's Safeguarding Policy requires all program teams to appoint a **Safeguarding Focal Point**[5] for their hotspots. A Safeguarding Focal Point should be appointed no later than when new partners submit their programmatic proposals to the Freedom Fund. Designated Safeguarding Focal Points are responsible for:

- Implementing the Freedom Fund's Safeguarding Policy and procedures in all projects implemented in their hotspot;
- Directly facilitate or support the capacity building of partners with safeguarding training, workshops etc;
- Supporting implementing partners to have robust, accessible, reporting mechanisms in place;
- Referring hotspot safeguarding concerns and complaints (from partners and program participants or communities) to the Safeguarding Manager via the established reporting system;

[4] SWG TOR are available on the Freedom Fund Safeguarding Dropbox folder.
[5] The US Office has a safeguarding focal point as well. TOR available in the Freedom Fund Safeguarding Dropbox folder.

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- Carrying out mapping exercises of referral mechanisms, local laws and cultural practices that could support management of safeguarding 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.

Hotspots, having more than one team member, have the safeguarding responsibilities shared as for the table below:

TASK	**Hotspot Designated Safeguarding Focal Point**	**Hotspot Program Advisors**
Receive disclosures and coordinate with partners/Freedom Fund safeguarding manager	Yes	Yes
Support partners with training logistics and needs	Yes	Yes
Incorporate safeguarding components into monitoring activities for partners	Yes + collate results	Yes
Monitor/track progress or delays with the three safeguarding phases of partners (capacity building)	Yes	Yes
Support in tailoring posters/comms safeguarding material with the partners	Yes	Yes
Provide training to partners with consultant/SG Manager/alone	Yes	No
Attend SWG	Yes	No
Have regular communication with FF Safeguarding Manager	Yes	No

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;

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- 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.

9.3 Safeguarding Champions

Every Freedom Fund Department has appointed one or more Safeguarding Champion[6] to regularly collaborate with the Safeguarding Manager. She/He operates as an antenna between the Safeguarding Manager and the rest of their team. In particular they are responsible for:

- Escalating safeguarding issues/challenges related to their department to the Safeguarding Manager
- Building organisational safeguarding capacity;
- Promoting consistency in the implementation of safeguarding policy across the organisations departments;
- Supporting Safeguarding Manager through sharing tools, learning and best practice during staff meetings;
- Supporting the development of tools and training materials to strength the implementation of safeguarding standards.

10. 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 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 team members, and hotspots' partner organisations.

The Board of Trustees shall be quarterly updated as a minimum on the progress and implementation of this policy and the overall Safeguarding Framework.

11. SAFEGUARDING IN MEDIA, COMMUNICATIONS AND PHOTOGRAPHY

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

The Freedom Fund has 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

[6] Safeguarding Champions TOR are available in the Freedom Fund Safeguarding Dropbox folder.

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purposes or using survivor-related data, team members 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 person, assess and endeavour to comply with local traditions or restrictions for reproducing personal images.
3. Before recording, photographing, or filming anyone, obtain written or in some cases verbal consent from those featured. In some instances, such as with group photos, it may be sufficient to obtain verbal consent from the group and 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 people 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 information about a program participant or a community member when sending images electronically.
8. Ensure data and images are securely stored, as outlined in the Employee Handbook.
9. Respect a person's decision to refuse to be interviewed or photographed.
10. Avoid negative, degrading, or stigmatising images of participants and communities, 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.

Please refer to: Annexes 7 and 8: Freedom Fund Consent Forms; Annex 9: Freedom Fund Visitor Guide and Agreement

11.2 The Freedom Fund's social media accounts

- Use only social media platforms sanctioned by the Freedom Fund and refrain from private use of program participants or communities (children and adults in vulnerable circumstances included) images or posting them on personal social media;
- Always ensure that informed written consent or sometimes verbal 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 Team.

11.3 Personal social media accounts

- Keep your personal and professional life separate, including on social media. In your role as a team member or associated individual;

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- 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, team members and other 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, sexist, 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.

11.4 Partners' use of social media:

- Where a partner organisation has posted images or stories about program participants or community members 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 everyone (children and adults in vulnerable conditions included);
- Always inform the Safeguarding Manager if you observe or read content from The Freedom Fund partners (especially in relation to supported programs) which breaches the Safeguarding Policy.

12. SAFEGUARDING AND EVENTS MANAGEMENT

The Freedom Fund has safeguarding measures in place to promote the safety, protection, and well-being of anyone attending its events and public-facing activities. Freedom Fund events support the organisation's fundraising and relationship-building efforts, as well as program and research work. Types of events vary, but often they consist of fundraising receptions and dinners, panel discussions and technical workshops, and donor field trips/ hotspot visits.

To find out more about how the Freedom Fund refines and adapts safeguarding standards for its events, please refer to the Freedom Fund Events and Safeguarding Policy.

Where any kind of Freedom Fund event involves children and/or adult survivors please refer to the checklist at Annex 10 of this policy.

DECLARATION

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

Name and signature: Date:

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ANNEX 1: FREEDOM FUND SAFEGUARDING DEFINITIONS

The following definitions explain terms used within the Freedom Fund's Safeguarding Policy, or that might arise in discussions of safeguarding matters.

Adult in vulnerable circumstances: is defined as someone over the age of 18 unable to take care of themselves/protects themselves from harm or exploitation; or who, due to their gender, mental or physical health, disability, or as a result of disasters and conflicts, are deemed to be at risk of being abused.

Associated individual: for the purpose of this policy, "associated individual" refers to FF board members, team members, interns, consultants, contractors, researchers, vendors, hotspot partners, corporate grantees, movement building associations, training facilitators such as Freedom Rising' s facilitators, media contractors (journalists, photographers etc), donors and visitors to hotspots.

Child: any person 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.

Child labour: the term "child labour" is often defined as work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development. It refers to work that:

1. Is mentally, physically, socially, and morally dangerous and harmful to children; and
2. Interferes with their schooling by:
    - Depriving them of the opportunity to attend school;
    - Obliging them to leave school prematurely; or
    - Requiring them to attempt to combine school attendance with excessively long and heavy work.

Child marriage: refers to any marriage where one or both spouses are below the age of 18. It is a violation of the Universal Declaration of Human Rights, which states that "marriage shall be entered into only with the free and full consent of the intending spouses." Girls are more likely to be child brides, and consequently drop out of school and experience other forms of violence.

Child Protection: in its widest, child protection is a term used to describe the actions that individuals, organisations, countries, and communities take to protect children from acts of "harm" maltreatment (abuse) and exploitation e.g., domestic violence, exploitative child labour, commercial and sexual exploitation and abuse, deliberate exposure to HIV or other infections and physical violence. It can also be used as a broad term to describe the work that organisations undertake in particular communities, environments or programmes that protect children from the risk of harm due to the situation in which they are living**.**

Discrimination: includes the exclusion of, mistreatment of, or action against an individual based on social group, race, ethnicity, colour, religion, gender, sexual orientation, age, marital status, national origin, political affiliation, or disability.

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Duty of care: is a common law concept that refers to the responsibility of the organisation and individual to provide children with an adequate level of protection against harm. It is the duty of the organisation and its individuals to protect children from all reasonably foreseeable risk of or real injury.

Financial abuse: involves making or attempting to make a person financially dependent by maintaining total control over financial resources, withholding access to money, and/or forbidding attendance at school or employment (UNWOMEN definition).

Gender based violence (GBV): refers to violence that targets individuals or groups on the basis of their gender. The United Nations' Office of the High Commissioner for Human Rights' Committee on the Elimination of Discrimination against Women (CEDAW) defines it as "violence that is directed against a woman because she is a woman because she is a woman or that affects women disproportionately", in its General Recommendations 19. This does not mean that all acts of violence against a woman or a girl child are gender-based violence, or that all survivors of gender-based violence are female.

Grooming: refers to behaviour that makes it easier for an offender to procure a child for sexual activity. For example, an offender might build a relationship of trust with the child, their family, or their community, and then seek to sexualise that relationship (for example by encouraging romantic feelings or exposing the child to sexual concepts trough obscene child abuse material). Grooming often involves normalising their behaviour to everyone, not only the child, and can also involve bestowing gifts, favours or money on the child, their family, and/or the community.

Obscene child abuse material: in accordance with the UNCRC Optional Protocol to the Convention on the Rights of the Child, "child pornography" also commonly known as "obscene child abuse material" means "any representation, of the sexual parts of a child for primarily sexual purposes".

Online grooming: the act of sending an electronic message with indecent content to a recipient, who the sender believes to be a child, with the intention of procuring the recipient to engage in or submit to sexual activity with another person, including but not necessarily the sender.

Program participant: refers to any child or adult currently in slavery, at risk of exploitation or who is a survivor of slavery who is involved in some manner in a project or program funded by the Freedom Fund.

Protection concerns: are abuses which would be usually considered criminal under local legislations, and perpetrated by persons who may not be described in the scope of the policy. In this case, perpetrators are not necessarily representing the organisation. It can be anyone within a community, country' s geographical borders.

Safeguarding concerns (internal): are those where persons covered by the policy are the alleged perpetrators and victims as well. Most commonly, but not only, referring to abuse of power, bullying or discrimination inside an office or bullying between a partner staff member and a FF staff member.

Safeguarding concerns (external): are those where representatives of the organisation commit any sort of harm to program participants or overall communities, the organisation

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is either directly or indirectly working with. Most commonly, but not only, referring to sexual exploitation and abuse. In situations in which local legislation may be weaker than this policy and the Freedom Fund Code of Conduct (Annex 2), representatives are obliged to abide by this policy, always keeping in mind the best interests of the child in particular.

Safe environment: for a child/adult a safe environment is one where active steps are taken to reduce risks of harm against, and there are clear, established guidelines and procedures for conduct, reporting abuse and follow-up.

Safeguarding survivor: the person who has been abused or exploited, by any representative of the organisation or programmatic activity. The term "survivor" is often used in preference to "victim" within the no-profit sector as it implies strength, resilience, and the capacity to survive, however it is the individual's choice how they wish to identify themselves.

Survivor: the person who has been abused or exploited. The term "survivor" is often used in preference to "victim" within the no-profit sector as it implies strength, resilience, and the capacity to survive, however it is the individual's choice how they wish to identify themselves. In the context of our work at the Freedom Fund, survivor usually implies someone who has survived an experience of modern slavery.

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ANNEX 2: FREEDOM FUND CODE OF CONDUCT

The Freedom Fund believes that anyone (children and adults in vulnerable circumstances included) have equal rights to protection from any kind of violence, abuse, harm, and exploitation, and takes seriously its duty of care towards its employees and associated individuals. The Freedom Fund also takes seriously its duty of care towards the people it works with; the communities (children and adults in vulnerable circumstances included), program and events participants and those whom its team members and other associated individuals[7] come into contact with.

As an associated individual of the Freedom Fund, I will:

- Conduct myself in a manner that is consistent with the values of the Freedom Fund.
- Treat anyone (children and adults in vulnerable circumstances included) with respect, regardless of ethnicity, colour, sex, sexual identity, language, religion, political or other opinion, nationality, disability, certification of birth or other status.
- Affirm the dignity of anyone and ensure that people are listened to, respected, understood and valued, even when rigid societal structures (caste, class, etc.) or societal norms (gender, age, etc.) suggest otherwise.
- Respect cultural differences which do not harm anyone (children and adults in vulnerable circumstances included).
- Guarantee that program and event participants fully understand the nature of their participation in any project or event.
- Promote an organisational culture in which abuse does not go unchallenged, and where complicity in violation of this code of conduct, 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.
- Be aware of potential abuse by maintaining dialogue and encouraging open communication with Freedom Fund employees, associated individuals, program and event participants (children and adults in vulnerable circumstances included) and the communities with whom we work.
- Encourage Freedom Fund employees, associated individuals and program and event participants (children and adults in vulnerable circumstances included) and communities to raise concerns about abuse by clarifying the procedure which they should take to do so. Enhance and promote their participation in the decisions that affect them.
- Take seriously any concerns raised about abuse, support any individual who raises such a concern, and comply fully with investigations of abuse.
- Keep confidential all information that I am party to regarding safeguarding cases, disclosing, and discussing information only with the relevant parties.
- Ensure the protection of anyone who may be the subject of this abuse and seriously take into account the needs and wishes of the survivor of abuse.
- Immediately disclose any harm, abuse and exploitation and policy non-compliance in accordance with appropriate procedures as outlined in the Safeguarding Policy.
- Not allow a personal relationship with a colleague to influence my conduct at work. Should a relationship give rise to a conflict of interest, result in an unfair advantage

[7] Freedom Fund associated individual: donors, partners, grantees, consultants, contractors, visitors, trustees.

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or disadvantage, or breach of confidentiality, employees are required to disclose to the Senior HR Manager or the Managing Director of Finance and Administration.

LIMITATIONS ON BEHAVIOUR

As an associated individual of the Freedom Fund, I will not:

- Engage in behaviour that is intended to shame, humiliate, belittle, or degrade anyone or otherwise perpetrate emotional abuse (including against children and adults in vulnerable circumstances)
- Hit or otherwise physically abuse anyone.
- 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.
- Exchange employment, goods, or services for sexual favours with anyone. Sexual exploitation constitutes an act of serious misconduct and is therefore grounds for serious disciplinary measures, including dismissal.
- Take advantage of my working position or title to commit an abuse of power towards those considered to be under my direct or indirect supervision.
- Use inappropriate, offensive, harassing, abusive, sexually provocative, demeaning, culturally inappropriate or discriminatory language when speaking with anyone (children and adults in vulnerable circumstances included).
- Behave provocatively or inappropriately with a child or adult in vulnerable circumstances.
- Accept bribes or significant gifts from governments, program participants, donors, suppliers, or others. Please refer to the Anti Bribery policy for more information.
- Place a program or event participant or communities in a risky situation.
- Become inebriated or drink alcohol to the point that it impairs my ability to behave professionally at working events.
- Take a program participant home with you, especially to stay overnight and especially if nobody else will be present.
- Share a bed or a room with a program participant.
- Do things for program participants of a personal nature that they can do for themselves (children and adults in vulnerable circumstances included).
- Condone, or participate in, illegal, unsafe, or abusive behaviour of program participants.
- Discriminate against or favour particular programme participants to the exclusion of others.
- Make promises to program participants that I cannot fulfil.
- Use any computer or other equipment to view, download, harass, exploit, create or distribute inappropriate material regarding children and adults in vulnerable circumstances.
- Hire children to perform domestic labour or any other labour which is inappropriate given their age or developmental stage, which interferes with their time available for education and recreational activities, or which places them at significant risk of injury or any other harm.

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Professional photography/content-gathering commissions for work purposes are organised through the Freedom Fund communications team with professional photographers and videographers. If a staff member is photographing or filming anyone on personal devices for work/program or personal purposes, I must:

- Assess and endeavour to comply with local traditions or restrictions for reproducing personal images (taking photos or videos)
- Obtain written, video, or verbal consent (as appropriate) from the person or a child and a parent/guardian of the child. As part of this I must explain how and where the photograph or film will be used.
- Ensure photographs or films present anyone in a dignified and respectful manner, not in a vulnerable or submissive manner. People should be adequately clothed and not in poses that could be seen as sexually suggestive.
- Ensure images are honest representations of the context and the facts.
- Not post images or details of anyone associated with Freedom Fund's work on personal social media sites unless verbal or written consent from the person is obtained.
- Only use the photograph/video for the circumstances agreed upon.

As a person engaged or associated with the Freedom Fund, I am required to use common sense and avoid actions or behaviours that could be construed as abuse when engaging in activities or visiting projects of the Freedom Fund or partners/grantees.

The Freedom Fund does not intend to dictate how staff conduct their personal lives. However unlawful or other behaviours outlined within this Code by Freedom Fund associated individuals which may bring Freedom Fund's reputation into disrepute, or which may jeopardise its position, or the security of Freedom Fund and its team members -whether conducted during or after office hours- will be considered as non-compliance of this Code and will be subject to performance management and or disciplinary procedure.

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ANNEX 3: FREEDOM FUND SAFEGUARDING RISKS ASSESSMENT TEMPLATE

*All Safeguarding Risk Assessments should be signed off at the end of this sheet by the Head of Department or the Freedom Fund Program Director, and when working through a Partner Organisation the Director or other Senior Executive of the Partner Organisation

Programmatic activity details: (short description of the project/intervention)

Risk assessment compiled by: xxx *Programme Team Member* Date: xxx

Risk assessment reviewed by: xxx *FF Project Advisor/Safeguarding Manager*

Date: xxx

Date of latest amendment: xxxx

Activity (e.g. workshop, travel, prepping)	**Describe the HAZARD / RISK (e.g. travel; theft; attack or intimidation; medical; emotional)**	**Risk to Whom (FF, Partner, Children, Adult at Risk)**	**Likelihood of it happening? (1=low-2=medium-3=high)**	**What are your mitigation strategies?**	**Risk level after mitigation? (1= low, 2=medium, 3=high)**	**Next steps to take: What steps need to be taken to bring risk down to acceptable levels or to ensure that risk does not increase?**	**Who is responsible?**	**By When?**

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ANNEX 4: FREEDOM FUND SAFEGUARDING CONCERN FORM WITH GUIDELINES INCLUDED

Section 1: Details of Person Making the Report

To ensure the global safeguarding lead is able to follow up the case appropriately, it is imperative that this section is completed IN FULL including details of the person completing the form: Name, Tel. Number & E-mail, their relationship with Freedom Fund e.g., are they a FF worker, associate or other and their relationship to the person the report relates to.

This section must also state the DATE the report is submitted and to whom at Freedom Fund

It is important to understand that the person completing the form might not be implicated in any way, but it is vital that the safeguarding team are able to follow up with them.

Section 2: Details of Concern

Who and how the concern was raised should be recorded in this section together with the name, age and contact details of the child or adult involved - without this, follow up is almost impossible.

Details of the concern should be explained as clearly as possible - please ensure you include what happened, when it happened, where it happened and who was involved. This helps us gain a good overall picture of the incident.

For the Voice section (what does the child/adult wants to happen) - please be mindful of managing expectations of the person. What they want to happen may not always be possible, but we have a responsibility to listen and record their views.

Section 3: Details of Initial Response

The person completing the Incident form should have an initial discussion with the designated safeguarding focal point or the safeguarding manager. Details of agreements made should be recorded here as well as the date and time this discussion took place. Discussion with the safeguarding focal point should also include whether there is a 'Trusted Adult' who can be identified to support the child and their contact details and relationship to the child. If a Trusted Adult can be identified, details of discussion and any agreements made should be recorded in this section.

This section must also include details of:
What actions were taken to ensure the immediate safety of the person? If any.
Whether the case was referred to the police or other government agencies?
Whether the child/adult was referred to any other agencies?

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FREEDOM FUND CONCERN FORM

Country				
Does this case relate to: (circle)		Individual		Group
Category (circle)	Freedom Rising	Hotspot Partner	Grantee	Other

Section 1: Details of Person Making the Report			
Name:		Tel. Number & E-mail	
Relationship with Freedom Fund		Relationship to Child/Adult	
Date report submitted		Submitted to (Name & role in FF)	

Section 2: Details of Concern

Was the concern:

☐ Observed ☐ Reported by a child/adult ☐ Reported by a Third Party

Date of incident: .....

If reported by a third party, please state their name & relationship to the child/adult:

.....

.....

Details of People involved:

Name	Age	M/F	Contact Details

DETAILS OF Concern (What happened; When; Where; Who was involved)

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VOICE: What does the person want to happen?

Section 3: Details of Initial Response

Discussion with Safeguarding Focal Point/Manager: Date/Time:

Agreements:

CONNECTION: Is there a trusted adult who can be contacted to support the child?

Name of Trusted Adult: Relationship to Child:

Contact Details:

Details of Discussion & Agreements with Trusted Adult:

VALUE: What actions were taken to ensure the immediate safety of the child/person?

CONNECTION: Was the case referred to the police or other government agencies? YES / NO

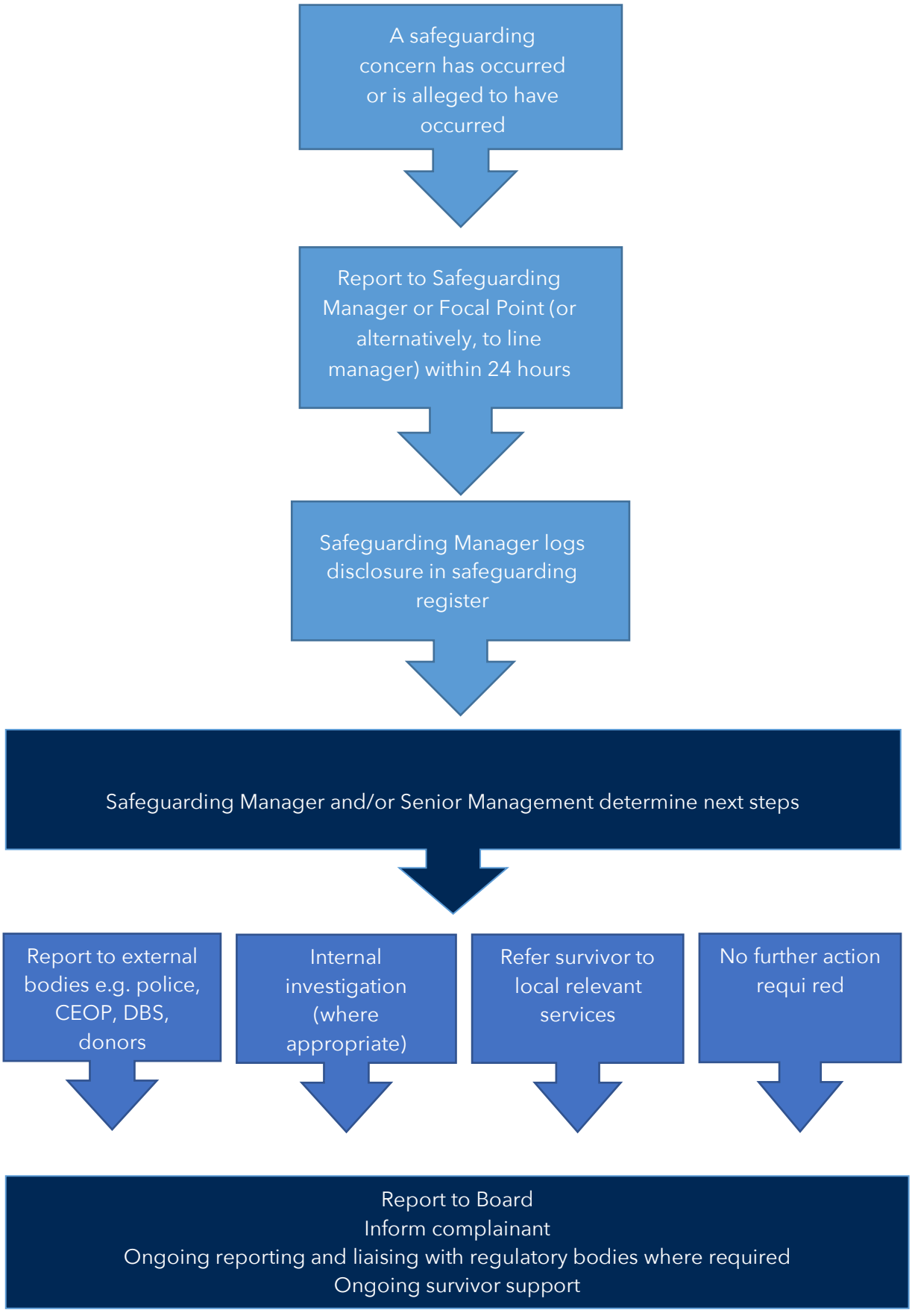
If yes, please give details. If not, please give reasons.

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CONNECTION: Was the child/adult referred to any other agencies or services?

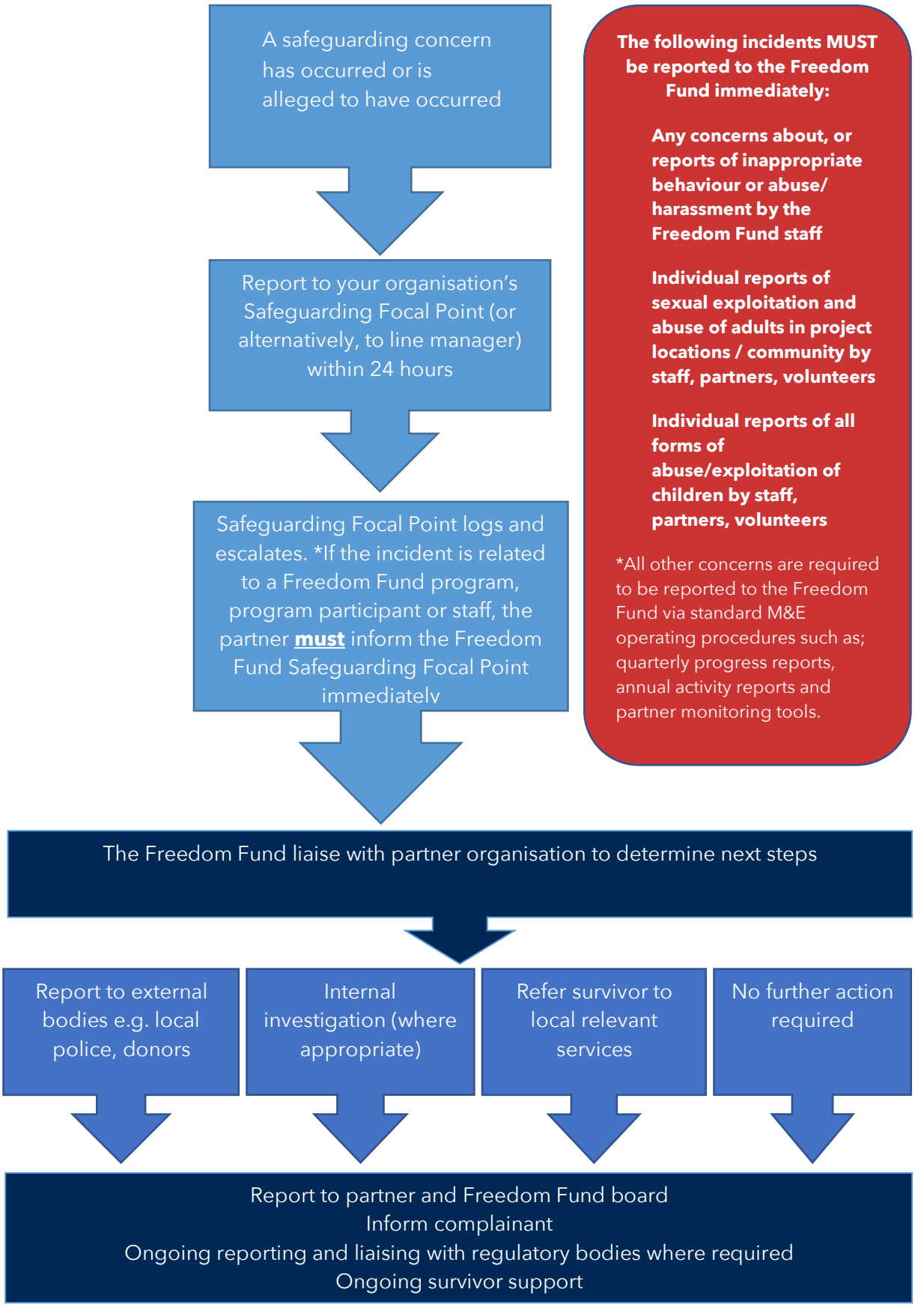
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ANNEX 5: REPORTING FLOWCHART – FREEDOM FUND INTERNAL REPORTING PROCEDURE



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ANNEX 6: REPORTING FLOWCHART: HOTSPOT PARTNER ORGANISATIONS



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ANNEX 7: MEDIA AND TESTIMONIAL CONSENT FORM FOR CHILDREN UNDER 18 YEARS OF AGE

THE SUBJECT SHOULD KEEP THIS SHEET FOR THEIR REFERENCE

The Freedom Fund is a global fund with the sole aim of helping end modern slavery.

This consent form may contain words that are new to you. If you read any words that are not clear to you, please ask the person who gave you this form to explain them to you.

We would like to interview you so that we can share your story with others to help us show the impact of our work. We would also like to record video, take photographs, and/or make audio recordings of you.

If you are under the age of 18, we will need your permission and the permission of your parent/guardian.

Your consent is entirely voluntary. You can say 'no' or change your mind later without giving us a reason. If you change your mind, the Freedom Fund will cease to use your image or recording in any future materials and remove it from our website or other digital platforms. In the case of prior publications (article, post, reports, brochures, etc.), the removal may not be possible if publication and dissemination has already taken place. However, we will cease to use your story, image or likeness going forward.

Saying no or changing your mind will not affect your relationship with the Freedom Fund in any way.

If you would prefer to keep your identity private you can use a pseudonym—a fake name—that you or the local staff member can choose. Please let us know if you would like to give audio rather than written consent.

If you have any questions, concerns or wish to withdraw your consent, please contact:

Name of Freedom Fund contact	Title of Freedom Fund contact (e.g. Program Officer)
Telephone/Mobile No.	Email

Or send an email to **safeguarding@freedomfund.org**

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PLEASE RETURN THIS SHEET TO PHOTOGRAPHER/VIDEOGRAPHER/FREEDOM FUND STAFF

I have understood all the information provided to me and give the Freedom Fund the right to use the following, unless consent is withdrawn:

- ☐ Photographs of me
- ☐ Audio recording of me
- ☐ Video footage of me
- ☐ Written accounts of my story

The Freedom Fund may use any of the above items for general publicity including, but not limited to, our website, publications, supporter emails, our social media channels, information leaflets, events, stakeholders' publicity, and external media outlets, or in connection with the above, in any way it sees fit and without any restrictions. These will be deleted and no longer used after 5 years.

I understand that my image, words, and name may be used in, and in connection with, materials that will be available globally. I understand that I will not be paid for the use of my story or any photos, video, or audio.

On my own behalf, and on behalf of my heirs, next of kin, and successors, I release the Freedom Fund from any and all claims, liabilities, and damages arising out of the rights granted here. I have understood all the information provided to me. I agree that the Freedom Fund may document my story and use video/photos/ audio recordings of me without me reviewing them first.

Child's Consent

I have understood all the information provided to me. I agree that the Freedom Fund may document my story and use video/ photos/audio recordings of me without me reviewing them first.

(Please circle) Yes / No

Printed Name	Signature
Pseudonym (compulsory; first name only)	Date

Parental Consent

I confirm that I am the parent/guardian of _____

Printed Name	Signature

Address _____

Telephone/Mobile No.	Date

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For staff use only:

Visual identifying information (i.e red dress)	
Freedom Fund representative present	Project

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ANNEX 8: MEDIA AND TESTIMONIAL CONSENT FORM ADULT

THE SUBJECT SHOULD KEEP THIS SHEET FOR THEIR REFERENCE

The Freedom Fund is a global fund with the sole aim of helping end modern slavery.

This consent form may contain words that are new to you. If you read any words that are not clear to you, please ask the person who gave you this form to explain them to you.

We would like to interview you so that we can share your story with others to help us show the impact of our work. We would also like to record video, take photographs, and/or make audio recordings of you.

If you are under the age of 18, we will need your permission and the permission of your parent/guardian.

Your consent is entirely voluntary. You can say 'no' or change your mind later without giving us a reason. If you change your mind, the Freedom Fund will cease to use your image or recording in any future materials and remove it from our website or other digital platforms. In the case of prior publications (article, post, reports, brochures, etc.), the removal may not be possible if publication and dissemination has already taken place. However, we will cease to use your story, image or likeness going forward.

Saying no or changing your mind will not affect your relationship with the Freedom Fund in any way.

If you would prefer to keep your identity private you can use a pseudonym—a fake name—that you or the local staff member can choose. Please let us know if you would like to give audio rather than written consent.

If you have any questions, concerns or wish to withdraw your consent, please contact:

Name of Freedom Fund contact	Title of Freedom Fund contact (e.g. Program Officer)
Telephone/Mobile No.	Email

Or send an email to **safeguarding@freedomfund.org**

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PLEASE RETURN THIS SHEET TO PHOTOGRAPHER/ VIDEOGRAPHER/ FREEDOM FUND STAFF

I have understood all the information provided to me and give the Freedom Fund the right to use the following, unless consent is withdrawn:

- ☐ Photographs of me
- ☐ Audio recording of me
- ☐ Video footage of me
- ☐ Written accounts of my story

The Freedom Fund may use any of the above items for general publicity including, but not limited to, our website, publications, supporter emails, our social media channels, information leaflets, events, stakeholders' publicity, and external media outlets, or in connection with the above, in any way it sees fit and without any restrictions. These will be deleted and no longer used after 5 years.

I understand that my image, words, and name may be used in, and in connection with, materials that will be available globally. I understand that I will not be paid for the use of my story or any photos, video, or audio.

On my own behalf, and on behalf of my heirs, next of kin, and successors, I release the Freedom Fund from any and all claims, liabilities, and damages arising out of the rights granted here. I have understood all the information

provided to me. I agree that the Freedom Fund may document my story and use video/photos/ audio recordings of me without me reviewing them first.

I agree that the Freedom Fund may document my story and use video/photos/audio recordings of me without me reviewing them first.

(Please circle) Yes / No

Printed Name	Signature

If you want to use your real name, do you want just your first name or both names to be used in Freedom Fund materials?

- ☐ First name
- ☐ First and last name

If you don't want your real name used, please provide a fake first and last name

Address	Date
Telephone/Mobile No.	Date

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For staff use only:

Visual identifying information (i.e red dress)	
Freedom Fund representative present	Project

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ANNEX 9: FREEDOM FUND VISITOR GUIDE & AGREEMENT

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 anyone 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, and overall communities. In order to ensure you can fully learn from and enjoy these visits, while also ensuring that anyone'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 team members and other associated individuals, please request to see our full Safeguarding Policy to your contact person.

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, communities 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 at the beginning of it.**

Respect for program participant's and communities' 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

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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 team 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 anyone before taking photographs and images;
- Ensure that any images or videos depict people 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 such as 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 communities.
- Seek permission from the Freedom Fund and/or Freedom Fund partner organisation before approaching a survivor of slavery to ask questions and/or conduct an interview.
- Refrain from asking survivors of slavery directly about their story. Instead refer to Freedom Fund and/or Freedom Fund partner organisation with questions.
- Exercise caution when writing about the location of the Freedom Fund's programs and partners, and check if a location/community should remain private to protect individuals.

GUIDANCE ON APPROPRIATE BEHAVIOUR

The following guidelines have been put in place to ensure anyone' protection and respect everybody 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.

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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 or community's members in an inappropriate or culturally insensitive way;
- Spend time alone with a program participant away from others;
- Treat anyone in a shaming, degrading, humiliating or otherwise emotionally abusive manner;
- Make promises to program participants and communities 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.

Full name Signature & Date

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ANNEX 10: FREEDOM FUND GUIDELINES FOR ENGAGING CHILDREN[8] AND ADULT SURVIVORS IN INTERNATIONAL & NATIONAL EVENTS[9]

The following guidelines intend to describe the safeguarding standards to be considered when inviting both children and adult survivors to national or international events. The guidelines are in alignment with the Freedom Fund *Honorarium policy & events participants per-diems*. Both children and adult survivors speaking at an event are eligible to receive an honorarium[10]. It is important to highlight that survivors, especially children, should be engaged for their subject matter expertise and should not be asked to speak about the details of their experience of trauma and abuse; however adult survivors might choose to share about their personal experiences of their own volition.

No child under the age of fourteen (14) years old should be invited to attend or speak to any formal event including speeches and conversations interlinked with modern slavery. Children are not expected to attend or speak to any international event, unless considered an important and positive opportunity for their lives. Please speak with the safeguarding manager if that is the case.

Please follow the steps below.

STEP ONE

These questions are designed to support a conversation you should have within your team regarding any Freedom Fund event including a child as a speaker, participant or attendee. Please consider the questions below if you wish to involve children in a national or international event/activity.

These questions set are also relevant to national or international events in which adult survivors (18 years and over) are asked to participate and / or speak. Consider questions 4-11 if having adult survivors involved in the event.

QUESTIONS
1. What are the main objectives/ intended outcomes of the event/ activity?
2. What is the main purpose of involving children in the activity/event?
3. Please provide justification for involving children in person. Discuss what other ways of child participation engagement you have considered for this event, e.g., written or video submission plus Zoom link up, and why these were not seen as suitable.
4. What do you see as the main benefits of involving children and adult survivors in this event: i. For them ii. For the organization

[8] Child: a person under 18 years old
[9] This form is required for any high-profile conference/meeting/forum etc. that normally entails transporting children/adult survivors' distances, nationally or internationally, to a place where they will be accommodated away from family and which is likely to attract or involve some publicity/media attention/activity
[10] For more information regarding the honorarium, please refer to the Honorarium policy & events participants per-diems

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iii. For the event
5. What are the main risks of involving children and adult survivors in this specific event? (e.g., retraumatising, videos/pics dissemination)
6. How will these risks be mitigated? (*E.g., available counsellor in person, consent forms signed, info sharing regarding pics and videos usage*)
7. How many children and adult survivors do you propose to attend the event? *Please also consider gender and age groups and any other information already at hand.*
8. For international events, which country/hotspot will they attend from?
9. What resources/supports are required? *(E.g., team members, visas, travel and accommodation arrangements, other resources, where will budget come from)*
10. How will children and adult survivors be involved from the start and how will they be included in the planning, selection, and decision-making processes? (If possible)
11. How will the best interests of children and adult survivors be assured throughout the process? *(E.g., Chaperone requirement)*

STEP TWO

It is recommended that any international event/activity is planned no less than 3 months in advance or 1 month in advance for national level event.

The event lead must tick all the necessary checklist requirements. The safeguarding champion or focal point is required to discuss the checklist requirements with the safeguarding manager, prior to the event being approved by the SPM, to ensure trauma informed practices at the event. This is required for the first time the hotspot or UK/US team held an event. Any subsequent event should be managed by the hotspot and/or event team autonomously. Nevertheless, it is recommended that the safeguarding champion/focal point discuss the event with the safeguarding manager, prior to the event being finalised.

It is recommended NOT to involve children in international events, but only adult survivors.

The event lead must ensure the requirements listed below are met BEFORE the event. Responsibilities might be shared among the event lead, other event staff members, the

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safeguarding focal point, the safeguarding champion, and safeguarding manager according to the situation:

Requirement	Checked
The event lead had a conversation based on the set of questions provided in step 1 of this document with the event team	
The event lead identified any safeguarding risk with the event team	
The event lead assessed the necessary mitigation measures for each risk identified with the event team	
The SG Champion or Focal Point shared with the Safeguarding Manager the risks assessment.	
Required standard mitigation measures (must be budgeted for in full):	Checked
Travel information form completed for any child and adult survivor regarding health requirements etc.[11]	
Provision of psychosocial support during the event. Preferable one counsellor available, in person, during the event. Online and phone sessions are also an option.	
Map of services (List of services available nationally and locally such as closer hospital/clinic, police station, child protection services, including national helplines as well)	
Budget for extra medical emergency expenditures associated with the attendees (travel medical insurance[12], sum lump of roughly estimated medical treatments costs based on the country in which the event is held per each participant, childcare costs for adult survivors' children as much as the ones of any other participant)	
Ensuring there is a chaperone for each child (parent, guardian, trusted adult as permitted by the child's parent or legal guarding e.g., a partner staff member, etc)	
Safeguarding induction with the parent/guardian/chaperone and the child or the adult survivor directly in preparation to the event. The induction should include: • Explanation of the FF Code of Conduct for events (child friendly/participants version)13 • Info about the safeguarding reporting channels available for them • Sharing of the map of services • Explanations and signing of the (child/adult) consent forms for data and image usages14	
Arranged safe transport to and from the event venue for the child & chaperone or the adult survivor (certified taxy company, drivers recommended by local partners, etc)	

[11] Please liaise with the Events team for the template
[12] Unless unavailable for special circumstances such as age or residential conditions
[13] Please ask the safeguarding manager for more information regarding the Code of Conduct for events
[14] Please refer to the Freedom Fund Safeguarding Policy – Annex 7&8

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Booked safe accommodation for the child & chaperone or the adult survivor (unless going home)[15]	
Safeguarding induction included in the speakers' and moderator meeting with the event team to prep for the event. Same applies to interpreters (if any). The induction should include: • Explanation of the FF Code of Conduct for events[16] • Info about the safeguarding reporting channels available for them • Sharing of the map of services • Explanations and signing of the (child/adult) consent forms for data and image usages.	
If children and/or adult survivors are interviewed by journalists. Journalists' induction on safeguarding. Check with the communication team for more information regarding this.	
Events with children should be alcohol free. In the likelihood of an event including alcohol, it must not be offered to children.	
Required standard mitigation measures for international events only (must be budgeted in full):	Checked
Interpreter available for anyone in need for all official activities related to the visit, if considering an international event (or nationally whenever needed)	
Short security briefing about the destination country for the chaperone or adult survivor	
Provision of travel and medical insurance for any participant during the full length of the visit[17]	
Recommended mitigation measures:	Checked
Whenever possible, potential provision of psychosocial support AFTER the event (counsellor, info sheet of services available). Post support might vary. Usually up to 2-4 weeks post event. To be defined on a case-by-case basis.	
Optional: any adult survivor being accompanied by a trusted adult of their choice if he/she wants.	
Information about the FF employees' support scheme available to colleagues attending the event.	
If applicable, short safeguarding briefing with the event's venue staff (usually the manager of the venue, making sure they follow the same principles of the FF Code of Conduct for Events)	
Whenever possible, follow up regarding the wellbeing of the child and/or adult survivor after the event within 2 weeks; usually by the safeguarding focal point (either by phone or in person, based on needs). It can be extended up to 2 months or further based on the situation.	

[15] Please refer to the Events Policy Brief for more information regarding safe transport and accommodation
[16] Please refer to footnote 6 of this document
[17] Please refer to footnote 5 of this document

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