

Stonewall

ABOUT THIS RESOURCE

This resource is produced by Stonewall, a UK-based charity that stands for the freedom, equity and potential of all lesbian, gay, bi, trans, queer, questioning and ace (LGBTQ+) people.

At Stonewall, we imagine a world where LGBTQ+ people everywhere can live our lives to the full.

Founded in London in 1989, we now work in each nation of the UK and have established partnerships across the globe. Over the last three decades, we have created transformative change in the lives of LGBTQ+ people in the UK, helping win equal rights around marriage, having children and inclusive education.

Our campaigns drive positive change for our communities, and our sustained change and empowerment programmes ensure that LGBTQ+ people can thrive throughout our lives. We make sure that the world hears and learns from our communities, and our work is grounded in evidence and expertise.

To find out more about our work, visit us at www.stonewall.org.uk

Registered Charity No 1101255 (England and Wales) and SC039681 (Scotland)

Stonewall is proud to provide information, support and guidance on LGBTQ+ inclusion; working towards a world where we're all free to be. This does not constitute legal advice, and is not intended to be a substitute for legal counsel on any subject matter.

Stonewall

**OVERARCHING
GLOBAL
SAFEGUARDING
POLICY**

OVERARCHING GLOBAL SAFEGUARDING POLICY

August 2022

1. Purpose

Safeguarding is extremely important to Stonewall and integral to our work with civil society partners and Global Diversity Champions (GDCs) globally. We believe that no one should ever have to experience or risk experiencing abuse, exploitation, or neglect. We are committed to proactively safeguarding and promoting the welfare of our beneficiaries, as well as taking all reasonable steps to ensure that those who are our partners, or who encounter Stonewall as part of its ongoing global programmes, do not come to any harm.

This policy relates to Stonewall's safeguarding activity in its work globally with partners and in the delivery of any events or programmes with GDCs. Its purpose is to:

- Protect children and adults at risk who engage with Stonewall or our global partners.
- Make our approach to safeguarding clear to staff, volunteers, supporters, and everyone who engages with us.

Reference to Stonewall global partners in this policy denotes a formal relationship, evidenced through an agreement, terms of reference and/or a contract. This policy aims to ensure that safeguarding is at the core of all the work we do together with our partners and their affiliates and responds to their local contexts.

The policy sets out our expectations of partners and of Stonewall staff, volunteers, trustees. It sets out the expected role of Stonewall safeguarding leadership in those instances where the partner procedures are not available, have been exhausted, are not safe, where the safeguarding concern relates to a member of Stonewall staff, volunteers or other affiliates and where Stonewall has a statutory or grant-based duty to report a safeguarding concern.

Our 'Partnerships Policy' that defines the different forms of partnerships Stonewall might have and the appropriate due diligence process across the range of partnership relationships is in development. This policy will sit alongside it from June 2022.

2. Scope

Overview

This policy applies to all partner and programmes work outside the UK and is compliant with the UK Charity Commission's guidance, including its guidance on safeguarding duties for charities. It is informed by Bond's ['Good governance for safeguarding guidance'](#), which sets out recommended practice and advice on safeguarding and people protection.'

All global partners must have their own safeguarding policy or an equivalent document in place. The policy must have related procedures which include substantially the same principles, expectations, and

responsibilities as this policy. Stonewall will provide support and share its expertise with partners to further enhance and develop their safeguarding capacity so that it may enter into partnership agreements. However, Stonewall will not be able to form a partnership with an organisation without agreeing their respective roles and responsibilities in relation to safeguarding. Some of the requirements Stonewall must comply with include a duty to notify funders periodically of low/moderate safeguarding concerns that arise. Based on our duties with the Charity Commission we have onward reporting responsibilities. For this reason, in some situations we will be an active part of the reporting chain of a safeguarding concern.

In some circumstances, Stonewall and its partners will also be subject to specific safeguarding obligations in partnership agreements based on funders requirements such as those of the Foreign, Commonwealth & Development Office's ('FCDO') guidance on [Safeguarding against Sexual Exploitation and Abuse and Sexual Harassment \(SEAH\) in the aid sector](#).

Funders are increasingly alert to safeguarding implications and will make their safeguarding requirements clear in any grant agreements. Stonewall will ensure that it complies with these conditions, that partners are equally aware of the grant conditions and include these conditions in agreements, contracts and/or terms of reference.

More broadly, this policy will also cover our work with Global Diversity Champions (GDCs) with the expectation that the contracts we enter with individual GDCs will incorporate this safeguarding policy and related procedures. Any events, projects, programmes we contract with a GDC will include this safeguarding policy as part of our work together.

If volunteers, beneficiaries, users of a Stonewall service or members of the public have complaints about Stonewall, its staff or partners that do not relate specifically to the welfare of children and adults at risk, they should follow the procedures set out in Stonewall's Feedback and Complaints Policy. However, our position is that if a person wanting to raise a concern is not clearly within the scope of those procedures, they should seek advice from the [Designated Safeguarding Lead](#) and seek clarification.

Compliance with agreed policy and/or procedures

Compliance with this safeguarding policy is not optional, it is compulsory. Stonewall, its [trustees](#) and Stonewall partners undertake to ensure everyone understands their own responsibilities including their mandatory obligation to report a concern, allegation, or disclosure, and is aware of the mechanisms in place to do so.

Since board members and trustees must always act in the best interests of Stonewall and its beneficiaries, they are also expected to comply with these procedures. This expectation is made clear to board members and trustees in their trustee induction process and during board meetings.

Stonewall and its partners, in entering into any agreement to work together will clearly set out and agree their respective policies, roles and responsibilities and formally agree these as a condition of the partnership. Absent this agreement, the partnership will not proceed.

It is the responsibility of all who work with Stonewall to act if there is a cause for concern about a child or an adult at risk.

Failure to comply

Stonewall and partners will apply appropriate disciplinary measures to staff found in breach of this and other safeguarding policies as agreed in our global work.

Disciplinary measures will be clearly set out in any partner agreements and staff, volunteers and others affiliated with the delivery of the project will be forewarned of the consequences of a safeguarding breach.

The consequences of a breach will be based on the relevant jurisdiction in which the incident takes place and the facts of a safeguarding incident.

If partners breach the agreed upon safeguarding processes stated in any partner contracts or agreement, it may result in termination of the relationship.

At a minimum, Stonewall staff, volunteers and trustees will be subject to the disciplinary measures of Stonewall's UK safeguarding policy and procedures.

Failure to comply with the Stonewall safeguarding policy for safeguarding matters that are subject to the UK jurisdiction may be managed in a number of ways, depending on the nature and consequences of any incident.

In some cases, a combination of responses may be required, including:

- I. Local Authority coordinated safeguarding investigation
- II. Police investigation
- III. Referral to the Disclosure & Barring Service (DBS), Disclosure Scotland or Access NI or equivalent
- IV. Serious incident reporting to The Charity Commission in line with our Serious Incident reporting procedure
- V. Internal review or co-operation with an external review as agreed or designated in the partner agreement
- VI. Disciplinary Action and/or termination (for staff, volunteers and trustees}
- VII. Enforcement Action in accordance with the agreed partnership arrangements (for partners}.

Distribution

Key to the successful implementation of this policy is ensuring thorough, comprehensive, and accessible distribution. To this effect Stonewall will:

- widely promote and disseminate the policy, making both hard and electronic copies available and accessible to all relevant stakeholders.
- share it in an accessible format.
- publicise the policy so that the policy commitments, principles, and practices are clear about Stonewall's position on safeguarding.

3. Principles

Our principles

Stonewall commits itself to the following principles identified in the Care Act (2014) statutory guidance in its approach to safeguarding children, young people, and vulnerable adults. These principles should be upheld by all those to whom this policy addresses.

EMPOWERMENT: refers to the degree of self-reliance and autonomy people have that enables them to express their interests in a responsible and self-determined way. It allows them to act on their own authority and helps people become stronger and more confident.

PROTECTION: Support and representation for those in greatest need. **PREVENTION:** Prevention of harm is a primary objective.

PROPORTIONALITY: A proportional and least intrusive response appropriate to risk.

PARTNERSHIP: Local solutions through services working in communities.

ACCOUNTABILITY: Accountability and transparency in delivering safeguarding

Stonewall's ethos of partnership includes valuing local solutions, community-led approaches, supporting partners through capacity building and empowerment where we have know-how to share and taking a proportionate and least intrusive response appropriate to risk.

Risk and responsibility

We believe that:

- No one should ever experience abuse, exploitation, or neglect.
- It is everyone's responsibility to safeguard children and adults at risk from abuse and to act when made aware of the risk of harm.

Stonewall recognises that it has responsibilities that extend to its work with partners and the delivery of programmes around the world to safeguard and promote the welfare of:

- All children who engage in Stonewall, partner and programme activities, including the children of adults that engage in activities part of our project work with partners.
- All adults at risk who engage in Stonewall and partners activities.

We recognise that:

- The welfare of the child, or adult at risk is paramount, including when considering disclosure of confidential information.
- **All** children and adults at risk, regardless of age, disability, gender identity, racial heritage, nationality, religion or belief, sex or sexual orientation have a right to equal protection from all types of harm or abuse.
- Some children and adults at risk are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues and that LGBTQI+ people are at a higher risk of abuse.

- LGBTQI+ people have a heightened risk of exploitation and misuse of power in country contexts with corrupt and repressive regimes, in emergency and post-conflict contexts and as migrants at all stages of their journey.
- We acknowledge the different cultural and legal settings where we have partners, that LGBTQI+ communities have different vulnerabilities and risks depending on their local context and will ensure that this is considered in how we work with partners to develop and deliver our safeguarding commitments.
- While recognizing the differences and particular challenges of safeguarding in some partners' contexts, we have a zero-tolerance approach to non-compliance with safeguarding.

4. Definitions

Child: means anyone under the age of 18 irrespective of the age of majority in the country where they live or where born.

Adult at risk: means anyone aged 18 or over who:

- is or may be in need of care or support by reason of mental or other disability, age, illness, social, economic or political status, displacement, gender, gender identity or sexual or romantic orientation or a combination of these factors and,
- is experiencing, or is at risk of, abuse or neglect; and, as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse, neglect or exploitation.

Safeguarding: means actions we take to prevent harm from occurring to children and adults at risk, and actions we take to protect children and adults at risk where harm has occurred or is likely to occur without intervention.

Designated Safeguarding Lead ('DSL'): means the member of staff designated as the contact person for all safeguarding issues. Where relevant, there will be a Stonewall DSL and a Partner DSL. This is usually an executive level function, reporting to the governance body of the organisation and supported by a Deputy DSL who is accountable for addressing safeguarding issues if the DSL is absent. Where relevant, both roles will be stipulated in the agreements between Stonewall and each partner so that it is very clear both internally and externally who oversees safeguarding issues.

Any safeguarding issues where the DSL has a conflict of interest are dealt with by the Chief Executive Officer or their equivalent depending on the structure of the partner.

In our global work all partners work together to deliver on our safeguarding responsibilities, however, Stonewall as lead partner may have additional responsibilities based on the legislative requirements of the UK including that in severe risk and high-risk incidents that there must be immediate escalation to partner and Stonewall governance body (a trustee or board) for consideration.

The Stonewall DSL will remain accountable for making sure the safeguarding risk is managed properly across all partnerships and this role will be reflected in individual partnership agreements Stonewall holds.

'Local Safeguarding Lead' is the member of the partner team who is designated to this role and who has the responsibility to make decisions to refer a safeguarding matter in conjunction with the Global Safeguarding Lead to their respective, and in some instances both, Designated Safeguarding Leads.

'Global Safeguarding Lead' is the member of the Stonewall Global team who is designated to this role and has the responsibilities of conferring with the Local Safeguarding Lead and Designated Safeguarding Lead(s) depending on the particulars of the safeguarding event.

'Safeguarding Lead Trustee': means the trustee nominated to have oversight of safeguarding arrangements and liaise with the DSL. Safeguarding remains a collective responsibility of all trustees and the Safeguarding Lead Trustee is required to report back and share information with the full board of trustees as appropriate.

'Staff': means anyone who works for, or is engaged by, Stonewall. This can be in a paid or unpaid, full time or part time, capacity. This includes directly employed staff, contractors, agency staff, consultants, volunteers, interns, and equivalents.

'Partner': A partner is another organisation that Stonewall has an agreed relationship with, defined through a mutual process of agreeing the terms of the relationship and usually signing a formal agreement or contract setting out the nature of roles and responsibilities. The use of partner in this policy implies a level of formal and mutual obligation between all partners and Stonewall.

'Partner staff': means anyone who works for, or is engaged by, the partner. This can be in a paid or unpaid, full time or part time, capacity. This includes directly employed staff, contractors, agency staff, consultants, volunteers, interns and equivalent.

5. Recognising, recording, responding & reporting concerns

Stonewall is committed to providing safe, appropriate, and accessible routes for reporting safeguarding concerns and is committed to responding efficiently and sensitively to all allegations and suspicions of abuse and harm against children or adults at risk. Our policies and procedures recognize that abuse may be carried out deliberately or unknowingly. can be a one-off incident or repeated, ongoing ill-treatment.

Stonewall will agree a safeguarding policy and procedure with all global partners that aligns with best practice, funders requirements and includes recognizing, recording, responding, and reporting safeguarding concerns. It recognises a safeguarding concern may arise in several ways including as a witness, having a suspicion, a person reporting an event, or fear of an event, or noticing a person in a of power takes unfair advantage of a fellow staff member, community member, partner, or volunteer.

Recognising harm or risk of harm can be complicated and it is not Stonewall's responsibility to decide whether harm has occurred. it is everyone's responsibility to look out for signs of abuse and harm and act if there are any concerns. Therefore, all those involved in global work should ensure they are aware of the risks of abuse and harm which include, but are not limited to:

- Physical abuse: including hitting, slapping, punching, burning, misuse of medication, inappropriate restraint.

- Intimate partner and family violence and abuse: including psychological, physical, sexual, financial, or emotional abuse. It also covers so-called 'honour'-based violence.
- Sexual abuse: including rape, indecent assault, inappropriate touching, exposure to pornographic material, abuse of a position of trust.
- Sexual exploitation: includes when a person takes advantage of a power imbalance to force or entice a child or vulnerable adult into engaging in sexual activity in return for something received by the child/vulnerable adult or those perpetrating or facilitating the abuse.
- Psychological or emotional abuse: including belittling, name-calling, threats of harm, intimidation, isolation, and 'conversion' therapy.
- Bullying, harassment, cyber bullying, or discriminatory abuse: including racist, sexist, bi phobic, homophobic, transphobic abuse; abuse based on a person's disability and other forms of harassment; slurs or similar treatment.
- Criminal exploitation: including by criminal gangs and organised crime groups such as, trafficking, online abuse, sexual exploitation, and the influences of extremism leading to radicalisation.
- Financial or material abuse: including stealing, bribery, selling assets, fraud, misuse or misappropriation of property, possessions, or benefits.
- Modern slavery: covering slavery (including domestic slavery), human trafficking and forced labour. Traffickers and slave masters use whatever they can to press, deceive and force individuals into a life of abuse and inhumane treatment.
- Neglect and acts of omission: including withholding the necessities of life such as medication, food, or warmth; ignoring medical or physical care needs.
- Self-neglect: covering a wide range of behaviour which shows that someone isn't caring for their own personal hygiene, health, or surroundings. It includes behaviour such as hoarding.
- Institutional or organisational abuse: including regimented routines and cultures, unsafe practices, lack of person-centred care or treatment
- Female genital mutilation: forced marriage and other 'honour-based' abuse.

Responding and reporting

Responding to a safeguarding concern

At the heart of Stonewall's approach to safeguarding is the best interest of the person at risk and that, working in close cooperation with our partners, we exercise our duty of care taking all reasonable steps to prevent harm from occurring and to respond appropriately when harm does occur.

Safeguarding puts beneficiaries and affected persons at the **centre** of all we do, and we apply our approach consistently and without exception across global partners, programmes, and staff.

In all our global work, we will set out clearly and make visible and accessible how a concern will be responded to at each stage.

Procedures agreed with partners will consider that in some country contexts LGBTQI+ people have a heightened risk and need a rapid response and include provisions that:

1. Partners will report a concern immediately to the appropriate local authority, where safe and appropriate (as identified in the risk assessments which have been mutually agreed with the partner) in the event of an emergency in order to prevent further harm and then inform their designated safeguarding lead.
2. Partners will report a concern to their designated safeguarding lead and the person acting in their place should they not be available.
3. If the partner's process is not safe or appropriate due to a conflict of interest, that the safeguarding concern is about the safeguarding lead, they will report the concern to the Stonewall Safeguarding Lead.
4. The partner/Stonewall depending on the situation, 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.
5. The partner's safeguarding representative who has received a report will notify Stonewall that a concern has been reported according to the Code of Conduct and severity of the risk. Details of when Stonewall should be notified will be stated in the partnership agreements.

Case management guidelines with flowcharts to guide those raising a safeguarding concern will be agreed by Partners and Stonewall and made available to all staff, associates, trustees, and volunteers to ensure each stage is clear and that the procedure is in keeping with this policy.

Reporting a safeguarding concern

Stonewall recognises the importance of reporting promptly and to the most relevant and accessible point of contact. This will be set out for each partner in their safeguarding policy and procedures so that all those engaged in the partnership are very clear on the safeguarding procedure, on what to report, who to report it to and how. Stonewall's approach will be adapted to the local partner to ensure it is relevant, involving partners in these processes. Stonewall will, as part of the safeguarding policy it agrees with each partner, provide for:

- a. A process for direct users of any service offered by the partner to alert Stonewall directly of a safeguarding concern.
- b. An escalation process to complain about the partner, Stonewall staff or others engaged in the project or programme.
- c. An anonymized process for reporting on partners, Stonewall staff or others engaged in the project or programme.

Stonewall will retain oversight of partner reporting procedures and carry out periodic reviews of any reports and how they were resolved.

Most importantly, Stonewall's safeguarding policy and procedures with global partner must align with UK domestic practice and our obligation to [report all relevant incidents to the UK Charity Commission for England and Wales \[\(the 'Commission'\)\]](#) and others via a [serious incident report](#).

Principles of Stonewall's safeguarding report-handling

Four principles influence and determine how we work with partners in our approach to safeguarding report-handling.

Each principle applies equally to all the elements of safeguarding report-handling and all four should be reflected in any process developed with a partner.

1. **Confidential report handling**

Confidentiality of all information assures the safety and wellbeing of all parties including the survivors, family and friends of survivors, witnesses, advocates, and subjects of a report.

Organisations we partner with must:

- Receive safeguarding reports along with other forms of feedback so that individuals sharing details of safeguarding concerns or incidents do not fear being stigmatised.
- Have systems in place that allow people to report anonymously. The report-handling mechanism must reflect how cases will be handled when they are received anonymously.
- Establish data management protocols. Keeping records secure and making sure all shared data is filed and processed using coding systems is essential.
- Establish information sharing protocols. Defining what information is shared with whom, when, and why.

2. **Accountable**

Accountability and transparency are an organisation's commitment to all stakeholders to deliver in line with the expectations of those stakeholders. It requires that partner organisations:

- Assume responsibility for consequences of their actions.
- Build trust in all areas of work to encourage openness about more sensitive subjects.
- Make all stakeholders aware of the organisation's principles, plans, and resources.
- Are responsive to all feedback and reports received.
- Report back to communities, inter-agency networks, and donors about the way they have handled and responded to any safeguarding reports.

3. **Preventative and responsive**

Fully functioning safeguarding report-handling mechanisms may prevent as well as respond to safeguarding incidents. They create a safe and supportive workplace culture. To make a reporting mechanism preventative and responsive partners will:

- Increase awareness of safeguarding policies that require that all reports will be acted upon.
- Log concerns to help identify trends in concerns for early detection of maltreatment or harm caused by staff, operations, or programmes.

- Display reporting pathways to demonstrate organisational commitment and increase awareness of how concerns, incidents, and reports are handled.
- Discipline staff when incidents are confirmed and updating staff, communities, partners, and other stakeholders, including Stonewall, on the disciplinary actions taken.
- Rapidly respond to stop any further harm or maltreatment.

4. Contextualised

When working in global partnerships it is important to build upon sociocultural norms and to consult with partners to understand how the report-handling system works best for them. Stonewall acknowledges this and will build upon the work of the full range of actors and systems that are already present in a partner's country. Where establishing new reporting mechanisms it will engage in capacity building work with partners to ensure any new approaches are embedded.

6. Working with partners

It is recognised that there are inconsistencies in the establishment and rigour of safeguarding policies and practice across organisations further compounded when operating in different legal, social, and cultural contexts. This can include variance in safeguarding comprehension, literacy, and training. This disparity can have the potential to threaten the safety of programmes and increase exposure to risk both for Stonewall and those with whom the organisation encounters.

The provision and primacy of safeguarding in a partner organisation will be a key determinant in the decision to enter and establish a partnership. Stonewall will work to support, as far as is reasonably practicable, partner organisations with less established safeguarding experience, rigor, or protocol to safely and effectively fulfil their organisational responsibilities and deliver on partnership goals.

Understanding and managing risks in Stonewall's Global Work

At Stonewall, we are accountable for understanding and managing risk of harm to children or adults at risk, through our direct actions and through the actions of our partners. We recognise that failure in due diligence when agreeing and delivering partnership programmes may result in risk of harm, or actual harm, to children and adults at risk. Accordingly, we place considerable weight on the importance of identifying and mitigating safeguarding risks in all our programmes.

Stonewall will maintain a summary of the programmes operating in each country, with identification of partners and grantees. This summary will link to the relevant safeguarding policy and will include emergency contacts for the projects.

Alignment and implementation of safeguarding policy and procedures with partners

Stonewall will in entering any partnership agree a safeguarding policy that aligns with Stonewall's safeguarding policy. All safeguarding policies should be reviewed and approved by the Stonewall Global Safeguarding Lead and DSL, and form part of any contractual agreement's terms and conditions.

Due diligence on proposed partnerships should include:

- Ensuring partners and grantees have appropriate controls and safeguarding measures in place, including safer recruitment measures.

- Ensuring they meet locally applicable standards in safeguarding children and adults at risk.

Risk assessment of partnership projects

Prior to commencing new projects, programmes, or initiatives, we will conduct a safeguarding risk assessment. This will usually be conducted by the project or programme lead, acting with input and review from the Designated Safeguarding Lead.

This process should actively involve partners, so they can advise on context-specific information and their own procedures, as well as offering their expertise on suitable mitigations.

The risk assessment will include:

A review and mapping exercise to accurately identify the law and regulation pertaining to safeguarding in the relevant territory. This will include (but is not limited to):

- Which incidents are crimes (e.g. sex work, crimes against the person).
- Mandatory reporting under local law e.g. reporting to local authorities or police.
- A summary of labour/employment law; and
- Locally available resources to support the management of safeguarding concerns and incidents.

Known safeguarding risks associated with:

- Legal protections for LGBTQ+ people within the territory.
- Identified safeguarding issues associated with children or adults at risk in within the territory.
- The nature of the work being undertaken in the programme.

Mitigations must be put in place to manage all identified safeguarding risks, with these mitigations clearly owned by Stonewall, their partners and grantees. Mitigating actions might include:

- Publishing relevant safeguarding policies and procedures so that all those working on, or engaging with, the project are aware of them. These documents should be available in all relevant language(s) and provide clear routes for raising safeguarding concerns that are relevant.
- Training staff, including partners and grantees, in how to recognise risk and apply the safeguarding policy.
- Ensuring that relevant staff are available to deal with safeguarding concerns and who speak the language(s) in which concerns may be raised by children, adults at risk or others.

Where appropriate, and on the advice of the Designated Safeguarding Lead, these project or programme risks will be reflected in the organisational risk register, which is regularly reviewed by Stonewall's Trustees.

Training

Stonewall is committed to ensuring all staff and trustees are trained at the appropriate level to fulfil both their day-to-day role and their safeguarding roles and responsibilities. Within our global

programmes, we will also ensure that staff and volunteers in partner and grantee organisations have access to the relevant safeguarding policies, and, where relevant, have been trained in safeguarding.

Partnership Termination

If it is considered that a partner is not effectively fulfilling its safeguarding responsibilities, then Stonewall may decide to not enter a partnership.

If acceptable practice is not being observed, then Stonewall may decide to terminate the partnership.

7. Code of conduct

The Stonewall Code of Conduct sets out the culture and expectations of behaviour from all who work for or with us. As part of this policy, all Stonewall staff are required to comply with Stonewall's Code of Conduct for relationships at work and for working with Children and Adults at Risk.

Partners will be made aware that Stonewall is committed to reporting all relevant incidents to the Charity Commission for England and Wales [(the 'Commission')] via a serious incident report in line with its procedures and Stonewall's Safeguarding incident risk rating.

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| <p>Severe Risk</p> | <p>A beneficiary or other individual connected with the charity's activities including with global partners has/alleges to have suffered serious harm, for instance:</p> <ul style="list-style-type: none"> • Allegation that a staff member has physically or sexually assaulted or neglected a beneficiary while under the charity's care • Allegation that a trustee, staff member or volunteer has been sexually assaulted by another trustee, staff member or volunteer • A staff computer is found to contain images of child sexual abuse • A beneficiary or individual connected with the charity's activities has died or been seriously harmed; a significant contributory factor is the charity's failure to implement a relevant policy • Stonewall failed to carry out DBS/PVG or equivalent checks which would have identified that a member of staff or trustee was disqualified in law (under safeguarding legislation) from holding that position • Breach in safeguarding policy/procedure presents risk of legal action • And/or High Risk and there is a likelihood of reputational damage and loss of trust for Stonewall. <p>Required action: Immediate escalation to partner and Stonewall governance bodies (a trustee or board) for consideration under Serious Incident Reporting Procedure and partner equivalent where relevant.</p> <p>Incident report for partner and Stonewall governance bodies required.</p> |
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| High Risk | <p>Threshold for Significant harm met; and/or</p> <p>Response not in line with policy and procedures; and/or</p> <p>Risk of reputational damage/loss of trust for Stonewall</p> <p>Required action: immediate escalation to partner's safeguarding governance body, Stonewall's Designated Safeguarding Lead and Stonewall Safeguarding Advisory Committee.</p> <p>Incident report for partner's safeguarding governance body and Stonewall Safeguarding Advisory Committee required.</p> |
| Moderate Risk | <p>Threshold for external referral met. Incident response appropriate.</p> <p>Required action: Actioned by partner Designated Safeguarding Lead with notice to Stonewall Designated Safeguarding Lead.</p> <p>Reported to Safeguarding Advisory Committee in line with Quarterly cycle and included in Safeguarding Metrics to the Board.</p> |
| Low Risk | <p>Threshold for external referral not met. Concern documented and appropriate signposting to support services provided if necessary. Incident response appropriate.</p> <p>Required action: Actioned by partner Designated Safeguarding Lead with notice to Stonewall Safeguarding Lead.</p> <p>Reported to Stonewall Safeguarding Advisory Committee in line with Quarterly cycle.</p> |
| Insufficient information for risk evaluation | <p>Required action: Themes reported to Stonewall Safeguarding Advisory Committee in line with Quarterly cycle.</p> |

Stonewall will also report incidents to other regulatory bodies and government departments or donors, where appropriate.

8. Confidentiality

Our safeguarding work with global partners will maintain confidentiality of information at all stages of the process from gathering information to subsequent case management. When working with global partners, Stonewall will take due account of the partners knowledge of the local context and assess any additional confidentiality or security risks.

Information sharing should always be necessary, proportionate, relevant, accurate, timely, and secure. A record should be kept of what has been shared, with whom and for what purpose, and of every decision made and the reasoning behind it.

It is important to be open and honest with the individual concerned (and their family, where appropriate) from the outset, about why, what, how and with whom information will, or could, be shared, and to seek their agreement, unless it is unsafe or inappropriate to do so.

Wherever possible, referrals to external agencies will always be made with the consent of the person concerned.

If in doubt, and if possible, a staff member should seek advice, without disclosing the identity of the individual concerned.

Any safeguarding issue that may attract media interest should be shared with the Stonewall Communications Team.

9. Supporting/related policies and procedures

Several Stonewall policies and procedures may need to be consulted for a global safeguarding concern. For Stonewall staff these are part of ANNEX 1 and those relevant to global partners will be specifically addressed in a partner agreement for clarity.

Annex One

Related Policy – available from Stonewall Intranet for staff and volunteers

- Code of Conduct for working with Children and Adults at Risk Complaints Policy
- Global Code of Conduct
- Relationships at work policy
- Data Protection Policies
- Digital Safeguarding Policy
- Disciplinary Policy
- Equity and Diversity Policy
- Informal conflict resolution and formal grievance policy
- Health and Safety Policy
- Overarching Safeguarding Policy UK
- Photography and Image Capture, Storage and Sharing Policy
- Safeguarding at Stonewall: Managing Allegations
- Safer Recruitment and Recruitment of those with experience of offending
- Serious Incident Reporting Policy
- Whistleblowing Policy

Policy Review and Sign off

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|---------------------|------------------------------|
| Policy owned by | Designated Safeguarding Lead |
| Approved by | Board |
| Date of last review | August 2022 |
| Date of next review | August 2023 |