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## Leave No Girl Behind (LNGB) Safeguarding Due Diligence Tool

**Purpose:** Provide information to the Fund Management (FM) team to facilitate GEC-T LNGB due diligence.

### Our Commitment

The GEC Fund Manager is committed to minimising any negative effects that may arise due to GEC-funded interventions. For the Fund Manager this means:

- Implementing a **safeguarding policy** that covers all GEC staff and contractors and outlines our commitment to keep all children<sup>1</sup> and vulnerable adults<sup>2</sup> who come into contact with any staff and contractor from the Fund Manager or any GEC-funded activity safe (from violence, exploitation, abuse and neglect).
- Being confident that all GEC-funded organisations share our commitment to keeping staff and beneficiaries safe, with a particular focus on keeping children and adults at risk safe.
- That all GEC-funded organisations and their partners and contractors put in place adequate safeguards for staff and beneficiaries, with a particular effort to safeguard children and adults at risk from violence, exploitation and abuse and wherever possible, also seek to address protection risks, such as school related gender-based violence.
- The FM and any GEC-funded organisation act swiftly on all reported safeguarding concerns.
- Everyone associated with the GEC continues to learn from experience so as to continually improve approaches to safeguarding.

The safety of beneficiaries, adults at risk and children who come into contact with the GEC is a collective and paramount responsibility that requires the Fund Manager and fund recipients to work together and learn from each other. To that end, our approach focuses on striving for improvements rather than penalising organisations or individuals who contact us with concerns.

We encourage projects to proactively approach us if they have any concerns related to safeguarding so that we can work together to make sure all GEC-funded organisations have the support necessary to improve practice and strengthen safeguards.

The Fund Manager has developed 14 minimum standards in relation to safeguarding with which all recipients of GEC-funds have to comply. These reflect FCDO's new enhanced safeguarding due

*If you have a concern about the behaviour or actions of a member of the GEC Fund Manager team please report (anonymously, if you prefer) to the GEC whistleblowing email address [email address] and/or [email address] or telephone: [telephone number]*

diligence. This tool has been designed for your project to self-assess against these standards.

As part of our due diligence processes, we require that all GEC-funding recipients fill in the below self-audit form to self-assess their level of compliance with GEC organisational safeguarding minimum standards. These standards should be seen as the minimum and we encourage all projects to go beyond them during the course of their project.

<sup>1</sup> This includes all individuals below the age of 18 regardless of the age of majority in country.

<sup>2</sup> Defined as any person who is aged 18 years or over and who is at risk of abuse or neglect because of their needs for care and support (Care Act 2014 [England]).

Should you realise that there are major weaknesses in your approach as you complete the self-audit or you struggle to answer the questions sufficiently, please get in touch with the Fund Manager to support you to develop a plan of action to rectify gaps or to discuss how you can seek suitable resources to support you.

Following your submission, the Fund Manager will also feedback if it has concerns regarding your response and suggest where you may need additional support and focus.

**Instructions:**

Each section below applies to both the lead organisation and all its partner organisations. However, only the lead partner needs to provide evidence of compliance. It is up to the lead partner to provide relevant evidence to support their answer, but guidance of what the FM would consider appropriate can be found in the separate guidance document.

Only one template is to be used for each project. If more than one template is used, the project will be requested to re-submit. You can expand the sections as needed or attach a separate sheet of paper for any further explanation you think is necessary. Every organisation receiving GEC funding will need to answer every question in this tool (apart from evidence of compliance which is only for the lead partner). The template has been prepopulated with the information already provided by your project in the previous safeguarding self-audit round.

If you have any questions, please contact the Fund Manager at *[email address]*.

**Section 1: Please explain your overall approach to safeguarding children and adults. Please make specific reference to safeguarding both within your organisation and to the work that your organisation does.**

Please list all of your consortium and downstream partners as well as any contractors you will to work with (any organisation that will receive GEC funding through your project and is listed either in your proposal or in the contract). Please also say whether each partner will have staff or contractors that may have frequent and/or unsupervised contact with children or vulnerable adults. Please expand table as needed. **Note that each of these partners will need to be included in section 2 of this tool.**

Name of partner	Role in consortium	Staff or contractors will have daily or unsupervised contact with children/vulnerable adults	Staff or contractors will have occasional contact with children/vulnerable adults	Staff or contractors will have very little direct contact

Section 2: Self-audit	Lead partner			Implementing partners			
	YES (+Supporting Comments)	NO (+Supporting Comments)	Evidence of compliance <sup>3</sup> (please link the relevant document here)	YES (+Supporting Comments)	NO (+Supporting Comments)	Action required?	Time scale?
Section 1: Safeguarding							
<b>Standard 1: All organisations receiving GEC funding must have either an overarching/combined safeguarding policy or a combination of relevant policies which address bullying, sexual harassment and abuse targeted at both beneficiaries, including adults at risk, partner staff and staff within an organisation.</b>							
Do you have a safeguarding policy? Does the policy or combination of policies include a statement of your commitment to safeguarding, including a zero-tolerance statement on <i>bullying, harassment and sexual exploitation and abuse</i> targeted at both <i>beneficiaries and staff</i> ?							
Has the policy been approved and endorsed by the relevant management body of the organisation (e.g. senior management board, executive committee, etc.)?							
<b>Standard 2: All organisations must have a separate child safeguarding policy which address <i>all</i> forms of sexual, physical and emotional violence towards children.</b>							

<sup>3</sup> Please see the separate guidance document for a list of example evidence that you may want to consider.

Do you have a written child safeguarding or child protection policy at the country level?							
Has the policy been approved and endorsed by the relevant management body of the organisation (e.g. senior management board, executive committee, etc.)?							
Does the policy or other relevant documents outline specific safeguarding processes that need to be followed when conducting activities directly with children? If so, please outline these.  This question refers to any specific processes that you need to follow when planning activities such as implementing a girls' club, organising transportation for children, or other activities where project staff work directly with children.							
What safeguards do you have in place specifically relating to parental consent for children to participate in your project?	•						
What safeguards do you have in place specifically in relation to use of information technology?							

What safeguards do you have in place specifically in relation to protection of data about children?							
What safeguards do you have in place specifically in relation to use of photographs, videos and other communications material of or about children?							
Section 2: Whistleblowing							
<b>Standard 3: All organisations must have comprehensive systems for escalating and managing concerns and complaints. These must include the option of whistleblowing and for this to be available to both beneficiaries, including children and their caregivers, and staff without reprisal.</b>							
Do you have a whistle-blowing policy which protects whistle blowers from reprisals?							
Does your whistleblowing policy and procedure outline clear processes for dealing with concerns raised and by whom and the timelines involved							
Do you share your safeguarding policy with downstream partners?							
Are there measures in place to support staff to report concerns internally and confidentially? What are these?							

<p>Do you inform children and communities about your organisation's safeguarding commitment, policy and procedures as appropriate? How and when? How do you support children and communities to hold your organisation accountable to the safeguards you have put in place?</p>							<p>July to September 2018</p>
<p><b>Standard 4: A clear handling framework, to respond appropriately to all concerns and support the survivor of violence must also be in place.</b></p>							
<p>Do you keep a detailed register of safeguarding issues raised and how they were dealt with? Do you treat historical allegations separately and differently from current disclosures?</p>							
<p>Do you have clear investigation and disciplinary procedures to use when allegations and complaints are made?</p>							
<p>How will you work with national authorities in cases where the law may have been broken?</p>							
<p>Is there a person in your organisation responsible for ensuring disciplinary procedures are initiated when a concern is reported? Who, and what is their training?</p>							

<p>Does your organisation have contact details that are readily available for local child protection resources, safe places, national authorities and emergency medical help? If yes, please give more detail about these and about where this information is kept so it is available to anyone who might need it. Please attach a child protection service mapping if you have done one.</p>							
<p>Does your organisation have established relationships with relevant child protection actors at local level? If yes, please describe how you work with them.</p>							
<p>Does your organisation have capacity to respond to and investigate any reported concerns? Describe the resources available. Include both at the country level and the global level.</p>							
<p>If a member of staff or a consultant is dismissed or disciplined are there any procedures in place to prevent or minimise the chances of this person working closely with children again? Describe them. Please describe how this works</p>							

for both national and international staff.							
Section 3: Human resources							
<b>Standard 5: All organisations must have a human resources system which includes effective management of recruitment, vetting and performance management. Vetting must include adequate screening and assessment of individuals that will have direct contact with children.</b>							
Does your recruitment process consider and evidence the level of safeguarding risk in a job role? If yes, so how?							
Do you have different levels of recruitment and security checks commensurate with the safeguarding requirements of the role?							
Does your human resources policy depict a well-planned interview process?							
Do interviewers have the relevant experience and knowledge of current safeguarding practices? How is this done for recruitment into roles where staff/contractors will work directly with children or adults at risk?							
If the role being recruited is for those working directly with at risk groups (adults or children) then does your policy include specific questions in the interview that draw out people's attitudes and							

values in relation to the protection of children and/or adults at risk? If so how?							
Does your organisation communicate its commitment to zero tolerance to <b>all</b> forms of violence against children, beneficiaries and staff during the recruitment process? If so how?							
Does your organisation require up to two references including some from previous employees or others who have knowledge of the candidate's experience and suitability to work with children?							
Does your recruitment policy include a criminal background check on candidates? If so, who is this for?							
Does your policy require that background checks should be carried out for all prospective employees? If so what type of background check?							
Do you make use of probationary periods of employment to ensure suitability once in post? If so how?							
<b>Standard 6: All staff, contractors, volunteers and other representatives of the organisation have at least a mandatory induction when they start and annual refresher training on the organisation's safeguarding policy (or bundle of policies), child safeguarding policy and whistleblowing.</b>							

Do you provide mandatory training on whistle-blowing to new trustees/staff/volunteers within a suitable and appropriate timeframe of them joining your organisation?							
Are all staff and volunteers provided with training on the code of conduct as part of their induction?							
Do you provide mandatory training on safeguarding to new trustees/staff/volunteers within a suitable and appropriate timeframe of them joining your organisation?							
Do you provide regular mandatory refresher training on safeguarding to staff/volunteers? If so, how frequently?							
When was your last child safeguarding training held? And when is the next one planned?							
Does the training include an opportunity for staff and volunteers to learn about how to recognise and respond to concerns about child abuse and other safeguarding concerns?							
Section 4: Risk management							

**Standard 7: Each organisation must have a comprehensive and effective risk management framework in place which includes a detailed risk register for the LNGB project. The LNGB risk register must include reference to safeguarding risks, including those for children.**

Do you have a risk management policy or framework capturing risk appetite and risk categories including safeguarding?							
Do you share your risk management policy where it relates to safeguarding risks with your downstream partners i.e. are downstream partners advised on escalation procedures around safeguarding issues?							
Do you have risk registers for all programmes that feed into an overall organisational risk framework?							
Are risk owners within the organisation clearly defined, with regular review processes defined for mitigating actions?							
Is there regular senior oversight of your risk register? If yes, how?							
Has your organisation/consortium conducted a comprehensive risk assessment of the proposed GEC activities? If yes, please give details including of the							

programmatic safeguards you will put in place to protect children and communities.							
Do you have any DNH processes in place during the project cycle management? If so, what are they?							
Has your organisation/consortium identified any children with whom you work as particularly vulnerable to violence or abuse? If yes, what additional safeguards and measures have you put in place?							
<b>Standard 8: Each organisation must have procedures in place to make sure that safeguarding processes and standards are also upheld for any partner, contractor or supplier they work with.</b>							
What safeguards do you require your contractors and sub-contractors (including both companies and individuals) to adhere to? This might include preventing child labour, trafficking in persons and abuse of children, etc. – please specify							
How does your organisation's procurement processes check that contractors and sub-contractors have these safeguards in place? Please mention how you reference this							

in TORs, background checks, assessment criteria, etc.							
Do you have additional safeguards in place for when you contract an organisation/company/consultant to do work that involves direct contact with children or adults at risk? For example, this could be a construction company that will work in a school or an enumerator for an evaluation.							
How does your organisation monitor compliance with the above safeguards across your contractors and sub-contractors on an ongoing basis? Please describe how they are held to account in practice.							
Section 5: Code of conduct							
<b>Standard 9: Each organisation needs to have a code of conduct which is applicable both inside and outside of working hours. This needs to set out the ethics and behaviour expected of all parties.</b>							
Do you have in place a Code of Conduct for staff and volunteers that sets out clear expectations of behaviours -- inside and outside the work place -- and what will happen in the event of non-compliance or breach of these standards?							

Does the code of conduct prioritise the wellbeing and care of all people including beneficiaries?							
Does your code of conduct link with existing national and local legislation in the country/countries where your project will work? If so how?							
<b>Standard 10: Specific behaviour protocols must be in place outlining appropriate and inappropriate behaviour of adults towards children (and children to children).</b>							
Does your organisation have behaviour protocols in place when interacting with children? Please outline what is included as acceptable and unacceptable behaviour.							
Section 6: Governance and accountability							
<b>Standard 11: Effective governance and accountability standards must be in place within all organisations with the Board holding ultimate responsibility for safeguarding.</b>							
Does the governance structure reflect regular review of management of safeguarding issues internally and externally?							
Are your beneficiaries actively involved in any of the governance structures of the organisation and/or specifically within programmes which affect them							

and their communities? If so how?							
Does your organisation consult children and communities about project activities and your organisation's safeguarding policies?							
In addition to the FM's self-audit when and how often is your organisation's safeguarding and child safeguarding policy internally and/or externally reviewed?							
Did your last internal or external review produce any notable findings and recommendations? If so, what were these and have they all been actioned?							
Has your policy been revised in the last 2 years? If so, what was updated and why?							
<b>Standard 12: Designated Safeguarding Officers must be found at different levels including at least at senior level in the country office and at the Board.</b>							
Do you have a designated safeguarding officer at board level who is responsible and accountable for safeguarding standards and reporting across the organisation to include							

downstream partners approach to safeguarding?							
Do you have a designated senior safeguarding officer who reports regularly to the senior leadership and Board?							
Do you have a child protection/child safeguarding designated officer, contact person, or team in your country office and in each regional/district office?							
How does your in-country designated safeguarding officer work across the organisation? (Explain their roles, ToRs, responsibilities and authority levels.)							
Is your designated safeguarding officer in-country appropriately skilled and trained in child safeguarding? How?							
Does your designated safeguarding officer or any other staff member who have special responsibilities for keeping children safe have access to any internal support? If so what type of support?							
<b>Standard 13: There are clear guidelines for monitoring and overseeing implementation of the policy (policies).</b>							

<p>How do you monitor compliance with your safeguarding policies? How often are spot checks conducted for example and who is responsible for this?</p>						
<p>Does your organisation have mechanisms in place to monitor compliance with the GEC's safeguarding and Do No Harm across the consortium and across your contractors/sub-contractors? Describe how this is done by both lead and implementing partners.</p>						
<p>Do you test the safeguarding systems being implemented by your contractors/partners? If so, how frequently? Please describe what aspect of your partners' safeguarding processes you test and how.</p>						
<p><b>Standard 14: All safeguarding incidents and allegations must be reported to the GEC Fund Manager within 24 hours.</b></p>						
<p>What processes and agreements are in place between the lead partner (the contract holder) and any other downstream partners (including the external evaluator) to report safeguarding concerns and for this information to be shared with the Fund Manager in a timely manner?</p>						

<p>Is there a person or persons within your organisation tasked with reporting any arising GEC-related safeguarding breaches to the Fund Manager? Who?</p>							
<p>Is there a person or team responsible for coordinating responses and action planning to investigate and address corrective action related to GEC related safeguarding breaches? Explain their role.</p>							