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# **Child Safeguarding Policy**

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# Board statement

Oak Foundation is committed to safeguarding the rights, safety, and wellbeing of children and all people.

We recognise that safeguarding is a shared responsibility and a fundamental part of our mission. We are determined to ensure that our child safeguarding policy<sup>1</sup> reflects our values, aligns with sectoral best practice, and responds to emerging risks.

We have strengthened our policy to make it clearer, more accessible, and more actionable. This revised policy is intentionally more concise, supported by a robust set of guidance notes tailored to the distinct roles and responsibilities of different staff groups. It reflects our commitment to clarity, practicality, and continuous improvement. These materials are part of Oak Foundation's ongoing safeguarding journey: one that involves learning, collaboration, and shared accountability across the organisation and with our grantee partners.

We continue to build on international child safeguarding standards and draw from the experience of peer organisations and our grantee partners. We are committed to learning and adapting as new best practice and risks emerge, including those related to digital safety, intersectional vulnerabilities, and power imbalances in funding relationships.

We will continue to regularly review and refine this policy to ensure it remains relevant and effective. We aim to be leaders in the philanthropic sector by embedding child safeguarding in all aspects of our work and by supporting others to do the same.

We are resolute in our commitment to supporting the rights enshrined in the UN Convention on the Rights of the Child – and the rights of all people – to live free from harm.

We recognise that safeguarding is a continuous process that requires reflection, collaboration, and vigilance. Through this policy, we aim to uphold high standards within Oak Foundation and to support our grantee partners in establishing and strengthening child safeguarding measures that are appropriate to their contexts and capacities.

*The next revision of this policy is scheduled for end 2027.*

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# 1. Policy<sup>1</sup>

We<sup>2</sup> are dedicated to supporting organisations to help people and communities thrive in just societies, where everyone is safe and has the opportunity to succeed. We support civil society as a pillar of democracy and believe in the power of collective action in achieving ambitious goals.

We envision a world where all children and adults are protected from all forms of harm and violence. We consider all forms of violence against children as crimes against children, with devastating consequences for their development and on societies.

## 1.1 Policy statement

This document outlines our expectations for how we, as a foundation, will prevent and respond to safeguarding concerns, and how we will hold ourselves accountable.

We define child safeguarding as our responsibility to ensure that staff, programmes, grantee partners, and operations do no harm to children and do not expose children to the risk of harm and abuse.

This policy is grounded in the [United Nations Convention on the Rights of the Child](#), and best practice approaches. We hold ourselves accountable to [the Keeping Children Safe International Safeguarding Standards](#). While we do not expect our grantee partners to adopt the same safeguarding framework, we expect them to have meaningful and contextually appropriate safeguards in place to protect children. Through our grant-making, we pledge to support grantee partners to strengthen their safeguarding practices.

As safeguarding practices continue to evolve, we will revise this policy regularly to reflect new trends and learnings. This policy builds on the valuable contributions and feedback of grantee partners, funders, experts, and Oak staff, for which we are grateful. We also thank the Funder Safeguarding Collaborative for their thoughtful feedback.

## Child safeguarding principles

- Safeguarding children is ‘everybody’s business.
- All children deserve to be treated with respect.
- All children have the right to freedom and protection from all forms of violence.
- All forms of violence against children are an abuse of power and/or of a position of trust and responsibility, unacceptable, and preventable.
- Adults engaged in positions of trust towards children must exercise the highest levels of integrity and good practice.
- All organisations and professionals (e.g., staff, volunteers, or contractors) working or in contact with children must ensure that their organisations, programmes, policies, and practices are designed and developed to promote the protection and wellbeing of children and do not pose a risk to children.

## 1.2 Pledge and application

Through this policy, we commit to actively preventing harm and promoting the safety, protection, and wellbeing of children across all programmes and operations.

We recognise that everyone connected with our work has the right to be safe, including our staff and those working on our behalf. This policy should be used alongside other internal policies and guidance, listed in the reference section.

We hold ourselves accountable to the standards laid out in this policy and monitor our implementation annually. In doing so, we aim to strengthen our reputation as a foundation of integrity, committed to putting our principles into practice.

This policy applies to:

- All staff employed by Oak Foundation, including full-time, part-time, and temporary staff
- Trustees and Advisors to the Board
- Volunteers and visitors representing Oak
- Fellows and other contracted personnel, including consultants

For clarity and brevity, the term “Oak staff and associates” is used throughout this document to refer to all categories listed above.

Although Oak Foundation staff and associates rarely come into direct contact with children through their work, we support and fund organisations that do. We recognise our responsibility and duty of care to safeguard and protect children who engage with our foundation or our grantee partners. This includes taking proactive steps to prevent harm, identify risks, and respond to safeguarding concerns. We also acknowledge that Oak staff and associates may witness, suspect, or be involved in a safeguarding concern, and must be prepared to act in accordance with our safeguarding procedures.

We expect our grantee partners to develop safeguarding measures that are appropriate to their organisation and context. Safeguarding children is relevant to all organisations, not only those working in direct contact with children and/or their families. We pledge to support grantee partners in establishing relevant safeguards. For more information, see chapter 2.6.

#### Breaches

We are committed to taking appropriate action, including disciplinary, legal, or other measures, in response to any breaches of this policy. Oak staff and associates are responsible to act if they have concerns about a child or the behaviour of an adult towards a child. However, it is not their role to determine whether harm has occurred or what action is required to protect the child. Oak staff and associates must report any safeguarding concern in accordance with our reporting procedure outlined in Chapter 3.

#### 1.3 Safeguarding standards<sup>3</sup>

We hold ourselves accountable to the Keeping Children Safe standards outlined here below, and evaluate progress based on these standards.

Each of the standards is interlinked, and together they create a comprehensive system that protects and safeguards children.



**Policy:** We have a written, comprehensive safeguarding policy that describes our commitment to preventing and responding appropriately to harm to children. Our policy is approved by the Board of Trustees and applies to all Oak staff and associates. The policy is promoted and distributed in an appropriate manner, through multiple channels.

**People:** We define clear responsibilities and expectations for our staff and associates and support them to understand and act in line with these. Staff with specific safeguarding responsibilities are designated at different levels to support the implementation of the safeguarding policy and our commitments. Our recruitment process includes robust child safeguarding measures. We provide guidance for appropriate and inappropriate behaviour towards children and for engaging grantee partners on child safeguarding.

**Procedures:** We have clear child safeguarding procedures that are applied across the organisation. We have integrated child safeguarding measures within existing processes and systems (risk management, strategic planning, budgeting, recruitment, performance management, procurement, partner agreements, etc.) and we have identified clear reporting and responding procedures for incidents and concerns.

**Accountability:** We monitor and review our safeguarding measures regularly. The Adviser, Safeguarding and Organisational Development, reports progress, performance, and lessons learned to key stakeholders (management and external or independent bodies where relevant) and includes updates in safeguarding annual reports. Learnings from practical case experience inform policy review and changes to our child safeguarding measures.

## 2. Prevention and people

Prevention is the cornerstone of the protection and safeguarding of children. We are committed to preventing harm to children through the following actions:

- Clearly defining safeguarding terminology to ensure joint understanding;
- Setting out roles and responsibilities for implementing our safeguarding commitments;
- Embedding safeguarding considerations into the recruitment and management of staff and associates;
- Providing a written code of conduct that outlines both expected and prohibited behaviours;
- Offering training and professional development opportunities to ensure our staff and associates understand their safeguarding responsibilities and know how to respond if a safeguarding concern arises;
- Strengthening the safety of our grant-making by supporting programme staff and setting safeguarding expectations for grantee partners, including intermediary organisations;
- Ensuring all forms of communication, including the use of children's images and stories, are aligned with safeguarding principles;
- Promoting safe use of technologies and online environments, including digital platforms, social media, and AI tools, to prevent harm and exploitation.

### 2.1 Definitions and terms

For the purpose of this policy, we draw our definitions of key safeguarding terms, where possible, from globally recognised sources, including the [International Classification of Violence against Children](#) (ICVAC) developed by UNICEF, as well as

guidance from the World Health Organisation and ECPAT International.<sup>4</sup> We recognise that different definitions exist and are used to describe similar terms. Where possible, we use standardised terminology to ensure clarity, consistency, and alignment with international safeguarding frameworks.

By adopting these definitions, we aim to promote a shared understanding of safeguarding concepts among staff and associates, grantee partners, and stakeholders, and to support effective implementation of our policy across all areas of our work.

For a full list of terms and definitions, please see Annex I.

### 2.2 Roles and responsibilities

Safeguarding is a shared responsibility. While all Oak staff and associates are expected to uphold the values and standards outlined in this policy, specific roles carry responsibilities for safeguarding at a strategic and operational level. Clear governance and accountability mechanisms are essential for effective implementation of the policy.

#### All staff and associates

All staff and associates must familiarise themselves with this policy and comply fully with its standards, including the code of conduct. Staff and associates are responsible for:

- Being aware of safeguarding risks to children, including common forms of harm and exploitation;
- Seeking guidance when unsure about a situation or safeguarding concern;
- Reporting any suspected or known concern about the safety of children, in line with the reporting procedure in Chapter 3;
- Participating fully in safeguarding inquiries when requested;
- Completing annual safeguarding training.

#### Board of Trustees

The Board of Trustees holds strategic responsibility for safeguarding across Oak Foundation. The Board of Trustees is responsible for:

- Promoting a positive safeguarding culture throughout the organisation;
- Ensuring safeguarding concerns are taken seriously and appropriate action is taken;

- Receiving and reviewing annual safeguarding reports;
- Supporting the Senior Designated Officer (President) and Designated Officers in managing allegations involving Oak staff and associates or grantee partners.

### **President / Senior Designated Officer**

The President serves as Oak Foundation's Senior Designated Officer. The President is supported by the Chief of Staff and the Director of Operations as alternates. The President bears the ultimate responsibility, as delegated by the Board, for the policy's overall implementation.

The President is responsible for:

- Overseeing strategic and operational safeguarding across the Foundation;
- Promoting a positive safeguarding culture;
- Reporting annually to the Board of Trustees on safeguarding progress and incidents;
- Supporting Designated Officers in managing safeguarding concerns and procedures.

### **Team leads**

This category includes directors, heads of functions, and other staff with supervisory responsibilities.

Team leads are responsible for:

- Championing safeguarding within their teams and programmes;
- Ensuring Oak staff and associates comply with this policy;
- Promoting good safeguarding practice and awareness.

### **Programme staff**

Programme staff play a key role in embedding safeguarding into Oak's grant-making. Programme staff are responsible for:

- Assessing grantee partners' safeguarding arrangements;
- Supporting grantee partners throughout the grant cycle to understand and meet safeguarding expectations;
- Providing guidance on safeguarding responsibilities outlined in funding agreements;
- Conducting site visits and engaging with grantee partners in line with Oak's safeguarding standards.

### **Human Resources staff**

Human Resources staff are responsible for:

- Implementing Oak's safe recruitment standards;
- Ensuring Oak staff and associates read, sign, and adhere to internal safeguarding policies;
- Supporting safeguarding-related performance management and disciplinary processes.

### **Designated Officers**

Oak Foundation has two Designated Officers: the Head of HR and the Adviser, Safeguarding and Organisational Development, as well as the HR Officer as alternate to the Head of HR. The Designated Officers are responsible for:

- Promoting a safeguarding culture across the Foundation;
- Managing safeguarding concerns at an operational level;
- Supporting staff and associates and escalating concerns to the Senior Designated Officer and external authorities, as appropriate;
- Overseeing the reporting procedure, including monitoring reporting channels and ensuring adherence to the steps outlined.

The Head of HR is the initial point of contact for concerns or allegations involving Oak staff and associates.

The Adviser – Safeguarding and Organisational Development is the initial point of contact for safeguarding concerns related to grantee partners.

### **Global Safeguarding Team**

The Global Safeguarding Team comprises the Senior Designated Officer and the Designated Officers, including alternates. The Global Safeguarding Team is responsible for:

- Promoting consistency in the implementation of this policy across the organisation;
- Providing oversight of safeguarding processes and procedures;
- Analysing safeguarding data to generate learning and improve practice;
- Supporting the development of tools and training to strengthen safeguarding implementation;
- Conducting regular reviews of safeguarding effectiveness across the Foundation;
- Coordinating the annual safeguarding report for the Board of Trustees.

## 2.3 Safer recruitment

Oak Foundation recognises that creating safe environments for children begins with the recruitment and appointment of qualified, skilled, and vetted individuals. We are committed to ensuring that all recruitment processes reflect our duty to prevent harm and promote the protection and wellbeing of children.

Our recruitment practices are designed to identify candidates who share our safeguarding values and to deter individuals who may pose a risk to children. These measures apply to all staff and associates.

### Recruitment of staff and associates

In addition to our standard recruitment processes, the following child safeguarding measures are applied:

- All job postings include a child safeguarding statement, making it clear that we prioritise the safety and protection of children.
- Interviews include questions relevant to the safeguarding responsibilities of the role.
- All applicants undergo relevant vetting processes (including police background checks, subject to local laws). Before employment begins, candidates must sign a declaration confirming that there is no known reason or event that would render them unsuitable for the role and disclosing any criminal convictions or ongoing prosecutions.
- Applicants must provide two referees, including their most recent employer. Referees are asked to comment on the candidate's suitability to work in roles that may involve contact with children. Oak reserves the right to contact any previous employer.
- Employment is conditional upon satisfactory references, proof of qualifications, relevant vetting or clearance procedures, and verified identification.

### Selection of consultants and contractors

All consultants and contractors we engage must meet the following safeguarding requirements:

- Consultants and contractors are subject to relevant vetting procedures (including police background checks, subject to local laws).

- All consultants and contractors must be briefed on Oak's child safeguarding policy and Code of Conduct and must confirm their understanding and agreement. They must confirm that there is no known reason or event that would render them unsuitable for the role and disclosing any criminal convictions or ongoing prosecutions.

## 2.4 Code of Conduct

All individuals covered by the policy commit to promoting and protecting the safety and wellbeing of children. The standards of behaviour outlined in this Code apply at all times and in all interactions with children. These standards are interpreted within the framework of the UN Convention on the Rights of the Child.

We will take appropriate action in response to breaches of this policy and Code of Conduct. Actions may include additional guidance, training, supervision, disciplinary measures, or termination of employment or engagement with the Foundation. All breaches must be reported in line with the procedure outlined in Chapter 3.

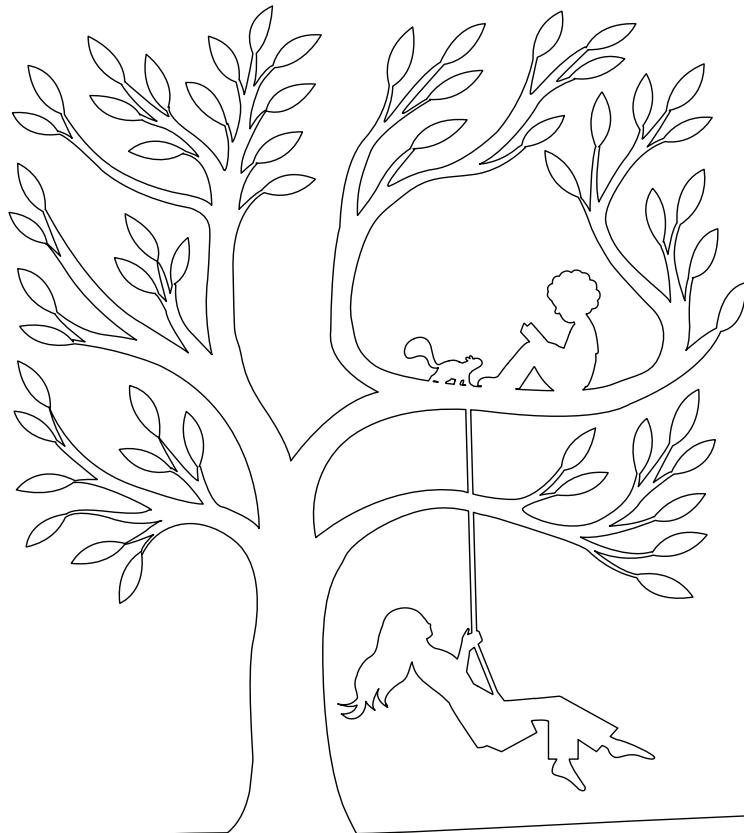
Staff and associates must also ensure that their personal behaviour reflects the spirit of this Code. They must act in ways that promote the protection and promotion of the wellbeing of children and not act in ways that place children at risk or undermine our reputation. Staff and associates are expected to exercise sound judgement in applying this duty to their private lives.

This code outlines both positive behaviours and prohibited conduct. We encourage staff and associates to seek guidance in situations that may be unclear or when in doubt. We suggest directing questions to line managers, and/or one of the Designated Officers.



### **Oak encourages the following behaviours**

- Treat all children with respect regardless of age, culture, social origin, language, beliefs, disability, sexual orientation, gender identity, or other status.
- Use language and behaviour towards children that is age appropriate, supportive, and respectful.
- Be calm, positive, supportive, and encouraging in interactions with children.
- Maintain professional boundaries in all relationships with a child (including their family) that you have met through work.
- Familiarise yourself with the grantee partner's safeguarding policies ahead of site visits and follow both their policies and Oak's Code of Conduct.
- Respect and uphold the local laws, customs, and traditions of countries we work in or visit. Where these conflict with child rights principles, uphold the United Nations Convention on the Rights of the Child.
- Ensure another adult is present, wherever possible, when working near children.
- Obtain informed consent from children and their parents/carers before taking pictures or videos.
- Represent children with dignity and cultural sensitivity in all storytelling technology use, and social media.
- Challenge unacceptable behaviour in accordance with this Code of Conduct, where safe to do so.
- Immediately report any concerns, suspicions, incidents, or allegations of safeguarding concerns, in line with Oak's reporting procedure.





### **Oak prohibits the following behaviours**

- Never use offensive, discriminatory, harassing, shaming, culturally inappropriate, or sexual language around children.
- Never use physical punishment or discipline of any kind towards children.
- It is prohibited to engage in sexual activity of any form with children or make suggestions of a sexual nature. This is prohibited regardless of local age of majority or consent. Mistaken belief about a child's age is not a defence<sup>17</sup>.

This includes:

- sexual activity in exchange for gain or benefit.
- paying for sexual services, i.e., exchange of money, employment, goods, or services, and exchange of assistance that is due to them.
- Never contact children through any form of social media, share personal contact details, or attempt to form friendships or intimate relationships.
- Do not engage in online communication with children that is personal, secretive, or outside the scope of professional responsibilities.
- Never photograph or film children without prior informed consent.
- Do not post or share images, videos, or stories of children online without prior informed consent and adherence to our storytelling and media guidelines. We strongly discourage the publication of identifiable images of all children online, due to the risk of misuse, including manipulation into synthetic child sexual abuse material.
- Never use children's personal data, including images, voice recordings, or biometric data, in AI tools or systems without informed consent and a clear safeguarding rationale.
- Never use generative AI tools to create, manipulate, or simulate content involving children.
- It is prohibited to use technology or social media inappropriately. This includes accessing, viewing, creating, downloading, or distributing online child sexual abuse material.

- It is prohibited to share, download, or save child sexual abuse material – even for reporting purposes. Instead, report it to the hosting platform or seek help from one of the Designated Officers.
- It is prohibited to use children for domestic or other labour that is inappropriate for their age or developmental capacity, interferes with education and recreational activities, or places them at significant risk of harm.
- Never agree to keep information about harm or potential harm of a child or information regarding concerns about an adult confidential. All concerns must be reported.
- Never investigate safeguarding allegations yourself. Use the appropriate reporting channels.
- Never ignore or fail to report safeguarding allegations or poor practice.
- Never rely on your reputation, position, or affiliation with Oak to protect you from accountability.

## 2.5 Training and development

We recognise that effective safeguarding requires high levels of awareness, understanding, and confidence among staff and associates. For this policy to be well understood and consistently applied, individuals must be clear about their responsibilities and competent in putting safeguarding principles into practice.

We commit to the following actions to build safeguarding capacity across the organisation:

- Disseminating and promoting the policy through multiple formats, including the website, animation videos, printed materials, and verbal briefings. The policy is accessible to all stakeholders in electronic format.
- Adapting the reporting procedure to reflect national legal frameworks in countries where Oak has offices, ensuring that any breach of the policy is addressed appropriately and in compliance with local legislation.
- Delivering regular safeguarding briefings and training for all staff. Training is mandatory and conducted annually. Newly recruited staff and associates receive safeguarding induction and are required to attend the next available training session.
- Providing additional training for staff and associates with specific safeguarding responsibilities, including Designated Officers, programme staff, and team leads. This training is tailored to their roles and delivered on a need basis.
- Offering access to safeguarding resources, including guidance materials, tools, and examples of good practice. Oak encourages staff and associates to share experiences and lessons learned to strengthen safeguarding implementation across the Foundation.
- Maintaining an open-door culture, where staff and associates are encouraged to seek advice and raise questions about safeguarding. Staff and associates may contact their line manager or a Designated Officer for guidance. We also provide a comprehensive safeguarding handbook on our intranet, which includes practical and role-specific guidance.
- Monitoring training participation and engagement, to ensure safeguarding knowledge is embedded across the organisation and that staff feel supported in fulfilling their responsibilities.

## 2.6 Safeguarding in grant-making

We recognise our responsibility to ensure that children affected by our grant-making are protected from harm. We are committed to taking all appropriate steps to ensure that the organisations we fund have robust safeguarding arrangements in place to prevent harm and violence and respond effectively when concerns arise. In our grant-making, we pledge to:

- Strengthen the capacity of our programme staff to assess and support safeguarding as a part of due diligence and the grant cycle;
- Maintain open and ongoing dialogue on safeguarding throughout the grant cycle, including in progress reports and site visits;
- Include grant objectives and conditions on safeguarding where we feel that improvements are needed;
- Invite grantee partners to include a dedicated budget line for safeguarding within their applications;
- Offer safeguarding advice and support, including access to external experts;
- Signpost grantee partners to resources, experts, and peer organisations to strengthen their safeguarding arrangements.

As part of our due diligence process, we require grantee partners to have appropriate child safeguarding measures in place. Where grantee partners need support to strengthen their safeguarding approach, we provide guidance and resources to help them lead and operate safe organisations.

Our child safeguarding standards provide an overview of what we consider as appropriate safeguards. Our Child Safeguarding Self-Assessment tool defines minimum expectations that serve as guiding principles. While we do not prescribe a specific safeguarding model, we use this tool to assess whether improvements are needed, considering each organisation's structure, operating context, and ways of working. By signing an Oak Foundation grant agreement, grantee partners confirm their understanding of and commitment to our child safeguarding expectations for the duration of the grant.

### Intermediary organisations

In several programmes, Oak Foundation provides grants to intermediary organisations that re-grant funds to smaller organisations. This approach enables us to support a broader range of grantee partners, each contributing meaningfully to their communities and fields of work. Intermediary organisations are required to:

- Maintain their own safeguarding arrangements;
- Stay informed about safeguarding best practices relevant to their region and sector;
- Monitor the safeguarding practices of their grantee partners.

When granting funds to an intermediary organisation, staff and associates pledge to:

- Engage in open dialogue about safeguarding and clearly communicate our safeguarding requirements;
- Ensure the intermediary has adequate safeguarding arrangements in place, including due diligence and ideally, support for their grantee partners;
- Include safeguarding expectations for both the intermediary and their grantee partners in the grant agreement;
- Agree on a clear procedure for reporting any safeguarding concerns.

### 2.7 Safeguarding in communication

We recognise that the public use of children's images and stories can pose safeguarding risks, including unintended exposure, exploitation, or harm. It is therefore essential that all communications involving children are guided by the principles of dignity, privacy, and the best interests of the child.

We are committed to ensuring that children's rights are respected in all our communications. This includes their right to be heard, their right to give or withhold informed consent, and their right to protection from harm.

Oak staff and associates must ensure that:

- Informed consent is obtained before taking or using any images or stories of children. This includes ensuring that grantee partners have secured the informed, voluntary, and age-appropriate consent of the child and their caregiver(s), and that they have consented to share the material with Oak. The

communications team has consent forms that staff and associates must have signed to ensure clear consent.

- Transparency is maintained in how images and stories will be used, how risks are assessed and mitigated, how data is stored and managed, and how consent can be withdrawn.
- Privacy and anonymity are protected. Images or stories must not reveal a child's identity, location, or other identifying details unless it is demonstrably in the child's best interest and explicit consent has been given.
- Images of children taken during site visits are not shared on personal social media accounts or other non-Oak platforms.
- Data protection standards are upheld. The storage, use, and deletion of images and stories must comply with the [General Data Protection Regulation \(GDPR\)](#) and relevant national legislation.
- Content is used responsibly. Communications must avoid sensationalism, stereotyping, or portraying children as passive victims. Stories should reflect children's strengths, agency, and context.
- Images of children must never present them in poses that could be interpreted as sexually suggestive or in ways that compromise their dignity or privacy.

Oak strongly discourages the publication of identifiable images of children online, due to the risk of misuse, including manipulation into synthetic child sexual abuse material. Where possible, use anonymised or symbolic imagery, and always assess the potential risks before sharing any content.

### 2.8 Safeguarding in technology and the digital environment

We recognise that new technologies and the digital environment offer significant opportunities to advance our mission. However, they also present evolving risks to children's safety and wellbeing. While Oak's own digital presence and use of technology are regulated, we acknowledge the need for specific safeguarding considerations in both our internal practices and the digital initiatives of our grantee partners.

We use the term *digital safeguarding* to refer to the policies, procedures, and practices that protect children in online spaces and in the use

of digital tools. This includes, but is not limited to, the Internet, social media, mobile applications, digital communications, and artificial intelligence.

Our duty to safeguard children from harm and violence extends to both offline and online environments. As such, our safeguarding procedures must be relevant, adaptable, and applicable across all contexts in which we and our grantee partners operate.

This section outlines key expectations and guidance for the safe and responsible use of technology. It is not exhaustive. As technologies evolve rapidly, we must remain alert to emerging risks and take proactive steps to assess and mitigate them.

We define the following expectations for the appropriate use of digital technologies:

- Oak staff and associates are personally responsible for their conduct on the Internet, social media, and other digital platforms — both in a professional and personal capacity. All activities must reflect Oak's values and safeguarding commitments.
- Informed consent must be obtained before collecting, using, or sharing digital data. This includes an obligation to be transparent about how we will use individuals' data, how we assess and mitigate risks to individuals, how we manage and store data, and how consent can be withdrawn.
- The use of images, videos, or personal data of children in digital spaces must comply with the standards outlined in section 2.7 of this policy. This includes ensuring dignity, privacy, and the best interests of the child. Extra caution must be taken when publishing children's images online, as such content can be misused or manipulated, including through the creation of synthetic child sexual abuse material. Where possible, avoid publishing identifiable images of children, and always assess the potential risks before sharing any content.
- Any use of devices, software, or internet access provided by Oak must comply with the IT Policy. This includes responsible use of all digital tools and platforms. Accessing illegal content or websites that are inappropriate, unsafe, or contrary to Oak's values is strictly prohibited. This includes, but is not limited to, sites that promote violence, hate speech, discrimination, pornography, exploitation, or misinformation.

- Use of AI tools must follow Oak's AI Policy, including requirements for human oversight, data protection compliance, and ethical use. Oak staff and associates must be aware of the potential for bias, misinformation, and unintended consequences in AI-generated content.
- Oak encourages grantee partners to consider digital safeguarding risks in their programmes and operations. While we are still developing our internal guidance and links to external expertise, we are committed to learning alongside our grantee partners and to identifying practical ways to support safe and responsible use of technology in diverse contexts.

## 3. Procedures and accountability

### 3.1 Reporting safeguarding concerns

We are committed to ensuring that all safeguarding concerns — whether witnessed directly, disclosed, or suspected — are taken seriously and responded to appropriately. This includes concerns raised by Oak staff and associates, grantee partners, or members of the public.

Although Oak staff do not work directly with children, they may come into contact with children through:

- Attendance at grantee partner events
- Site visits
- Activities involving staff members' children at Oak offices
- Personal or community interactions outside of work

Oak staff and associates must be aware of what to do if they witness, suspect, or are informed of a safeguarding concern involving a child. We respond to all reports, including rumours, that suggest a child may be harmed or at risk of harm. The safety and wellbeing of children must always be the paramount concern.

#### How to Report: Internal Reporting Structure

We have a designated safeguarding structure to ensure appropriate handling of concerns:

- If the concern relates to an Oak staff or associate, it should be reported to the Designated Officer, Head of HR.
- If the concern relates to a grantee partner, it should be reported to the Designated Officer, Adviser, Safeguarding and Organisational Development.

Oak staff and associates must complete the reporting template in Annex III with as much information as possible and share it with the relevant Designated Officer.

The internal reporting process remains consistent across Oak Foundation, regardless of the country in which the incident occurred. However, external reporting obligations — such as notifying statutory authorities — will vary depending on local laws and procedures in the country where the incident took place. It is the responsibility of the Designated Officers to assess and report to statutory authorities.

#### **External reporting structure**

Safeguarding concerns can be reported using Oak Foundation's online reporting form, available at: [Report Fraud or Abuse](#)

Reports may be submitted anonymously and are treated with confidentiality.

Reports should include:

- A clear description of the concern,
- Date, time, and location of the incident (if known),
- Names of individuals or organisations involved (if known),
- Any immediate risks to children,
- Any actions already taken.

Safeguarding concerns may also be reported to an Oak staff or associate.

#### **In the case of a child safeguarding emergency**

In an emergency where a child has been seriously hurt or is in imminent danger of being harmed, staff and associates must:

1. Call local emergency services (see below);
2. Inform the Designated Officer (Adviser, Safeguarding) as soon as possible;
3. If the Designated Officer (Adviser, Safeguarding) is not present, inform the other Designated Officer (Head of HR) or the Senior Designated Officer (President);
4. Complete the reporting template in Annex III with as much information as you can.

#### **Local emergency service numbers**



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Brazil: 190

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Denmark: 112

---

Switzerland: 117

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United Kingdom: 999

---

United States: 911

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Zimbabwe: 995

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France: 112

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India: 112

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Thailand: 191 (1151 for English)

# Reporting a safeguarding concern

## Step 1

Is this a safeguarding concern?

Do you suspect someone of having breached Oak's Child Safeguarding Policy?

Do you suspect or know of a child or adult being at risk of harm/being harmed by an Oak staff member or representative, or by a grantee partner representative?

Do you suspect or know of a child or adult being at risk of harm/being harmed, because of Oak's or grantee partners' work?

Yes

No

This is not a safeguarding concern. If uncertain, please speak to one of the Designated Officers or managers.

## Step 2

Is this an emergency?

Is anyone in immediate physical danger?

Has there been a serious injury or medical emergency?

Is there a threat to life or safety (e.g., violence, abuse, self-harm)?

Is urgent intervention required to prevent harm?

Are emergency services (e.g., police, ambulance) needed?

No

Yes

## Step 3

Report concern to Designated Officer

## Step 3



Contact local emergency services

## Step 4

Complete the Child safeguarding reporting template and send to Designated Officer (Head of HR for staff-related concerns OR Adviser, Safeguarding for grantee-related concerns)

Brazil: 190
Denmark: 112
Switzerland: 117
United Kingdom: 999
United States: 911
Zimbabwe: 995
France: 112
India: 112
Thailand: 191 (1151 for English)

### 3.2 Responding to safeguarding concerns

This section provides a summary of our approach to responding to safeguarding concerns. The full procedure is available in the safeguarding handbook in our intranet, which outlines roles, responsibilities, and detailed steps for managing concerns.

We are committed to responding to all safeguarding concerns, whether witnessed, disclosed, or suspected, with professionalism, sensitivity, and urgency. The safety and wellbeing of children is always our paramount concern.

We follow a principled and structured approach to responding to safeguarding concerns, in line with international standards and sectoral best practice.

#### Guiding principles

In responding to safeguarding concerns, Oak Foundation seeks to reduce harm by following principles of good practice:

- **Child-centred and trauma informed<sup>5</sup>:** We prioritise the rights, safety, and dignity of children and respond in ways that minimise harm and avoid retraumatisation.
- **Survivor-centred:** Where applicable, we respect the wishes and wellbeing of survivors and ensure they are supported and informed throughout the process.
- **Transparency and fairness:** We ensure impartial, evidence-based decision-making and uphold due process.
- **Professionalism:** We respond in a timely, coordinated, and documented manner, following recognised best practice. We are guided by experienced safeguarding experts in our response to concerns.
- **Confidentiality:** We are mindful of protecting individuals and share information strictly on a need-to-know basis.
- **Accountability:** We document, monitor and review actions and decisions taken.

Our response procedure differs depending on the nature of the concern:

#### Concerns involving grantee organisations

These are reported to and managed by the Designated Officer (Adviser, Safeguarding and Organisational Development), with support of the Senior Designated Officer and relevant Programme staff.

We do not require grantee organisations to report safeguarding concerns to Oak; however, grantee partners and other stakeholders can report to Oak. We do not directly investigate concerns within grantee organisations. Instead, we:

- Ensure that the grantee partner responds appropriately and professionally to the concerns and in line with their safeguarding policy and/or sectoral standards and best practice.
- Provide support and guidance where needed, including access to external safeguarding expertise.
- Monitor the adequacy of the response and follow up to ensure risks are mitigated and systems are strengthened.
- Reserve the right to take further action — including suspending or terminating funding — if the response is inadequate or poses further risk.

#### Concerns involving Oak staff and associates

These are reported to and managed by the Designated Officer (Head of HR), with support of the Senior Designated Officer and Board of Trustees.

Our response may involve up to six interconnected strands:

1. **Initial risk assessment** – Immediate consideration of any risks to children and actions to ensure their safety.
2. **Statutory enquiries** – Referral to social care services to assess whether a child requires protection or support.
3. **Police investigation** – Engagement with law enforcement if a criminal offence may have occurred.
4. **Internal investigation** – Investigation into the allegation by Oak Foundation to determine if disciplinary action is warranted.
5. **Referral to professional bodies** – Where applicable, referral to a professional registration body for consideration of barring or misconduct.
6. **Case review and risk assessment** – Evaluation of the handling of the case and reassessment of organisational risks to prevent recurrence.

**If a safeguarding allegation is made against:**

- The Designated Officer (Adviser, Safeguarding): the Senior Designated Officer (President), Designated Officer, and the (Head of HR) will manage the allegation process.
- The Designated Officer (Head of HR): the Senior Designated Officer (President) and Designated Officer (Adviser, Safeguarding) will manage the allegation process.
- The Senior Designated Officer (President): the Designated Officer (Head of HR) and the chair of the board will manage the allegation.
- Board member: The Senior Designated Officer (President) and Advisors to the Board will manage the allegation.

# Annexes

**Annex I:**

Definitions and terms

**Annex II:**

Reporting template

**Annex III:**

Declaration for staff and associates of Oak Foundation

**Annex IV:**

Reference list

## Annex I: Definitions and terms

**Child** means every human being under the age of 18, in line with international legal frameworks.

**Child protection**<sup>6</sup> is the prevention of, and response to, all violence, exploitation, and abuse against children.

**Child safeguarding**<sup>7</sup> is the responsibility that organisations have to make sure their staff, programmes, grantee partners, others working on behalf of the organisation (e.g., volunteers), and operations promote the protection and wellbeing of children and do not pose a risk to children.

**Violence against children**<sup>8</sup> refers to any deliberate<sup>9</sup>, unwanted<sup>10</sup> and non-essential act<sup>11</sup>, threatened or actual, against a child or against multiple children that results in or has a high likelihood of resulting in death, injury, or other forms of physical and psychological suffering.

**Physical violence against a child**<sup>12</sup> refers to any deliberate, unwanted, and non-essential act that uses physical force against the body of a child and that results in or has a high likelihood of resulting in injury, pain, or psychological suffering. This includes using severe and minor assaults against a child and isolating a child.

**Sexual violence against a child**<sup>13</sup> refers to any deliberate, unwanted, or non-essential act of a sexual nature, either completed or attempted, that is perpetrated against a child, including for exploitative purposes, and that results in or has a high likelihood of resulting in injury, pain, or psychological suffering. This includes rape of a child, sexual assault, and non-contact sexual violence against a child.

**Act of a sexual nature**<sup>14</sup> is a physical, verbal, or non-verbal conduct that involves any part of the body used for sexual activity or references to sexuality and has a sexual intent or connotation.

**Exploitation**<sup>15</sup> refers to the use of something or someone else (unfairly) for one's own advantage; the action of taking advantage of a person or situation, especially unethically or unjustly for one's own ends, or treating others unfairly in order to gain an advantage or benefit.

**Psychological violence against a child**<sup>16</sup> refers to any deliberate, unwanted, and non-essential act, verbal and non-verbal, that harms or has a high likelihood of harming the development of a child, including long-term physiological harm and mental health consequences. This includes terrorising a child, harassing, spurning, and humiliating a child, or exposing a child to domestic violence and other violent experiences.

**Neglect of a child**<sup>17</sup> refers to the deliberate, unwanted, and non-essential failure to meet a child's physical or psychological needs, protect a child from danger, or obtain medical, educational, or other services when those responsible for the child's care have the means, knowledge, and access to services to do so. This includes physical and psychological neglect, neglect of a child's physical or mental health, educational neglect, and abandonment of a child.

**Child labour**<sup>18</sup> is often defined as work that deprives children of their childhood, their potential and their dignity, and is harmful to physical and mental development. It refers to work that is mentally, physically, socially or morally dangerous, and harmful to children; and/or 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. Whether or not particular forms of work can be called child labour depends on the child's age, the type and hours of work performed, and the conditions under which it is performed.

**Child sexual abuse material (CSAM)**<sup>19</sup> refers to material that visually depicts a child engaged in real or simulated explicit sexual activities or any representation of the sexual parts of a child for primarily sexual purposes.

**Child sexual exploitation material (CSEM)**<sup>20</sup> refers to material that depicts the sexual exploitation of a child, including but not limited to situations where a child is engaged in sexual activities in exchange for something (e.g., money, gifts, status).

**Victim / Survivor**<sup>21</sup>

The term “victim” is a crucial legal term that serves to define children who have been subjected to harmful and/or criminal acts as rights-holders and to avoid any form of responsibility or blame being placed on the child. The term should be used in an objective manner to state the fact that the child has been subjected to a harmful/criminal act.

Outside of legal and medical contexts, the term “survivor” is sometimes preferred, as this term implies resilience. “Survivor” has also been largely used in the context of violence against women and gender-based violence, and these fields of work have further influenced the field of child protection, which is increasingly using the term interchangeably or in combination with “victim”.

Outside the legal context, care should be taken when engaging with persons, including children, who have been subjected to violence. It is recommended to use the terms ‘victim’ or ‘survivor’, or another term the individual prefers. It is also strongly advised to check with the person concerned how they wish to be referred to.

**Concern**, or safeguarding concern, is where a person has:

- Behaved in a way that may have harmed a child or might lead to a child being harmed
- Possibly committed or is planning to commit a criminal offence against a child or related to a child or adults; or behaved towards a child in a way that indicates s/he is or may be unsuitable to work with children; and
- Breached provisions of this policy.

**Survivor-centred approach**<sup>22</sup> is one for which the survivor’s dignity, experiences, considerations, needs, and resiliencies are placed at the centre of the process, from the initial program design to investigating and responding to potential incidents. The survivor should be informed, participate in the decision-making process, and provide consent on the possible use and disclosure of their information. Those interacting with the survivor and/or handling information regarding the allegation must maintain confidentiality, ensure safety of the survivor, and apply survivor-centred principles which are safety, confidentiality, respect, and non-discrimination. When the survivor is a child, the approach must consider the best interests of the child and engage with the family/caregivers as appropriate. Staff and partners should comply with host country and local child welfare and protection legislation and international standards, whichever gives greater protection.

**Sharing of information on a need-to-know basis** means that:

- Information is disclosed only to individuals who require it to perform their safeguarding-related duties
- Disclosure is limited to what is necessary to protect the survivor or respond to the concern
- Confidentiality is maintained to protect the survivor’s dignity and safety; and informed consent is obtained wherever possible, except where mandatory reporting or immediate risk overrides confidentiality

**Contact with children**<sup>23</sup> means working on an activity or in a position that involves or may involve any interaction with children, no matter how minimal, either under the position description or due to the nature of the work environment. This includes indirect interaction with children in the community.

**Working with children**<sup>24</sup> means being engaged in an activity with a child where the contact would reasonably be expected as a normal part of the activity and the contact is not incidental to the activity. This includes both in-person and online activities. Working includes volunteering or other unpaid work.

### Annex III: Reporting template

*Complete as much detail as you are able. Don't delay making a referral if there is information missing. Don't investigate further to collect information that is missing.*

<b>Part 1 Details of the person you are concerned about, if known</b>		
Full name:		
Gender:	Age and/or Date of birth:	Country, City:
Religion:	Ethnicity:	Any additional needs (e.g. disability, language spoken, interpreter required)
Parent's/Carer's name(s):		
Contact details:		
<b>Part 2 Details of the alleged perpetrator</b>		
Name, role and organisation:		
Age and/or Date of Birth:		
Relationship to alleged victim/survivor:		
Country, City:		
<b>Part 3 Your Details</b>		
Your Name:	Your Position:	Your contact details:
<b>Part 4 Report</b>		
Are you reporting your own concerns or concerns raised by someone else?		If reporting concerns raised by someone else, please provide their name, role and contact details (if known):
<input type="checkbox"/> Reporting my own concerns		How have you been made aware of this concern (in-person report, email, phone call, ...)?
<input type="checkbox"/> Reporting concerns raised by someone else		

Please provide details of the concerns including:

- What happened? Describe in detail what you know about the alleged incident(s).
- Do you know if anyone else that the alleged perpetrator was involved? (Provide full names, titles and organisation, if possible).
- When and where did the alleged incident(s) occur? Indicate dates and times, if available.
- Please make it clear whether you are giving a fact, expressing opinion or an opinion of someone else.

If known, please provide details (name, role contact details if known) of any witnesses to the incident/concerns:

**Part 5: Actions Taken**

State any risk of immediate danger.	
Identify any action taken already (e.g. contact with police, manager, children or adults social care services etc.).	
State if the victim/survivor or family/carer or alleged perpetrator are aware that a report has been made.	
Any further information or comments.	

**Date and time of report being submitted** \_\_\_\_\_

**Annex IV: Declaration for staff and associates of Oak Foundation**

*To be appended to contract of employment or consultancy*

1. I confirm that I have read Oak Foundation's Child Safeguarding Policy and agree to abide by it.
2. I confirm that I have read and understood my duties, obligations, and responsibilities as they pertain to this policy.
3. I confirm that I am aware that if I have questions related to my duties, obligations or responsibilities set out in this policy, I will ask my supervisor, the Designated Officers or the President for support.
4. I also declare that I have disclosed to Oak Foundation any issue which could give rise to any child protection concern — real or perceived — regarding my suitability for employment or consultancy.
5. I confirm that I have no criminal prosecutions pending involving inappropriate conduct with children, nor have I been previously convicted of any offence involving inappropriate conduct with children.
6. I confirm that I will notify Oak Foundation of any changes to points 4 and 5, regarding my suitability or criminal prosecutions.

By my signature below, I certify that the above statements are true and correct.

Name and signature

Date

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## Annex V: Reference list

1. This content was partly produced with the help of generative AI, to review clarity and consistency in language and tone and compare sources. The policy is written, reviewed and agreed upon by Oak staff and Board.
2. Throughout this policy, Oak Foundation is referred to as “we”. This includes everyone involved in working with, protecting, and promoting the values and mission of the foundation.
3. [The Keeping Children Safe International Safeguarding Standards](#)
4. In previous versions of our policy, the term “abuse” was commonly used to describe harm against children. In line with international safeguarding frameworks, we now use the broader term “violence”, in alignment with the language of the UN Convention on the Rights of the Child (Article 19) and the ICVAC. Using the term “violence” allows to capture the full spectrum of harmful acts against children, including those that may not be legally classified as “abuse” in all jurisdictions and to tackle variations in legal frameworks, cultural beliefs, and social norms, which may define or interpret “abuse” differently across countries.
5. For a working definition of trauma-informed practice, see: [Working definition of trauma-informed practice - GOV.UK](#)
6. Keeping Children Safe
7. *Ibid.*
8. [International Classification of Violence against Children](#), UNICEF, p.13-14
9. Deliberate acts refer to the intention to act and/or to intentionally not take action. They should not be equated with the desire to cause harm. The notion of intent to act is useful to distinguish accidents from acts of violence. Similarly, the deliberate engagement in reckless and dangerous behaviours, where the harmful outcome could have been foreseen if not explicitly intended, is considered violence. *Ibid.*, p.14
10. Unwanted acts are not agreed to by the victim or are committed against someone who is unable to refuse or agree. For children, the capacity to refuse or agree to an act is dependent on their age and their evolving capacities. Regardless of age, the capacity to refuse or agree is also dependent on other individual characteristics of the child, such as whether she or he has a disability. Unwanted acts also include those that are perpetrated with agreement as a result of intimidation, force, fraud, coercion, threat, deception, use of drugs or alcohol, manipulation, or abuse of power or of a position of vulnerability. *Ibid.*
11. Non-essential acts are those that cannot be justified by reason of survival or fitness, as well as acts that do not serve a legitimate function that could not also be obtained by non-violent means. Essential acts, on the other hand, comprise acts that are necessary for the child’s survival (e.g., physical restraint to prevent an injury) and medical well-being (e.g., physical force by a dentist/ physician to cure or mend), as well as acts undertaken in self-defence or in defence of one’s children. *Ibid.*
12. *Ibid.*, p.28-29
13. *Ibid.*, p.30-31
14. *Ibid.*, p.30-31
15. [Terminology Guidelines for the Protection of Children from Sexual Exploitation and Sexual Abuse](#), Interagency Working Group on sexual Exploitation of Children International, ECPAT Luxembourg, p.54
16. [International Classification of Violence against Children](#), *op.cit.*, p.32-34
17. *Ibid.*, p.35-36
18. International Labour Organization
19. [Terminology Guidelines for the Protection of Children from Sexual Exploitation and Sexual Abuse](#), *op.cit.*, p.24
20. *Ibid.*
21. [Terminology Guidelines for the Protection of Children from Sexual Exploitation and Sexual Abuse - Second Edition](#), ECPAT International, p.140-144, 146-147
22. [Safeguarding Leadership Tool](#), BOND
23. [DFAT Child Protection Policy for the Australian Government’s aid program \(2018\)](#)
24. *Ibid.*

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### **Our mission**

Oak Foundation makes grants in over forty countries around the world to contribute to a safer, fairer, more sustainable world.

### **Our Programmes**

Environment, Global Climate Initiative, Housing and Homelessness, International Human Rights, Issues Affecting Women, Learning Differences, Prevent Child Sexual Abuse, Special Interest, Oak Foundation Denmark, and Zimbabwe