

Safeguarding children and vulnerable adults policy

Reporting safeguarding concerns

If, in the course of your work with the Shell Foundation, you have a concern about the safety or wellbeing of a child or a vulnerable adult (also referred to as an “adult at risk”) or see or hear of a situation which you know or suspect to breach this Safeguarding Policy (and/or the Code of Conduct) you must report it without delay via one of the following routes:

- Via the Safeguarding Team email: safeguarding@shellfoundation.org
- Online via [EthicsPoint](#)
- To the Safeguarding Team:
 - Maurice Othulo, Safeguarding Officer
 - Rachel Singh Davies, Safeguarding Officer

If you believe a crime is being committed or there is an imminent risk to life you must contact the relevant emergency services immediately (and then report the incident to the Safeguarding Team).

Executive summary

What is safeguarding?

Safeguarding means taking reasonable steps to protect from harm and promote the well-being of the beneficiaries of the Shell Foundation (SF) and all those the SF comes into contact with, in particular children and vulnerable adults.

Harm includes (among other things) physical, emotional, sexual, financial abuse and neglect. For more information about types of harm and abuse you should be alert to see Schedule 1.

Your responsibilities

Safeguarding is everyone's responsibility.

We expect everyone working for or representing SF in any way to maintain high levels of professionalism and to ensure they never act in a way that causes or risks causing harm to others, in particular children and/or vulnerable adults.

We expect everyone representing SF to adhere to the highest standards of behaviour at all times and comply with this Policy and any other policies or procedures referenced within it including (but not limited to):

- the Safeguarding Code of Conduct – Schedule 2
- the Shell Code of Conduct
- the SF's Business Principles
- [the SF's Anti-Bullying and Harassment Policy]
- [the SF's Whistleblowing Policy].

Any failures to act in accordance with these expected standards will be taken seriously.

Duty to report

If in the course of your work for SF you have a concern about the safety or wellbeing of a child or vulnerable adult or are worried about the behaviour of an adult, i.e. you believe that they pose a risk of harm to others, you must report this without delay to the Safeguarding Team. See the front page of this Policy and paragraph 6.2 for how to report.

If you believe a crime is being committed or there is an imminent risk to life you must contact the relevant emergency services immediately (and then report the incident to the Safeguarding Team).

If you have any questions or concerns regarding safeguarding or this Policy speak to your Safeguarding Team: safeguarding@shellfoundation.org

1. Who does this Policy apply to?

- 1.1. Shell Foundation ('SF' or 'we') is a charity registered in England and Wales regulated by the Charity Commission. We exist to create and scale business solutions that empower underserved populations to earn a living income through access to clean energy products and services.
- 1.2. All SF representatives (or 'you') are expected to be familiar with and comply with this Policy at all times.
- 1.3. For the purposes of this Policy, SF representatives mean (whether full-time or part-time, paid or unpaid): secondees (including secondees from Shell International Ltd or other agencies); employees; contractors, consultants, volunteers, interns, trustees, social entrepreneurs, students, advisors, Partners or Suppliers or anyone else who is otherwise representing SF in any formal or official capacity.
- 1.4. Partners refer to any one of the local or international organisations that SF enters into a contractual agreement to execute its Business Model, they may also be referred to as grantees. Suppliers are those who supply goods or services to the Foundation and sign up to the SF Business Principles.

2. Guiding principles

- 2.1 SF adheres to core Business Principles in its work, which state that SF will exercise its duty of care and responsibility to the following groups:
 - The people we aim to help – we undertake to respect their rights, to listen to their wishes and to remember at all times that we exist to help and serve them.
 - Our Partners – we undertake to work together to achieve mutually agreed outcomes that benefit society.
 - Our staff – we undertake to respect the human rights of our staff; to promote the best use of their talents; to create an inclusive work environment where every staff member has an equal opportunity to develop his or her skills and talents; to encourage the involvement of staff in the planning and direction of their work; and to provide them with channels to report concerns. We recognise that the SF's success depends on the full commitment of all staff.
- 2.2 SF safeguards and promotes the well-being and welfare of SF's beneficiaries and all who come into contact with SF and to take reasonable steps to ensure that no-one who comes into contact with SF comes to harm as a result. The safety and welfare of everyone affected by SF's activities, especially children and vulnerable adults, is our highest priority and should be reflected in all we do. SF is also committed to safer recruitment and vetting.
- 2.3 This Policy applies to everyone regardless of their age, marital status, sex, gender identity, ethnicity, nationality or race, religion or belief, disability, pregnancy or maternity or sexual orientation.

3. What is 'safeguarding'? What is a 'safeguarding concern'?

- 3.1 For the purposes of this Policy safeguarding refers to the steps taken to protect children and vulnerable adults from the risk of harm, abuse, exploitation and harassment. This includes physical abuse, sexual abuse, emotional abuse, financial abuse and neglect.
- 3.2 Safeguarding is everyone's responsibility, and it is important for everyone to remember that abuse can happen anywhere and to be alert to it. For more information on types of harm see Schedule 1.
- 3.3 This Policy sets out what SF does to help protect children and vulnerable adults from harm in the course of its activities, how you, as a representative of SF are expected to behave, what harms and concerns you should be alert to and what to do if you have a safeguarding concern.
- 3.4 A safeguarding concern is a concern about the safety or welfare of a child or vulnerable adult or about the behaviour of an adult towards a child or vulnerable adult, i.e. that you suspect they may pose a risk of harm to the child or vulnerable adult. Safeguarding concerns can be contemporary or historic.

All safeguarding concerns must be reported – see "Reporting Safeguarding Concerns" below.

4. 'Children' and 'vulnerable adults'/'adults at risk'

- 4.1 Children mean people under the age of 18. Some children, because of their personal circumstances, may be more vulnerable to abuse than others.
- 4.2 Vulnerable adults (also referred to as 'adults at risk') mean people who are or may be in need of community care services by reason of mental disability, sensory impairment, age or illness; and who is or may be unable to take care of him/herself, or unable to protect him/herself against significant harm or exploitation.
- 4.3 SF does not normally in the course of its programming work directly with children or adults at risk, although its representatives may come into contact with these groups from time to time.
- 4.4 SF is also mindful that its representatives are likely to be in a position of power or trust in respect of many of the social entrepreneurs or Partners that it works with through its programming and that, although many of these individuals will not meet the definition of "adult at risk" (as defined above), they may well have particular vulnerabilities as a result of their circumstances which we ask all our representatives to be mindful of in their dealings with them.

5. Workplace bullying or harassment

- 5.1 SF is committed to ensuring a safe and respectful environment in all project sites and offices world-wide, including a zero tolerance towards any form of bullying, harassment (including sexual harassment), sexual exploitation and abuse of any person by our representatives, either directly or indirectly.
- 5.2 Any allegations of bullying or harassment will be taken seriously. [For more information see our Anti-Bullying and Harassment Policy.]
- 5.3 If you are an employee or contractor of Shell seconded to SF and have a concern or question about workplace bullying or harassment please see the [Shell Group Global Code of Conduct](#). All employees and contractors are expected to act in accordance with the Shell Group Global Code of Conduct. If you are unsure whether your question or concern falls within this Code of Conduct, you should contact the Safeguarding Team for further guidance. This can be done on a no-names basis.

6. Our Safeguarding Team

- 6.1 If you have any questions or concerns about safeguarding, this Policy and how it applies to you or a specific situation, you should speak to our Safeguarding Team without delay. They are here to support and guide you and will take appropriate steps to respond to any safeguarding concerns that are raised. All concerns will be taken seriously and dealt with appropriately.
- The Safeguarding Team's email is: safeguarding@shellfoundation.org
 - Safeguarding Officers (SOs). They are members of the senior management team who are here to receive and respond to safeguarding concerns and will keep appropriate records. The Safeguarding Officers will provide the Designated Safeguarding Trustee with current data (confidentially) on compliance with this Policy as well as challenges to managing safeguarding risks in the organisation.
 - Designated Safeguarding Trustee. They are a designated member of the Board of Trustees who oversees the compliance of this Policy and safeguarding more generally. They ensure that safeguarding is a standing agenda at Board meetings.
- 6.2 All managers are expected to promote this Policy and be accountable for its implementation and ensure that new hires undergo safeguarding training and existing direct reports have refresher training.

7. Receiving and reporting safeguarding concerns

7.1 If, in the course of your work with SF, you have a concern about the safety or wellbeing of a child or a vulnerable adult (also referred to as an “adult at risk”) or see or hear of a situation which you know or suspect to breach this Safeguarding Policy (and/or the Code of Conduct) you must report it without delay via one of the following routes:

- Via the safeguarding team email: safeguarding@shellfoundation.org
- Online via [EthicsPoint](#)
- To the Safeguarding Team:
 - Maurice Othulo, Program Compliance and Assurance Lead and Safeguarding Officer.
 - Rachel Singh Davies, CFO and Safeguarding Officer.

If you believe a crime is being committed or there is an imminent risk to life you must contact the relevant emergency services immediately (and then report the incident to the Safeguarding Team).

7.2 You should always treat safeguarding disclosures with discretion and sensitivity and share information on confidential / ‘need to know’ basis.

8. How we will respond to safeguarding concerns

8.1 Representatives of SF have a duty to report safeguarding concerns (as above) which will always be taken seriously and handled in a confidential and appropriate manner.

8.2 Individuals who raise any such concern in good faith will never be subjected to any detriment as a result.

8.3 The Safeguarding Officers will consider all the available information and decide (taking account of 8.5 in the case of an adult at risk) whether any action needs to be taken. Appropriate referrals will be made to external agencies, such as the Local Authority and/or the Police.

8.4 Referrals to the Local Authority should be made in accordance with the referral threshold set by the relevant Local Safeguarding Partnership, where applicable. A referral to the Local Authority must always be made where there is reasonable cause to suspect that a child or adult at risk has suffered significant harm through abuse or neglect; or is likely to suffer significant harm in the future.

8.5 In the event the safeguarding concern or allegation relates to an adult at risk, the Safeguarding Lead, when assessing whether to make a referral to an external agency, must consider the views of the adult in all circumstances where it is possible and safe to seek their views. If an adult refuses intervention to support them with a safeguarding concern or allegation, this should be respected. There are some exceptions where the wishes of the adult may be overridden and a referral made, including (but not limited to) where the adult does not have capacity to make the

decision, other people are or may be at risk of harm (including children), an individual associated with SF is implicated, or a serious crime has been committed.

- 8.6 In borderline cases, the Safeguarding Officer should discuss the safeguarding concern with the Local Authority. Following the discussion(s), the Safeguarding Officer will be guided by the Local Authority in terms of whether, in their judgement, a referral should be made.
- 8.7 The timing of referrals should reflect the level of perceived risk of harm, and be made as soon as reasonably practicable or, if that is not possible, not longer than one working day of identification or disclosure of harm or risk of harm.
- 8.8 The Safeguarding Team will always consider the jurisdictional context of the safeguarding allegation and draw on advice and guidance from local experts and authorities, where appropriate.
- 8.9 The Safeguarding Team will ensure that detailed, accurate and secure records are kept of safeguarding concerns, discussions and decisions taken including the rationale for those decisions. This will include instances where referrals were or were not made to other agencies. Safeguarding concerns and related information will be stored and processed in a confidential manner and shared on a 'need to know' basis, in accordance with SF's safeguarding obligations and any requirements under applicable data protection legislation (including the Data Protection Act 2018 and GDPR 2018) and any applicable policies in place from time to time.

9. Implementing this Policy

- 9.1 The implementation of this Policy lies with the SF Leadership Team, overseen by the Safeguarding Officers and the Designated Safeguarding Trustee.
- 9.2 As part of SF's commitment to safeguarding, it will ensure that:
- all recruitment and human resources management procedures include a risk assessment and appropriate background checks (including appropriate criminal records checks and vetting) – under no circumstances will any individual who is associated with SF and considered to pose a risk of harm to children or adults at risk be deployed to work or volunteer with these groups;
 - all representatives will be made aware of this Policy and staff members (i.e. those employed by or seconded to SF) will receive appropriate safeguarding training (which covers the obligations and information in this Policy);
 - a copy of this Policy is available online;
 - all representatives will be required to sign the Statement of Commitment form and abide by the Code of Conduct (Schedule 2) as a condition of any engagement with SF;
 - procedures for dealing with safeguarding concerns, including allegations of abuse against staff, representatives, and those of Partner agencies are communicated clearly;

- clear channels for reporting allegations are made available to the SF's representatives (and that reporting can be made anonymously);
- there is an appropriate Designated Safeguarding Trustee and Safeguarding Officers in place (see above);
- it seeks to embed a culture that respects and protects children, vulnerable adults and their communities is cultivated in the organisation, led by the Board and senior leadership;
- Where appropriate, according to the particular facts and circumstances of a safeguarding concern or allegation raised, consider whether to make a serious incident report to the Charity Commission in accordance with its guidance.

10. Working with Partners and Suppliers

- 10.1 SF will conduct appropriate due diligence on our Partners and Suppliers (and any other third-party contractors).
- 10.2 Partners, Suppliers (and any other third-party contractors) will be informed of SF's expectations of them in respect of this Policy, and the arrangements in place to help ensure the safety and welfare of any child or adults at risk who may come in contact with the Partner/Supplier or their activities, and respond to any safeguarding concerns, including:
- undergoing a Partner Assurance process in which safeguarding risks are evaluated at on-boarding and annually thereafter where they are required to make full and frank disclosure through self-assessment;
 - the mandatory requirement to have a robust safeguarding policy and procedures in place (which SF will support partners to draft if requested), including a clear Code of Conduct on which their staff are trained and are expected to comply with at all times;
 - the requirement that they carry out appropriate due diligence against any organisations they themselves work with or formally partner with to ensure they have appropriate policies and practices in place and are required to report any safeguarding risks or matters which may otherwise pose reputational risk to the Partner or Supplier to the Partner and Supplier;
 - reporting safeguarding concerns and incidents of which the Partner or Supplier becomes aware to SF as soon as practicable in accordance with this Policy; and
 - setting up feedback and complaints mechanisms that are appropriate, confidential and accessible for children, vulnerable adults and communities to raise concerns, including effective and trustworthy whistleblowing mechanisms.
- 10.3 We expect all Partners and Suppliers to be made aware of the Safeguarding Code of Conduct and are expected to sign and comply with its provisions. This should be included in all Memoranda of Understanding and funding agreements.

11. How we expect you to behave

11.1 We expect all SF representatives (regardless of where in the world the individual is working and regardless of whether the work is online or in person) to at all times to:

- comply with the Safeguarding Code of Conduct (at Schedule 2); and
- comply Shell's Code of Conduct (in the Employee Handbook).

12. Failure to comply with this Policy

12.1 A failure to comply with this Policy will always be taken seriously. Action taken in response to breaches or alleged breaches could include:

- An internal or external investigation.
- Disciplinary action which could include sanctions up to immediate dismissal.
- Suspension and/or ceasing of activity, relationship, funding or engagement.
- Suspension and/or cancellation of the contract or partnership.

12.2 SF may be required to share specific information with donors, relevant regulatory bodies, law enforcement and protection agencies, as appropriate.

13. Other policies

13.1 This Policy should be read in conjunction with:

- Shell Foundation Business Principles.
- Shell Ethics and Compliance Policy.
- Shell Global Code of Conduct.
- Shell HR policies that apply in the country in which the employee is employed (which will include policies relating to whistleblowing).
- Any secondment agreement in place between you, SF and Shell.
- Any other applicable agreement or contract in place between you and Shell Foundation Shell Foundation Recruitment & Selection Policy & Procedure.
- SF Anti-Bullying and Harassment Policy
- [SF Whistleblowing Policy](#)
- [Data Protection Policy](#); [ICT Acceptable Use Policy](#)

14. Useful contacts and resources

Please refer to the following helpful contacts and further guidance:

- Foreign, Commonwealth & Development Office (FCDO) Counter Fraud and Whistleblowing Unit at: reportingconcerns@dfid.gov.uk
- Lambeth Safeguarding Children Partnership:
Website: www.lambethsaferchildren.org.uk
Phone: 020 7926 3344
Email: helpandprotection@lambeth.gov.uk
- Lambeth LADO
Website: [LADO Referral | Lambeth Safeguarding Children Partnership \(lambethsaferchildren.org.uk\)](http://LADO Referral | Lambeth Safeguarding Children Partnership (lambethsaferchildren.org.uk))
Phone: 020 7926 4679
Email: LADO@lambeth.gov.uk
- [Lambeth Safeguarding Adults Board](#)
- [Charity Commission – Safeguarding and protecting people for charities and trustees](#) (June 2022)
- [Working Together to Safeguard Children](#) (2023)
- [DBS Guidance - Working with children in the charity sector and overseas aid organisations](#) (2023)
- [DBS Guidance – Working with adults at risk in the charity sector and overseas aid organisations](#) (2023)
- [Information Sharing Advice for Safeguarding Practitioners](#) (2024)

15. Review

This Policy will be reviewed at least every two years or earlier to reflect any changes in relevant legislation or regulations, or any lessons learned.

Date: August 2024

Schedule 1

Types of harm that you should be alert to

1. Abuse, Exploitation and Neglect: All forms of actions or inactions resulting in harm (or risk of harm), injury, or death of children or a vulnerable adult by another. These include:
 - 1.1 Physical Abuse results in actual or potential physical harm from an interaction or lack of interaction. There may be single or repeated incidents. Examples include smacking, hitting, shaking, poisoning, burning, drowning or suffocating, or deliberately making a someone ill.
 - 1.2 Sexual Abuse is the involvement of a child or vulnerable adult in sexual activity that he or she does not fully comprehend, is unable to give informed consent to, or for which the child or vulnerable adult is not developmentally prepared and cannot give consent, or that violates the laws or social taboos of society. The activity is intended to gratify the needs of the perpetrator. It includes being touched in a way that is inappropriate; being forced to look at sexual pictures or videos; being forced to watch someone do something sexual; being forced to make sexually explicit pictures or videos and have them shared through technology; made to do something sexual to someone that may feel uncomfortable or wrong. Perpetrators may sexually groom children or vulnerable adults by enlisting the trust of caregivers to enable easy access to the child or vulnerable adult.
 - 1.3 Emotional Abuse includes the failure to provide a developmentally appropriate, supportive environment, including the availability of a primary attachment figure, so that the child or vulnerable adult can develop a stable and full range of emotional and social competencies. Acts of emotional abuse may include restriction of movement, patterns of belittling, denigrating, scapegoating, threatening, scaring, discriminating, ridiculing, or other non-physical forms of hostile or rejecting treatment.
 - 1.4 Sexual or Commercial Exploitation includes using children or vulnerable adults to work or perform other activities for the benefit of others where the perpetrator profits monetarily, socially, politically, or in other ways where there is an exchange of gifts, cash, or in kind. This includes, but is not limited to, child labor, forced recruitment into armed groups, prostitution, trafficking, and pornography. These activities will risk the physical or mental health, education (e.g. depriving them from schooling or combining school with long hours at work in the case of children), moral, or social-emotional development (e.g. early or forced marriage).
 - 1.5 Neglect or Negligent Treatment is the inattention or omission on the part of the caregiver to provide for the development of the child or vulnerable adult in all spheres such as health, education, emotional development, nutrition, shelter, and safe living conditions. This includes the failure to properly protect children and vulnerable adults from harm as much as is feasible.
 - 1.6 Spiritual Abuse using text from spiritual books or quoting scripture as an excuse to perpetrate abuse and violence or to instill fear in children and vulnerable adults.
 - 1.7 Modern Slavery includes the crimes of human trafficking, slavery, and slavery-like practices such as servitude, forced labor, forced and/or early marriage, the sale and exploitation of children and vulnerable adults, and debt bondage.³

- 1.8 Financial And Material Abuse includes theft, fraud, exploitation, and pressure in connection to wills, property, inheritance, and financial transactions, or inciting a child or vulnerable adult to do any of these things on another individual's behalf; it may also involve the misuse or misappropriation of property, possessions, and benefits belonging to children or vulnerable adults.
- 1.9 Domestic Abuse or Intimate Partner Violence is any incident or pattern of incidents of controlling, coercive, or threatening behavior, violence, or abuse of adults, by intimate partners, previous intimate partners, or family members regardless of gender or sexuality.⁴
- 1.10 Bullying is behaviour directed either against an individual or a group of individuals that creates a threatening or intimidating environment undermining the confidence and self-esteem of the recipient(s). It could be an abuse or misuse of power that humiliates or injures the recipient(s).
- 1.11 Harassment means unwelcomed verbal, non-verbal or physical conduct, that is related to a person's characteristics, whether they are actual or perceived, which include: age, disability, gender, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.
- 1.12 Sexual harassment - Any unwelcome sexual advance, request for sexual favour, verbal or physical conduct or gesture of a sexual nature, or any other behaviour of a sexual nature that might reasonably be expected or be perceived to cause offence or humiliation to another. Sexual harassment is particularly serious when it interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive environment. Sexual harassment may be unintentional and may occur outside the workplace and/or outside working hours. While typically involving a pattern of behaviour, it can take the form of a single incident. Sexual harassment may occur between or amongst persons of the opposite or same sex.
- 1.13 Any Misuse of Power, authority, or position on a child or vulnerable adult not covered above.
- 1.14 Survivor/Victim - The person who has been abused or exploited. The term 'survivor' is often used in preference to 'victim' as it implies strength, resilience and the capacity to survive, however it is the individual's choice how they wish to identify themselves.

Schedule 2

Shell Foundation's Safeguarding Code of Conduct

This Code of Conduct (CoC) applies at all times. It has been developed with reference to the Inter-agency Standing Committee (IASC) Task Force on Protection from Sexual Exploitation and Abuse⁵ and covers the prevention and protection of participants from sexual exploitation and abuse in humanitarian relief

1. Conduct and behaviour
 - 1.1 SF representatives (including Partner and Suppliers) must never:
 - 1.1.1 engage in any sexual exploitation, misconduct, abuse or inappropriate sexual behaviour of any kind. Allegations of such conduct will be taken seriously, investigated and appropriate reports made (which may include reports to the relevant statutory agencies or police) and appropriate steps taken. The steps taken in response will depend on the circumstances and jurisdiction of each case and could include disciplinary action up to and including dismissal without notice;
 - 1.1.2 engage in sexual activity with children (person under 18) regardless of the age of majority or consent locally - mistaken belief in the age of a child is not a defence;
 - 1.1.3 exchange money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading, or exploitative behaviour. This includes exchange of assistance that is due to participants;
 - 1.1.4 have sexual relationships with those receiving a benefit from an SF related programme. Such relationships are based on inherently unequal power dynamics and undermine the credibility and integrity of development work;
 - 1.1.5 do anything illegal or act in away that is unlawful or against any applicable regulatory code or equivalent;
 - 1.1.6 discriminate against or favour any person because of their age, gender identity, sex, race, nationality or ethnic background, faith or belief, sexual orientation, marriage, maternity or pregnancy, or disability;
 - 1.1.7 engage in or attempt to engage in sexual or inappropriate relationships with children or vulnerable adults for whatever reason, including the use of suggestive conversations, comments, texting, instant messaging, emails, or via social media platforms, as there is an inherently unequal power dynamic - this includes possessing or distributing indecent images of children, vulnerable adults, or others;
 - 1.1.8 have any unnecessary physical contact with children or adults at risk and wherever possible, avoid situations which may lead to your behaviour towards them being misinterpreted by others;
 - 1.1.9 use your status or position to form inappropriate relationships with any child or vulnerable adult, either face-to-face or online, which are of a sexual or exploitative nature, or which may become so;

- 1.1.10 communicate with children via social media, emails, or phone unless it is as an agreed part of your work and managers are both informed and able to monitor activity;
 - 1.1.11 engage or pay a child or vulnerable adult for any service that is not part of an organised and agreed activity;
 - 1.1.12 encourage or assist children or vulnerable adults to break the law in any way;
 - 1.1.13 engage in any commercially exploitative activities with children or vulnerable adults, including child labour or trafficking;
 - 1.1.14 use your status or position to intimidate, bully, threaten, discriminate against, embarrass, shame, humiliate, coerce, or undermine children or vulnerable adults;
 - 1.1.15 carry out your duties or visit with children and vulnerable adults while under the influence of alcohol, solvents, or drugs - this also includes not smoking in the presence of children during research or other activities;
 - 1.1.16 use any sort of physical chastisement/punishment or implements to beat or hit a child or vulnerable adult as a form of discipline, or withhold food, water, or other necessities of care;
 - 1.1.17 take any bribes or rewards in order to cover up or ignore suspicious activity involving children or vulnerable adults or otherwise;
 - 1.1.18 neglect a child or leave a child unsupervised that may put the child at risk of harm or injury; and
 - 1.1.19 carry out traditional practices that are harmful, such as early or forced marriage of a child or vulnerable adult.
2. SF representatives (including Partners and Suppliers) must always:
- 2.1.1 comply with this CoC and the Safeguarding Policy (and any other applicable and related policies);
 - 2.1.2 use language and communicate in a way (and via mediums) that are appropriate and professional (including online and offline);
 - 2.1.3 treat everyone with respect, respect a person's right to privacy;
 - 2.1.4 be aware and recognise power imbalance between yourself and other members of staff, representatives and beneficiaries therefore authority must be exercised in an accountable and transparent way;
 - 2.1.5 always report any safeguarding concerns to the Safeguarding Team in accordance with this Policy and without delay and cooperate with their enquiries as far as possible; and
 - 2.1.6 work to create and maintain an environment that prevents sexual exploitation and abuse of any kind and promotes the Business Principles and compliance with this Policy – managers have a particular role in this

- regard and should support and develop systems to help create an open, professional and supportive culture;
- 2.1.7 treat all children and vulnerable people fairly and in a way that demonstrates respect and preserves dignity;
 - 2.1.8 balance the need to respect societal norms of the communities with the responsibility to report abusive cultural practices - if in doubt raise your concern with the Safeguarding Team for guidance;
 - 2.1.9 work in partnership with colleagues and other agencies to promote and safeguard the welfare of children, vulnerable adults, and people in everything that we do;
 - 2.1.10 ensure that, whenever possible, there is more than one adult present during activities with children and vulnerable adults, or they are at least within sight or hearing of others – unless the reason for this has been firmly established and agreed with a manager overseeing the SF's activities;
 - 2.1.11 develop and keep clear personal boundaries and rules when conducting activities that involve children or vulnerable adults, to keep both them and you safe; and
 - 2.1.12 ensure that confidential information or images concerning children, families, and communities is not shared inappropriately on social media, or with others, except through formal safeguarding reporting processes with full and informed consent that has been freely given.
3. Safe recruitment and training
- 3.1 SF representatives must always:
- 3.1.1 disclose any criminal record, caution, reprimand, warning or other relevant information on the self-disclosure form, whether received prior to or during the course of your work or association with the SF, as well as changes in circumstances. This requirement is in addition to any other published requirement for disclosure as part of your work or association with SF or a former organisation or agency you may be (or have been) attached to;
 - 3.1.2 cooperate with any other vetting or checking procedures that SF may consider appropriate; and
 - 3.1.3 attend any safeguarding training that you are required to complete within the required time framework, as directed. For example, all SF staff (which includes employees, volunteers, contractors, secondees, and interns) must complete the mandatory safeguarding training within the first two weeks of beginning their relationship with SF, or as soon as practicable thereafter, and attend the annual mandatory safeguarding training and any other mandatory training that may be required of you from time to time.
 - 3.1.4 Partners and Suppliers must ensure that their representatives and staff are subject to appropriate level of criminal record checks and vetting and ensure that no-one who is unsuitable to work with children or vulnerable adults is deployed to work with or have contact with those groups.

4. Risk assessments

4.1 Anyone implementing or delivering an intervention funded by SF (in full or in part) must always:

4.1.1 ensure there is an appropriate written risk assessment in place prior to implementing any project which may involve children and vulnerable adults. They must provide a safe and conducive environment for all activities. The person responsible for Safeguarding should review the risk assessment and the delivery/implementation manager should work collaboratively with the Safeguarding responsibility holder to finalise and agree the assessment and any steps that need to be taken to address any safeguarding risks identified, and ensure the assessment is regularly monitored and updated as and when required.

Commitment made by Shell Foundation Representative, Partner or Supplier

- I have read and understood my responsibilities outlined in the Shell Foundation Safeguarding Policy.
- I agree with the terms contained herein and accept the importance of complying with these provisions while working with or representing SF and its partners in any way.
- I understand that the consequences for non-compliance could have serious repercussions, including immediate termination of the secondment/contract.
- I also understand that SF may need to report concerns to donors, other organisations, professional bodies, and/or the police.
- If any of my personal circumstances change that might affect my ability to undertake my duties within SF and/or that may create a possible risk to children, vulnerable adults or others, I undertake to inform SF's Safeguarding Officers immediately and seek his/her guidance.

Name:

Date:

Job title/role/position: _____

Affiliation/Organisation: _____

Address: _____

Signature: _____