

Anglo American Foundation Safeguarding Policy

PURPOSE

The purpose of this policy is to protect people, particularly children, at risk adults and beneficiaries of assistance, from any harm that may be caused due to their coming into contact with Anglo American Foundation. This includes harm arising from:

- The conduct of staff or personnel associated with Anglo American Foundation
- The design and implementation of Anglo American Foundation's programmes and activities

The policy lays out the commitments made by Anglo American Foundation and informs staff and associated personnel of their responsibilities in relation to safeguarding. All staff and associated personnel are required to review and sign the Foundation's Safeguarding Code of Conduct.

This is a global policy and applies to all Anglo American Foundation staff and associated personnel regardless of region and location.

This policy does not cover:

- Sexual harassment in the workplace – this is dealt with under Anglo American's Bullying and Harassment Policy
- Safeguarding concerns in the wider community not perpetrated by Anglo American Foundation or associated personnel

Terms used in this policy shall have the meaning set out in the Glossary of Terms.

WHAT IS SAFEGUARDING?

For the Anglo American Foundation, safeguarding means protecting peoples' health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect. In addition, we understand it to mean protecting people, including children and at-risk adults, from harm that arises from coming into contact with our staff or programmes.

Further definitions relating to safeguarding are provided in the glossary below.

SCOPE

- The Trustees of and all staff contracted by Anglo American Foundation
- Associated personnel and other parties (including but not limited to volunteers, contractors, and implementation partners) who will engage with grantees and beneficiaries of the foundation, on our behalf

This Policy applies to Anglo American Foundation globally, unless any aspect of the Policy is not permitted by local law or regulation.

POLICY STATEMENT

Anglo American Foundation believes that everyone we come into contact with, regardless of age, gender identity, disability, sexual orientation or ethnic origin has the right to be protected from all forms of harm, abuse, neglect and exploitation. Anglo

American Foundation will not tolerate abuse and exploitation by staff or associated personnel.

This policy will address the following areas of safeguarding [as appropriate]: child safeguarding, adult safeguarding, beneficiaries of assistance, and protection from sexual exploitation and abuse. These key areas of safeguarding may have different policies and procedures associated with them (see Associated Policies).

Anglo American Foundation commits to addressing safeguarding throughout its work, through the three pillars of prevention, reporting and response.

PREVENTION

Anglo American Foundation responsibilities

Anglo American Foundation will:

- Ensure all staff have access to, are familiar with, and know their responsibilities within this policy
- Design and undertake all its programmes and activities in a way that protects people from any risk of harm that may arise from their coming into contact with Anglo American Foundation. This includes the way in which information about individuals in our programmes is gathered, communicated and stored
- Implement stringent safeguarding procedures when recruiting, managing and deploying staff and associated personnel
- Ensure staff receive training on safeguarding at a level commensurate with their role in the organization
- Follow up on reports of safeguarding concerns promptly and according to due process

Staff responsibilities

Child safeguarding Anglo American Foundation staff and associated personnel must not:

- Engage in sexual activity with anyone under the age of 18
- Sexually abuse or exploit children
- Subject a child to physical, emotional or psychological abuse, or neglect
- Engage in any commercially exploitative activities with children including child labour or trafficking

Adult safeguarding

Anglo American Foundation staff and associated personnel must not:

- Sexually abuse or exploit at risk adults
- Subject an at-risk adult to physical, emotional or psychological abuse, or neglect
- Engage in any commercially exploitative activities with at-risk adults

Protection from sexual exploitation and abuse

Anglo American Foundation staff and associated personnel must not:

- Exchange money, employment, goods or services for sexual activity. This includes any exchange of assistance that is due to beneficiaries of assistance
- Engage in any sexual relationships with beneficiaries of assistance, since they are based on inherently unequal power dynamics

Additionally, Anglo American Foundation staff and associated personnel are obliged to:

- Contribute to creating and maintaining an environment that prevents safeguarding violations and promotes the implementation of the Safeguarding Policy
- Report any concerns or suspicions regarding safeguarding violations by an Anglo American Foundation staff member or associated personnel to the appropriate staff member

ENABLING REPORTS

Anglo American Foundation will ensure that safe, appropriate, accessible means of reporting safeguarding concerns are made available to staff and the communities we work with. The Foundation will ensure that all reports are confidential.

Any staff reporting concerns or complaints through formal whistleblowing channels (or if they request it) will be protected by Anglo American's Disclosure of Malpractice in the Workplace (Whistleblowing) Policy.

Anglo American Foundation will also accept complaints from external sources such as members of the public, partners and official bodies.

How to report a safeguarding concern

Staff members who have a complaint or concern relating to safeguarding should report it immediately to the Foundation's Safeguarding Focal Point (the Foundation Operations Manager) or line manager. If the staff member does not feel comfortable reporting to the Safeguarding Focal Point or line manager (for example if they feel that the report will not be taken seriously, or if that person is implicated in the concern) they may report to any other appropriate staff member. For example, this could be a senior manager or a member of the HR Team. Alternatively, staff can also report a complaint or concern through YourVoice, the Foundation's whistleblowing platform.

External parties with a concern or complaint relating to safeguarding should report it immediately to the Anglo American Foundation via YourVoice.

YourVoice is our confidential channel that allows our staff, partners, official bodies and members of the public, to challenge any behaviour that conflicts with our Values and Code of Conduct, without fear of retaliation. Anything you report in good faith will be taken seriously, treated with the utmost confidentiality and investigated by an independent team. You also have the option of remaining anonymous. It is 'your voice' - and your opportunity to be heard.

RESPONSE

Anglo American Foundation will follow up safeguarding reports and concerns according to policy and procedure, and legal and statutory obligations (see Procedures for reporting and response to safeguarding concerns in Associated Policies).

Anglo American Foundation will apply appropriate disciplinary measures to staff found in breach of policy.

Anglo American Foundation will offer support to survivors of harm caused by staff or associated personnel, regardless of whether a formal internal response is carried out (such as an internal investigation). Decisions regarding support will be led by the survivor.

CONFIDENTIALITY

It is essential that confidentiality is maintained at all stages of the process when dealing with safeguarding concerns. Information relating to the concern and subsequent case management should be shared on a need to know basis only, and should be kept secure at all times.

- Anglo American Foundation Trustee Code of Conduct
- Anglo American Code of Conduct
- Complaints policy and procedures
- Health and Safety policy
- Disclosure of Malpractice in the Workplace policy
- Anti Fraud and Corruption policy
- Safeguarding policy
- Bullying and Harassment policy
- Security policy
- Use of IT policy
- Other policies as appropriate

Please also refer to Anglo American's Business Integrity Policy

Glossary of Terms

Beneficiary of Assistance

Someone who directly receives goods or services from Anglo American Foundation's programmes. Note that misuse of power can also apply to the wider community that the Foundation serves, and also can include exploitation by giving the perception of being in a position of power.

Child

A person below the age of 18.

Harm

Psychological, physical and any other infringement of an individual's rights, as set out in the United Nation's Universal Declaration of Human Rights (which can be found in full here).

Psychological harm

Emotional or psychological abuse, including (but not limited to) humiliating and degrading treatment such as bad name calling, constant criticism, belittling, persistent shaming, solitary confinement and isolation

Protection from Sexual Exploitation and Abuse (PSEA)

The term used by the humanitarian and development community to refer to the prevention of sexual exploitation and abuse of affected populations by staff or associated personnel. The term derives from the United Nations Secretary General's Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse (ST/SGB/2003/13).

Safeguarding

For the Anglo American Foundation, safeguarding means protecting peoples' health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect. In addition, we understand it to mean protecting people, including children and at-risk adults, from harm that arises from coming into contact with our staff or programmes. One donor definition is as follows:

Safeguarding means taking all reasonable steps to prevent harm, particularly sexual exploitation, abuse and harassment from occurring; to protect people, especially vulnerable adults and children, from that harm; and to respond appropriately when harm does occur.

This definition draws from our values and principles and shapes our culture. It pays specific attention to preventing and responding to harm from any potential, actual or attempted abuse of power, trust, or vulnerability, especially for sexual purposes.

Safeguarding applies consistently and without exception across our programmes, partners and staff. It requires proactively identifying, preventing and guarding against all risks of harm, exploitation and abuse and having mature, accountable and transparent systems for response, reporting and learning when risks materialise. Those systems must be survivor-centred and also protect those accused until proven guilty.

Safeguarding puts beneficiaries and affected persons at the centre of all we do.

Sexual abuse

The term 'sexual abuse' means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

Sexual exploitation

The term 'sexual exploitation' means any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. This definition includes human trafficking and modern slavery.

Survivor

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.

At risk adult

Sometimes also referred to as vulnerable adult. A person who is or may be in need of care by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.

