



This policy explains how Green Levers works to prevent harm and protect children and adults at risk in all of our work, including grant-making, research, and partnerships.

1. About this policy

This policy applies to Green Environmental and Social Initiatives (GESI), a charitable company registered in England and Wales (Charity No. 1214357) and a company limited by guarantee (Company No. 15784474). "Green Levers" is its trading name. It sets out the principles and procedures that govern safeguarding across all areas of the charity's operations and funded work, in the UK and internationally.

While GESI does not directly deliver frontline services, it works with partners who support or engage with individuals who may be vulnerable due to factors such as age, disability, displacement, trauma, or socioeconomic disadvantage. The policy applies equally to GESI's work in grant-making, research, and partner engagement.

GESI upholds the rights of children as defined in the United Nations Convention on the Rights of the Child (UNCRC¹), including the right to protection from all forms of violence, abuse, and exploitation.

All of GESI's work is underpinned by the principle of *do no harm*, a globally recognised commitment to ensuring that charitable activities do not cause or exacerbate harm to individuals or communities. This principle is grounded in humanitarian and development standards, including the Core Humanitarian Standard (CHS)² and informed by guidance from sector leaders such as CHS Alliance³ and Bond⁴.

GESI addresses safeguarding through the three interconnected pillars of **prevention, reporting, and response**. This is widely adopted across the charity and humanitarian sectors to promote effective safeguarding practice. While not defined by the Charity Commission itself, this framework supports strong safeguarding governance and provides a clear structure to prevent harm, enable safe disclosures, and ensure appropriate action.

¹ UN Convention on the Rights of the Child (UNCRC), 1989 Available at:

<https://www.unicef.org.uk/what-we-do/un-convention-child-rights/>

² <https://www.corehumanitarianstandard.org/>

³ <https://www.chsalliance.org/>

⁴ <https://www.bond.org.uk/>



In overseeing the activity of GESI, the trustees are mindful of the Charity Commission guidance: [Safeguarding and protection people for charities and trustees](#)⁵.

This policy applies to GESI's:

- Trustees;
- Staff and contractors⁶;
- Partners⁷; and
- Volunteers.

2. What is safeguarding

Safeguarding is about embedding practices throughout the organisation to ensure the protection of children and vulnerable adults wherever possible and dealing sensitively and appropriately with the situation should any incident arise which places a child or vulnerable adult at risk or in which a child or vulnerable adult has suffered abuse.

Vulnerable persons can be harmed, or put at risk of harm, by organisations and institutions, and abuse of vulnerable groups can happen in all types of organisations. Such harm may result from unintentional acts or deliberate actions.

Unintentional acts may lead to harm due to a lack of 'due diligence' or competence or through organisational negligence, such as inadequate care and supervision, lack of policies, procedures, and guidance to inform programming and practice, or lack of staff compliance with legal requirements. Also, deliberate actions may be taken by people with intent to abuse vulnerable people.

3. What is abuse

Abuse can be caused by those inflicting harm or those who fail to act to prevent harm. Abuse is not restricted to any socio-economic group, gender, or culture.

Abuse can take a variety of forms, for example:

⁵ <https://www.gov.uk/guidance/safeguarding-duties-for-charity-trustees>

⁶ For the purposes of this policy 'Staff' is defined as anyone who works for, or is engaged by GESI, either in a paid or unpaid, full time or part time capacity. This includes directly employed staff, contractors, agency staff, consultants, visitors, researchers, volunteers, interns, and equivalents.

⁷ "Partner" means any organisation which receives funding from GESI, which collaborates with GESI to deliver any of its programmes or activities, or which is otherwise associated with GESI's name and brand. This policy is intended to work alongside the equivalent policies of GESI's partners, where appropriate. GESI will ensure that each Partner has appointed a member of staff who will be responsible for promptly reporting to GESI's Director of Operations [Designated Safeguarding Lead] (or, if they are unavailable the Chair of the Trustee Board of any safeguarding concerns that arise in, or relevant the context of the partnership.



- Physical abuse
- Sexual abuse
- Emotional abuse
- Psychological abuse
- Neglect
- Radicalisation
- Financial abuse

A non-exhaustive list of potential indicators of abuse is set out at **Appendix 1** of this Policy

4. Who this Policy Protects

GESI recognises its responsibility to protect from harm all those who come into contact with the charity or its funded activities, including:

- Individuals and communities benefiting from GESI's programmes and funding.
- Children and adults at risk who may be affected directly or indirectly by our work.
- Research participants, particularly in vulnerable contexts.
- GESI staff, trustees, consultants, volunteers, and representatives.
- Partners and third parties working on behalf of GESI.

5. Roles and Responsibilities

The Board of Trustees bears ultimate responsibility for safeguarding and ensuring this policy is fully implemented. GESI's **Operational Director** serves as the **Designated Safeguarding Lead (DSL)**, overseeing day-to-day safeguarding implementation, policy adherence, and risk management including (but not exclusively):

- responding to all child and vulnerable adult safeguarding concerns and enquiries;
- making any necessary reports to statutory agencies and will keep records of any action taken in response to safeguarding concerns;
- ensuring GESI's policy reflects changes to legislation and is kept up to date in relation to best practice when the policy is reviewed;
- ensure that trustees, members of staff and volunteers have appropriate training in the application of the policy on an annual basis and will review the position annually; and
- monitoring the overall trend of any safeguarding concerns and report annually (or more frequently, as appropriate) to the trustees. While all the trustees have a collective responsibility for safeguarding, the Nominated Safeguarding Trustee will usually be the first point of contact on the board for the Designated Safeguarding Lead.
- seeking to ensure processes and procedures of GESI are in line with good practice, and are updated to address new needs that may be identified



The Chair of the Trustee Board will be appointed as the **Nominated Safeguarding Trustee** to provide governance-level oversight and support the DSL in ensuring safeguarding is embedded across the organisation. The appointment of the Nominated Safeguarding Trustee will not detract from the fact that all the trustees share collective responsibility for safeguarding within GESI. An annual safeguarding report will be presented to the Board for review and accountability.

Every individual who becomes aware of any suspicions or allegations regarding harm to children or vulnerable adults is required to report this immediately to the Designated Safeguarding Lead.

6. Due Diligence and Grant Conditions

GESI integrates safeguarding into all due diligence processes and grant-making decisions. All partners and research collaborators are expected to meet safeguarding standards appropriate to the level of risk involved, and as set out in more detail in the relevant written agreement.

Key expectations include:

- All organisations or individuals engaging with vulnerable groups must have appropriate safeguarding policies and procedures in place.
- Staff and representatives in high-risk roles must undergo vetting (e.g., DBS, ICPC, or national equivalent).
- Safeguarding responsibilities and incident-reporting obligations will be embedded in all grant or funding agreements.
- Safeguarding risks will be assessed for all roles or projects that involve direct contact with vulnerable individuals or access to sensitive information. Mitigation measures such as police checks, training, or supervision will be applied proportionately based on risk.

7. Managing Safeguarding Risks

GESI maintains a safeguarding risk register, reviewed at least annually. Risk assessments will be conducted for all funded projects and organisational activities, with enhanced scrutiny applied to:

- Work involving children or vulnerable adults.
- Research involving direct participant engagement.
- Grants made to overseas partners in higher-risk regions.

Where risks are identified, GESI will work with partners to ensure robust mitigating measures are in place before activity commences.



8. Reporting and Response

Safeguarding concerns should be reported immediately to the **Designated Safeguarding Lead (DSL)**. GESI commits to:

- Acting on concerns promptly and proportionately.
- Reporting serious incidents to statutory authorities and the Charity Commission where applicable.
- Ensuring confidentiality and data protection in managing concerns and disclosures.

GESI may establish additional confidential reporting channels for safeguarding concerns as the organisation grows to further ensure safety and trust in disclosure processes.

9. Training and Organisational Culture

All trustees, staff, and relevant volunteers will receive safeguarding training during induction and at regular intervals. GESI promotes a safeguarding culture where individuals are empowered to raise concerns and where values of dignity, equity, and protection underpin all activities.

10. Safeguarding in Overseas and Digital Work

GESI recognises additional safeguarding risks in international and digital contexts.

In overseas settings:

- Partners must meet UK-equivalent safeguarding standards.
- GESI may reference international best practice frameworks such as the Core Humanitarian Standard and IASC Minimum Standards⁸.

In digital settings:

- Adult supervision is required in online sessions involving children or vulnerable groups.
- Recording or photographing participants requires prior written consent.
- Secure platforms must be used with access controls (e.g., passwords, waiting rooms).
- GESI staff and partners will receive digital safeguarding training and clear behavioural guidelines.

⁸ The IASC (Inter-Agency Standing Committee) Minimum Operating Standards are international safeguarding benchmarks that set out how organisations should prevent and respond to sexual exploitation and abuse in humanitarian and development work. See:

<https://interagencystandingcommittee.org/>



11. Reporting serious incidents to the Charity Commission and other external bodies

GESI is committed to reporting all relevant incidents to the Charity Commission for England and Wales via a serious incident report.⁹ GESI will also report incidents to other regulatory bodies and government departments or funding bodies, where appropriate. Where there is evidence that criminal activity may have taken place, or concerns have been raised in relation to a vulnerable adult, GESI will report to the relevant police and/or safeguarding authorities as appropriate (for example to the relevant Local Authority Adult Safeguarding Board), taking appropriate account of the Charity Commission's guidance in this respect.¹⁰

Decisions to report to external authorities will be fully risk assessed and anonymisation/ pseudonymisation considered when necessary. Reporting will not be avoided on the basis that it may harm GESI's reputation or give rise to litigation and any concerns in relation to data protection will not act as a barrier to reporting, although they will be carefully considered to ensure that the disclosure is made within the legal framework for so doing.

12. Appendix: Definitions of Abuse and Exploitation

Safeguarding means protecting people's health, wellbeing, and human rights, and enabling them to live free from harm, abuse, and neglect.

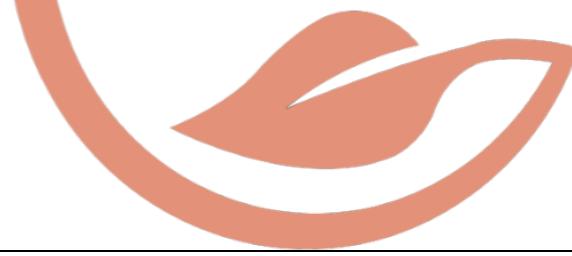
Survivor refers to a person who has experienced abuse or exploitation. GESI adopts a survivor-centred approach in responding to incidents, recognising the individual's autonomy, dignity, and right to define their own experience.

Abuse - It can often be difficult to recognise abuse. It is nevertheless important to know what could indicate that abuse is taking place and to be alert to the need to consult further. Someone can abuse a child/vulnerable adult by actively inflicting harm or by failing to act to prevent harm. Abuse can take place within a family, in an institutional, work or community setting, by telephone or on the internet, at events (hosted externally or internally), or when carrying out research. Abuse can be carried out by someone known to the person or by a complete stranger. If you are worried about a child/vulnerable adult it is important that you keep a written record of any physical or behavioural signs and symptoms. In this way you can monitor whether or not a pattern emerges and provide evidence to any investigation if required.

⁹ The Charity Commission's guidance sets out what constitutes a serious incident and how to make a report, <https://www.gov.uk/guidance/how-to-report-a-serious-incident-in-your-charity>.

¹⁰

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/780835/Criminal_reporting_of_safeguarding_offences_including_overseas_v3.pdf



A. Children

Physical Abuse	Physical abuse is the deliberate infliction of pain, physical harm or injury and includes withholding or misuse of medication.
Emotional Abuse	Emotional abuse is the emotional ill treatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless, unloved or inadequate or causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. It may feature age or developmentally inappropriate expectations. Some level of emotional abuse is involved in all types of ill treatment of a child, though it may occur alone.
Sexual Abuse	Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, whether or not they are aware of what is happening. This may involve physical contact, including penetrative or non-penetrative acts or non-contact activities, such as involving children in looking at, or the production of, pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways.
Neglect	Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. It may involve a parent or carer failing to provide adequate food, shelter or clothing, failure to protect a child from physical harm or danger, or failure to ensure access to appropriate medical care or treatment.

B. Adults

Physical Abuse	Physical abuse is the deliberate infliction of pain, physical harm or injury and includes withholding or misuse of medication.
Psychological abuse	Psychological abuse is any pattern of behaviour by another that results in harm and may include insults, humiliation, ridicule, bullying, threats, enforced isolation, interference in relationships and contact between consenting adults, coercion, lack of privacy or choice, denial of dignity.
Sexual Abuse	Sexual Abuse is any sexual activity involving but carried out without the informed consent of a vulnerable adult. Sexual abuse may include sexual intercourse, inappropriate touching, offensive or suggestive language, 'voyeuristic' behaviour and exposure to the suggestive or sexually explicit activities of others, including films, photographs, images etc.
Financial or material abuse	Financial abuse is the misappropriation of funds (savings or income) or property of a vulnerable adult. This may include exploitation, theft or fraudulent use of money, misuse of property or possessions and incurring financial liabilities on behalf of a vulnerable adult without their informed consent.
Neglect and acts of omission	Neglect may be deliberate or by default where the abuser is not able to provide the care and support needed or may not recognise the need for the care and support to be given. The abuser may also be neglecting themselves.
Discriminatory abuse	When the vulnerable adult is harassed or discriminated against because of their age, race, gender, sexuality, religion, disability, culture etc.
Self Neglect	Where the adult at risk is neglecting to care for their own personal hygiene, health, or surroundings.
Modern Slavery	Includes forced labour, debt bondage, sexual exploitation, criminal exploitation, and domestic servitude.
Domestic abuse	Includes controlling, coercive, or threatening behaviour and / or violence between people who are or have been intimate partners or family members. Abuse can take a variety of forms, not only physical but also psychological, sexual, emotional, social, financial, intimidation and neglect.



Version Control – Approval, Review and Trustee Assurance

This policy will be reviewed **at least annually**, or sooner if safeguarding incidents occur, if relevant laws or guidance change, or if GESI's activities or risk profile evolve.

The policy is shared with all trustees, staff, and delivery partners, and made publicly available. It is supported by:

- GESI's Grant Making Policy
- GESI's Research Policy
- GESI's Code of Conduct
- Whistleblowing and Complaints Procedures
- Trustee Safeguarding Oversight and Annual Reporting Process

The Board of Trustees confirms that it has read and understood the Charity Commission's safeguarding guidance.

This includes:

- **Safeguarding and protecting people for charities and trustees**
<https://www.gov.uk/guidance/safeguarding-duties-for-charity-trustees>
- **10 actions trustee boards need to take to ensure good safeguarding governance (infographic)**
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/756636/10_safeguarding_actions_for_charity_trustees_infographic.pdf

Trustees are committed to making safeguarding a priority and to embedding safeguarding considerations across GESI's governance, risk management, grant-making, and operational functions.

Version No	Approved By	Approval Date	Main Changes	Review Period
1.0	Board of Trustees	June 2025	Initial draft approved	Annually or earlier if required