

Foundation Policy Standard

Safeguarding

Doing what's right

Objective/Risk

This policy addresses the risk of Vodafone Foundation failing to adequately protect children and at-risk adults from harm in the course of its work.

The purpose of this document is to outline the principles by which the Foundation will safeguard beneficiaries and the processes to hold staff, volunteers and partners to account.

Policy Owner

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Version/Date

V4.0, July 2025

Scope and Compliance

This Policy Standard applies to Vodafone, Vodacom and Safaricom Foundations (referred to collectively in this document as 'Vodafone Foundation') and their employees, volunteers, grant recipients and delivery partners. Failure to comply may result in the withdrawal of funding, loss of future contracts with Vodafone Foundation, and/or disciplinary action.

This Policy aligns with international human rights standards and UK legislation and is informed by guidance published by the UK Charity Commission.

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1 The Policy Standard

1.1 Principles

Vodafone Foundation recognises that the welfare of our beneficiaries and the communities in which we work, as well as that of our staff and volunteers, is paramount. Everyone we come into contact with, in the course of our work, particularly children and at-risk adults, and regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, has a right to equal protection from all types of harm or abuse.

Vodafone Foundation and anyone working for or with us has a responsibility to promote and protect the welfare of beneficiaries within all activities we undertake. We will not tolerate any abusive or exploitative behaviour by employees or anyone else involved in delivering our programmes and we will not tolerate inaction in preventing, reporting, or responding to abuse, neglect or exploitation. Our zero-tolerance approach does not mean there will be no reports or incidents of harm or abuse. Rather it signifies our commitment to act on all safeguarding concerns and that actions taken in response will always be timely, appropriate, and grounded in a survivor-centred approach.

These principles apply to everyone who works for Vodafone Foundation, whether in a paid or voluntary role, as well as our grant recipients and delivery partners.

There is no time limit to our accountability to individuals and communities we work with. Our safeguarding duty includes acting on any concerns relating to non-recent incidents of abuse (also known as historical abuse).

1.2 Definitions

Safeguarding	the responsibility of the organisation to take all reasonable steps to make sure our staff and representatives, operations and programmes do no harm to the children or adults we work with, or to the staff or volunteers who work on our behalf, or expose them to abuse or exploitation; and to respond appropriately when harm does occur
Child	anyone under 18 years of age, regardless of the age of consent in any specific local market
At-risk adult	anyone over the age of 18 who may be or is unable to protect or care for themselves by reason of disability (of any kind), illness or age, those suffering from trauma, addiction, or their immigration status
Beneficiaries	individuals or communities with whom Vodafone Foundation comes into contact through its programming and operations
Staff	anyone employed directly by and working for Vodafone, Vodacom or Safaricom Foundations
Volunteer	anyone supporting Vodafone Foundation and its work in an unpaid capacity. This includes Vodafone, Vodacom and Safaricom employees volunteering their time to support Foundation activities

Representative	anyone acting on behalf of Vodafone Foundation but not directly employed by Vodafone Foundation. This includes delivery partners, grant recipients, suppliers, contractors, Trustees, and donors visiting Vodafone Foundation programmes
Victim/Survivor	a person who has experienced maltreatment or harm committed by a staff member or associate or as caused by Vodafone Foundation's operations or programmes. The victim/survivor may be a staff member or a member of the community, child or adult. The terms 'victim' and 'survivor' can be used interchangeably. 'Victim' is a term often used in the legal and medical sectors. 'Survivor' is the term generally preferred in the psychological and social support sectors because it implies resiliency
Victim/Survivor-centred approach	an approach which places the survivor's experiences, considerations, and needs at the centre of our processes and actions, elevates the voice of survivors, and places their wishes, rights, dignity, safety, and wellbeing at the forefront of efforts to prevent and respond. This occurs from the initial concern or report, through to investigating, responding to concerns and potential incidents, follow up actions, and case management

2 Behaviours

1. Do no harm.

- i. Never do anything that compromises the safety and wellbeing of beneficiaries or colleagues, whether in-person or online.
- ii. Ensure that all our engagement with the people we work with or encounter in our work is appropriate, not exploitative or abusive, and does not take advantage of any imbalances of power that may exist.
- iii. Do not engage in any form of abuse, exploitation or harassment towards others. This includes all types of harm such as physical, sexual, emotional, financial, neglect, stalking and domestic abuse.
- iv. Do not attempt or engage in sexual activity with anyone under the age of 18, regardless of local age of consent.
- v. Avoid showing or sharing images where a child, children, or community members can be identified without prior informed consent
- vi. When operating in international or high-risk contexts, including conflict zones or areas with differing legal frameworks, Vodafone Foundation staff and partners must uphold the highest safeguarding standards, even where these exceed local legal requirements. Cultural sensitivity must be balanced with a firm commitment to child and adult-at-risk protection.

2. Create a safe and welcoming environment.

- i. All staff, volunteers and representatives are expected to create and maintain safe environments both in person and online, that both actively promote and protect the safety, dignity and wellbeing of beneficiaries, their families and all staff, volunteers and representatives, to prevent risk of harm and/or abuse.
- ii. Understand the risks prior to commencing new activities and design events and programmes with safeguarding in mind.
- iii. When hosting events, complete a health and safety risk assessment in advance and take steps to minimise the risk of accidents or harm.

3. Report concerns and any suspected breaches of this Policy.

- i. Report any allegation, concern of future harm, or suspicion of abuse or harm promptly, sharing all information that could aid in protecting those harmed or at risk of harm, and minimising risks to those individuals and others.

- ii. Report all safeguarding concerns as quickly as possible, including lower-level concerns. This helps to identify, respond and prevent further harm, and increases trust with the communities we work in, and can prevent harm and abuse from escalating. Report even if information is incomplete – we would rather investigate and find no issue than to miss the opportunity to avoid harm.
 - iii. Take any reports you receive seriously and escalate them as required by this Policy.
 - iv. Our responsibility to report extends beyond the people we work with directly. We understand abuse can happen in contexts that are not directly related to our work, but we still have a responsibility towards reducing that harm such as sexual, physical, emotional, exploitative, or neglectful harm and abuse.
4. **If in doubt, ask for advice.**
- i. Consult Vodafone Foundation's Safeguarding Lead, Lucy Harris, if unsure how to implement any part of this Policy, and prior to any events or activities where safeguarding risks are assessed to be high.

3 Controls and deliverables required for compliance

Local Foundation Trustees are responsible for ensuring that the following controls are fully implemented within their local Foundation and followed for all Foundation projects.

3.1 Nominated Safeguarding Trustee

All Foundations must nominate a Trustee to be responsible for governance and safeguarding to ensure accountability. It is the responsibility of the Trustee to work with the Board and Foundation team to ensure that safeguarding practices are implemented effectively. The nomination should be ratified by the Board of Trustees.

3.2 Safeguarding risk assessment

A safeguarding risk assessment must be done prior to the start of any programme, new activity or event to identify conditions that might cause or enable harm. Where risks are identified appropriate mitigation must be taken. A list of higher risk programmes and partnerships should be documented, shared with the Safeguarding Trustee and reviewed regularly to ensure risks are properly managed.

The Board of Trustees should review safeguarding risks at least once a year. Evidence of the discussion should be documented in Board minutes.

3.3 Recruitment

When hiring staff who will work with children or at-risk adults or deploying staff to higher risk activity or events, steps should be taken to vet these individuals (through DBS checks in the UK or a local equivalent), to evaluate their knowledge of safeguarding practices, and to certify their willingness to uphold Vodafone Foundation's Safeguarding Policy.

3.4 Employee awareness

All employees and contractors involved in the delivery of Foundation projects must be familiar with the Safeguarding Policy. Employees should not be left to work unsupervised with children or at-risk adults. Basic training should be provided to these individuals and should cover, amongst other things, how to treat young people and at-risk persons with respect and dignity, how to behave when in a position of trust, and where and how to report concerns. Where risk assessments completed prior to any new activity or event highlight specific risks, tailored training should be provided to any staff or partners involved to ensure these risks are managed effectively.

3.5 Partners and suppliers

Agreements with grant recipients, partners or suppliers who may come into contact with children or at-risk adults must include specific safeguarding terms. These terms must commit the other party to safeguarding beneficiaries, in accordance with the Foundation's Safeguarding Policy. The terms must also require both parties to report any relevant safeguarding concerns to each other in a timely manner.

In addition, the other party must submit a copy of their own safeguarding policy. This should be reviewed to ensure it is adequate and they should be asked how they implement the policy in practice, including what mechanisms they have in place to report incidents. Partner safeguarding policies must be retained in case needed for future review. If they do not have a policy of their own, they should be asked to confirm their commitment in writing to Vodafone Foundation's Safeguarding Policy.

Any partners who work with at-risk beneficiaries must be monitored throughout the lifecycle of a project to ensure they are fulfilling their commitments in this area. At a minimum, any partner staff who work with at-risk beneficiaries should be adequately trained by the partner to ensure that they know how to behave appropriately and report any suspected misconduct.

3.6 Events

Any event or activity that the Foundation directly undertakes should be assessed for the likelihood of a child or at-risk person attending and appropriate safeguarding and health and safety procedures should be put in place.

3.7 Online safety

Ensure the use of Vodafone Foundation systems, apps, platforms and digital channels does not expose people to harm through failures in data security, inappropriate digital conduct or misuse of technology. Safeguarding risks should be considered in the design of all digital tools, platforms, and online interactions.

3.8 Consent to film or photograph

Any photography or filming as part of communication activity around Vodafone Foundation programmes must adhere to the Foundation's separate photography and video guidelines. If you wish to publish any image or video of beneficiaries, prior written consent from the beneficiary and parent or legal guardian, if the beneficiary is a child, must be received and retained. Images and video, if retained, must be stored securely to ensure they are not shared or used for any purpose other than that for which consent was given.

3.9 Reporting mechanisms

All local Foundations should have a mechanism for employees, beneficiaries, delivery partners or members of the public to report breaches of this Safeguarding Policy. This may be the Vodafone Foundation Speak Up process (see Section 3 below).

Any concerns raised by employees, beneficiaries, delivery partners or members of the public must be reported to the Group Foundation Director.

4 Reporting wrongdoing and responding to concerns

Breaching this Policy will be treated with the utmost seriousness, will be investigated fully, and may result in disciplinary action, including termination of employment, appointment or contract, referral to local law enforcement and the UK Disclosure and Barring Services (or local equivalent).

A breach of this Policy includes, but is not limited to:

- Failing to report a safeguarding concern
- Engaging in or facilitating abusive, exploitative, or inappropriate behaviour
- Breaching confidentiality or mishandling sensitive information
- Failing to follow safeguarding procedures or risk mitigation measures
- Inaction in the face of known or suspected harm

You can report breaches of this Policy via any of the following channels:

- Directly to Vodafone Group Foundation Director, Lisa Felton, via email lisa.felton@vodafone.com or phone +447880 738302.
- Confidentially via an external, independent hotline: [EthicsPoint - Vodafone](#). This reporting line is administered by NAVEX on behalf of Vodafone Group Plc.
- Confidentially via Vodafone Foundation's own reporting channel speakup.foundation@vodafone.com.

All reports received will be acknowledged within 10 working days. Reports will be triaged to assess severity and risk and investigated appropriately, either by Vodafone Group's Investigations team, external counsel, or a partner organisation. All investigations will be managed in line with a survivor-centred and trauma-informed approach, sharing information only on a need-to-know basis. Investigations will aim to be concluded within 30 working days, unless complexity or survivor needs require more time. Serious breaches will be reported to the Board of Trustees and, where appropriate, to law enforcement or regulatory bodies.

5 Monitoring implementation

We recognise that safeguarding is a continuous journey of learning, adaptation, and reflection and will work to ensure that learnings are continuously embedded into relevant processes, procedures, and practices.

Implementation and enforcement of this Policy will be reviewed regularly by Vodafone Foundation's Board of Trustees and Audit & Risk Committee. The Policy wording will be reviewed annually by the Audit & Risk Committee.

Vodafone Foundation's Governance team will be responsible for communicating the policy principles and providing guidance and training for all Foundation staff, as well as volunteers and other representatives where required.

The Governance team will also provide assurance through its monitoring of programme delivery and local Foundation implementation, including through in-country governance reviews.

Local Foundation Managers will be responsible for monitoring compliance in their country of operation, including the activities of partners, grant recipients, suppliers and contractors delivering activities on behalf of Vodafone Foundation.

6 Roles and responsibilities

6.1 Group Policy Owner

The Group Policy Owner is ultimately responsible for ensuring the Policy is written, approved, implemented, maintained and monitored.

6.2 Group Policy Champion

The Group Policy Champion is accountable to the policy owner and responsible for managing the operation of the policy, including reporting on compliance.

6.3 Group Foundation Trustees

Vodafone (Group) Foundation Trustees are responsible for overseeing the management team's implementation of the Policy and will ensure that safeguarding concerns are reported to relevant agencies where required.

6.4 Local Foundation Trustees

Local Foundation Trustees are responsible for ensuring local compliance with the principles of this policy and the control requirements in Section 2. One Trustee must be nominated as a Safeguarding Trustee.

6.5 Staff, volunteers and representatives

Staff, volunteers and representatives are responsible for upholding the principles and behaviours required by this Policy and for reporting any suspected breaches.

7 Related documents and resources

- Vodafone Foundation Code of Conduct
- Vodafone Foundation Minimum Operating Standards
- Photography and video guidelines

Copies of each are available for request from the Vodafone Foundation Safeguarding Lead or via vodafonefoundationqueries@vodafone.com.

8 Document history

Version	Date	Changes	Other standards affected	Approved by
2.0	20/02/18	Reformatted to fit Group Policy Standard template.		Andrew Dunnett
3.0	06/03/19	Addition of requirement for Safeguarding Trustee		Andrew Dunnett
4.0	03/10/25	Update following review by Save the Children		Lisa Felton