



Policy Name	:	Global Safeguarding Policy
Issue Date	:	01/10/2024

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## 1. Policy Statement

Safeguarding is a key priority to C40 Cities Climate Leadership Group Inc. (“C40 Inc.”) and its subsidiaries and affiliates (collectively, “C40”).

We believe that no one should have to experience or risk experiencing abuse, exploitation or neglect. C40 is committed to proactively safeguarding and promoting the welfare of **anyone who comes in contact with C40 globally** and to taking reasonable steps to ensure that people do not, as a result, come to harm.

Therefore, C40 will promote a safe space for all individuals the organisation is interacting with and ensure that everyone is treated with dignity and respect.

C40’s approach will at all times be trauma-informed and survivor-led, and recognise the impact of abuse or harm on affected people.

## 2. What is Safeguarding?

C40 is committed to the ethical principle of ‘**do no harm**’ and defines **safeguarding** as the **steps taken to protect anyone from harm and abuse**, including staff and volunteers, and other people who come into contact with C40 through its activities.

‘**Abuse**’ or ‘**harm**’ refers to any type of harm or abuse, from sexual abuse to bullying, and includes neglect and exploitation and it can physical, mental or taking place in an online platform. A more extensive list is provided further down.

Safeguarding also refers to C40’s **practices to handle incidents and/or complaints**.

## 3. Protecting Children, Young People and Adults at Risk

C40 applies safeguarding standards and protection to all.

C40 has a legal obligation to provide enhanced protection and mitigations measures when interacting with **children, young people and adults at risk** in line with UK Safeguarding legal requirements.

Therefore, C40 takes extra precautions when it comes to **children, young people, and adults at risk** who come in contact with the organisation, its grantees and its suppliers and any other C40's third party in the course of their work with the organisation. .

C40 defines a **child** as any person under the age of 18, whether living with their families, in state care or living independently.

C40 defines a **young person** as everyone between the age of 18 and 29.

C40 defines an **adult at risk** as a person aged 18 and over whom:

- Has needs for care and support;
- is experiencing, or at risk of, abuse or neglect;
- is unable to protect themselves from either the risk of, or the experience of abuse or neglect;
- Is unable to safeguard their own well-being, property, rights and or other interest.

C40 commits to take proportionate actions to ensure the welfare and protection of children, young people and adults at risk is embedded by design in every programme, activity and/or interaction with those groups.

Therefore, C40 staff, volunteers and third parties will commit to upholding the highest behavioural standards as described below:

- Shall treat every child or vulnerable adult with dignity and respect regardless of differences of ethnicity, religion, age, ability, gender, sexual orientation, class and economic circumstances.
- Shall give children a voice – creating an environment and providing opportunities for children to tell us what we are doing well, what risks there are to them and how we can help keep themselves and others safe.
- Shall not make suggestions to individuals or offer inappropriate or offensive advice that could be considered abusive. C40 staff shall not commit any form of psychological abuse, such as verbally or physically

intimidating, threatening, humiliating, degrading, shaming, blaming or coercing anyone, especially child or vulnerable adult.

- Shall not give personal gifts or cash to children or vulnerable adults.
- Shall not initiate, or respond to, sexual contact with children or vulnerable adults.
- Shall not develop relationships with children and/or vulnerable adults outside of the scope of C40-related events.
- Shall not be alone with a child or vulnerable adult in a private place that cannot be readily seen by other responsible adults.
- Shall not offer cigarettes or alcohol to children or vulnerable adults.
- Shall not use their personal electronic devices such as mobile phones or tablets to take any photographs or videos of children or vulnerable adults, shall not post information about children or vulnerable adults on social media, and shall not post anything to social media which would bring C40 into disrepute.
- Are always responsible for the interaction between an adult and a child even when it appears that a child is acting in a provocative manner. It is the responsibility of the adult to set appropriate boundaries that protect the best interest of the child.
- Shall ensure that all events and activities involving any children/ vulnerable adults are in the best interests of the children involved.

## Vulnerable communities (or Frontline Communities)

C40 might work directly or indirectly with vulnerable or frontline communities.

C40 refers to **vulnerable communities** as people who experience the first, and often the worst, effects of climate change. Due to existing and historic racial, social, environmental, and economic inequities, and, they may have limited resources for adaptation. However, their experiences at the forefront of climate impact offer unique strengths and insights into climate resilience strategies and practices.

C40 also recognises that vulnerability can be transitory and dependent on specific circumstances and/or power imbalances. Therefore, an individual that normally would not be characterised as vulnerable can be considered so under certain circumstances.

When working with those communities and anyone who is vulnerable, C40 commits to create a safe space by taking proportionate and locally appropriate actions to ensure their welfare, protection and dignity is considered in every programme, activity and/or interaction with those groups.

## 4. How to report a concern

Anything that seems suspicious or potentially harmful is a concern. Any concerns, no matter how small, can be reported to the email address [safeguarding@c40.org](mailto:safeguarding@c40.org).

Only the Designated Safeguarding Officer (DSO) and the Deputy DSO have access to this inbox, which is the first point of contact.

C40's Designated Safeguarding Officer is the Head of Operations.

C40's Deputy Designated Safeguarding Officer is the Chief People and Operations Officer.

C40's Executive Safeguarding Officer is the Managing Director of Corporate, who might be made aware of concerns raised if this is appropriate.

However, if you are not comfortable with submitting your report via email to [safeguarding@c40.org](mailto:safeguarding@c40.org), please use [ethics@c40.org](mailto:ethics@c40.org) or contact the confidential external line [Safecall](#).

If you decide to use Safecall, your report will be received and recorded externally to C40, with key details passed through to Legal for further action. Your identity will only be revealed by Safecall to C40 or anyone else with your explicit consent.

## 5. Scope For C40's Staff

C40 Staff must acknowledge and comply with this policy and refrain from causing any harm or abuse to anyone who comes in contact with C40. Failure to do so may result in disciplinary action and/or termination of their contract.

### For C40's Board members/ trustees:

Board members and trustees must comply with this policy. C40's Executive Safeguarding Officer, through the C40 Management Team, will ensure this policy is understood by staff, that survivors are protected and that any incidents are appropriately reported and dealt with as soon as possible.

In the event of a significant safeguarding event / incident this will be brought to the attention of the Board in line with the [Incident Management Plan](#).

### For Third Parties:

C40 expects the third parties we work with (including suppliers, grantees and other partners) to confirm they have appropriate safeguarding policies, protocols and practices to ensure the protection of people who may be impacted. If third parties do not have their own policies, C40 expects them to comply with this Safeguarding Policy to the extent applicable.

## 6. Understanding and Managing Risks

C40 recognises that individuals can be harmed, or put at risk of harm, by organisations and institutions, and that abuse can happen in all types of organisations. Such harm may result from unintentional acts or deliberate actions.

C40 acknowledges that our staff, volunteers and other people we come into contact with could be exposed to safeguarding risks in a variety of ways. Including:

- Sexual harassment, abuse and exploitation
- Bullying and harassment
- Physical or emotional abuse
- Discrimination
- Self-neglect
- Technology-assisted abuse
- Someone with a position of trust at C40 abusing that trust
- A culture, which may allow poor behaviour and poor accountability
- Domestic abuse and/or violence
- Coercive control

- Modern Slavery and Human trafficking
- Health and Safety risks
- Commercial exploitation
- Extremism and radicalisation
- Forced marriage
- Female genital mutilation

C40 commits to evaluate safeguarding risks that might emerge with programmatic activities, especially those involving children, young people, adults at risk and vulnerable communities. Programme Managers contemplating these activities must liaise with the Designated Safeguarding Officer and to carry out a risk assessment of safeguarding matters prior to commencement of new projects, programmes and initiatives and to put in place adequate mitigating actions when necessary.

C40 includes safeguarding on our risk register, which is reported on to the Operational Management Team on a quarterly basis and twice-yearly to the Finance and Audit Committee - in line with the [Risk Policy](#).

## 7. Statement of Commitments

C40 commits to taking all reasonable measures to ensure those impacted by projects and programmes delivered and/or supported by C40 are protected as far as possible from harm and abuse of all kinds.

### C40 commits to:

- Not tolerating any harmful behaviour which involves C40's staff or anyone that comes in contact with the organisation and taking proper actions when a safeguarding issue arises. C40 defines this approach as 'zero tolerance';
- Developing a 'safety culture' within C40 by creating and maintaining protective environments and providing a safe and trusted environment for those affected to come forward and disclose concerns and incidents;
- Taking a trauma-informed and survivor-led approach which recognises the impact of abuse or harm on affected people;

- Ensuring C40 staff and Board members are fully cognisant of safeguarding policies and procedures;
- Increasing understanding and raising the awareness of staff within the organisation of risks relating to safeguarding. This includes providing appropriate training to staff on this policy and their duties and ensuring that all staff are trained on how to recognise, respond to, report and record a concern in accordance with the relevant national or programme safeguarding procedures;
- Ensuring all staff are aware of their responsibilities to report concerns and of steps to take/ who to go to in order to report such concerns;
- Ensuring that safeguarding concerns are addressed promptly and through the appropriate channels, in accordance with country - or programme-specific procedures (which reflect this policy);
- Investigating those who have been involved in causing harm or pose a risk of harm through appropriate process and/ or external reporting to relevant authorities;
- Reporting safeguarding incidents, allegations or concerns to external authorities and regulators, as appropriate, in accordance with the Incident Management Plan and our survivor-led approach;
- Placing safeguarding at the heart of recruitment practices by carrying out appropriate safe recruitment checks on Staff, including the highest level of Disclosure and Barring Service (DBS) checks (or equivalent in the country of operation) to which we are entitled;
- Requiring suppliers and sub-grantees to accept C40's non-staff code of conduct, which commits them to appropriate safeguarding measures;
- Ensuring that the management of information, documentation and photography is handled in accordance with C40's Data Protection Policy and Privacy Notice;
- Ensure that anonymised details of safeguarding incidents are recorded on an Incident Tracker in line with the C40 Incident Management Plan.
- Using the records of safeguarding incidents (including reports to the Board) to reflect and learn lessons from past incidents/ concerns and implement any learning points that arise, whether



relating to how the incident was handled or to how to prevent it occurring. This may include seeking views of the person or groups affected, where appropriate.

## 8. Embedding Organisational Commitment

In order to make its policy commitments a practical reality, C40 will continually strengthen a range of measures that focus on making sure this policy and associated procedures are in place, that people are supported to understand and work within the provisions of the policy, that it is fully and effectively integrated into all of our activities, and that it is subject to monitoring and review.

C40 will implement and keep updated:

- (i) [Safeguarding Manual of Practice](#)
- (ii) [Staff Code of Conduct](#) and [Non-Staff Code of Conduct](#)
- (iii) An [external channel](#) to report complaints.

Through those, C40 will foster a culture of openness and accountability wherein Staff and members of the public are, respectively, confident that they can raise any matter of genuine concern without fear of reprisal in the knowledge that they will be taken seriously and that matters will be investigated appropriately and managed on a need-to-know basis, with appropriate remedial action taken.

## 9. Policy Review

This policy was adopted by C40's board of trustees in September 2024.

This policy will be reviewed and revised every three years, as and when a safeguarding serious incident occurs, when necessary due to a change in legislation, policy or guidance or when there is a change in relation to the nature or mode of delivery of programmes changes – whichever comes first.