

Vodafone Foundation Safeguarding Policy

Objectiv/ Risk

This policy addresses the risk of the Foundation failing to adequately protect children and vulnerable adults from harm when beneficiaries of Vodafone Foundation programmes.

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

Scope and compliance

This Policy Standard applies to the Vodafone Foundations and their employees, grant recipients and delivery partners. Failure to comply may result in the withdrawal of funding, loss of future contracts with the Vodafone Foundation or disciplinary action.

Contents

1	The Policy Standard	1
1.1	Principles.....	1
1.2	Definitions	1
2	Controls and deliverables required for compliance	2
2.1	Nominated Safeguarding Trustee	2
2.2	Safeguarding risk assessment	2
2.3	Employee and volunteer awareness.....	2
2.4	Parteners and suppliers	3
2.5	Consent to film or photograph	3
2.6	Reporting mechanisms.....	3
3	Roles and responsibilities.....	4
3.1	Group Policy Owner	4
3.2	Local Foundation Trustees	4
3.3	Applying the policy to projects run by the Vodafone Foundation	4
3.4	Updating	4

1 The Policy Standard

1.1 Principles

The Vodafone Foundation recognises that the welfare of our beneficiaries and the communities in which we work is paramount. Everyone we come into contact with in the course of our work, particularly children and vulnerable 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.

The 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.

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

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

1.2 Definitions

Child anyone under 18 years of age, regardless of the age of consent in any specific local market.

Vulnerable adult anyone who is or may be in need of community care services by reason of disability, age or illness; and is or may be unable to take care of unable to protect him or herself against significant harm or exploitation.

2 Controls and deliverables required for compliance

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

2.1 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 Foundation team and ensure that safeguarding practices are implemented effectively. The nomination should be ratified by the Board of Trustees. The appointed representative of the Vodafone Foundation in Romania is the President of the Board of Directors.

2.2 Safeguarding risk assessment

A safeguarding risk assessment must be done prior to the start of any programme 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.

As part of safeguarding risk prevention, the following measures will be considered, but not limited to:

- Creating a safe environment regardless of the activity - A safe environment is a physical or virtual space, where participants can develop a sense of protection, where they feel confident and can express their ideas, are accepted and not judged, where the lack discrimination prevails, where there is the possibility of development with minimal risks, where there are multiple ideas and beliefs that are debated and argued constructively. A safe space is a space where positive behavior is promoted and where policies are in place to prevent and correct potentially negative impact events.
- Position of Trust - Position of trust is that level reached by a person of high integrity from whom the highest possible standard is always expected. Anyone in a position of trust treats beneficiaries with dignity and respect and ensures that they always have a safe environment for them to develop harmoniously. It is prohibited for anyone to use their position of trust to engage in inappropriate relationships with the beneficiaries they work with.
- Risk management - Risk is an event or series of events with possible negative consequences. Risk management involves the systematic use of procedural codes and available tools to assess and deal with any risk that may arise in an activity, regardless of its type. When thinking about risks, the most important things to consider are the likelihood that they will occur and the severity of the possible consequences of their occurrence.

2.3 Employee and volunteer awareness

All employees, volunteers and contractors involved in the delivery of Foundation projects must be aware of the Safeguarding Policy. Anyone working with children or vulnerable adults must receive appropriate training, consisting of initial training in the safety and protection of children and vulnerable people in accordance with this policy, and training on updating the legal framework. This training should cover, amongst other things, how to treat young people and vulnerable persons with respect and dignity and how to behave when in a position of trust. The training process is ensured by the project manager and/or the Director of the Foundation through individual or group sessions, organized at the start of the contractual relationship and whenever needed.

Staff recruitment

The selected personnel will be required to provide a criminal record in order to be employed or to provide services.

During the recruitment process, the Vodafone Foundation will request the necessary documentation to confirm the identity of the persons providing referrals and to verify the relevant qualifications required to undertake activities with children or vulnerable adults.

In the case of volunteers, the provisions of Law 78/2014 on the regulation of volunteer activity in Romania are applied.

All employees, volunteers and contractors involved in the execution of Foundation projects must confirm that they have read, understood and comply with the existing Code of Conduct at the level of the organization and the Safeguarding Policy.

2.4 Partners and suppliers

Agreements with grant recipients, partners or suppliers who may come into contact with children or vulnerable 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 the other party to report any substantiated failure to uphold the welfare of beneficiaries.

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 to Vodafone Foundation's Safeguarding Policy.

Any partners who work with vulnerable 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 vulnerable beneficiaries should be adequately trained by the partner to ensure that they know how to behave appropriately and report any suspected misconduct.

2.5 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.

2.6 Reporting mechanisms

for employees, delivery partners or members of the public to report breaches of this Safeguarding Policy. This may be the Vodafone Speak Up process. Channels for reporting a Speak-up

External:

- Online via [EthicsPoint - Vodafone](#)
- By telephone 0800 090 3102 (free of charge)

*The claimant has the possibility to use this channel when it could legitimately consider that the Speak-up could not be objectively investigated locally or it fears possible retaliators; the process of managing the Speak-up reported through the external channel is detailed in the "Vodafone Global Policy Speak Up".

Internal:

- Line Manager ("LM")
- Via e-mailspeakupro@vodafone.com (local triage team)

2.7 Monitoring and evaluation

The responsibility for monitoring and evaluating the application of the safeguarding policy rests with the safeguarding officer. He has the right to carry out verifications regarding the compliance with the provisions of this policy. Monitoring is a continuous process, and the assessment of compliance with the provisions of the safeguarding policy is carried out annually and whenever necessary.

3 Roles and responsibilities

3.1 Group Policy Owner

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

3.2 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, this being the President of the Board of Directors.

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

3.3 Applying the policy to projects run by the Vodafone Foundation

The Safeguarding Policy and the principles underlying it are applied to all projects run by the Vodafone Foundation. The obligation to comply with the safeguarding policy will be included in sponsorship contracts, service contracts and volunteering contracts, and the safeguarding policy is an annex to these contracts.

3.4 Updating

Considering the states of emergency and alert in recent years, but also the dangers represented by the ongoing armed conflicts in various geographical areas, this policy will periodically align with the provisions that will regulate the safety and protection of children and vulnerable adults, whenever will be the case.