

Safeguarding Policy

1. Introduction

CoST, the Infrastructure Transparency Initiative, is a registered charity with the Charity Commission for England and Wales. As such, CoST has a responsibility to ensure compliance with the UK regulations, including safeguarding and other related matters. This document is part of CoST's safeguarding framework. The other documents included in this framework are:

- Code of conduct
- Complaints procedure
- Safeguarding procedure
- Whistleblowing policy and
- Anti-trafficking policy and plan

2. Purpose

The purpose of this policy is to protect people, particularly at-risk adults and beneficiaries of assistance, from any harm that may result from their contact with CoST's activities. This includes harm arising from a CoST Board member, CoST International Secretariat staff, contractors and sub-grantee.

The policy outlines CoST's commitments and informs Board Members, staff, contractors, and sub-grantees of their responsibilities for safeguarding. This policy does not cover safeguarding concerns in the wider community that are not perpetrated by CoST Board Members, CoST International Secretariat staff, contractors, or sub-grantees.

3. What is safeguarding?

In the UK, safeguarding means protecting people's health, well-being, and human rights, and enabling them to live free from harm, abuse and neglect.¹

We understand it to mean protecting people, including at-risk adults, from harm that may arise from contact with the CoST International Secretariat's activities. Further definitions relating to safeguarding are provided in the glossary below.

4. Scope

The scope of this policy includes all Board members, CoST International Secretariat staff, contractors (associated personnel) and sub-grantees (delivery partners).

In addition, it is expected that all CoST Members, specifically the host organisation staff and contractors, and Multi-Stakeholder Group Members, will consider developing a policy for their CoST programme based on this policy where national and institutional regulations, policies and requirements are considered inadequate.

5. Policy Statement

CoST believes that everyone we come into contact with, regardless of age, gender, disability, sexual orientation or ethnic origin, has the right to be protected from all forms of harm, abuse, neglect and exploitation. CoST will not tolerate abuse and exploitation by associated personnel.

¹ NHS 'What is Safeguarding? Easy Read' 2011

This policy addresses the following areas of safeguarding: adult safeguarding, and protection from sexual exploitation, abuse and harassment. These key areas of safeguarding may have different associated policies and procedures (see Associated Policies).

CoST commits to safeguarding throughout its work through the three pillars of prevention, reporting, and response.

6. Prevention

6.1 CoST responsibilities

CoST will:

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

6.2 Staff responsibilities

6.2.1 Adult safeguarding

Associated personnel and delivery partners must not:

- Sexually abuse, harass or exploit at-risk adults.
- Subject an at-risk adult to physical, emotional or psychological abuse, or neglect.

6.2.2 Protection from sexual exploitation, harassment and abuse

Associated personnel and delivery partners 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, associated personnel and delivery partners 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 a CoST staff member or associated partners to the appropriate staff member.

7. Enabling reports

CoST will ensure that safe, appropriate, accessible means of reporting safeguarding concerns are made available to staff and the communities we work with.

Any staff member who reports concerns or complaints through formal whistleblowing channels (or requests to do so) will be protected by the CoST Whistleblowing Policy.

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

8. How to report a safeguarding concern

Staff members who have a complaint or concern relating to safeguarding should report it immediately to their Safeguarding Focal Point or line manager. If the staff member does not feel comfortable reporting to their Safeguarding Focal Point or line manager (for example, if they believe the report will not be taken seriously, or if the person is implicated in the concern), they may report to any other appropriate staff member. The following are the contact details for the CoST Safeguarding Lead and the CoST Board Safeguarding Trustee:

<p>CoST Safeguarding Lead</p> <p>Evelyn Hernandez</p> <p>e.hernandez@infrastructuretransparency.org</p> <p>+33 6 38 66 00 34</p>	<p>Safeguarding Trustee</p> <p>Claire Schouten</p> <p>claire.schouten@gmail.com</p>
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9. Response

CoST will follow up on safeguarding reports and concerns in accordance with policy and procedure and legal and statutory obligations (see Procedures for reporting and response to safeguarding concerns in Associated Policies). CoST will apply appropriate disciplinary measures to staff found in breach of policy.

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

10. Confidentiality

It is essential that confidentiality be maintained at all stages of the process when addressing 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.

This Policy will be reviewed every five years by the Board.

Approval date	Changes made	Review date
24/11/2025	<p>Extracting the content from the Safeguarding policy</p> <p>Completing the content using recommended good practice</p>	07/05/2025 and 10/11/2025

Annex: Glossary of Terms

Beneficiary of Assistance

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

Harm

Psychological, physical and any other infringement of an individual's rights.

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, Abuse and Harassment (PSEAH)

The term used by the humanitarian and development community to refer to the prevention of sexual exploitation, abuse and harassment of affected populations by staff or associated partners. 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

In the UK, safeguarding means protecting people's health, well-being, and human rights, and enabling them to live free from harm, abuse and neglect.²

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

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.

Sexual harassment

The term 'sexual harassment' means a behaviour characterised by the making of unwelcome and inappropriate sexual remarks or physical advances in a workplace or other professional or social situation.

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; it is the individual's choice how they wish to identify themselves.

² NHS 'What is Safeguarding? Easy Read' 2011

At-risk adult

Sometimes also referred to as a 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.

Code of conduct

Sets out the conduct expected of CoST staff, contractors, suppliers and associated partners. Associated partners include, but are not limited to, the following: CoST Member host organisation staff, partners, MSG Members, volunteers, and programme visitors, including academics, journalists, and public officials.

Whistleblowing policy

This policy outlines CoST's commitment to non-retaliation against staff members who report any malpractice concerns and the procedures for investigating such reports.

Complaints policy

This policy sets out CoST's commitment to receive and respond to complaints. It governs the procedures to respond to complaints.

Procedures for response to safeguarding concerns

This is a set of procedures outlining how to handle reports of breaches of the CoST safeguarding policy.