

## ACCOUNTABILITY LAB GLOBAL

### Document 02: Safeguarding and PSEAH Policy

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| <b>Document number</b> | 02 of 20                                                                                                                                     |
| <b>Status</b>          | Approved                                                                                                                                     |
| <b>Owner</b>           | Global Safeguarding Lead                                                                                                                     |
| <b>Approved by</b>     | AL Global Board of Directors, on the recommendation of the Governance Committee                                                              |
| <b>Date adopted</b>    | 23 September 2026                                                                                                                            |
| <b>Adopted by</b>      | AL Board of Directors                                                                                                                        |
| <b>Effective from</b>  | 23 September 2026                                                                                                                            |
| <b>Review cycle</b>    | Annually                                                                                                                                     |
| <b>Next review due</b> | 23 September 2026                                                                                                                            |
| <b>Part of</b>         | The AL Global policy set, Documents 00 to 20. Document 00, the Alignment, Roles and Ownership Register, is the control document for the set. |

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Note: PSEAH means protection from sexual exploitation, abuse and harassment.

## 1. Our position

Accountability Lab works with people who are often vulnerable, marginalised, politically exposed, dependent on us for income or opportunity, or at risk from the people we hold to account. Community monitors, citizen reporters, whistleblowers, fellows, junior staff and partner staff are in a weaker position than the people who fund, employ, select and publish their work.

That is the risk this policy is about. Not stranger danger. The realistic scenario at AL is that someone with power inside or close to our network uses it to exploit, coerce, harass or endanger someone who depends on them.

AL does not tolerate this. We do not tolerate the conditions that allow it either, which are unclear reporting routes, unchecked seniority, and a culture where people calculate the cost of speaking up.

**AL does not run programmes for children or young people under 18.** This policy is therefore written for adults. Where contact with anyone under 18 happens by exception, Annex C applies without exception.

## 2. Scope

This policy applies to everyone listed in section 2 of the AL Code of Conduct, in the same three tiers.

**Tier 1, directly and in full:** AL Global employees, **employees of Model A fiscally sponsored projects**, board members, fellows, interns, volunteers, consultants, contractors and their personnel.

Model A project staff and Employer of Record staff are AL Global employees. AL is their legal employer and carries the safeguarding duty for them and for the people they work with. They are covered by this policy exactly as any other AL employee is, and their client organisation cannot substitute its own safeguarding policy for this one.

**Tier 2, by agreement: Model C fiscally sponsored partners**, where the partner is a separate entity. This policy flows down through the sponsorship agreement unless the partner has a safeguarding policy of equal or higher standard. Equivalence is assessed and recorded by the Global Safeguarding Lead at onboarding and reviewed annually. It is never assumed, and absence of a policy is a reason to support the client to build one rather than to proceed without.

**Tier 3, by collective adoption: Network Labs.** See below.

AL's authority over these three groups is different: total over Model A staff because AL is the employer, contractual over Model C clients, and nil over Network Labs by the network's own constitutional design. One obligation covering all three would either overstate AL's authority over the Labs or understate it over its own employees.

It applies to conduct in and outside working hours, online and in person, and to conduct towards:

- Programme participants, community monitors, citizen reporters and their families
- Fellows, interns, volunteers and applicants
- Staff of partner and grantee organisations
- AL colleagues, including across reporting lines
- Members of the public who come into contact with AL's work

Network Labs are autonomous, separately governed organisations, and AL Global is one participating lab among them. Under the Governance Compact, AL Global has no authority to direct them and this policy does not claim any.

Where a Network Lab is a subrecipient under a grant held by AL Global, safeguarding obligations are set contractually in the subaward. That is a separate instrument from the Compact and it is binding.

### 3. Definitions

**Adult at risk.** Any adult who, because of their circumstances, is less able to protect themselves from harm or exploitation. At AL this commonly includes people who are economically dependent on AL or a partner, politically exposed or at risk of reprisal, displaced, in poor health or living with a disability, isolated by geography or language, junior in a steep hierarchy, or facing discrimination on grounds of gender, sexuality, caste, ethnicity or religion.

Being vulnerable or marginalised does not make someone permanently helpless. Risk is situational. The test is whether the circumstances of a particular interaction leave someone unable to refuse, complain or walk away.

**Sexual exploitation.** Any actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes. This includes profiting financially, socially or politically from the sexual exploitation of another person.

**Sexual abuse.** Any actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

**Sexual harassment.** Unwelcome conduct of a sexual nature, or conduct based on someone's sex or gender, that has the purpose or effect of humiliating, intimidating or offending them, or of making their work or participation harder. Judged by effect, not intent.

**Other forms of harm** covered by this policy:

- Physical abuse, including violence, restraint and inappropriate punishment
- Psychological abuse, including threats, humiliation, isolation, controlling behaviour, deprivation of contact and coercive management
- Financial abuse, including theft, withholding pay or entitlements, misuse of someone's benefits, and pressure over money or property
- Neglect, including failing to provide agreed support, safety measures, medical help or duty of care to someone in our charge
- Discriminatory abuse, including harassment or slurs based on any protected characteristic

- Endangerment through disclosure, meaning exposing someone's identity, testimony or location in a way that puts them at risk of reprisal, arrest or violence. This is a safeguarding failure at AL, not only a data breach.

#### 4. Principles

- **Survivor centred.** The wishes, safety and dignity of the person harmed lead our response. We ask what they want. We do not make decisions about them without them unless someone's immediate safety requires it, or the law requires it.
- **No hierarchy of protection.** Seniority, funding value, donor relationships and reputational cost do not affect how a concern is handled.
- **Reporting is mandatory.** Everyone in scope must report concerns. Failure to report is a disciplinary matter.
- **Confidential, not secret.** Information is shared only with those who need it. Confidentiality is never used to suppress a report, and AL will not use non-disclosure agreements to prevent disclosure to regulators, donors, police or courts.
- **Do no harm.** We assess the risk of reprisal to the person reporting and to the person harmed before we act, and we act in a way that reduces it.
- **We stay in our lane.** AL is not a specialist protection agency. We do not counsel, investigate specialist matters, or offer clinical advice. We refer to services that can, and we pay for them where we should.
- **Higher standard than local custom.** Where local law, custom or practice permits something this policy prohibits, this policy applies.
- **Presumption of good faith.** People who report are believed to be acting honestly unless there is clear evidence otherwise.

#### 5. Roles and responsibilities

Names and contact details are held in Annex A, which is updated as post holders change without needing to reissue this policy.

**AL Global Board Safeguarding Lead** One designated member of the AL Global Board of Directors, sitting on the Governance Committee, who: - Provides the reporting route that bypasses management entirely - Holds the Co-CEOs accountable for safeguarding performance - Leads the Board's handling of any concern involving a Co-CEO or a member of senior management - Ensures serious incidents are reported to regulators, donors and authorities as required - Presents the annual safeguarding report to the Governance Committee and then to the full Board

Where the Board Safeguarding Lead is unavailable, conflicted, or is the subject of the concern, the Chair of the Board takes the role for that matter.

**Global Safeguarding Lead, AL Global** A senior staff member, not a Co-CEO, who: - Receives and triages all safeguarding reports - Decides the response route and commissions investigations - Maintains the safeguarding incident register - Arranges support for people who have been harmed - Provides advice to staff and Network Lab Safeguarding Leads - Manages training and annual policy review - Escalates to the Board Safeguarding Lead under section 7

**Deputy Global Safeguarding Lead** Acts when the Global Safeguarding Lead is unavailable, conflicted, or is the subject of the concern.

**Co-CEOs** AL Global has three Co-CEOs, holding the Innovation and Operations, Programs and Learning, and Networks and Partnerships portfolios. Any Co-CEO may receive a safeguarding concern. Accountable to the Board for safeguarding overall. Ensures resourcing. Does not sit in the reporting chain for concerns about themselves.

**Managers** Brief their teams, make time for training, act on concerns immediately, and do not attempt to resolve safeguarding matters informally or alone.

**Everyone** Report. Do not investigate. Do not promise confidentiality you cannot deliver.

## 6. What we do to prevent harm

### 6.1 Safe recruitment and engagement

- All roles are advertised with a statement that AL screens for safeguarding.
- Two references are taken and verified for every employee, and long term consultant, including one from the most recent employer (if available or possible). References are asked directly whether the person has been the subject of a substantiated safeguarding or misconduct concern.
- Candidates are asked to disclose any criminal conviction, disciplinary finding or ongoing investigation relating to sexual misconduct, exploitation, violence or fraud. Non-disclosure is grounds for withdrawal or dismissal.
- Criminal record checks are carried out where they are lawful, available and reliable in the relevant country. Where they are not, we rely on structured referencing and a probationary period, and we record that we did so.
- All safeguarding responsibilities are written into job descriptions.
- Signing the Code of Conduct is a condition of engagement.

### 6.2 Safe programming

Before a new programme, event, fellowship cohort or partnership starts, the responsible manager completes a short safeguarding risk assessment covering:

- Who might be at risk, and from whom
- Where power is concentrated and unchecked

- How participants can complain, in their own language, without going through the person they would be complaining about
- Travel, accommodation and transport arrangements
- Whether identities, testimony or images could expose anyone to reprisal
- What local support services exist, and who pays

The assessment is reviewed by the Global Safeguarding Lead for anything involving fellows, community monitors, or work in a high risk political environment.

### 6.3 Behaviour rules

Everyone in scope must:

- Treat people with respect regardless of their status, and be conscious that AL's position gives them power in the relationship
- Get informed consent before recording, photographing, publishing or quoting anyone, and explain the risk to them honestly
- Avoid being alone with a person at risk where it can reasonably be avoided, and use open or public settings for meetings
- Keep relationships with programme participants professional
- Disclose immediately any charge, conviction or investigation relating to sexual misconduct, exploitation, violence or fraud
- Report concerns

Everyone in scope must never:

- Exchange money, employment, goods, services, selection for a programme, or any other assistance for sex or sexual favours
- Buy sex, at any time, whether or not it is legal locally
- Engage in any sexual activity with a person under 18
- Enter a sexual or romantic relationship with a programme participant, community monitor, fellow or beneficiary while AL holds power over their participation, payment or safety
- Use their position to obtain financial, political or social advantage from someone dependent on AL
- Harass, bully, humiliate, threaten or physically discipline anyone
- Withhold pay, entitlements, references or opportunities as leverage

- Disclose the identity, testimony or location of a whistleblower, monitor, reporter or survivor to anyone who does not need it
- Use AL devices, accounts or platforms to access, produce or share sexual images of children, or to harass anyone

#### 6.4 Relationships between staff

Consensual relationships between adults are not prohibited. Relationships where one person has any influence over the other's pay, assessment, promotion or continued engagement must be declared to the Co-CEO, Innovation and Operations. AL will change reporting lines. No one will be asked to end a relationship or to resign because of one.

#### 6.5 Training

- Safeguarding induction for everyone within 30 days of starting
- Annual refresher for all staff, fellows and board members
- Additional training for managers, Safeguarding Leads and anyone handling reports or investigations
- Training delivered in a language participants understand, and recorded

### 7. Reporting and response

#### 7.1 How to report

Use any route. You do not need to try one before another, and you do not need permission.

- Your line manager, or any manager you trust
- The Global Safeguarding Lead or Deputy
- Your Translocal Network Safeguarding Lead
- The AL Global Board Safeguarding Lead
- The Chair of the Board, where the Board Safeguarding Lead is unavailable or is the subject of the concern
- Directly to police, a regulator, a donor or a lawyer, at any time, without telling AL first

**AL does not currently operate an independent external reporting channel.** Until it does, route 4 is the furthest a report can travel inside AL. Route 6 is always available and does not require AL's permission.

Reports may be verbal or written, and may be anonymous. An anonymous report is taken as seriously as a named one, though it may limit what we can investigate.

If someone is in immediate danger, act first. Call emergency services or move the person to safety, then report within 24 hours.

## 7.2 Timelines

All periods are in **working days**, meaning Monday to Friday excluding public holidays where the person handling the matter is based.

| Stage                                                                     | Deadline                              |
|---------------------------------------------------------------------------|---------------------------------------|
| Report acknowledged to the reporter                                       | 3 working days                        |
| Immediate safety measures considered and put in place                     | Same day the report is received       |
| Initial assessment complete, decision on route taken                      | 10 working days                       |
| Escalation to Board Safeguarding Lead where section 7.4 applies           | 2 working days                        |
| Investigation complete                                                    | 30 working days                       |
| Extension, where needed, notified in writing with a reason and a new date | Once, up to a further 30 working days |
| Outcome communicated to reporter and to the person concerned              | 5 working days after the decision     |
| Appeal by either party                                                    | Within 10 working days of the outcome |
| Appeal decided                                                            | 20 working days                       |

Where a deadline cannot be met, the reason and a new date are given in writing. Silence is not acceptable.

## 7.3 What happens when a report is received

- The person receiving the report writes it down as soon as possible, in the reporter's own words where possible, and passes it to a Safeguarding Lead. They do not investigate.
- The Safeguarding Lead considers immediate safety, for the person harmed and the person reporting, including risk of reprisal.
- The Safeguarding Lead offers the person harmed support, and asks what they want to happen. Their wishes lead the response unless someone's immediate safety or the law requires otherwise. If we override their wishes, we tell them why.
- An initial assessment establishes what is alleged, who is involved, whether it falls under this policy, and whether authorities or donors must be notified.
- Where an investigation is needed, someone independent of everyone involved conducts it. Where the matter is serious, involves senior staff, or is beyond internal capacity, AL commissions an external investigator.

- The person accused is told what is alleged, in enough detail to respond, at the point where doing so will not put anyone at risk or damage evidence. They may be suspended on full pay as a neutral measure. Suspension is not a finding.
- Outcomes are decided by someone with authority to act and no involvement in the matter.
- Both parties are told the outcome and their right of appeal. The reporter is told what was concluded and, in general terms, that action was taken, without confidential detail about another person's discipline.
- Everything is recorded in the safeguarding incident register.

#### 7.4 Escalation to the Board

The Global Safeguarding Lead escalates to the Board Safeguarding Lead within 2 working days where any of the following apply:

- The concern involves sexual exploitation, abuse or assault
- The concern involves a Co-CEO, a board member, or a member of senior management
- Someone has died, been seriously injured, arrested or detained
- There is a credible threat of reprisal against a reporter or survivor
- The matter is likely to require notification to a regulator, donor or the police
- The matter is likely to become public
- The Global Safeguarding Lead is conflicted

Where the concern involves a Co-CEO or the Global Safeguarding Lead, the Board Safeguarding Lead takes over the handling entirely. Where it involves all three Co-CEOs, or the group acting jointly, the Board Safeguarding Lead handles it with the Chair of the Board and commissions an external investigator. A concern about one Co-CEO is never handled by that Co-CEO, and is not handled by any single colleague acting alone; it goes to the Board Safeguarding Lead, who may ask the remaining two Co-CEOs to act jointly where that is appropriate.

#### 7.5 External notification

AL notifies external parties where required. Decisions are made by the Global Safeguarding Lead with the Board Safeguarding Lead, and recorded with reasons.

- **Police and local authorities.** Where a criminal offence may have occurred. We do not report to authorities against the wishes of an adult survivor unless the law requires it or someone else is at serious risk. In some countries where AL works,

reporting can put a survivor in danger, particularly where their identity, sexuality or political activity is criminalised. Local advice is taken and the reasoning recorded.

- **US regulators.** AL Global is a registered 501(c)(3). Reporting obligations are checked with counsel case by case.
- **Donors.** Per the terms of the relevant grant agreement.
- **Network Labs.** Where the person concerned works across entities.

## 7.6 Support

AL will fund, where the person harmed wants it and it is available:

- Medical care
- Psychological support
- Legal advice
- Relocation or security measures where there is a reprisal risk
- Time off without loss of pay for anyone harmed or reporting

The Global Safeguarding Lead<sup>[5]</sup> maintains a list of vetted support services for each country where AL works. Where no vetted service exists, this is recorded as a gap and raised with the Board.

## 7.7 No retaliation

Retaliation against anyone who reports in good faith, or participates in an investigation, is gross misconduct. This includes exclusion, changed duties, withdrawn opportunities, negative references, and informal freeze-out.

Deliberately false or malicious reports are a disciplinary matter. A report that turns out to be mistaken is not.

## 8. Records and oversight

- The Global Safeguarding Lead maintains a single safeguarding incident register. Access is limited to the Global Safeguarding Lead, the Deputy, and the Board Safeguarding Lead. Any other access requires the Global Safeguarding Lead's written approval, recorded.
- Records are held securely, encrypted, and separately from personnel files.
- Retention follows the Document Retention Policy. Given that historic disclosure is common in this field, safeguarding records should be retained longer than standard personnel records. The exact period needs legal input for each jurisdiction.

- The Global Safeguarding Lead reports quarterly to the Co-CEOs and annually to the Board, covering numbers, types, timeliness, outcomes, patterns and gaps. The report is anonymised.
- The Governance Committee reviews this policy annually and recommends it to the full Board. The review is minuted.

**How this fits AL's committee structure.** AL Global has two standing board committees, Finance and Governance. Safeguarding oversight sits with the Governance Committee. Where a safeguarding matter carries a financial or donor-compliance consequence, such as a fraud element, a donor clawback or an insurance claim, the Governance Committee refers that element to the Finance Committee. AL also convenes an Audit subcommittee under the Finance Committee during the audit period, and Strategy and Fundraising committees on an ad hoc basis. None of those has a standing safeguarding role, and safeguarding matters are not deferred waiting for one to convene.

## 9. Partners, grantees and contractors

Every contract, sub-award and grant agreement issued by AL includes:

- A requirement to have a safeguarding policy and a named contact<sup>[^c6]</sup>
- A requirement to report safeguarding concerns involving AL funds, staff, participants or activities to AL within 5 working days
- A requirement to cooperate with AL investigations
- AL's right to suspend or terminate funding for serious breach or for failure to report

Due diligence is proportionate. For small grassroots partners, AL supports them to build a policy rather than disqualifying them for not having one. Absence of a policy is not a reason to exclude a small organisation. Refusal to engage with safeguarding is.

*See: Grants, Sub-Awards and Partner Due Diligence Policy.*

## Annex A: Role holders and contacts

*Updated by the Global Safeguarding Lead as post holders change. Changing this annex does not require Board re-approval of the policy.*

| Role                                   | Name                   | Contact                      | Date updated   |
|----------------------------------------|------------------------|------------------------------|----------------|
| AL Global Board Safeguarding Lead      | Danai Nhando           | danai.nhando@gmail.com       | 1 October 2026 |
| Global Safeguarding Lead, AL Global    | Corina Rebegea         | Corina@accountabilitylab.org | 1 October 2026 |
| Deputy Global Safeguarding Lead        | Leah Shearman          | Leah@accountabilitylab.org   | 1 October 2026 |
| Chair of the Board                     | Maria Poli             | mariapolidemichele@gmail.com | 1 October 2026 |
| Independent external reporting channel | Not currently in place |                              |                |

## Annex B: Safeguarding report form

**This is a record, not an investigation. Write what you saw or were told. Do not add opinion or conclusions.**

- Your name and role (or write “anonymous”)
- Date and time of this report
- Date, time and place of the incident or concern
- Who is at risk or has been harmed. Name, role or relationship to AL, and whether they know this report is being made
- Who the concern is about. Name and role if known
- What happened. In the words used to you where possible. Quote rather than summarise
- How you came to know. Directly witnessed, told by the person, told by someone else, or other
- Is anyone in immediate danger? What has already been done
- What has the person harmed said they want, if they have said anything

- Who else knows
- Any risk of reprisal, to anyone, if this is taken forward
- Anything else

Send to a Safeguarding Lead by the most secure means available. Do not keep a copy on a personal device.

## **Annex C: Contact with people under 18**

AL does not run programmes for children or young people. This annex covers the exception: an event, activity or interaction where a person under 18 is present, whether planned or not.

**Approval.** Any planned AL activity involving anyone under 18 requires written approval from the Global Safeguarding Lead in advance. No exceptions, including for family members of staff at events.

### **If it is planned, the following apply without exception:**

- Written consent from a parent or legal guardian for participation, for transport, and separately for any photograph, recording or publication. Consent explains the risks honestly, including reprisal risk from any political content.
- At least two adults, screened and briefed, present at all times. No adult is ever alone with a person under 18, including during transport.
- Criminal record checks on all adults with responsibility for under-18s, where lawful and available. Where not available, structured referencing plus a documented decision by the Global Safeguarding Lead.
- No alcohol served or consumed at the activity, by anyone.
- Transport and food arranged and paid for by AL, door to door. The child cannot be alone in the car with an adult at any time, a caregiver or at least two adult AL staff members must accompany the minor to their place of residence
- A named person responsible for safeguarding on the day, briefed and identifiable to participants.
- No publication of names, schools, locations or identifiable images without specific written consent, and not at all where it could expose the young person to reprisal.
- No private contact between AL personnel and a person under 18, including social media, messaging apps, personal phone numbers or personal email. All contact goes through official AL channels with a parent or guardian copied.

**Unplanned contact.** Where a person under 18 turns up at an AL activity or contacts AL, staff should be courteous, keep the interaction brief and in public view, and inform their manager and a Safeguarding Lead the same day.

**Absolute prohibitions.** Sexual activity of any kind with a person under 18. Physical punishment. Any private one-to-one contact including being in vehicles alone with a minor.. Accessing, producing or sharing sexual images of children. Any of these results in dismissal and referral to authorities.

**Reporting concerns about a child.** Report to a Safeguarding Lead immediately. AL does not investigate child protection matters. We refer to the relevant statutory authority or a recognised child protection agency, taking local advice on whether that is safe for the child, and we record the reasoning.