



Safeguarding Policy

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Document owner and review date

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Next review date:	September 2024

POLICY

Purpose and scope

This policy expresses our commitment to protect those we work and engage with—especially children, and other vulnerable people and beneficiaries of our programmes.

Scope

This policy applies to:

- All staff employed or contracted by Thomson Reuters Foundation or its wholly-owned subsidiary, Reuters Foundation Consultants Ltd (collectively, the ‘**Foundation**’)
- Associated personnel who work with or for the Foundation, including but not limited to: consultants, contractors and volunteers, including trustees (referred to in this policy as ‘**associated personnel**’)

When we refer to ‘**you**’ in this policy, we mean Foundation staff and associated personnel.

This policy covers: child protection, protection of other vulnerable people, and protection of Foundation beneficiaries and others we interact with from harm, exploitation or abuse.

This policy does not address workplace harassment and bullying, employee grievances or non-safeguarding related reports of misconduct. For these matters, please refer to the following:

- [Harassment & Bullying Policy](#)
- [Grievance Policy](#)
- [Code of Business Conduct & Ethics](#), [Supply Chain Ethical Code](#), and [Whistleblowing Policy](#)

Policy statement

The Foundation will not tolerate harm, abuse or exploitation. All people, regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation have a right to be free and protected from all types of harm, abuse and exploitation.

The Foundation is committed to taking all reasonable measures to protect vulnerable groups (including children) that we interact with from harm, abuse or exploitation. We recognise vulnerable groups may require additional protection. We also recognise that the welfare of a child is paramount (i.e. child protection takes precedence over other considerations).

This policy sets out:

- Our expectations for conduct of Foundation staff and associated personnel
- The principles that inform our decision-making and actions
- The steps we will take to ensure safeguarding concerns are effectively investigated and addressed
- The Foundation is committed to addressing safeguarding through prevention, reporting and response.

Compliance

Directors and managers are responsible for ensuring this policy complied with throughout the Foundation. If you have any questions relating to this policy, please contact the Designated Safeguarding Lead or Deputy.

Key Contacts

The key contacts for this policy are:

- Designated Safeguarding Lead - Murshed Anwar, Head of Legal - Murshed.Anwar@thomsonreuters.com
- Deputy Designated Safeguarding Leads—
Nicholas Glicher, Chief Operating Officer - Nicholas.Glicher@thomsonreuters.com
Mariam Tadros, Director of Programmes- mariam.tadros@thomsonreuters.com
- Safeguarding Lead Trustee – Mary Alice Vuicic

All safeguarding suspicions or concerns can be reported to:

Foundation-Compliance@thomsonreuters.com

This is a monitored email with access limited to the Designated Safeguarding Lead and Deputy. If you are not comfortable submitting your report to that address, please see below 'How to report' for other ways to report.

Preventing harm and making our programmes safe

Harm, including harm to vulnerable persons, can occur in all types of organisations.

Harm can be deliberate or unintentional. Unintentional harm can result from insufficient care, thought and planning or through individual or organisational negligence—for example, having inadequate policies, procedures and guidance in place, or staff non-compliance with legal requirements or organisational policies. People may also take deliberate actions to abuse vulnerable people.

The Foundation's responsibilities

The Foundation has zero tolerance for harm, abuse or exploitation. To support this stance, the Foundation will:

- Provide appropriate training to staff and associated personnel
- Carry out appropriate safeguarding checks when recruiting and deploying staff and associated personnel
- Take seriously and promptly investigate all safeguarding concerns or allegations and take appropriate action if this policy is not complied with
- Report safeguarding incidents, allegations or concerns to external authorities and regulators, as appropriate, and in accordance with applicable laws and best practice. Prior to making a report, the Foundation will assess the risk associated with making the report, including risks of further harm to individual(s) involved and other unintended consequences
- Make this policy available on the Trust.org website

Code of safe conduct for Foundation staff and associated personnel

You are always expected to maintain professionalism in your conversations and conduct and must never:

- Sexually or commercially abuse or exploit any person, or subject a person to physical, emotional or psychological abuse or neglect or act in ways that could place that person at risk of abuse from others

- Develop a relationship with any person that is—or could reasonably be viewed as—emotionally exploitative or abusive, or engaging in behaviour that is shaming, threatening, humiliating, belittling, coercive or otherwise emotionally harming or manipulative
- Condone or participate in illegal, unsafe or abusive behaviour, especially towards children or vulnerable people
- Engage in sexual activity with anyone under the age of 18 (even if it is legal to do so in the jurisdiction)
- Buy sex or provide anything else of value, including employment, goods or services in exchange for sex¹
- Develop a physical or sexual relationship with a child or other vulnerable person or engage in inappropriate or sexually provocative behaviour
- Do things for a person of a personal nature that they can do for themselves
- Invite a child or other vulnerable person to your home, share personal contact details with them or communicate with them via personal social media or similar personal online messaging sites
- Use language, make suggestions or offer advice that is inappropriate or offensive, particularly towards children or other vulnerable people
- Discriminate against, show differential treatment or favour an individual (including a child or other vulnerable person) to the exclusion of others

You should always avoid one-to-one contact with a child or other vulnerable person out of public view and, where possible, take steps to avoid a situation where this could arise.²

You must report all safeguarding concerns or suspicions in accordance with this policy.

Designing and delivering safe programmes

We strive to avoid harm to all people we interact with. Working with vulnerable groups in a responsible, ethical way requires care and planning.

When designing and carrying out projects or broader Foundation initiatives—particularly those that include or could involve interactions with children or other vulnerable people—we expect staff and associated personnel who are responsible for the project or initiative to plan ahead and take appropriate steps to reduce potential risks of harm. As needed, the Designated Safeguarding Lead or Deputy or other senior managers or directors within the Foundation can be involved in this assessment and planning process.

Members of our Editorial team should also refer to the [Reuters Handbook of Journalism](#), including its specialised guidance on [Reporting about people](#), which includes guidance on considerations for reporting on and interviewing vulnerable people.

¹ The Foundation does not want to judge those who participate in selling sex. However, in line with the IASC Core Principles on PSEA, The Foundation bans this activity (even where consensual) to prevent sexual exploitation and abuse.

² In rare circumstances where it is necessary to have one-to-one contact, find a place which is appropriate (e.g. use a room with windows, leave the door open) and let another Foundation team member know where you are, with whom and what you are doing.

How and when to report safeguarding concerns

The Foundation is committed to providing safe, appropriate, accessible means for reporting of concerns by staff and associated personnel.

The Foundation also encourages reports from external sources such as members of the public, partners and official bodies.

If you become aware of a concern

A safeguarding concern can arise in various ways. For example:

- you witness abuse taking place
- an individual tells you that they have suffered harm
- you notice behaviour or hear rumours that lead you to suspect that someone has been harmed or is at risk of harm

If someone tells you they have been harmed or are at risk of harm you should:

- Listen carefully
- Avoid asking detailed or leading questions, but try to confirm basic information about who, when, where, what, but not why
- Indicate that:
 - You and the Foundation take what they are saying seriously
 - Consistent with this policy, you will provide their report to the Designated Safeguarding Lead, and you or the Designated Safeguarding Lead will be in touch to provide an update
 - Their report will only be kept confidential and only shared on a need-to-know basis
- Prepare a written record of:
 - Name of person making the report
 - Name of alleged victim (if different from above) and how they are related to the Foundation
 - Name of alleged perpetrator and whether they are Foundation staff or associated personnel
 - Description of incident, including, if possible, date, time and location

If you are concerned someone is at immediate risk, assess the risk and use common sense to take steps to ensure the person is not in immediate danger. For example, it may be appropriate to contact local emergency medical services if the person needs immediate medical attention. Where possible, take all steps in consultation with the Designated Safeguarding Lead or Deputy.

Generally speaking, you should not intervene directly to attempt to rescue someone in vulnerable circumstances (e.g. a victim of trafficking or someone who has expressed suicidal thoughts) or provide them with personal contact details, etc.—you are not trained to do so, and you may put yourself or the other person in danger. You should communicate that while you cannot personally intervene, you will contact someone at TRF who may be able to help. The Designated Safeguarding Lead or Deputy may be able to signpost to appropriate bodies and/or specialist organisations who are better positioned to offer direct assistance.

How to report

Report all safeguarding concerns or suspicions immediately to the Designated Safeguarding Lead or Deputy (contact details below). Do not seek to investigate safeguarding complaints or suspicions. The report should be made as soon as possible and no later than 24 hours after being informed or becoming aware of the concern.

REPORT all safeguarding suspicions or concerns to: Foundation.Compliance@thomsonreuters.com

This is a monitored email with access limited to the Designated Safeguarding Lead and Deputy. If you are not comfortable submitting your report to that address, please call or email the Designated Safeguarding Lead or Deputy directly:

Designated Safeguarding Lead	Murshed Anwar, General Counsel murshed.anwar@thomsonreuters.com Phone: +44 (0) 20 31978281
Deputy Designated Safeguarding Leads	1. Nicholas Glicher, Chief Operating Officer Email: nicholas.glicher@thomsonreuters.com Phone: +44 (0) 20 7542 9729 2. Mariam Tadros, Director of Programmes Email: mariam.tadros@thomsonreuters.com

Consultants or staff who are working on projects outside the UK can report directly to the Designated Safeguarding Lead (or Deputy), or to their TRF Project Lead—the Project Lead, in turn, must report any concerns immediately to the Designated Safeguarding Lead (or Deputy).

We also encourage reports of actual or suspected misconduct through the [Thomson Reuters Business Conduct and Ethics Hotline](#). Reports can be made by phone or online and may be submitted anonymously.

Confidentiality must be maintained at all stages. Reports must be shared only with the Designated Safeguarding Lead (or Deputy) and the Designated Safeguarding Lead will share information only on a limited 'need to know' basis. The written report and all related documents must be kept confidential and secure.

How we will respond

The Foundation will respond to safeguarding reports and concerns according to its policies, and its legal and regulatory obligations.

See [Annex A](#) for our process for investigating, reporting and resolving safeguarding concerns.

As a registered charity, we are required to report certain incidents (including, potentially, safeguarding incidents) to the Charity Commission. We may also need to report incidents to other regulatory bodies, government departments or authorities, law enforcement or funding bodies.³ All decisions to report to external authorities must be fully risk-assessed to avoid further harm to the dignity or safety of the survivor or similar negative consequences. The Foundation will never avoid reporting on the basis that it

³ See Annex A for additional detail.

may harm the Foundation's reputation or give rise to litigation. Similarly, data protection concerns will not act as a barrier to reporting but will be carefully considered in connection with any report.

The Safeguarding Lead Trustee will have oversight of safeguarding and will receive reports of relevant incidents that arise. The Safeguarding Lead Trustee will ensure the board of trustees is regularly updated on safeguarding matters.

Support for survivors

The Foundation is committed to providing appropriate support to survivors of harm caused by staff or associated personnel at all stages of the reporting and investigation process. Decisions regarding support will be made on a case-by-case basis but should always be led by the survivor.

Policy review

This policy will be reviewed by the board of trustees annually, when there is a change in UK law or good practice, or when an incident occurs that highlights a need for change – whichever occurs first.

Glossary of terms

Child - Any individual below the age of 18, regardless of local laws regarding age of consent or majority. For the purposes of this policy, all children are considered vulnerable persons.

Harm - Includes emotional, psychological or physical harm or abuse or neglect or other infringement of an individual's rights.

Safeguarding - Safeguarding describes the steps taken to prevent people from harm, including the Foundation's beneficiaries, volunteers, and other people who interact with the Foundation. While safeguarding principally refers to the prevention of harm, it also encompasses practices to handle incidents, concerns and complaints.

Sexual abuse - The term 'sexual abuse' means an 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.

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

Vulnerable person or vulnerable groups – We define vulnerability broadly to include:

- (1) A child.
- (2) A person who is or may need 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.
- (3) A person who is or may be vulnerable because of their circumstances. For example:
 - Victims of gender-based violence, including rape, sexual assault or sexual harassment
 - Bonded labourers or victims of trafficking or slavery
 - People with very limited education
 - People with learning difficulties
 - Victims and survivors of manmade or natural disasters
 - People who are living in extreme poverty or who are financially isolated

Associated policies and references

This policy should be read alongside our related organisational policies, including:

- [Code of Business Conduct & Ethics](#)
- [Supply Chain Ethical Code](#)
- [Whistleblowing Policy](#)
- [Privacy Statement](#)
- [Disciplinary Action Policy](#)

References:

- BOND Template Safeguarding Policy and related resources
- BBC Media Action – Working with Vulnerable Contributors Guidelines

ANNEX A

Process for Investigating and Addressing Safeguarding Reports

If the Designated Safeguarding Lead or Deputy receives a safeguarding report, he or she will take the following steps:

1. Initial response

The Designated Safeguarding Lead (or Deputy) will consider whether immediate steps are needed to safeguard any person(s) who might be at risk.

The Designated Safeguarding Lead (or Deputy) will consider whether there is sufficient information to follow up or investigate the report. If there is insufficient information, and no way to obtain this information (e.g. the person making the report did so anonymously and did not provide details for further contact), the report will be filed by the Designated Safeguarding Lead (or Deputy) and the Chief Executive Officer and Safeguarding Lead Trustee will be notified.

If the report raises concerns relating to children, a person who is vulnerable by reason of mental or other disability, age or illness, or other serious concerns, **expert advice will be sought immediately**.

2. Confirm reporting obligations

The Designated Safeguarding Lead (or Deputy) will confirm whether there are obligations to inform relevant bodies. In some cases, the Foundation may be required to report when a complaint or concern is first received (i.e. before any investigation by the Foundation, to avoid prejudicing any criminal or regulatory process).

Where there is evidence of criminal activity, or concerns have been raised in relation to a child or vulnerable person, the Designated Safeguarding Lead (or Deputy) will consider whether to report to the relevant police and/or safeguarding authorities as appropriate, taking appropriate account of the Charity Commission's guidance⁴ and following an appropriate risk assessment, including whether: external reporting might risk further harm to those affected by the alleged incident(s); those affected do not want the matter externally reported; external reporting risks disproportionate consequences for the accused; or due process is not guaranteed or likely.

Safeguarding reports may be required by:

- The Foundation's funders (including other NGOs and foundations, and UK government and UN agencies that hire us to provide consulting services or give the Foundation grants)
- Statutory bodies (e.g. the Charity Commission via serious incident reports⁵)
- Others

⁴https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/754070/guidance_on_criminal_reporting_inc_overseas.pdf

⁵ The Charity Commission has published guidance as to what constitutes a serious incident and how to make a report, which is updated from time to time and available at: <https://www.gov.uk/guidance/how-to-report-a-serious-incident-in-your-charity>

The Designated Safeguarding Lead (or Deputy) will consult with the Chief Executive Officer and Safeguarding Lead Trustee prior to making any reports.

3. Investigation

The Designated Safeguarding Lead (or Deputy) will determine whether to commence an investigation, in consultation with the Safeguarding Lead Trustee.⁶

An internal investigation should not be commenced or continued where doing so may compromise criminal or regulatory investigations by relevant authorities.

If the decision is made to investigate internally, the Designated Safeguarding Lead (or Deputy) shall ensure that he or she (or the assigned internal investigator, if applicable) has the relevant expertise and capacity to manage a safeguarding case. This should include consideration of the relevant geographical, cultural, linguistic and legal considerations. If we do not have the appropriate expertise, immediate assistance will be sought, through external specialised support if necessary.

If the report concerns Foundation staff or associated personnel, the steps may include investigation, disciplinary measures (to the extent applicable), referral to relevant authorities. Investigations will be undertaken with reference to the [CHS Alliance Guidelines for Investigations](#) and, where staff are involved, the [Disciplinary Action Policy](#). All investigations and decisions involving staff will be carried out or made, as applicable, consistent with existing policies for staff misconduct.

A decision may be made to terminate a contract with a contractor or supplier based on the actions of their staff or subcontractors.

If an investigation is undertaken, the Chief Executive Officer will be responsible for making a final determination based on the information provided in the investigation report, in consultation with the Designated Safeguarding Lead (or Deputy), the Safeguarding Lead Trustee and, where appropriate, the full board of trustees.

4. Conclude the case

All decisions must be documented clearly and confidentially.

⁶ The Designated Safeguarding Lead (or Deputy) may also consult with the Chief Executive Officer, the Foundation's HR lead, or other Foundation managers, where appropriate and recognising the confidential and need-to-know nature of such discussion.