



Safeguarding Policy

| Policy | Date of approval | Date of policy review |
|--|---|------------------------------|
| Safeguarding Policy | June, 28, 2022 | June 2023 |
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1. Introduction

Established in 2003, WageIndicator Foundation is an independent non-profit organisation whose mission is to promote transparency in the labour market by sharing and comparing income data through its network of national websites.

WageIndicator has operations in more than 200 countries worldwide. With headquarters in Amsterdam, the Foundation has regional offices in Islamabad, Bratislava.

2. WageIndicator and Safeguarding

WageIndicator Foundation collects, compares and shares labour market information through online and offline surveys and desk research. WageIndicator is reliant on the data that it collects from its website visitors and face-to-face respondents who share information on a voluntary basis. WageIndicator cherishes and respects the uniqueness of this popular support and the trust that comes with it. All respondents of the specially designed WageIndicator surveys, online or face to face are guaranteed anonymity.

The information gathered is uploaded onto WageIndicator's national websites which serve as online libraries featuring wage information, labour law and career advice, for workers, employees and employers. Minimum Wage data is updated every month, Living Wage data every quarter, Labour Law and salary data every year. New Collective Agreements are updated on an ongoing basis. Information updated at wageindicator.org is also updated in the national WageIndicator sites in national languages.

WageIndicator does not have any direct contact with children in the community in the course of its data gathering work. Its contact with vulnerable adults is through face-to-face surveys that it conducts with workers either in the company premises or outside the workplace. WageIndicator has arrangements in place to ensure that the recruitment of the interviewers it commissions reflects its safer recruitment procedures where risks have been identified and induction briefings include awareness of its safeguarding policy and code of conduct.

Within the workspace, WageIndicator works with a small number of university interns under the age of 18. Regardless of the age of the intern, WageIndicator recognises that there is a power imbalance between the intern and their supervisor. WageIndicator has appropriate measures in place through its safer recruitment policy, code of conduct and awareness raising activities for its staff and interns to reduce the risk of harm to all its employees and interns.

The websites managed by WageIndicator are accessed by approximately 40 million users. The social media platforms managed by WageIndicator are accessed by more than 10 million users. WageIndicator has an online help desk to respond to work-related abuse reported by WageIndicator website visitors. Visitors reporting safeguarding concerns through this platform are directed to appropriate institutions/professionals that can provide support and advise on further actions.

Respect for human rights, especially diversity and inclusion, integrity, and commitment to promote equality is part and parcel of WageIndicator's fundamental values. The organisation strives to maintain the same through all its actions and processes. WageIndicator promotes respect for others, has zero tolerance for sexual exploitation and abuse of children and discrimination because of creed, colour, race or any other diversity factors. This applies to all relationships, both internally and externally. Just as its mission is to promote and practice labour rights within the organisation and through its online platforms, its Safeguarding Policy is designed to protect from harm and keep safe its employees and

vulnerable groups with whom it has contact through its work. This includes developing, enabling, and nurturing a strong safeguarding culture within WageIndicator and all its stakeholders.

WageIndicator's work is guided and supported by a contemporary safeguarding policy base that is consistent with professional best practice, which is compliant with international legal frameworks, guidance and relevant regulations, and which reflects the nature of our work.

3. Contact us

For any queries about Safeguarding at WageIndicator please contact Rupa Korde in the first instance at rupakorde at wageindicator dot org or Karen Rutter at karenrutter at wageindicator dot org, our Safeguarding Leads.

4. WageIndicator Safeguarding Policy Statement

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

WageIndicator expects all staff, interns and contractors to avoid infringing the rights of individuals to dignity, respect and equality in the course of their work, be they colleagues, data contributors, sponsors, project partners, subscribers, or clients.

WageIndicator works with BOND's definition of safeguarding, which states:

"Safeguarding is the responsibility of organisations to make sure their staff, operations, and programmes do no harm to children and adults at-risk nor expose them to abuse or exploitation. It is becoming good practice to think about how we safeguard everyone in our organisations at all times, including protecting staff from harm and inappropriate behaviour such as bullying and harassment".

This policy relates to safeguarding of children and vulnerable adults who come into contact with us, directly and indirectly through our work. Consequently, WageIndicator will take all possible steps to safeguard and protect children and vulnerable adults who come into contact with the activities of WageIndicator during its work, from abuse or maltreatment. The safeguarding of our staff is managed through our human resource management policies.

5. The scope of this policy

WageIndicator's Safeguarding Policy applies to all supervisory board members, directors, international staff, its employees (full time or part time) working across the globe, interns, consultants and contracted individuals for specific projects, and all visitors offline, including journalists and associated personnel.

Safeguarding applies consistently and without exception across all areas of the organisation's work where there is direct or indirect contact with children and vulnerable adults. It applies to **all** children and vulnerable adults regardless of their background and requires proactively identifying, preventing, and guarding against all risks of harm, exploitation and abuse. We commit to having robust, accountable, and transparent systems for response, reporting and learning when safeguarding risks

materialise. Those systems include a duty of care to all actors who report allegations and concerns, and to adopt a survivor centred approach to the alleged victim/survivor.

We require employees to bring to WageIndicator's attention, through our safeguarding reporting system, any concerns or allegations against any member of our staff, partners and all people associated with our work. WageIndicator commits to responding constructively and in a timely manner to reports or allegations that are made to us.

6. Definitions

Child: Any person under the age of 18.

Vulnerable Adult: Vulnerable adults are defined as people who are unable to take care of protecting themselves against harm or exploitation for any reason. When safeguarding adults, this involves reducing and preventing the risk of harm, neglect or abuse alongside supporting them to maintain their own lives. While most would consider vulnerable adults to be those who lack capacity, adults with full capacity can also be considered as vulnerable as well. This is when they are unable to take care or protect themselves from harm.

Child maltreatment: Is the abuse and neglect that occurs to children under 18 years of age. It includes all types of physical and/or emotional ill-treatment, sexual abuse, neglect, negligence and commercial or other exploitation, which results in actual or potential harm to the child's health, survival, development or dignity in the context of a relationship of responsibility, trust or power.

Child exploitation: Refers to the use of children for someone else's advantage, gratification or profit often resulting in unjust, cruel and harmful treatment of the child. These activities are to the detriment of the child's physical or mental health, education, moral or social-emotional development.... It covers situations of manipulation, misuse, abuse, victimisation, oppression or ill-treatment.

Survivor-centred approach: A survivor-centred approach to violence against women seeks to empower the survivor by prioritising their rights, needs and wishes. It means ensuring that survivors have access to appropriate, accessible, and good quality services including health care, psychological and social support, security, legal services. (UNFPA 2012)

Violence and harassment: A range of unacceptable behaviours and practices that aim at, result in, or are likely to result in physical, psychological, sexual or economic harm. This potentially covers physical abuse, verbal abuse, bullying and mobbing, sexual harassment, threats and stalking, among other things. Includes harassment through work related communication enabled by technology.

7. Legal Framework

This policy has been drawn up on the basis of legislation, international instruments and guidance that seeks to protect children and adults at risk in the international context. **(annex 1)**. WageIndicator offices located in different countries are required to apply national safeguarding legislation and employment laws of the country where the office is located.

WageIndicator leadership will promote a fair, open and positive culture and ensure all involved feel able to report concerns, confident in the knowledge that they will be heard and responded to in a timely manner.

8. Safer Recruitment

Safer recruitment is an integral part of WageIndicator's commitment to build an organisational culture wherein the safety and wellbeing of everyone involved is paramount. The overall purpose of safer recruitment is to help identify and deter or reject individuals who are deemed to pose a danger to children and vulnerable adults.

Our recruitment policy states our procedures to reduce the risk of unsuitable people entering our organisation.

If WageIndicator does ever engage in activities which may involve contact with children or vulnerable adults that require the presence of its staff or other representatives, they will be required to undertake a criminal record or other background check following a risk assessment and in accordance with relevant legislation and context in the country of operation. We will ensure that these are carried out as part of our commitment to safer recruitment and safeguarding.

Where we become aware that any current staff member or associate may pose a risk to children and/or adults at risk we will comply with the legislation and relevant guidance in respect of referring that representative to the relevant authorities in the country of operation if appropriate.

9. Code of Conduct

WageIndicator's Code of Conduct describes the ethics and behaviours required of all stakeholders to ensure a robust safeguarding environment. It is designed to create a culture of safeguarding best practice and reduce the risks of harm. All supervisory board members, directors, international staff, its employees (full time or part time) working across the globe, interns, consultants and contracted individuals for specific projects and all those who act on our behalf, will read and sign it, and are expected to adhere to its values and minimum standards. Those making overseas visits are expected to uphold local law wherever it operates, except where WageIndicator's Code of Conduct is more stringent, in which case this will apply. Breaches of the Code of Conduct are grounds for disciplinary action as well as possible referral of matters to relevant external bodies including statutory authorities, for example where a possible criminal breach is involved. Our Code of Conduct is publicly available in the [Safeguarding Policies section at WageIndicator.org](#).

10. Embedding a strong safeguarding culture through capacity building

A strong safeguarding culture requires an informed and trained staff team and a clear action plan for commitments made. We make the following key commitments:

- Relevant WageIndicator staff will receive a thorough induction covering all aspects of our safeguarding policies and implementation plan, and they will be introduced to the Safeguarding Lead.
- All staff, interns and contractors will sign the Code of Conduct, which clearly lays out the expectations of best practice in our conduct and our goals for nurturing a safe working environment.
- All staff and interns will receive annual training that includes safeguarding.
- Staff with specific safeguarding responsibilities will be trained to implement safeguarding in their specific context, informed, encouraged to be approachable and will respond to issues in a professional and timely manner.

- All staff and contractors are obliged to create and maintain an environment that prevents exploitation and abuse. However, directors and managers at all levels have a particular responsibility to support and develop a culture and system that maintains this environment.
- WageIndicator's Safeguarding Policy will be reviewed at least annually by WageIndicator's Safeguarding Lead in collaboration with the General Director and approved by the Supervisory Board.

11. Whistleblowing

WageIndicator's Whistleblowing Policy, which is publicly available in the [Safeguarding Policies section at WageIndicator.org](#), has been developed to support its safeguarding framework.

The policy elaborates a clear process that is widely communicated and accessible to all staff for dealing with concerns. A complaint handling framework managed by a named whistleblowing officer, ensures reports are examined and resolved quickly at the appropriate level. It identifies a clear process to follow if the concern is being raised against an individual in the organisation. The policy makes explicit that there can be no reprisals for the whistleblower where concerns are reported in good faith and without malice. This applies to all WageIndicator operations worldwide regardless of legislation to protect whistleblowers.

12. Reporting and Accountability Lines

WageIndicator's responsibility for recognising and reporting safeguarding concerns applies across the organisation, with all our stakeholders. Designated staff are responsible for responding to reports of safeguarding concerns. Clear roles and responsibilities for key staff and General Director with designated safeguarding responsibilities and accountability lines have been developed for clarity.

13. Responding to Safeguarding Concerns

WageIndicator is committed to responding effectively, sensitively and swiftly to all allegations and suspicions of any type of harm, violence and harassment. WageIndicator places a mandatory obligation on all staff, interns and contractors to immediately report concerns, suspicions, allegations and incidents that indicate actual or potential abuse and harassment of children, vulnerable adults and beneficiaries when perpetrated by staff and contractors. WageIndicator also urges all staff, interns and contractors to report violence and harassment against colleagues. WageIndicator commits to take appropriate action in response to any such reports and does not tolerate abuse, harassment and any form of misconduct.

14. Reporting Process

Internal safeguarding concerns relating to WageIndicator staff, interns and contractors can be reported via email or in-person to the Safeguarding Lead ([karenrutter at wageindicator dot org](mailto:karenrutter@wageindicator.org)) or the Safeguarding Lead Director ([rupakorde at wageindicator dot org](mailto:rupakorde@wageindicator.org)) should they feel unable to report to the Safeguarding Lead. The Safeguarding Lead or the Safeguarding Lead Director will follow up matters on an anonymous basis and is committed to investigate claims thoroughly and fairly using our internal procedure for managing concerns.

WageIndicator's General Director will be informed immediately and will make sure that incidents are dealt with appropriately and that all steps below are followed.

The safety and wellbeing of the individual(s) affected is the paramount consideration and immediate steps must be taken by the Safeguarding Lead in collaboration with other WageIndicator senior team

members as necessary to protect the individual(s) affected and to address any possible urgent medical needs.

Where it appears that a criminal offence may have taken place, the matter will be referred to the appropriate national authorities in line with local reporting/referral systems. A virtual or in person case discussion involving relevant members of WageIndicator Leadership will be held within 24 hours to discuss the nature of the case and to take decisions on next steps. Any investigation involving WageIndicator staff, interns or contractors will be handled fairly with the full support of the Director Operations. Investigations will be objective, transparent, and will be guided by professional expertise and support when required.

Safeguarding concerns identified through visitor traffic to WageIndicator's websites will be managed by the Help Desk and signposted to appropriate institutions and professionals for support and advice for further action.

15. Data Protection

WageIndicator recognizes its obligations to process data in line with existing relevant data protection legislation including a duty to protect personal data against any unauthorised or unlawful processing and any accidental loss or destruction of, or damage to, the personal data. WageIndicator has installed robust measures to protect all the data that it gathers and manages. All respondents of the especially designed WageIndicator surveys are guaranteed anonymity.

With other third parties who share data, for each occasion specific agreements are included, including privacy clauses that must at least be in compliance with the General Data Protection Regulation of the European Union. The same regulation governs our relationship with subscribers to WageIndicator newsletters and paying customers of our data, as well as participants in our webinars.

WageIndicator will always seek and facilitate consent of alleged adult victims and children's caregivers before sharing safeguarding concerns with the relevant authorities. However, in cases where information suggests an immediate risk of harm, data protection legislation is not a barrier to sharing safeguarding concerns. Those representing WageIndicator as staff cannot keep confidences when they involve concerns about a vulnerable adult or a child who is at risk or likely risk of harm. It is important that everyone providing services on behalf of WageIndicator is prepared to explain that confidentiality will need to be breached where shared information suggests harm to anyone. WageIndicator teams operating in different geographical locations are required to observe data protection requirements of the countries where they are based.

16. Recording

All safeguarding concerns or allegations must be recorded as soon as possible, and the record will form the basis for sharing information with the safeguarding lead and onward referral where relevant.

Safeguarding records will be kept in line with Data Protection requirements and information will be shared observing GDPR requirements. All incident reports will be clearly recorded with concerns raised and actions taken and securely stored with password protected access to authorised personnel only. In WageIndicator Terms: a separate DropBox.

17. Risk Management

WageIndicator will manage risk responsibly. Risk is defined as uncertainty, whether positive or negative, that will affect the outcome of an activity, or the well-being of individuals or the reputation of an organisation. WageIndicator's risk management log includes safeguarding risks. The WageIndicator senior leadership team is committed to review and assess regularly the risks faced by the organisation in all areas of our work and to plan for the management of those risks.

18. Media and Communications

Through its use of photographs, video and written case study material, WageIndicator commits to representing information about its work in ways that respects the dignity of the people portrayed. WageIndicator respects the wishes of the individual when requesting permission for photographs/video/and written information.

Informed consent must be obtained by anyone whose photograph/video/case information will be used for the purpose of communicating WageIndicator's work. WageIndicator will not take photographs of anyone who is concerned about the use or impact of the image. Where relevant consent must be provided by the parent or guardian for children under the age of 18, as well as the child themselves where possible.

Likewise, for an adult who lacks the capacity to provide informed consent, a family member/caregiver must give consent on their behalf. It is good practice to ensure that the subject of the photograph/video/case study understands how, when and where the information is going to be used and where it will be stored and for how long. Absolutely no payments or any other form of compensation are to be provided to any person being photographed/videoed in exchange for their video film or photograph or to encourage consent.

WageIndicator understands that in today's digital landscape, photographs can be shared widely beyond their original intent of use. Consequently, we will work hard to ensure that individuals who have their photographs taken in relation to our work are used for the purpose for which consent is given. We will ensure that people who give us consent have clear pathways for contacting us through our communication and media teams and that they are aware that options to withdraw consent remain open, without a time limit.

When using photographs, video film or case study material the names of children will always be changed to protect their identity. WageIndicator's media and communication team will ensure that no photographs/videos of children or vulnerable adults will be used that could be regarded as degrading or sexually provocative. Photographs or videos will not be manipulated or taken out of context.

WageIndicator will ensure that any photograph or recorded case study history of a child or vulnerable adult does not place them in a position of harm or render them vulnerable to any form of exploitation or abuse. WageIndicator will disguise their identity and will not provide any information that could lead to a child or vulnerable adult being identified or tracked.

All social media and case studies used through digital channels generated by WageIndicator will be subject to the same safeguarding guidelines as outlined in this policy. WageIndicator Social Media instructions must be followed at all times. Information about a child/children or vulnerable adult's life and any photographs/videos of children or vulnerable adults will be kept confidential in secure files. Access to photographs is limited to those that need them during the course of their work. All people involved with using WageIndicator's social media channels are allowed to only use

photographs, videos and other visual materials that are shared with them internally for promotional purposes, or are made accessible through third parties with the same purpose. All textual and visual materials will include a citation of the sources. WageIndicator Foundation will only include those visual materials that it is allowed to use, whether through copyright statements, fair use policies, explicit consent or other ways of permission granted.

19. E- Safety.

The safe and responsible use of technology is an important consideration at WageIndicator. Our E-safety arrangements apply to the use of all forms of digital communication (internet, SaaS, email, chat, video communications, etc.). WageIndicator has measures in place to ensure that confidential material transmitted electronically is encrypted with enterprise grade technologies, protecting our data at rest and in-transit, so that it cannot be viewed "in flight".

The minimum information WageIndicator needs to register for its Newsletters is name and email address. After the user has registered and given permission, WageIndicator may send emails of interest to the user. If a subscriber to one of our Newsletters no longer wishes to receive a specific newsletter, they can just follow the "unsubscribe" instructions located near the bottom of each newsletter.

WageIndicator doesn't collect email addresses from users in relation to the salary survey, salary check and Decent Work Check they may have visited and/or contributed to by volunteering data.

Our Helpdesk and email addresses are password protected. Email addresses are only used to answer message(s) from users. WageIndicator will use certain personal information only for the purposes for which it was originally collected and will make sure it is deleted securely. WageIndicator will not share, sell, rent, swap or authorise any third party to use email addresses or other personal data for commercial purposes without users' permission.

If users claim their right to be removed, a message to WageIndicator suffices to delete any traces in the data that might be connected to the user in question. The websites of WageIndicator use cookies, small files stored on the device of the user. These cookies allow WageIndicator to manage access to, and use of the WageIndicator websites, recognise the user and help WageIndicator understand how its websites are used. Users may disable cookies at any time through the browser (see Aboutcookies.org).

WageIndicator may transmit non-personally identifiable website usage information to third parties in order to show users relevant advertisements. If any information is transferred out of the European Economic Area (EEA), it will be done with the relevant protection stated under the General Data Protection Regulation of the European Union. With respect to the Decent Work Check, special mention must be made of the possibility that employers/factories/plants may be mentioned in published so-called Decent Work Check-pages on relevant WageIndicator websites.

Companies always get a message prior to publication. Companies not wishing to be mentioned in these publications should turn to WageIndicator for consultation and a constructive solution, using the contact address at the bottom of 'their' company page. WageIndicator does not believe that naming and shaming is sound policy.

All WageIndicator staff are required to undergo security awareness training within the first week of their hire date, and are provided refresher training as and when needed to ensure that they are aware

of the latest strategies to reduce the risks against cyber-attacks and WageIndicator's protocols for accessing confidential information.

20. Implementation and Review

WageIndicator's safeguarding policy will be available to all supervisory board members, directors, international staff, its employees (full time or part time) working across the globe, interns, consultants and contracted individuals for specific projects via induction and through its website and all national WageIndicator sites under the button "Disclaimer" down left in the footer.

All supervisory board members, directors, international staff, its employees (full time or part time) working across the globe, interns, consultants and contracted individuals for specific projects will sign the code of conduct as part of the induction process; the safeguarding lead will ensure this arrangement is in place through the Director of Operations

WageIndicator employees with specific safeguarding responsibilities will be trained to receive and respond professionally to safeguarding concerns and allegations.

WageIndicator will continually evaluate its safeguarding practice and update its policy following an annual review by the General Director

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Annex 1 – International Legal Framework for Safeguarding

- United Nations Convention for the Rights of the Child (UNCRC), a legally binding international agreement setting out the civil, political, economic, social and cultural rights of every child, regardless of their race, religion or abilities. (https://www.unicef.org.uk/wp-content/uploads/2010/05/UNCRC_united_nations_convention_on_the_rights_of_the_child.pdf)
- Convention on the Elimination of All Forms of Discrimination against Women. (CEDAW) Countries that have ratified or acceded CEDAW are legally bound to put its provisions into practice, and thereby agree to submit national reports on measures taken to comply with its obligations. [OHCHR | Convention on the Elimination of All Forms of Discrimination against Women](#)
- The United Nations Convention on the Rights of Persons with Disabilities is an international human rights treaty of the United Nations intended to protect the rights and dignity of persons with disabilities. ([IS164 07 Easyread UN Convention on Human Rights \(publishing.service.gov.uk\)](#))
- Convention for the Protection of Human Rights and Fundamental Freedoms (1950), updated (2014) ([Microsoft Word - S02-A04.doc \(unhcr.org\)](#))
- College of Europe Convention for the Protection of Children from Sexual Exploitation and Sexual Abuse*) Lanzarote (2007) (https://ec.europa.eu/anti-trafficking/council-europe-convention-protection-children-against-sexual-exploitation-and-sexual-abuse_en)
- Directive 2011/93/EU of the European Parliament and of the Council on combating sexual abuse, sexual exploitation of children and child pornography and replacing Council Framework Decision 2004/68/JHA (2011) (<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32011L0093>)
- United Nations Declaration on the Elimination of Sexual Abuse and Exploitation (2017) ([Microsoft Word - Document1 \(un.org\)](#))
- [Core Humanitarian Standard](#) on quality and accountability and/or the [Inter-Agency Standing Committee Minimum Operating Standards on Preventing Sexual Exploitation and Abuse](#) for overseas humanitarian and development work.

Annex 2 – Accountability Framework

1. Introduction

Accountability is a fundamental principle underpinning the expectations and obligations of WageIndicator employees, its management, and its governance. This reflects an organisational culture of responsibility and transparency for its decisions and actions across all functions of the organisation.

2. Scope

This framework applies to all those with safeguarding responsibilities. This includes all staff and contracted staff, Safeguarding Lead (SL) and managers at all levels, directors and supervisory board, which holds ultimate accountability for safeguarding at WageIndicator.

3. Safeguarding accountability

WageIndicator's contact with vulnerable adults is limited to period face to face surveys that it conducts in the company premises or outside the workplace. WageIndicator has arrangements in place to ensure that the recruitment of the interviewers which involve safeguarding risks reflect its safer recruitment procedures and information briefings include awareness of its safeguarding policy and code of conduct. Ultimate safeguarding accountability rests with WageIndicator's General Director.

4. Executive Leadership

- Ensure the organisation's strategic plans reflect safeguarding responsibilities.
- Work with the Safeguarding Lead to regularly review whether the arrangements the organisation has put in place are creating a safer culture and keeping people safe.
- Check the organisation's risk matrix reflects safeguarding risks properly and plans sensible measures to take, including relevant insurance for General Directors' liability.
- Make sure there is space on the agenda for safeguarding reports and help directors and General Director understand and challenge those reports.
- Make sure there is an annual review of safeguarding policies and procedures and that this is reported to the directors and General Director.
- Oversee arrangements for monitoring to see whether policies and procedures are effective.
- Call for audits of qualitative and quantitative data (either internal or external) when they are needed.
- Oversee safeguarding allegations against staff, interns, contractors, together with the safeguarding lead.
- Be a point of contact if someone wishes to complain about a lack of action in relation to safeguarding concerns.
- Champion safeguarding throughout the organisation.
- Attend relevant safeguarding training events and conferences.
- Support the directors in developing their individual and collective understanding of safeguarding.
- Report serious incidents to donors and regulatory bodies as required.
- Support regular safeguarding updates for staff.
- Identify ways of gathering the views of stakeholders in relation to safeguarding and share these with the board.

5. The role of the General Director

- To ensure that the organisational culture is conducive to facilitate the implementation of the safeguarding framework.
- Be the accountable officer for the management of all safeguarding concerns and must be informed of complaints and allegations by the Safeguarding Lead
- To include safeguarding activity in reports to the board.
- To ensure supervision and support to the Safeguarding Lead.

The General Director is accountable to the directors and will keep them fully informed of any safeguarding situation and will recommend the appropriate course of action in response to any reported incident. In addition, WageIndicator will report any serious incident and action taken to the regulatory body in the country of operation as required and our donors for grant aid funded projects. Any reviews of our safeguarding policy framework will be presented to the Supervisory Board for approval by the General Director.

6. Operational – Safeguarding Lead

The Safeguarding Lead acts as the main source of support, advice, and expertise for safeguarding at WageIndicator. The Safeguarding Lead advises and supports the directors in developing and establishing WageIndicator's approach to safeguarding. This should be explicit in the role-holder's job description described below in the broad areas of responsibility and activities related to the role.

6.1. Responsibilities

- Ensure WageIndicator is compliant with all safeguarding requirements.
- Play a lead role in maintaining and reviewing WageIndicator's strategy for safeguarding.
- Coordinate the distribution of policies, procedures, and safeguarding resources throughout WageIndicator.
- Ensure safeguarding is integrated in key operational processes, work with staff, interns and contractors. Advise on training and development needs, providing/facilitating training where appropriate.
- Be the first point of contact for all safeguarding reports and manage these.
- Report all serious safeguarding incidents to the director with safeguarding responsibilities and agree process for managing these.
- Manage referrals to key safeguarding agencies (e.g., social services or police) of any incidents or allegations of abuse and harm.
- Liaise with Director Operations and facilitate support for WageIndicator staff who are victim/survivors including sign posting to appropriate services.
- Provide regular reports of safeguarding activity to the General Director for the directors.

The Safeguarding Lead is accountable to the General Director.

The Safeguarding Lead should be given the time, funding, training, resources, and support to provide advice and support to other staff on safeguarding matters, to take part in strategy discussions and/or to support other staff to do so and to conduct safeguarding investigations where appropriate.

7. Serious incident reporting

WageIndicator will make a report to the relevant regulatory body as required in the country of operation and donors if any of the following things occur:

- Individuals coming into contact through WageIndicator's work (adults or children) have been, or alleged to have been, abused or mistreated, or by someone connected with WageIndicator, for example a director, staff member, while under the management responsibility of WageIndicator
- There has been an incident where someone has been abused or mistreated (alleged or actual) and this relates to the activities of WageIndicator.
- There has been a breach of procedures or policies at WageIndicator which has put people at risk, including failure to carry out checks which would have identified that a person is disqualified in law, under safeguarding legislation, from having contact with children and vulnerable adults.

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