

SAFEGUARDING POLICY

Established December 16, 2022



Introduction

Global Nomads Group believes in a world in which every person's inherent worth and dignity are honored. We provide transformative, safe and justice-advancing online experiences that connect global youth across distance and difference. We leverage technology to connect youth with their global peers to explore and respond to the issues they care most about – from individual identity to global hunger to human rights. Whether participating in live conversations or exchanging stories in our online courses, young people are able to listen intently, share viewpoints, and explore both the similarities and differences in their lives. These eye-widening, mind-opening, and perspective-shifting exchanges are at the core of our programming and allow youth to powerfully experience our shared humanity.

Purpose and Scope

Purpose

The purpose of this policy is:

- to protect everyone associated or affiliated with Global Nomads Group, particularly our young participants who engage with our services;
- to provide parents and guardians, staff and interns, and other persons within the Global Nomads Group community with a clear understanding of the principles that guide our approach to child protection, wellbeing, safety and security; and
- to help young people who use our services (most of whom are between 12 and 25 years of age) understand Global Nomads Group's response to concerns and disclosures that are raised as we balance our core values of protecting and nurturing young people with promoting their autonomy and giving them a voice, as well as other steps we take as an organization to ensure their safety at all times.

The policy lays out the commitments made by Global Nomads Group, and informs staff and associated personnel (see definition) of their responsibilities in relation to safeguarding.

This policy does not cover:

- Sexual harassment in the workplace
- Safeguarding concerns not perpetrated by Global Nomads Group or associated personnel

Scope

This policy applies to all staff working on behalf of Global Nomads Group and associated personnel including and not limited to:

- Any full-time or part-time staff at Global Nomads Group;

SAFEGUARDING POLICY

Established December 16, 2022



- All staff contracted by Global Nomads Group;
- Associated personnel while engaged with Global Nomads Group work or visits, including but not limited to consultants, volunteers, facilitators, contractors, interns, and board members.

Definitions of Safeguarding Terms

Associated personnel: Any person while engaged with Global Nomads Group work or visits, including but not limited to the following: consultants, volunteers, facilitators, contractors, interns, and board members.

Vulnerable adult: Sometimes also referred to as “at-risk” 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 themselves, or unable to protect themselves against significant harm or exploitation.

Child: A person below the age of 18.

Grooming: Child grooming refers to an act of deliberately establishing an emotional connection with a child to prepare the child for child abuse. Child grooming is undertaken usually to carry out sexual abuse and other child exploitation like trafficking of children, child prostitution or the production of child pornography.¹

Harm: Psychological, physical, and any other infringement of an individual’s rights.

Participant: Someone who directly receives goods or services from Global Nomads Group’s programs. For the purposes of this policy, we define “participant” as any individual young person up to and including the age of 25. This is due to the nature of our work, which is designed to support young people ages 12-25.

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 and Abuse (PSEA): The term used by the humanitarian and development community to refer to the prevention of sexual exploitation and abuse of affected populations by staff or associated personnel. The term derives from the United Nations Secretary General’s Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse².

Safeguarding: Safeguarding is the specific responsibility of organizations to make sure their staff, operations, and programs do no harm to children and adults, nor expose them to abuse or exploitation.³ Safeguarding is putting in place appropriate policies, procedures and practices to

¹ <https://definitions.uslegal.com/c/child-grooming/>

² <https://www.unhcr.org/en-us/protection/operations/405ac6614/secretary-generals-bulletin-special-measures-protection-sexual-exploitation.html>

³ Kaya Connect: <https://kayaconnect.org/totara/dashboard/index.php>

SAFEGUARDING POLICY

Established December 16, 2022



ensure that our staff, partners and programs do no harm to the people we support. It includes protection from sexual exploitation and abuse (PSEA), and protection of vulnerable or vulnerable adults, children, and people with diverse genders, sexualities, and bodies.

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.

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.

Policy Statement

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

This policy will address the following areas of safeguarding [as appropriate]: youth safeguarding, adult safeguarding, and protection from sexual exploitation and abuse.

Global Nomads Group commits to addressing safeguarding throughout its work, through the three pillars of prevention, reporting, and response.

Prevention

Global Nomads Group’s responsibilities

Global Nomads Group will:

- Ensure all staff and associated personnel have access to, are familiar with, and know their responsibilities within this policy.
- Design and undertake all its programs and activities in a way that protects people from any risk of harm that may arise from their coming into contact with Global Nomads Group. This includes the way in which information about participants in our programs is gathered and communicated.
- Implement stringent safeguarding procedures when recruiting, managing, and deploying staff and associated personnel.
- Ensure staff and associated personnel receive training on safeguarding at a level

SAFEGUARDING POLICY

Established December 16, 2022



commensurate with their role in the organization.

Safer Recruitment

Global Nomads Group aims to ensure safer recruitment practices through a comprehensive recruitment and hiring process. All potential staff undergo interviews and reference checks prior to being offered employment. All offers are contingent on passing our vetting protocol, outlined below.

All staff and associated personnel who work with young people undergo a vetting process, which includes the following⁴:

- A comprehensive application form with a signed statement.
- An in person or video interview that examines an applicant's past employment or experience and explores other indicators of potential problem behavior.
- Reference checks with past employers (or appropriate reference checks for volunteers and young adults) and personal contacts.

Staff responsibilities

Child safeguarding

Global Nomads Group staff and associated personnel must not:

- Engage in sexual activity with any participant under the age of 18;
- Sexually abuse or exploit children;
- Subject a child to physical, emotional or psychological abuse, or neglect; or
- Engage in any commercially exploitative activities with children including child labour or trafficking.

Adult safeguarding

Global Nomads Group staff and associated personnel must not:

- Sexually abuse or exploit anyone, with particular attention to vulnerable adults; or
- Subject anyone, with particular attention to an vulnerable adult, to physical, emotional or psychological abuse, or neglect.

Protection from sexual exploitation and abuse

Global Nomads Group staff and associated personnel must not:

⁴ U.S. Department of Justice, Office of Justice Programs. Guidelines For the Screening of Persons Working with Children, the Elderly, and Individuals with Disabilities In Need of Support. <https://www.ojp.gov/pdffiles/167248.pdf>

SAFEGUARDING POLICY

Established December 16, 2022



- Exchange money, employment, goods or services for sexual activity; or
- Engage in any sexual relationships with participants, since they are based on inherently unequal power dynamics.

Additionally, Global Nomads Group staff and associated personnel are obliged to:

- Contribute to creating and maintaining an environment that prevents safeguarding violations and promotes the implementation of the Safeguarding Policy; or
- Abide by all [United States federal](#) and state laws or those of any host country.

Online Safety Guidelines

Staff and associated personnel should be intentional about creating healthy boundaries in their working relationships with the young people they are assigned to work with or otherwise come in contact with. They should be aware that when mentoring or supporting young people, it is important to maintain healthy professional and personal boundaries. Supervisors have the responsibility to support their direct reports in maintaining safe boundaries, and should work with their direct reports to develop a plan in the case of a pre-existing close personal relationship⁵ or a close personal relationship developing, such as arranging for the primary program support to be provided by another member of staff. While we expect positive professional relationships will develop, staff should bear the following in mind:

- Your role is not to become a primary source of emotional support to young people, instead you should focus on supporting young people with their engagement with peers and content creation.
- Without formal training, it is not safe or appropriate to attempt to provide crisis support to a young person. Instead, redirect the young person to think about support resources that are available to them or engage with your supervisor about which resources are most appropriate to provide.
- Staff should maintain clear boundaries with young people - they are not available to provide on-call support in crisis situations and should therefore not offer to provide that support. It is important to be upfront about this and not promise support that we cannot provide.
- Global Nomads Group's digital platforms have been designed to keep young people safe, in part through the provision that all communication on the platform happens through public channels without private messaging. All communication with young people should be done through official channels outlined in the respective program's Terms and Conditions (staff should therefore not use personal emails in communication with young

⁵A close personal relationship means a financial, family or sexual relationship or a relationship that involves a degree of intimacy beyond that normally present between members of staff with students, work colleagues or other members of the community.

SAFEGUARDING POLICY

Established December 16, 2022



- people).
- In the case of WhatsApp communication, at least one additional Global Nomads Group staff and/or associated personnel should be included in the messaging (always at least two staff/associated personnel). Such communication should only take place on designated Global Nomads Group phones and numbers where provided. Global Nomads Group monitors the need for phone use and can assign staff and associated personnel dedicated GNG phones if needed. Messaging should contain program related information only. Should messages contain anything regarding non-programmatic content or the request of psychological support or therapy, communication should halt and immediately be reported to a Safeguarding Officer or supervisor for next steps.
- In the case of Slack, a dedicated Global Nomads Group Slack workspace should be the main use for communication. Group messaging should be the default form of communication and direct messaging between staff and participants should be limited to one on one mentoring specifically relating to the program content or leadership development. At least one additional Global Nomads Group staff and/or associated personnel (always at least two staff/associated personnel) should always be included in the dedicated workspace to ensure proper monitoring of group and dedicated messages.
- Staff are encouraged to be transparent with their supervisor about any concerns around boundaries that may arise so that they can receive support to navigate the situation.

Maintaining Boundaries on Social Media

We recognize that social media platforms can play an important role in young people's work and can be a useful tool for communicating and building community. At the same time, it is important to maintain boundaries on social media as we work to safeguard young people and support our team's well-being and boundaries.

In the event that you are using a social media platform, such as Facebook, to engage in official, sanctioned and pre-approved Global Nomads Group activities (such would be listed in the Terms and Conditions), this should be done using an official Global Nomads Group account. Please keep the following in mind:

- If you are creating a group space (such as a Facebook group) through a social media channel, you should ensure that more than one Global Nomads Group staff or associated personnel is included.
- When possible, create a work account to manage groups or other activities on social media platforms. Keep your supervisor informed about social media accounts and activities - and your login information for Global Nomads Group affiliated accounts should be stored in LastPass and shared with your supervisor.
- Connect with your supervisor when creating a work account to manage groups or other activities on social media platforms are not possible and discuss safeguarding techniques to ensure the safety of participants, staff, and associated personnel.

SAFEGUARDING POLICY

Established December 16, 2022



- While connecting with young people on professional accounts, all other safeguarding guidelines apply -- these accounts should not be used to cross boundaries with young people.

Global Nomads Group staff members should avoid connecting directly on private accounts with young people under the age of 18 on social media platforms. Do not accept friend requests from young people under age 18 or engage in private messaging with young people under the age of 18.

Given the professional nature of LinkedIn, staff may accept connections from young people under the age of 18 but it is advised not to engage in private messaging with young people while they are participating in Global Nomads Group's programs. If a young person directly reaches out to a staff member, that staff member should not respond and instead leverage the official communication platform used for the program.

In some cases, a team member may wish to connect on Social Media with a young person 18 years or older. Social media can be a place where youth turn to promote their social justice or content creation work, network, and connect with other like-minded individuals, especially their peers. Staff should keep the following guidance in mind:

- Consider having separate personal and professional online identities/ accounts and whether that would help you maintain boundaries between your professional and personal life or between you and the young people you are working with.
- When weighing whether or not to connect with young people ages 18+ (alumni of Global Nomads Group programming) on social media, consider how you use your social media accounts: what personal information, opinions and behaviors do you exhibit on such accounts? Are you comfortable with that information being shared with our program beneficiaries? Is it appropriate? If you do connect with program beneficiaries, it is good practice to keep in mind your work with young people to make sure you do not compromise yourself or your profession.
- You should not feel pressured to connect with young people or anyone that you meet through work on social media accounts -- consider your own personal boundaries and whether you want to be contacted by the individual outside of a work context. Check your privacy settings to reflect your level of comfort with people finding you on social media -- you may wish to keep accounts private so that folks cannot follow you without your permission. If you choose not to accept a friend or follow request from a young person, you may wish to communicate with them to let them know that under our safeguarding policy, you are discouraged from connecting on social media -- when doing so, it is best to use professional lines of communication (email, etc.) to help reinforce this boundary. You may wish to connect with individuals on some platforms and not others -- for example, LinkedIn is often used for professional purposes, so it may be a

SAFEGUARDING POLICY

Established December 16, 2022



more appropriate place to connect. In the event that a young person or adult persists in trying to connect or communicate with you through social channels without your consent, you should connect with your supervisor for support navigating the situation.

- When considering whether connecting with a specific young person is appropriate, keep in mind that some individuals ages 18-25 may be particularly vulnerable -- if a young person is classed as a vulnerable adult, it is safer not to connect with them on social media, as with individuals under age 18. Likewise, if you are concerned that you or the particular young person may be more likely to cross boundaries if connected on social media, do not connect with that young person.
- Your supervisor can help you navigate these decisions and come up with a plan that works best for your well-being, while safeguarding young people.

Reporting

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

Any staff reporting concerns or complaints through formal whistleblowing channels (or if they request it) will be protected by Global Nomads Group's Whistle Blower Policy.

How to report a safeguarding concern

Staff members who have a complaint or concern relating to safeguarding should report it immediately to a Safeguarding Officer. If the staff member does not feel comfortable reporting to a Safeguarding Officer (for example if they feel that the report will not be taken seriously, or if either Safeguarding Officer is implicated in the concern), they may report to the Chief Executive Officer.

Designated Safeguarding Officer:

Nicole Goggin

Title: Senior Program Director

nicole@gng.org

Based in: United States

Pronouns: She/Her/Hers

Deputy Safeguarding Officer:

Elizabeth Knowles

Title: Chief Operating Officer

SAFEGUARDING POLICY

Established December 16, 2022



elizabeth@gng.org

Based in: United States

Pronouns: She/Her/Hers

The Designated Safeguarding Officer's responsibilities include:

- Ensure ongoing review and development of Global Nomads Group's approach to Safeguarding
- Oversee annual review of Safeguarding practices and recommend changes
- Provide advice and support to staff and associated personnel regarding safeguarding concerns
- Serve as primary point of contact for the reporting of safeguarding concerns and incidents, manage referrals/cases reported, and lead response to safeguarding concerns and incidents
- Oversee implementation of the Safeguarding Policy, including ensuring adequate training is in place for staff
- To be available to advise staff and associated personnel who encounter concerns or instances of disclosure or abuse

The Deputy Safeguarding Officer will support the Designated Safeguarding Officer in carrying out this work and is responsible for:

- Administration of the policy and related documents
- Designing and implementing systems to support our safeguarding work
- Training of team members
- Serve as an alternative point of contact for the reporting of safeguarding concerns and incidents, manage referrals/cases reported when Designated Safeguarding Officer is unavailable

Reports should be documented leveraging the [Safeguarding Incident Report Form](#). Should reports be verbally shared with a Safeguarding Officer, that Safeguarding Officer should fill out the Safeguarding Incident Report Form on behalf of the affected person(s).

Response

Global Nomads Group will follow up on safeguarding reports and concerns according to the procedure below and legal and statutory obligations.

Procedure

1. Report is received

SAFEGUARDING POLICY

Established December 16, 2022



1.1 Reports can reach the organization through various routes. This may be in a structured format such as a letter, e-mail, text, or message on social media. It may also be in the form of informal discussion or rumor. If a staff member hears something in an informal discussion that they think is a safeguarding concern, they should report that concern to the appropriate staff member in their organization (like their direct Supervisor) or a Safeguarding Officer. Further investigation to gather information and facts can be taken on a case by case basis.

1.2 If a safeguarding concern is disclosed directly to a member of the staff, the person receiving the report should bear the following in mind:

- Listen
- Empathize with the person
- Ask who, when, where, and what but not why
- Repeat / check your understanding of the situation
- Report to the appropriate staff member (see below)

1.3 The person receiving the report should then document the following information using an [Safeguarding Incident Report Form](#), which includes:

- Name of person making the report
- Name(s) of alleged survivor(s) of safeguarding incident(s) if different from above
- Name(s) of alleged perpetrator(s)
- Description of incident(s), including date(s), time(s), and location(s) of incident

1.4 The person receiving the report should then forward this information to a Safeguarding Officer within 24 hours.

1.5 Due to the sensitive nature of safeguarding concerns, confidentiality must be maintained during all stages of the reporting process, and information shared on a limited “need-to-know” basis only. This includes senior management who might otherwise be apprised of a serious incident.

1.6 If the reporting staff member is not satisfied that the organization is appropriately addressing the report, they have a right to escalate the report, either up the management line, to the Board, or to an external statutory body. The staff member will be protected against any negative repercussions as a result of this report. See Global Nomads Group’s Whistleblower Policy.

SAFEGUARDING POLICY

Established December 16, 2022



2. Assess how to proceed with the report

2.1 Appoint a Decision Maker for handling this report

2.2 Determine whether it is possible to take this report forward

- Does the reported incident(s) represent a breach in the safeguarding policy?
- Is there sufficient information to follow up this report?

2.3 If the reported incident does not represent a breach in Global Nomads Group's Safeguarding Policy, but represents a safeguarding risk to others (such as an incident that does not involve Global Nomads Group's staff or associated personnel), the report should be referred through the appropriate channels (e.g. local authorities) if it is safe to do so.

2.4 If there is insufficient information to follow up the report, and no way to ascertain this information (for example if the person making the report did not leave contact details), the report should be filed in case it can be of use in the future, and look at any wider lesson learning we can take forward.

2.5 If the report raises any concerns relating to children under the age of 18, **seek expert advice immediately**. If at any point in the process of responding to the report (for example during an investigation) it becomes apparent that anyone involved is a child under the age of 18, the Decision Maker should immediately be informed and should seek expert advice before proceeding.

2.6 If the decision is made to take the report forward, ensure that you have the relevant expertise and capacity to manage a safeguarding case. **If you do not have this expertise in-house, seek immediate assistance** through external capacity if necessary.

2.7 Clarify what, how, and with whom information will be shared relating to this case. Confidentiality should be maintained at all times, and information shared on a need-to-know basis only. Decide which information needs to be shared with which stakeholder - information needs may be different.

2.8 There may be separate policies depending on the type of concern the report relates to. For example workplace sexual harassment is dealt with through Global Nomads Group's HR Department. If there isn't a policy for the type of report that has been made, follow these procedures.

SAFEGUARDING POLICY

Established December 16, 2022



2.9 Check your obligations on informing relevant bodies when you receive a safeguarding report. These include (but are not limited to):

- Funding organizations
- Umbrella bodies/networks
- Statutory bodies

Some of these may require you to inform them when you receive a report, others may require information on completion of the case, or annual top-line information on cases. When submitting information to any of these bodies, think through the confidentiality implications very carefully.

3. Appoint roles and responsibilities for case management

3.1 If not already done so (see above), appoint a Decision Maker for the case. The Decision Maker should be a senior staff member, not implicated or involved in the case in any way.

3.2 If the report alleges a serious safeguarding violation, you may wish to hold a case conference. This should include:

- Decision Maker
- HR manager
- Safeguarding Officer
- Person who received the report (if different from the above)

The case conference should decide the next steps to take, including any protection concerns and support needs for the survivor and other stakeholders (see below).

4. Provide support to survivor where needed/requested

4.1 Provide appropriate support to survivor(s) of safeguarding incidents. This should be provided as a duty of care even if the report has not yet been investigated. Support could include (but is not limited to):

- Psychosocial care of counseling
- Medical assistance
- Protection or security assistance (for example being moved to a safe location)

4.2 All decision making on support should be led by the survivor.

SAFEGUARDING POLICY

Established December 16, 2022



5. Assess any protection or security risks to stakeholders

5.1 For reports relating to serious incidents: undertake an immediate risk assessment to determine whether there are any current or potential risks to any stakeholders involved in the case, and develop a mitigation plan if required.

5.2 Continue to update the risk assessment and plan on a regular basis throughout and after the case as required.

6. Decide on next steps

6.1 The Decision Maker decides the next steps. The could be (but are not limited to):

- No further action (for example if there is insufficient information to follow up, or the report refers to incidents outside the organization's remit)
- Investigation is required to gather further information
- Immediate disciplinary action if no further information is needed
- Referral to relevant authorities

6.2 If the report concerns associated personnel (for example contractors, consultants, or suppliers), the decision making process will be different. Although associate personnel are not staff members, we have a duty of care to protect anyone who comes into contact with any aspect of our program from harm. We cannot follow disciplinary processes with individuals outside of our organization, however decisions may be made for example to terminate a contract with a supplier based on the actions of their staff.

6.3 If an investigation is required and the organization does not have internal capacity, identify the resources to conduct the investigation. Determine which budget this will be covered by.

7. Manage investigation if required

7.1 Refer to the organization's procedures for investigating breaches of policy. If these do not cover safeguarding investigations, use external guidelines for investigating safeguarding reports, such as the [Child Welfare Information Gateway](#).

8. Make decision on outcome of investigation report

8.1 The Decision Maker makes a decision based on the information provided in the investigation report. Decisions relating to the Subject of Concern should be made in accordance with existing policies and procedures for staff misconduct.

SAFEGUARDING POLICY

Established December 16, 2022



8.2 If at this or any stage in the process criminal activity is suspected. The case should be referred to the relevant authorities *unless this may pose a risk to anyone involved in the case*. In this case, the Decision Maker together with other senior staff will need to decide how to proceed. This decision should be made bearing in mind a risk assessment of potential protection risks to all concerned, including the survivor and the Subject of Concern.

9. Conclude the case

9.1 Document all decisions made resulting from the case clearly and confidentially.

9.2 Store all information relating to the case confidentially, and in accordance with Global Nomads Group's policy and local data protection law.

9.3 Record anonymized data relating to the case to feed into organizational reporting requirements (e.g. serious incident reporting to the Board, safeguarding reporting to donors), and to feed into learning for dealing with future cases.

Global Nomads Group will apply appropriate disciplinary measures to staff found in breach of policy.

Confidentiality

It is essential that confidentiality is maintained at all stages of the process when dealing with 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.

Associated policies

Whistleblower Policy

[Safeguarding Incident Report Form](#)