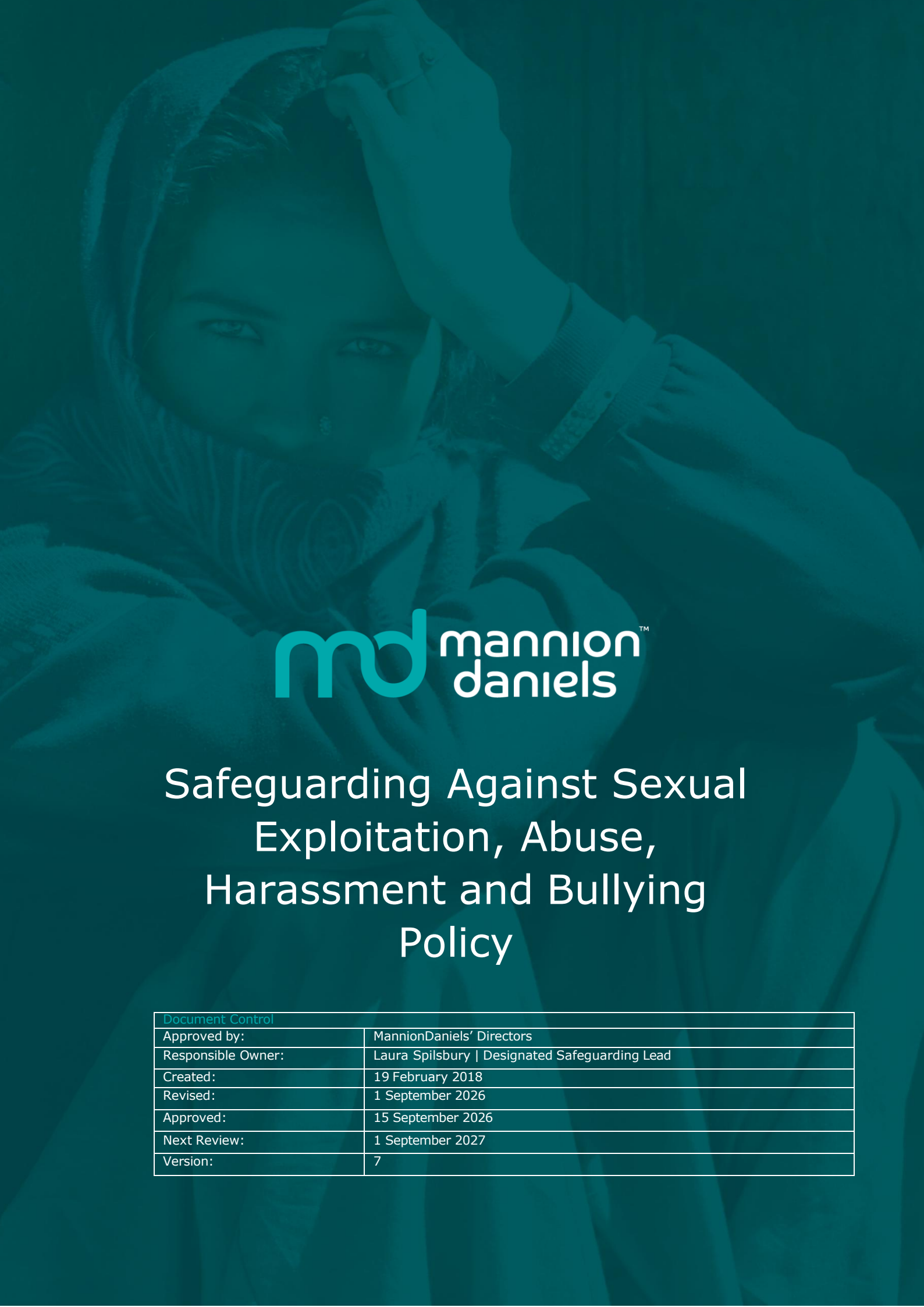

Safeguarding Against Sexual Exploitation, Abuse, Harassment and Bullying Policy

Document Control	
Approved by:	MannionDaniels' Directors
Responsible Owner:	Laura Spilsbury | Designated Safeguarding Lead
Created:	19 February 2018
Revised:	1 September 2026
Approved:	15 September 2026
Next Review:	1 September 2027
Version:	7

1. Policy Statement

MannionDaniels has a zero tolerance approach to safeguarding violations. We believe that everyone has the right to live free from abuse of any kind. We will not tolerate abuse in our workplace or related to any aspect of our work. For the purpose of this policy MannionDaniels defines 'abuse' as any form of child or adult abuse, including sexual exploitation, harassment and bullying. Our commitment to safeguarding is aligned with the UK's Safeguarding Strategy[1].

MannionDaniels recognises that abuse often comes about as a result of an imbalance of power. We also recognise and acknowledge our relative position of power in our working relationships with implementing partners (including grant-holders and grantees) and with the project participants of those implementing partners.

Safeguarding rests on the need to maintain professional behaviour at all times when working for, or when representing MannionDaniels for work. There are elements of kind, respectful and civil behaviour, resulting in professional conduct, that all staff and associated partners have the responsibility to consistently practice.

2. Purpose and Scope

This policy applies to all MannionDaniels staff including those employed by the wider MannionDaniels Group and associated parties.

The policy sets out the safeguarding responsibilities of those who work for and with MannionDaniels. Throughout this policy we refer to the term 'staff and associated parties'. The term 'staff' refers to MannionDaniels' staff members, including staff employed by the wider MannionDaniels Group. The term 'associated parties' refers to consultants, volunteers, interns, secondees, board members, trustees and our partners.

We will treat any breach of this policy very seriously. For staff, failure to follow this policy could lead to disciplinary action, which may ultimately result in dismissal. For associated parties who work with us, we reserve the right to immediately terminate your contract/association with MannionDaniels.

As a Fund Manager, MannionDaniels provides grants on behalf of wide-ranging clients to implementing partners delivering projects on the ground. Within our role as Fund Manager, we are responsible for ensuring implementing partners have appropriate and contextual safeguarding policies and procedures in place and that any safeguarding incidents or concerns are reported to the respective client in line with their own safeguarding policies and procedures.

The safeguarding policy should be read in conjunction with all other relevant policies and procedures including, but not limited to: the Health and Safety Policy, the Business Code of Ethics, the Diversity, Equality and Inclusion Policy,

[1] UK strategy on protection from sexual exploitation, abuse and harassment in international work.

the Recruitment and New Starter's Policy, Modern Slavery Policy and the Whistleblowing Policy.

3. Definitions

Safeguarding: the preventative action taken to protect our staff, associated parties and all individuals who come into contact with our organisation. We use the term safeguarding to refer to the following:

- Preventing and responding to bullying, harassment and/or abuse within the work setting
- Preventing sexual exploitation, abuse and harassment of all who come into contact with our organisation
- Putting in place systems, processes and procedures to protect our staff, associated parties and individuals who come into contact with our organisation from risk or impropriety.

Abuse: any action (or lack of action) that intentionally or unintentionally causes harm, exploitation, or distress to another person, particularly someone who is vulnerable and unable to protect themselves. This includes sexual exploitation, physical and verbal abuse, harassment and bullying.

Bullying: repeated unreasonable behaviour over time, where the behaviour causes or has the potential to cause harm to another person or persons. Such behaviour can be defined as any unsolicited or unwelcome act that humiliates, intimidates or undermines the individual involved and includes cyber-bullying. Bullying is a form of abuse, which can come from staff or peer behaviour.

Child: although we work in a wide variety of countries where the definition of a child varies, MannionDaniels considers anyone under the age of 18, a child.

Sexual Abuse[2]: means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. Any sexual activity with children (persons under the age of 18 years) constitutes sexual abuse.

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. It includes but is not limited to exchanging money, employment, goods or services for sex. This includes transactional sex regardless of the legal status of sex work in the country. It also includes any situation where sex is coerced or demanded by withholding or threatening to withhold goods or services or by blackmailing.

Sexual Harassment: unwanted contact of a sexual nature that violates a

[2] MannionDaniels applies the United Nations definitions of sexual abuse and exploitation

person's dignity, makes them feel intimidated, degraded, humiliated, or creates a hostile or offensive environment. It can be verbal, non-verbal or physical.

4. Roles and responsibilities

Company responsibilities: We have a responsibility to keep all children and adults that come into contact with our organisation safe and will do everything in our power to ensure they are safeguarded. We will do this by:

- Valuing them, listening to and respecting them
- Keeping them at the centre of everything we do
- Adhering to robust safeguarding policies and procedures
- Ensuring that the organisations we provide grants to have appropriate safeguarding measures in place
- Providing effective management for staff through supervision, support and training.

MannionDaniels is responsible for the actions of our staff and any associated parties we work with, or who works on our behalf. As an employer, MannionDaniels is responsible for ensuring the safeguarding policy is clear and there is adequate and appropriate training for each level of staff or associated party.

In our role as Fund Manager, MannionDaniels is responsible for conducting safeguarding due diligence on organisations that we grant funds to, both initially and then for the duration of the grant through regular monitoring. Additionally, we use a multi-staged due diligence process during business development and pre- contracting stages when considering the engagement of business partners (sub-contractors, suppliers, vendors, etc.). We assess the fitness of all potential partners during the pre- contracting stage, and our safeguarding checks conducted as part of this process are proportionate to each partner's role. Depending on the nature of planned work, we review the partner's policies and processes in place to safeguard their own staff and project participants. We also discuss issues that may arise based on work to be undertaken and apply appropriate measures to manage the identified risks.

MannionDaniels is not, and cannot be, responsible for the individual safeguarding of those who work for, or are project participants of, implementing partners (charities and CSOs we have granted funds to) other than from abuse by our staff and associated parties. Our responsibility lies in ensuring the implementing partner has real and effective policies and processes in place to safeguard their own staff and project participants. There will be slightly different but similar processes in place for each Fund MannionDaniels manages to ensure we maintain this responsibility to implementing partners. If you are unsure of these requirements, please speak to the relevant Project Manager.

Individual responsibilities:

It is the responsibility of every staff member and associated party to have read and understood this safeguarding policy. If you are unsure what this policy means or how it relates to you and your role within MannionDaniels, please contact the Designated Safeguarding Lead (contact details listed below).

All those who work for or with MannionDaniels play a role in safeguarding children and adults, and there are individuals within MannionDaniels with specific safeguarding responsibilities:

Designated Safeguarding Lead:

Laura Spilsbury (laura.spilsbury@manniondaniels.com)

The responsibility of the MannionDaniels Designated Safeguarding Lead will be to act on all safeguarding concerns. The Designated Safeguarding Lead will:

- Respond to a concern as soon as it raised, and within 24 hours of the concern being reported
- Take all details of the concern raised and determine the best course of action. Where the concern relates to a survivor, ascertain whether the individual in question is still potentially at risk of harm and if so, take action to safeguard them. Following this, determine what form of investigation or other course of action is required
- Take advice from relevant authorities in the countries in question
- Ensure investigations are carried out fairly, thoroughly and promptly
- Act on the investigation, including any further action to protect the survivor in question from harm, and ensure any disciplinary action that may be needed for the perpetrator
- Inform the person who raised the safeguarding concern of the investigation findings and actions, as appropriate
- Update the safeguarding register and company risk register
- Reflect on the report and investigation with the Deputy Safeguarding Lead and Director with responsibility for Safeguarding to ensure lessons are learnt and procedures strengthened if needed.

Deputy Designated Safeguarding Lead:

Emma Hayward (emma.hayward@manniondaniels.com)
The responsibility of the MannionDaniels Deputy Safeguarding Lead will be to support the Designated Safeguarding Lead in their role and deputise as and when needed.

Director with responsibility for safeguarding:

Matthew Wiltcher (matthew.wiltcher@manniondaniels.com)
The responsibility of the Director with responsibility for Safeguarding is to ensure that Safeguarding is represented at Board and Senior Leadership level and to deputise as and when needed.

These specific individuals represent each level of governance: Leadership Team,

Senior Management Team and Board Level. They have all received safeguarding training. Whilst it is expected that staff and associated parties report safeguarding concerns and incidents to the Designated Safeguarding Lead, they can also report to the Deputy Designated Safeguarding Lead and the Director with responsibility for Safeguarding too. All safeguarding reports made to these individuals will be acted on immediately and in line with our safeguarding policy and procedure.

5. Expected behaviour and conduct

All staff and associated parties are expected to behave in a professional and respectful manner at all times whilst working on behalf of and representing MannionDaniels.

In terms of preventing sexual exploitation, abuse and harassment, specific conduct and behaviours are expected, this includes:

- Not engaging in sexual activity with anyone under the age of 18. Mistaken belief in the age of the individual will not be considered a defence
- Not exchanging money, employment, goods, or services for sexual favours
- Not using language or making suggestions which are inappropriate or abusive, or could be construed that way
- Always being visible to others when working with children. There should never be a situation in which a staff member or associated party working on behalf of MannionDaniels is alone with a child. You must be accompanied at all times by an appropriate individual (e.g. a project worker, relative, carer or teacher)
- Not developing relationships with children or adults at risk which could in any way be deemed exploitative or abusive
- Not taking images or filming anyone using personal equipment, without prior agreement with MannionDaniels and without explicit and informed consent from the individual. All images and film taken on personal equipment in prior agreement with MannionDaniels should be promptly and securely shared and stored and then immediately deleted from your device
- Never sharing personal details or images or connecting to project participants on social media through your personal social media platforms, or in any other way
- Not using the MannionDaniels network and equipment directly or indirectly for the download, creation, manipulation, transmission or storage of offensive, obscene or indecent images, data or other material (including pornography) or any data capable of being resolved into obscene or indecent images or material

- Moderating intake of alcohol when representing MannionDaniels in a professional or social setting

In terms of preventing bullying, harassment and/or abuse within the work setting, all staff and associated parties are expected to treat each other with kindness, civility, respect and dignity, and thus maintain professional behaviour at all times in the workplace or when representing MannionDaniels.

- By kindness, we expect you to think positively of others and always be polite, avoiding any rudeness or micro-aggressions

- By civility, we expect you to treat others in an orderly and calm manner, even when faced with situations of stress

- By respect, we expect you to consider others' perspectives and accept differences

- By dignity, we expect you to value others, taking an inclusive approach and treating everyone ethically regardless of any differences in perspectives, culture, nationality, gender, age, sexuality, ethnicity etc.

6. Reporting a concern

MannionDaniels has a clear process for handling safeguarding incidents and allegations (see Annex 1). **All staff and associated parties who have a safeguarding concern or are informed of a safeguarding incident must report this as soon as they become aware**.

Reports can be made to the three individuals named above, who each hold safeguarding responsibilities within MannionDaniels. Reports can be made in person or via email.

MannionDaniels also has a central safeguarding inbox which reports can be made to (safeguarding@manniondaniels.com). Only the three individuals named above have access to this inbox.

7. Confidentiality and record keeping

Our overriding consideration will be the welfare of any survivors and whether their welfare remains at risk – as such absolute confidentiality cannot be promised. That said, all safeguarding reports made will be treated sensitively and information limited to those with safeguarding responsibility.

The Designated Safeguarding Lead at MannionDaniels maintains a safeguarding register that is updated to reflect all safeguarding cases. This is stored in a private space using our online document storage system, and only staff with responsibilities for safeguarding have access to it.

8. Safe Recruitment

MannionDaniels is committed to fair and robust recruitment processes, including safer recruitment checks of all staff. We have different levels of security and recruitment checks relative to the safeguarding requirements of our roles, and the relevant authorities in the countries where we work.

MannionDaniels provides mandatory safeguarding training at induction, and then annually to all staff. We also provide safeguarding training to all consultants who are contracted to deliver work on behalf of MannionDaniels, this is commensurate to the type of activities they will undertake and the level of safeguarding risk identified.

Policy schedule and endorsement

This safeguarding policy will be reviewed, approved and endorsed by the board annually or when legislation changes.

Signature, name and date of Director with Safeguarding Responsibilities

Matthew Wiltcher
15 September 2026

Annex 1: Reporting and handling of safeguarding concerns

Safeguarding report received

- Safeguarding allegation or concern received by the Designated Safeguarding Lead, Deputy Designated Safeguarding Lead, or the Director with responsibility for Safeguarding

Safeguarding meeting

- Within 24 hours of the report being received, the Designated Safeguarding Lead, Deputy Designated Safeguarding Lead, and the Director with responsibility for Safeguarding meet to discuss the incident, with all facts known at the time of the report shared among the group.
- The group discuss and decide on whether:
    - Any survivors are still at risk and if so, to provide necessary support and protection to them
    - Whether the concern meets the threshold for a formal safeguarding investigation
    - Whether more information is needed to be gathered before a decision can be made
    - Inform authorities (e.g. police or local authorities in the specific country) and relevant stakeholders (partners or client)
- If an investigation is required, Terms of Reference and an investigation plan will be drafted and agreed

Investigation

- Interviews with relevant parties, including witnesses, survivors and alleged perpetrators conducted to establish facts
- Review any evidence available e.g. case notes, CCTV, or digital evidence.
- The investigation will be conducted sensitively, respecting confidentiality and consent where appropriate
- Throughout risks will be continually assessed and protective action taken
- Once investigation is complete, an investigation report will be drafted and circulated among the investigation team. This will include:
    - An overview of the investigation carried out
    - Whether the safeguarding concern/allegations is substantiated, unsubstantiated, or inconclusive and subsequent actions taken from this
    - Whether any gaps have been identified in our safeguarding policies and processes (e.g. lack of training or supervision).
    - Actions to be taken to prevent a similar incident from occurring in the future

Post-Investigation

- Provide ongoing support to any survivors (e.g. counselling, advocacy, health services).
- Communicate findings to all relevant parties while respecting confidentiality and data protection.
- Log incident in the safeguarding register
- Create action plan to address any identified control weaknesses or gaps