

**SAFEGUARDING POLICY**

**OS HUB COMMITMENT TO SAFEGUARDING**

Open Supply Hub (OS Hub) exists to improve human rights and environmental conditions in and around factories and facilities by opening up supply chain data as a free, public good.

We take seriously our responsibility to safeguard those who work with OS Hub or on our behalf. OS Hub is committed to a work environment in which all individuals are treated with respect and dignity. Each individual has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits unlawful discriminatory practices, including harassment. We also uphold our responsibilities to Do No Harm through the work we do.

**INTRODUCTION**

Safeguarding is the responsibility of organizations to make sure their staff, operations, and programs or services do no harm to children and adults at-risk nor expose them to abuse or exploitation. We also use this term to include protecting our staff and associated personnel from harm resulting from working with us. Safeguarding includes (but is not limited to) a user of our services being harmed by staff or associated personnel, or put at risk of harm by the work of OS Hub. It includes a staff member being harmed by other staff or associated personnel, or put at risk of harm in the course of their work with OS Hub.

This policy applies to all OS Hub staff and associated personnel as well as to others with whom OS Hub has a contractual responsibility.

We also have a duty of care to deal with safeguarding concerns we become aware of in the course of our work, that are not caused by OS Hub. We recognize that the work of OS Hub involves coming into contact with organizations where OS Hub may observe safeguarding concerns. We commit to raising these concerns through the relevant reporting route detailed below. Our response, including referrals to other parties or services, will ensure we do not present risks of further harm to those we intend to safeguard.

**OUR VALUES AND SAFEGUARDING**

OS Hub is committed to values which guide how we deliver on our safeguarding commitments

<b>Collaborative</b>
We collaborate on implementing our safeguarding commitments, ensuring that we uphold the highest standards and encourage staff and others to speak out. We collaborate with experts on safeguarding as and when required, including to conduct investigations into harm where it is caused by OS Hub.
<b>Open</b>
We create open environments where staff and others can discuss safeguarding, can feel safe in their interactions with OS Hub and confident to report.
<b>Optimistic</b>
We will continue to strive to meet high standards of safeguarding, be mindful of the risks that might be presented by the work we do and safeguard effectively whilst still achieving our goals.

## OUR SAFEGUARDING STANDARDS

We deliver our safeguarding commitments through OS Hub Safeguarding Standards which are in line with international standards for safeguarding and reflect the nature of OS Hub's work.

<b>Safeguarding Culture</b>
Describes how OS Hub creates a culture for safeguarding, fostering openness and transparency and adopting zero tolerance for unacceptable behaviors.
<b>Governance and Accountability</b>
Describes OS Hub's governance and accountability processes for ensuring that the organization implements the Safeguarding Policy
<b>Safe People Practices</b>
Describes how OS Hub HR systems and processes integrate safeguarding requirements and ensure that our staff (and others) understand our safeguarding commitments.
<b>Safe Stakeholder Engagement Practices</b>
Describes how we identify and mitigate risks of our stakeholder engagement.
<b>Safe Product Data</b>
Describes how we ensure that our data management practices are as safe as is possible with an open source registry.
<b>Safe Reporting and Response</b>
Describes our reporting and response mechanisms for staff and others to report concerns.

## ROLES AND RESPONSIBILITIES

OS Hub will:

- Ensure all staff have access to, are familiar with, and know their responsibilities within this policy
- Ensure that the Board and staff, and associated personnel, understand expectations on behaviour through the Board Code of Ethics and staff/associated personnel code of conduct in the Employee Handbook
- Ensure that people are protected from harassment, exploitation and abuse when undertaking activities on behalf of OS Hub

Management will:

- Ensure the Safeguarding Policy is reviewed and updated every 2 years
- Manage safeguarding risks associated with their area of responsibility
- Review progress with implementing the Safeguarding Policy, through reviewing the implementation plan on a quarterly basis
- Review how we are meeting OS Hub Safeguarding Standards every 2 years
- Provide appropriate care, support and protection for those involved in safeguarding concerns or cases

Staff/associated personnel will:

- Contribute to creating and maintaining an environment that prevents safeguarding violations and promotes the implementation of the Safeguarding Policy
- Abide by the relevant code of conduct
- Report any concerns or suspicions regarding safeguarding violations
- Cooperate fully and confidentially in any investigation of concerns

## **PREVENTING HARM**

### Creating an environment for safeguarding

OS Hub recognizes that creating an environment for safeguarding entails promoting an open and transparent culture, embracing diversity, challenging inequity and encouraging staff and others to speak out. We make clear our commitment to diversity and inclusion in our Employee Handbook.

### Managing Risk:

OS Hub has introduced risk management practices for the organization. OS Hub identifies safeguarding as a key risk and incorporates the key or significant risks in OS Hub risk management plan.

### Recruitment and Performance Management:

OS Hub implements stringent safeguarding procedures when recruiting and managing staff and others. We ensure that commitments to safeguarding are included at all stages of our recruitment and that background checks on potential candidates are thorough. Our performance management system provides the opportunity for staff to discuss concerns regarding OS Hub's Safeguarding Policy with management, as well as how they are meeting their responsibilities for implementation.

### Building Awareness and Good Practice:

OS Hub provides induction and regular refresher training for staff on safeguarding. In addition to these formal awareness raising opportunities, managers are supported to regularly communicate on safeguarding, ensuring that OS Hub maintains good practice.

### Safeguarding in Stakeholder Engagement:

OS Hub endeavors to ensure that its stakeholder engagement activities do not put staff or others at risk of harm. Stakeholder engagement practices are informed by clear guidance on that engagement, including the action that OS Hub takes when observing safeguarding concerns as part of that engagement or having concerns reported directly to staff or OS Hub. We have the necessary information to report and refer these concerns safely within the locations in which OS Hub has a presence.

### Safeguarding in Product Data:

OS Hub incorporates safeguarding measures into its data management whilst maintaining the registry as open source.

### Encouraging Reporting:

We are committed to supporting our staff to speak out, to facilitating the reporting of safeguarding concerns, to ensuring prompt and effective response, not retaliating and defending/protecting staff, and others, who come forward.

Staff who witness or become aware of safeguarding concerns by colleagues have a duty to report their concern. Reports can be made to an employee's direct managers, OS Hub's Compliance Officers, or anonymously on OS Hub's third-party compliance platform, [AllVoices](#). OS Hub stakeholders can find further details on the reporting process in the OS Hub Whistleblower Policy.

If the concern relates to the OS Hub Executive Director, a report can be made to the Compliance Officers and/or the Board. Those who report safeguarding concerns will be entitled to protection

against retaliation. However, making malicious reports with the intention to harm the reputation of an individual or OS Hub is considered misconduct as described in the Employee Handbook.

Staff who observe, or receive reports of, violations in stakeholder operations should report this to the OS Hub Compliance Officers through AllVoices. The OS Hub Safeguarding Compliance Officers will be responsible for referring, or responding to, these cases as appropriate.

OS Hub will also accept reports that relate to harm caused by OS Hub from external sources such as members of the public, stakeholders etc. Reports of harm caused by OS Hub from external sources should be made through AllVoices.

#### Effective Response:

OS Hub ensures that its response to safeguarding reports is guided by survivor-centred principles. We put the best interests of the survivor front and center, respecting the decision-making rights of the survivors, maintaining confidentiality and responding in a timely and appropriate manner.

Investigations into safeguarding concerns will follow the same procedures found in the Whistleblower Policy section "Handling Reported Violations." Upon the opening of an investigation and the invitation of third party investigative counsel, collaborators, or partners, OS Hub will select trained independent investigators in coordination with the board who understand the impact of trauma and how it affects the survivor.

OS Hub supports survivors of harm caused by OS Hub with referrals to assistance from relevant and safe service providers. Where the local law requires, and it is judged safe for the survivor to do so, OS Hub will report serious incidents to the local authority. OS Hub will discuss doing so with the survivor to ensure their best interests are upheld.

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Breaches of this policy and failure to comply with these responsibilities will lead to disciplinary action which could include possible dismissal, as outlined in OS Hub Employee Handbook.

#### Monitoring and Review:

This policy has been approved by the Board and will monitor its implementation on a quarterly basis.

## **POLICY ACKNOWLEDGMENT**

*All employees and consultants must comply with OS Hub's Safeguarding Policy.*

I hereby declare that I have read, understand and will abide by OS Hub's **Safeguarding Policy** and have never been subject to prosecution for acts in contravention of this policy.

**Signed:**

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Name:

Title:

Date:

## **ANNEX A: DEFINITIONS**

**Children:** In line with the UN Convention on the Rights of the Child, OS Hub defines anyone under the age of 18 as a child.

**Adults at-risk:** Sometimes also referred to as vulnerable adults. 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 him or herself, or unable to protect him or herself against significant harm or exploitation.

Being at risk is not a 'fixed' characteristic but rather changes due to a range of factors, and can change over time. For example a person living with a disability may not be at risk in their own usual environment, but may become so if they are displaced and away from their usual coping mechanisms.

**Harm:** For the purpose of OS Hub policy, harm includes (but is not limited to) emotional, physical or sexual harassment, exploitation or abuse and neglect. Harm to children consists of anything which individuals, institutions or processes do or fail to do, intentionally or unintentionally, which harms a child or damages their well-being, dignity and prospect of safe and healthy development into adulthood.

**Staff:** Refers to all those on contracts with OS Hub, including secondees and consultants.

**Associated personnel:** Refers to members of the Board of Trustees or OS Hub's advisory bodies, interns, volunteers, donors, journalists and others undertaking activities for OS Hub but not on formal contracts.

## ANNEX B: OS HUB SAFEGUARDING STANDARDS

<b>Safeguarding Culture</b>
The organization has clearly defined values and an open and transparent culture which embraces diversity, challenges inequity and encourages staff and associates to speak out
There is a zero tolerance of unacceptable behaviors within the workplace, and unacceptable behaviors are challenged
Senior staff model leadership behaviors which create safe environments and demonstrate accountability for safeguarding
The organization attracts a diverse staff team, particularly for positions who have key decision-making responsibilities for safeguarding staff, children and communities
Staff, and others as relevant, in all their diversity, participate in decision-making and are treated with dignity and respect
<b>Governance Accountability</b>
The Board of Trustees and Senior Management Team have clearly defined accountabilities for safeguarding
Focal points for safeguarding, who coordinate the development and implementation of the Safeguarding Policy and procedures, are assigned from different positions
A Safeguarding Policy (or combination of policies) is in use and regularly communicated to all staff, and others as relevant, in a manner which suits them
An implementation plan is in place, identifying gaps in safeguarding measures and actions to address the gaps, which is monitored on a quarterly basis
Monitoring and evaluation processes include indicators for measuring safeguarding practices, using international standards as a basis
Learning is fed back into organizational implementation plans
<b>Safe People Practices</b>
People practices are built on diversity and inclusion
Recruitment and engagement processes integrate the necessary safeguards
Capacity building opportunities on safeguarding are available for staff, and others as relevant
Performance management processes include appropriate safeguards
Discipline and grievance processes are explicit with regard to safeguarding
<b>Safe Stakeholder Engagement Practices</b>
The national and local situation, legal context, and support services where in person stakeholder activities take place is mapped and understood
Potential risks of harm of stakeholder engagement practices are identified and addressed
Stakeholders, where appropriate, are made aware of the Open Supply Hub's safeguarding commitments and expectations
<b>Safe Product Data</b>
Safeguarding measures are incorporated into all forms of data management
Expanding the digital platform integrates safeguarding requirements
<b>Safe Reporting and Response</b>
Complaints and reporting mechanisms have been set up in consultation with staff and others who need to use them
Written procedures are in place on responding to reports or concerns relating to harm and abuse, including making referrals and reporting criminal cases safely where these have been caused by OS Hub
Investigations are undertaken by experienced professionals, who are trained on sensitive investigations such as allegations of sexual exploitation and abuse or child abuse