Policy/Procedure Revision History

Policy owner:	Human Resources		
Policy ID:	HR25 – Safeguarding Policy		
Year developed:	2005		
Revision number:	001		
Revision initiated/prepared by:		**Date:**	
Proposed changes:			
1st review by:	COO – Hayley Elwen	**Review date:**	14 March 2024
Agreed changes:	Additions to policy to cover broader community, and project work in communities		
Comments			
		Date approved	
		Effective date	
Revision number:	00		
Revision initiated / prepared by:		**Date:**	
Proposed changes:	**Reviewed:** To ensure correctness legality and writing style updated		
1st review by:	SERC/EMT	**Review date:**	
Agreed changes:	(summarise agreed changes)		
Comments			
		Date approved	
		Effective date	

Safeguarding Policy

1. Introduction

Safeguarding relates to preventing harm to individuals and the abuse of human rights. It protects the health, well-being and rights of individuals, particularly vulnerable groups.

2. Overview

The Endangered Wildlife Trust (EWT) is committed to protecting the safety and welfare of the individuals with whom it works alongside. The EWT acknowledges its duty to act appropriately to any allegations, reports, or suspicions of abuse, and will work to protect and prevent the abuse of vulnerable individuals.

3. Definitions

For the purposes of this policy, the following terms have the following meanings:

3.1 **Child:** any person under the age of 18.

3.2 **Mental Capacity:** an individual's ability to:

3.2.1 Understand the implications of their situation and risk to themselves.

3.2.2 Act to Prevent Abuse; or

3.2.3 Fully participate in decision-making about interventions involving them, be they life-changing events or everyday matters.

3.3 **Staff:** all individuals working for the EWT or at any of the EWT's premises or on any of the EWT's projects irrespective of their status, level, or grade. This includes but is not limited to, all employees, trustees, volunteers, consultants, contractors, and interns.

3.4 **Vulnerable Adult:** any person aged 18 years and over who has or may have a substantial learning or physical disability, a physical or mental illness or mental impairment, chronic or otherwise (including an addiction to alcohol or drugs), or a significant reduction in physical or mental capacity or any individual who may be particularly susceptible to exploitation or harm due to their gender, sexual orientation, social and/or economic circumstances.

3.5 **Vulnerable Person:** a Child or a Vulnerable Adult.

4. Policy Statement

The EWT believes that all individuals have a right to be protected from all forms of harm, abuse, neglect and exploitation. The EWT will not tolerate the abuse of any Staff or Vulnerable Persons in any form. The aim of this policy is to demonstrate the EWT's commitment to safeguarding individuals and to ensure that all Staff act appropriately in response to any concern regarding the abuse of a Vulnerable Person.

Safeguarding is the process of protecting a Vulnerable Person from abuse or neglect, preventing any adverse effect to their health and wellbeing and ensuring they are living in circumstances consistent with the provision of safe and effective care. This also includes ensuring that any Vulnerable Person can maintain control over their life and make informed decisions without undue pressure.

4.1 **The EWT will ensure that:**

4.1.1 All Staff are familiar with this policy and its procedures and that the welfare of every Vulnerable Person is of paramount importance;

4.1.2 Every Vulnerable Person will be treated with professionalism, dignity and respect.

4.1.3 Any concerns or suspicion of abuse or mistreatment of a Vulnerable Person are reported through the appropriate channels, as set out in this policy, without delay.

4.1.4 Confidentiality is strictly observed, unless in a situation in which the EWT is obliged by law or any other regulation to share.

4.1.5 Concerns or allegations of abuse of a Vulnerable Person are always taken seriously, investigated properly and acted on urgently and appropriately

5. Recognising Abuse

Different forms of harm or mistreatment of a Vulnerable Person are categorised under the broader term "abuse". The most defined types of abuse are:

5.1 Physical: violence towards or deliberate injury of a person, including but not limited to hitting, slapping, pushing, kicking, misuse of medication, unlawful or inappropriate restraint;

5.2 Neglect: including but not limited to persistent failure to meet a person's basic physical and/or psychological needs and neglecting to care for personal hygiene or health;

5.3 Sexual: including but not limited to using a person for sexual gratification, unwanted sexual activity, or behaviour;

5.4 Psychological: including but not limited to behaviour which adversely affects a person's self-esteem, harassment, and emotional abuse which causes distress, whether verbal or non-verbal;

5.5 Financial and Material: including but not limited to theft, fraud, exploitation, and pressure in connection to wills, property, inheritance, and financial transactions, or inciting a person at risk to do any of these things on another individual's behalf, the misuse or misappropriation of property, possessions, and benefits of an person;

5.6 **Sexual Exploitation:** including but not limited to placing a person in an exploitative situation and by way of example the Vulnerable Person receives gifts, money, or affection as a result of performing sexual activities or others performing sexual activities on them.

The above list is intended to be a guide and is not exhaustive.

6. Prohibited Behaviour

Staff are strictly prohibited from engaging in any of the following:

6.1 Inflicting, encouraging, condoning, participating in, or allowing the abuse or risk of any mistreatment or abuse of a Vulnerable Person;

6.2 Failing to report any suspicion of abuse or mistreatment of a Vulnerable Person;

6.3 Failing to disclose any criminal convictions, ongoing investigations, or police action that the Staff member has been subject to, including but not limited to, any convictions or investigations relating to the abuse or mistreatment of another person or any sexual offence;

6.4 Abusing their position to withhold professional assistance or give preferential treatment, gifts, or payment of any kind to a Vulnerable Person, or another person in relation to a Vulnerable Person, in order to solicit any form of advantage or sexual favour.

6.5 Using inappropriate language or otherwise acting inappropriately towards, or in front of, a Vulnerable Person, including but not limited to language or conduct involving the Vulnerable Person (or others) that is harassing, sexual contact, abusive, sexually provocative, sexual contact or that is intended or could have the effect of shaming or humiliating the Vulnerable Person or others;

6.6 Recruiting a Vulnerable Person for any work of any kind which is inappropriate for their age or stage of development, which interferes with their time available for education and recreational activities, which places them at risk of injury, or is in convention of any relevant laws pertaining to working with children, including those in relation to Child labour;

6.7 Acting in ways intended to shame, humiliate, belittle, or degrade a vulnerable person, or otherwise perpetrate any form of abuse.

6.8 Spending excessive time alone with a vulnerable person, away from others, behind closed doors, in a vehicle, or a secluded area without permission from the person's parent, guardian, or caregiver.

6.9 Inviting unaccompanied children or vulnerable adults into private residences unless they are at immediate risk of injury or in physical danger.

6.10 Sleep close to unsupervised children unless absolutely necessary (for example space constraints), in which case the supervisor's permission must be obtained, and ensure that another adult is present if possible (noting that this does not apply to an individual's children or family).

6.11 Hitting or otherwise physically assaulting or abusing vulnerable people.

6.12 Doing things of a personal nature for a child that they could do for themselves or show favour or provide gifts to vulnerable people to the exclusion of others.

6.13 Be under the influence of alcohol or drugs when assuming responsibility for a child or vulnerable person.

6.14 Exploiting children for labor (for example dangerous agricultural or forestry activities) or sexual purposes (for example prostitution) or any other conditions

6.15 Attempting to contact, visit, or have any communication with any Vulnerable Person with whom the Staff member has come into contact with as part of their work for the Charity, outside of their normal duties with the Charity or without written permission;

6.16 Taking, distributing, or publishing images of a Vulnerable Person without consent; or that are exploitative or do not respect their dignity.

6.17 Any other breach of this policy.

The above list is intended to be a guide and is not exhaustive. These prohibited behaviours should be read in line with the EWT's Disciplinary Policy, and any breach will be dealt with under the Disciplinary Procedure and may be treated as gross misconduct leading to summary dismissal.

7. Safeguarding Concerns

7.1 If Staff receive an allegation of abuse, they should:

7.1.1 Provide reassurance to the Vulnerable Person involved, advising them that the matter will be treated seriously.

7.1.2 Provide the reporting form (only if this is appropriate) and advise the person, or their guardian, as to EWT procedures for reporting and review of the incident.

7.1.3 Listen carefully to the allegation and record what they have been told as soon as possible, without investigating or probing.

7.1.4 Remain calm and try not to show shock or disbelief; and

7.1.5 Do not promise to keep any secrets, as you will have to report management concerns.

7.2 If staff are told that there is a concern but the person does not want to report it to the staff member:

7.2.1 They should advise the person of the link on the website for safeguarding, or provide a copy of the Safeguarding incident report to them, which includes the contact details for reporting

7.3 If Staff witness abuse of any kind, they should:

7.3.1 Contact emergency services without delay if required.

7.3.2 Preserve any evidence they have of the events.

7.3.3 Keep themselves, other Staff, and Vulnerable individuals safe as far as possible.

7.3.4 Report the matter through the correct channels (complete the Safeguarding Incident reporting form); and

7.2.5 Advise the alleged victim that you will be reporting the matter.

- It is crucial that any concern, complaint, or suspicion of abuse or mistreatment is reported to the Chief Finance Officer; Head of Conservation, or Chief Executive Officer, without delay and in any event within 24 hours.

- If the Vulnerable Person does not consent to the allegation being reported, if it is appropriate and there is a good reason to override their lack of consent based on the safety of the individual or any other legal or regulatory obligation that the EWT is subject to, Staff must still report the concern.

- If the Vulnerable Person does not have the capacity to consent to the allegation being reported, their guardian should be contacted, and a decision may be made without their consent, having in mind the Vulnerable Person's best interests.

- To report a concern, Staff must contact the CFO, who is responsible for dealing with any safeguarding concerns in the EWT. In their absence, you should contact the CEO or any one of the members of the Executive Team.

- The CFO must ensure that any concerns are acted on, clearly recorded, and liaise with the correct authorities, and refer for further action if necessary.

- If the suspected or actual abuse is of an extremely serious and urgent nature, and there is an immediate threat or a crime has been committed, Staff should contact the emergency services without delay.

- When reporting a concern, Staff should provide a written statement.

- Upon receiving a reported concern, the EWT will conduct a risk assessment without delay to assess the level of risk posed by the alleged perpetrator, which will consider whether it is safe for them to continue in their role with the EWT or whether suspension pending investigation is reasonable in the circumstances. They will also take any protective or preventative action which is required.

- Any concern reported will be treated with discretion and confidentiality will be strictly abided by at all stages of the procedure and any investigation, by both Staff and witnesses, unless the EWT has a legal duty or other obligation to report the matter to specific regulatory bodies or law enforcement. All information recorded will be kept secure and will comply with the Data Protection Policy.

8. Safe Recruitment

8.1 The EWT is committed to safer recruitment policies and practices for all Staff.

8.2 In order to commence work with the EWT, Staff may be required to:

8.2.1 Provide two satisfactory references;

8.2.2 Disclose details of all criminal convictions.

8.2.3 The EWT may take any other action required to establish whether an applicant is a known risk to Vulnerable Persons, including but not limited to, checking any legitimate registers and performing security checks.

8.2.4 Unless the above requirements are met, applicants will not be able to work with the EWT.

9. How to raise a Complaint or Concern

If allegations are made about you, the CFO must be informed immediately by you. A written account of your position and of the allegation made should be provided to the CFO and then signed and date recorded. Any person who is accused will be treated with the utmost respect; all allegations will be treated with sensitivity and confidentially.

10. Concerns about a Vulnerable Person's Wellbeing

If any representative of the EWT has concerns about the well-being of Vulnerable Persons, the priority must be the immediate safety and welfare of the Vulnerable Person. Once you know that the Vulnerable Person is safe, it is important not to question the Vulnerable Person or investigate the matter. If a Vulnerable Person does report any form of abuse to a representative of the EWT, you must only ask questions to gather information (these questions can be: "who, what, where, and when". But not "why").

11. Confidentiality

Confidentiality must always be respected throughout the complaint process by all representatives of the EWT and witnesses. Anyone found in breach of confidentiality will be subject to disciplinary action, which in serious cases could result in termination of employment.

Use of Personal Data about a Vulnerable Person

In order to protect a Vulnerable Persons personal data that could be at risk, all representatives of the EWT must adhere to the Data Protection Policy, set out in the employee handbook.