

Safeguarding Policy

Risk Owner	Rachel Briggs, Safeguarding Lead
Approver	International Board
Review Date	Annually due March 2021

1. Purpose and objectives of policy

This policy:

- Outlines World Animal Protection's approach to protect the health, safety and welfare of all employees, volunteers, beneficiaries, and others who come into contact with the organisation (hereafter referred to as stakeholders).
- It is intended to prevent and, in the worst case, deal with, abuse, harassment or
 exploitation of children and vulnerable adults. While these groups are not directly part of
 our core activities, there are occasions when employees may have contact with them,
 such as during fundraising or campaigning community engagement events.

The primary objectives are:

To safeguard and promote the health and welfare of all stakeholders.

- To assign accountability and responsibilities to those with a core role to play in the protection of our stakeholders.
- To establish a procedure for reporting and responding to safeguarding concerns.
- To outline the support available for survivors.

Scope of policy:

 It applies directly to World Animal Protection, all branches and subsidiaries (consolidated group)



• It is acknowledged that Affiliates will have their own robust risk management frameworks monitored by their respective independent boards and regulators. However, they are welcome to adopt in part or whole this policy.

2. Safeguarding Policy Statement

World Animal Protection will not tolerate abuse, harassment or exploitative actions of any nature by its employees, volunteers or any person acting on its behalf. We recognise the rights of all of our stakeholders to be treated with respect and dignity by our employees and others who represent us.

World Animal Protection also has a responsibility to protect its employees and volunteers. Unacceptable behaviour towards any employee or volunteer by another employee will not be tolerated and may lead to disciplinary action.

Equality and impartiality

We undertake all work regardless of race, nationality, religion or gender of animal owners, animal organisations or other beneficiaries, and without adverse distinction of any kind. We will not use our resources to further any particular political, religious or other agenda.

Abuse of power and trust

We recognise that in many situations our employees may be perceived as having a position of power, authority and trust. They must not take improper personal advantage of their position under any circumstances, this includes employees within the organisation where there may be an imbalance of power or they are in a position of trust.

Laws and customs

Employees must always follow national laws and generally local customs. Where these are not mutually complementary, observance of the law will take precedence. Failure to do so may lead to problems with law enforcement agencies, as well as the loss of respect for individuals and for the organisation. Ignorance of laws and customs is not an acceptable excuse.



Recruitment of employees and volunteers

In recruiting new employees, volunteers, consultants and others, and especially those whose intended role is likely to involve contact with children or vulnerable adults, World Animal Protection will make every effort to ensure that it does not employ or engage anyone with any history which suggests that it might pose a risk to these groups.

Sexual activity

Obtaining sexual contact through influence, whether monetary or otherwise, is universally and totally unacceptable. Sexual activity of any nature while being seen to represent World Animal Protection should be avoided under any circumstances.

Working with vulnerable adults

World Animal Protection fully recognises its responsibilities when working with people who, in the context of our activities, may be particularly vulnerable or susceptible to abuse or exploitation. Employees will treat all people with whom they come into contact with respect and dignity.

Working with children

Employees who work, or are likely to work, with children must familiarise themselves with a series of basic measures to minimise the risk of a negative incident occurring, such as avoiding unobservable one-to-one contact with a child, or gaining consent to photograph or film children and use the material obtained. These measures must be followed at all times.

3. Organisational roles

3.1. The role of the International Board (Board)

The Charity Commission will hold trustees to account if things go wrong and will check that trustees followed their guidance and the law. Trustees are responsible:

- To have primary responsibility for safeguarding at World Animal Protection.
- To promote a fair, open and positive culture and ensure all involved feel able to report concerns with confidence that they will be heard and responded to.



- To ensure appropriate Safeguarding policies and procedures are in place and are followed by all employees and representatives of the organisation.
- To comply with their legal duties, trustees must react responsibly to reports of safeguarding risks and incidents of abuse and take steps to make sure all employees know how to deal with these. Trustees should report a serious incident to the Charity Commission if anyone affected by World Animal Protection have been, or are alleged to have been, abused or mistreated while in contact with our employees or a representative of our organisation.
- The International Board must nominate a Safeguarding trustee who is responsible for dealing with concerns relating to safeguarding. They will be tasked with reporting safeguarding issues to the remaining trustees.
- To review the implementation of the Safeguarding policy on an annual basis.

3.2. The role of the CEO and Global Leadership Team

- To prioritise and shape a safe culture and environment where everyone understands their right to be safe and knows how to speak up when problems arise.
- To ensure that the safeguarding policy is implemented throughout the organisation.
- To make resources available to fulfil organisational safeguarding responsibilities.
- To champion safeguarding as a primary consideration in decision making processes, including strategic development.
- To work closely with the International Board to ensure Safeguarding is a key governance priority.
- To ensure that any concerns or allegations are promptly investigated and reported.
- Create a Safeguarding Committee to receive, investigate and respond to all concerns and allegations.



3.3. The role of the Safeguarding Committee

- Members of the Safeguarding Committee are responsible being a focal point for receiving any concern or allegation from an employee, a volunteer or a member of the public.
- The Safeguarding Committee are responsible for undertaking a thorough and fair investigation, offering support to the survivor, and keeping the relevant local authorities informed where applicable. Full roles and responsibilities of the Safeguarding Committee can be found in Appendix 1.

3.4. The role of Directors and Line Managers

- To ensure that this policy is complied with and to take action if they suspect that is not happening.
- To be the first point of contact for reports or concerns, then to escalate the concern to a member of the Safeguarding Committee.
- To ensure that all employees and volunteers in regulated roles are subject to Disclosure and Barring (DBS) checks where applicable.
- To provide appropriate support to employees reporting disclosures or concerns.
- To ensure all employees and volunteers receive safeguarding orientation and training as a mandatory part of the induction process, and regularly thereafter.

3.5. All employees and volunteers

- To fully comply with World Animal Protection's safeguarding policies and procedures.
- To regularly attend appropriate training to understand how to implement this policy within their area of work.
- To remain vigilant for signs of abuse or harm towards any stakeholder and to report concerns to their line manager or a member of the Safeguarding Committee within 24 hours of the incident. Failure to do so will result in disciplinary proceedings.



4. Safeguarding Procedure

The following steps outlines our procedures for dealing with reports of a breach of World Animal Protection's Global Safeguarding Policy, where the safeguarding violation is:

- Against employees or members of the public,
- Perpetrated by employees, volunteers or associated personnel.

4.1 How to report a safeguarding concern

- 4.1.1 For all employees or volunteers who experience, witness or hear of an incident that is a Safeguarding concern, you must report it to either your line manager or a Safeguarding Committee member. Line managers are responsible for escalating the safeguarding concern to a Safeguarding Committee member.
- 4.1.2 If a safeguarding concern is disclosed directly to an employee, the person receiving the report should bear the following in mind:
 - Listen
 - Empathise with the person
 - Ask who, when, where, what but not why
 - Repeat and check your understanding of the situation
 - Report to the Safeguarding Committee member within 24 hours

All associated partners and members of the public should report their concerns directly to a member of our Safeguarding Committee through our dedicated Safeguarding email address: safeguarding@worldanimalprotection.org.

4.2 Processing and investigating a safeguarding concern

- 4.2.1 Once the Safeguarding Committee member has received the initial information outlining the safeguarding concern, they will work with the Reporter (person raising the concern) to complete the **Safeguarding Incident Report Form**. This form will include:
 - Name of person making report
 - Name(s) of alleged survivor(s) of safeguarding incident(s) if different from above
 - Name(s) of alleged wrongdoer(s)



- Description of incident(s)
- Dates(s), times(s) and location(s) of incident

4.2.2 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 appraised of a serious incident.

4.2.3 If the reporting employee is not satisfied that the organisation is appropriately addressing the report, they have a right to escalate the report to:

- their line manager;
- a member of the GLT;
- the Safeguarding trustee of the International Board who is Sarah Ireland and can be contacted at irelandsdm@gmail.com;
- or to an external statutory body, such as the <u>Charity Commission</u>.

The employee will be protected against any negative repercussions as a result of this report as per the Global Whistleblowing Procedure.

4.2.4 If the Reporter is a member of the public or a representative from an associated organisation and they are not satisfied that World Animal Protection is appropriately addressing the report, they have a right to escalate the report to:

- a trustee of the International Board;
- or to an external statutory body.

4.2.5 World Animal Protection may have separate policies depending on the type of concern the report relates to. For example, workplace sexual harassment is dealt with through the Global Human Resources policy.

4.2.6 The Safeguarding Coordinator is responsible for checking our obligations on informing relevant bodies when they receive a safeguarding report. These include (but are not limited to):

- Funding organisations
- Umbrella bodies/networks
- Statutory bodies (such as the Charity Commission in the UK)



4.2.7 If the report alleges a serious safeguarding violation, we will hold a case conference. This should include:

- Safeguarding Officer/Decision Maker
- Person who received the report
- Head of People and Culture
- HR Business Partner and/or local HR Manager

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).

4.2.8 The Safeguarding Committee will then determine how best to proceed with the report. The full Safeguarding Committee Procedures can be made available upon request.

4.3 Response

- 4.3.1 Provide appropriate support to survivor(s) of safeguarding incidents. Nb. 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 or counselling
 - Medical assistance
 - Protection or security assistance (for example being moved to a safe location)

4.3.2 All decision making on support should be led by the survivor or their assigned guardian if they are under 18 years of age.

The survivors view and preference will always be considered and recorded, however there may be times when we have to take action against their wishes. This will be discussed with them and the reasons why e.g. others may be at risk, a crime may have been committed.

Post incident support should be made available for teams or team members involved if required.

4.3.3 The Decision Maker decides the next steps. These 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 of World Animal Protection's remit)
- Investigation is required to gather further information



- Immediate disciplinary action if no further information needed
- Referral to relevant authorities
- 4.3.4 Document all decisions made resulting from the case clearly and confidentially.
- 4.3.5 Store all information relating to the case confidentially, and in accordance with World Animal Protection policy and local data protection law.
- 4.3.6 Record anonymised data relating to the case to feed into organisational reporting requirements (e.g. serious incident reporting to Board, safeguarding reporting to donors), and to feed into learning for dealing with future cases.

5 Reporting

If any employee is involved in an actual or suspected serious safeguarding incident, or if a serious safeguarding incident takes place within any of World Animal Protections offices, in addition to the procedures set out within this policy, it should also be reported to the Charity Commission. It is the responsibility of Trustees to ensure that this takes place. It is the duty of the Safeguarding Officer to inform the International Board of any safeguarding incidents.

All suspected or actual safeguarding incidents should be reported to the Charity Commission by completing their online <u>serious incident report form</u>.

The Safeguarding Officer shall provide the International Board an annual Safeguarding report detailing safeguarding incidents and concerns over the past year, lessons learned with recommended improvements to policy and procedures.

6 Training

All employees, volunteers, board members and contracted representatives of World Animal Protection will be required to complete our Safeguarding e-learning training module.

Further in-depth training will be made available to the Safeguarding Committee members and the International Board of Trustees on an annual basis.

Additional information and support can be provided to any of our stakeholders by a member of the Safeguarding Committee upon request.



7 Assurance

Strategic and independent oversight is the third line of defence. A risk based internal audit programme will be developed each year and approved by the People and Culture Committee to ensure that risk controls remain efficient and effective.

The International Board have a number of mechanisms available to them to assure Safeguarding mechanisms are in place and are acted upon, such as:

- Speaking to employees to make sure they understand how to raise a concern and to get feedback on past experiences
- To work with statutory agencies and partners
- Carry out checks at different offices and view any necessary paperwork
- Ensure training plans are in place and are carried out
- Record any potential conflicts of interest at any level
- Include safeguarding as a standing agenda item at meetings
- Review a sample of past concerns to identify lessons learned and make sure they were handled appropriately
- Invite external reviews or inspections

8 Related policies

This policy should be read in conjunction with the following related policies:

- Complaints and Compliments Policy
- Data Protection Policy
- Human Resources Policy
- Health and Safety Policy Statement



- Partnership Policy
- Travel Policy
- Whistleblowing Policy and Procedure
- Modern Slavery Statement
- Lone Worker policy or procedure (to be drafted)
- Volunteer policy or procedure (to be drafted)

9 Review and approval

This policy will be subject to an annual review and will be presented to the board via the People and Culture Committee.

Version control:

Version	Amendments	Approved by	Date
1	New policy	Board	March 2020
1.1	Review by safeguarding trustee	Board	June 2020
1.2	Review by International Board	Board	September 2021



Appendix 1: Definitions

As per the definitions set out in the Children Act 1989 (UK), a '**child**' is anyone who has not yet reached their 18th birthday. It also includes unborn children.

Adults aged 18 and over have the potential to be vulnerable (either temporarily or permanently) for a variety of reasons and in different situations. An adult may be vulnerable if they:

- Have a learning or physical disability
- Have a physical or mental illness, chronic or otherwise, including an addiction to alcohol or drugs
- Has a reduction in physical or mental capacity
- Is in receipt of any form of healthcare
- Is detained in custody
- Is receiving community services because of age, health or disability
- Is living in sheltered or residential care home
- Is unable, for any other reason, to protect themselves against significant harm or exploitation.

Abuse in vulnerable adults may consist of single or repeated acts. It may be physical, verbal or psychological, it may be an act of neglect or omission to act, or it may occur when a vulnerable person is persuaded to enter into a financial or sexual transaction to which they have not consented or cannot consent.



Appendix 2: Types of Harm

The following lists the types of harm to be aware of:

- **Bullying** is a persistent misuse of power, whether formal or informal. It is ongoing offensive, abusive, intimidating, malicious or insulting behaviour.
- **Criminal Exploitation** is a form of modern slavery that sees victims being forced to work under the control of highly organised criminals in activities such as forced begging, shoplifting and pickpocketing, cannabis cultivation, drug dealing and financial exploitation.
- **Cyberbullying** is bullying that takes place over digital devices like cell phones, computers, and tablets. Cyberbullying can occur through SMS, Text, and apps, or online in social media, forums, or gaming where people can view, participate in, or share content. Cyberbullying includes sending, posting, or sharing negative, harmful, false, or mean content about someone else. It can include sharing personal or private information about someone else causing embarrassment or humiliation.
- **Discrimination** is the selection for unfavourable treatment of an individual or individuals on the basis of: gender, race, colour or ethnic or national origin, religion, disability, sexual orientation, social class, age (subject to the usual conventions on retirement), marital status or family responsibilities, or as a result of any conditions or requirements that do not accord with the principles of fairness and natural justice.
- **Emotional Abuse** is any act including confinement, isolation, verbal assault, humiliation, intimidation, infantilization, or any other treatment which may diminish the sense of identity, dignity, and self-worth.
- **Forced Marriage** is a marriage where one or both people do not consent to the marriage and pressure or abuse is used.
- Harassment is behaviour that makes someone feel intimidated or offended.
- Health and Safety is about promoting positive wellbeing as well as preventing injury and illness.
- Human Trafficking is the recruitment, transportation, transfer, harbouring, or receipt of
 persons by improper means (such as force, abduction, fraud, or coercion) for an improper
 purpose including forced labour or sexual exploitation.
- Modern Slavery is when one person obtains or holds another person in compelled service. Someone is in slavery if they are: forced to work through mental or physical threat.
- **Negligent Treatment** is a form of abuse where the perpetrator, who is responsible for caring for someone who is unable to care for themselves, fails to do so. It can be a result of carelessness, indifference, or unwillingness.
- Physical Abuse is when a person uses physical force over another person.



- Radicalisation is a process by which an individual or group comes to adopt increasingly
 extreme political, social, or religious ideals and aspirations that reject or undermine
 the status quo or reject and/or undermine contemporary ideas and expressions of
 freedom of choice.
- **Self-neglect** is a behavioural condition in which an individual neglects to attend to their basic needs, such as personal hygiene, appropriate clothing, feeding, or tending appropriately to any medical conditions they have.
- **Sexual Abuse** is unwanted sexual activity, with perpetrators using force, making threats or taking advantage of victims not able to give consent.
- **Sexual Exploitation** is actual or attempted abuse of a position of vulnerability, power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.
- Sexual Harassment is any unwelcome or offensive sexual behaviour that is repeated, or
 is serious enough to have a harmful effect, or which contains an implied or overt promise
 of preferential treatment or an implied or overt threat of detrimental treatment. Sexual
 harassment can involve spoken or written material, images, digital material or a physical
 act.



Appendix 3: Safeguarding Committee

The Safeguarding Committee is made up of:

- The Safeguarding Officer, this will be our Global People Director, who is responsible for
 ensuring that the Safeguarding policy and procedures are implemented and followed.
 They oversee all Safeguarding related policies, procedures, code of conduct documents
 etc. The Safeguarding Officer will support the Safeguarding Coordinators and will be the
 key decision-maker on the outcome of all Safeguarding investigations.
- The Safeguarding Coordinators, these are our Human Resources Business Partners, Head of People and Culture and Global Learning and Development Manager (NZ). They will be responsible for:
 - Supporting Country Directors to understand safeguarding measures in their local context;
 - o Acting as a key liaison to receive information about safeguarding concerns;
 - o Ensuring that all information is recorded on the safeguarding incident form and referred to the safeguarding committee within 24 hours;
 - o Maintaining the safeguarding incident log;
 - o Providing overall support to the wider implementation of policies and procedures relating to safeguarding;
 - Helping investigate reports of safeguarding concerns;
 - Assessing local safeguarding risks within the organisation, including programmes and projects;
 - o Consulting with, and report to, local agencies whenever necessary.
- The Safeguarding Trustee, responsible for meeting with the Safeguarding Officer on an annual basis to review the Safeguarding policy, procedures, training provisions and any reported incidents.



• The Safeguarding Information Officer, this will be our Global Learning and Development Manager (NZ) who is responsible for updating trustees and senior leaders on the latest safeguarding guidance and best practice issues. They are responsible for reviewing and updating the policies and procedures.

Code of Conduct for Safeguarding Committee members: It is expected that all World Animal Protection Safeguarding Committee members will act in the following manner:

- To have a thorough understanding of the Global Safeguarding Policy and Procedures;
- Strive to create a secure, supportive and confidential atmosphere in which those who have suffered abuse can disclose their concerns;
- Provide a sensitive, caring and compassionate response;
- Receive information from any employees, volunteers, children, parents and/or carers who have safeguarding concerns and record it;
- Being able to assess information promptly and carefully, clarifying and obtaining more information about the matter as appropriate;
- Provide advice and support to employees on issues relating to safeguarding;
- Dealing with individual cases, including attending case conferences and review meetings as appropriate;
- To maintain confidentiality regarding safeguarding cases at all times. 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.



Appendix 4: Safeguarding Incident Report Form

To be completed by the person receiving the report of a Safeguarding concern.

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Appendix 5: Safeguarding Regulated Roles Register

We will only engage people who have undergone formal Disclosure and Barring (DBS) background checks. Roles requiring a DBS will be listed on this Safeguarding Regulated Roles Register

This will list all roles requiring a DBS check as in the course of their work they may come into contact with children or vulnerable adults e.g. volunteer management roles. These roles will need to be scoped with the Global Senior Leadership Team