WWT
SAFEGUARDING (BABIES, CHILDREN AND ADULTS AT RISK)
POLICY AND GUIDANCE

Safeguarding statement

WWT acknowledge their duty of care to safeguard the welfare of babies, children and adults at risk and is committed to ensuring its safeguarding practices reflect statutory responsibilities; UK government guidance and best practice, including that of the Charity Commission.

Protecting people is a governance priority for WWT. It is a fundamental part of operating as a charity for the public benefit. We will ensure our charity:

- has appropriate policies and procedures in place, which are followed by all staff, volunteers, trustees and beneficiaries
- checks that people are suitable to act in their roles
- knows how to spot and handle concerns in a full and open manner
- has a clear system of referring or reporting to relevant organisations as soon as concerns are suspected or identified
- sets out risks and how they will be managed in a risk register which is regularly reviewed
- follows statutory guidance, good practice guidance and legislation relevant us
- Ensuring that suitable employees and volunteers are recruited by adopting safe recruitment, selection and, as appropriate, vetting processes.
- is quick to respond to concerns and carry out appropriate investigations
- makes sure protecting people from safeguarding harm is central to its culture
- has enough resources, including trained staff/volunteers/trustees for safeguarding and protecting people
- conducts periodic reviews of safeguarding policies, procedures, and practice
- Values, listens to and respects children and adults at risk who are employed, volunteer for us or who interact with us.

All in WWT should be aware of and alert to risks relevant to safeguarding:

- sexual harassment, abuse and exploitation
- cyber abuse
- negligent treatment
- self-neglect
- physical or emotional abuse
- bullying or harassment
- health and safety
- commercial or financial exploitation
- exploitation by criminals including extremism and radicalisation
- forced marriage
- human trafficking and modern-day slavery- please refer to separate Trust policy
- female genital mutilation
- discrimination on any of the grounds in the Equality Act 2010

The policy recognises that the welfare and interests of babies, children, young people and adults at risk are paramount in all circumstances. It aims to ensure that all babies, children, young people, and adults at risk: -

- Have a positive and enjoyable experience during participation in our activities, events, learning and engagement with nature and wildlife, in a safe, person-centred environment.
- Are protected from abuse whilst:
    - Participating in the activities, events, learning, and engagement opportunities provided by WWT
    - Interacting with our staff and volunteers who are carrying out conservation work in the UK and throughout the world
    - Volunteering or working for WWT as a vulnerable person
- This protection is regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality, ethnicity, or national origin), religion and belief, gender & sexual orientation; have the right to protection from harm, abuse, or exploitation

As part of our Safeguarding policy WWT will: -

- Nominate a WWT Safeguarding lead, covering all UK and worldwide work. **This is the Head of Safety Management, supported by the Deputy Chief Executive (who is the designated lead Director for Safeguarding)**
- Value, listen to and respect children, young people, and adults at risk
- Prioritise the safety and wellbeing of children, young people, and adults at risk.
- Ensure all staff and volunteers understand their roles and responsibilities in respect of safeguarding and are provided with appropriate training opportunities to recognise, identify, and respond to signs of abuse, neglect and other safeguarding concerns relating to babies, children, young people, and adults at risk; recognising too that we also have duties as an employer of vulnerable people
- Ensure appropriate action is taken in the event of incidents/concerns of abuse
- Provide support to those who raise or disclose a concern to the WWT Safeguarding Lead
- Ensure that confidential, detailed, and accurate records of all safeguarding concerns are maintained and securely stored
- Take steps to prevent the employment of unsuitable persons through robust selection and recruitment processes and by undertaking the appropriate Disclosure & Barring Scheme checks.
- Ensure robust safeguarding arrangements and procedures are in operation and regularly reviewed.
- Ensure our safeguarding practice reflects statutory responsibilities, government guidance and complies with best practice and regulatory requirements wherever in the world we operate as a charity. We recognise the
    - UN Convention on the Rights of the Child
    - Universal Declaration of Human Rights.
    - The 2014 ILO Protocol to the Forced Labor Convention, 1930 (No. 29)

  This policy is intrinsically linked to our Environmental and Social Management System (ESMS)

This policy and associated guidance will be widely promoted and applies to all staff (whether casual, placements or permanent staff) volunteers (including Trustees), agency staff and contractors. This policy statement will be made publicly available on request. **Training on safeguarding and the key points of this policy is mandatory for all every 3 years.**

The policy will be kept under bi-annual review or in the following circumstances: -

- Changes in legislation and/or government guidance
- as required by a Local Authority Safeguarding Board or the Charity Commission
- Due to any other significant change or event locally, nationally, or internationally
- Following any serious incidents within WWT relating to Safeguarding

Should anyone have any queries relating to this topic, please contact the WWT Designated Safeguarding Lead or the WWT nominated Director for Safeguarding.

Introduction

WWT wants babies, children and persons at risk to enjoy their involvement with us and to feel encouraged to take an active part in wetland conservation. Your work may only rarely bring you into contact with these groups but when

it does, they are entitled to be safe with you and may look to you as a role model. WWT expects the behaviour of everyone who works with us, whether paid or not, to be absolutely above reproach in this respect. This policy and the accompanying guidance are intended to help us all to achieve this, both in the UK and outside of the UK.

While primarily intended to ensure protection of babies, children and adults at risk, this policy is also meant to protect staff and volunteers - and others working with us - from any false allegation of improper conduct. With both purposes in mind, the guidance given here is intended to help you understand how the policy is meant to be applied in practice.

At WWT, we view safeguarding as everyone's responsibility. As a result, we each need to know what to do if an incident or allegation of abuse is raised and how to deal with it. In eventualities not covered in this policy and guidelines, staff should continue to use their professional judgement.

Scope of the Policy

This Policy and associated guidance apply to all staff, volunteers (including Trustees, interns, work experience placements etc.), visitors, agency staff and contractors. It covers activity across all WWT sites and Projects both in the UK and worldwide.

Definitions

For the purposes of this document:
Where the word 'child' or 'children' is used, this should also be taken to mean young people. The UN Convention on the Rights of the Child defines a child as a person below the age of 18, unless the laws of a particular country set the legal age for adulthood younger. At WWT we state that a child is below the age of 18.

Following recent case reviews, the NSPCC is encouraging everyone in the safeguarding arena to specifically include the term 'babies' when talking about under 18 year olds to ensure that the specific needs of under 2 years olds are not forgotten about when talking about safeguarding.

Safeguarding Children

Safeguarding children is the process of protecting babies, children and young people from abuse or neglect, preventing impairment of their health and development, and ensuring they are growing up in circumstances consistent with the provision of safe and effective care that enables children to have optimum life chances and enter adulthood successfully.

In the document 'Working Together to Safeguard Children 2018', safeguarding and promoting the welfare of children is defined as:

- protecting children from maltreatment.
- preventing impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes

Definitions of child abuse or neglect

Physical abuse: *A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.*

The physical signs of abuse may include:

- Unexplained bruising, marks, or injuries on any part of the body by use of some instrument
- Multiple bruises - in clusters, often on the upper arm, outside of the thigh
- Cigarette burns

- Human bite marks
- Broken bones
- Scalds, with upward splash marks,
- Multiple burns with a clearly demarcated edge.

Sexual abuse: *Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing.*

They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet).

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

The physical signs of sexual abuse may include:

- Pain or itching in the genital area
- Bruising or bleeding near genital area
- Sexually transmitted disease
- Vaginal discharge or infection
- Stomach pains
- Discomfort when walking or sitting down
- Pregnancy

Changes in behavior which can also indicate sexual abuse include:

- Sudden or unexplained changes in behaviour e.g., becoming aggressive or withdrawn
- Fear of being left with a specific person or group of people
- Having nightmares
- Running away from home
- Sexual knowledge which is beyond their age, or developmental level
- Sexual drawings or language
- Bedwetting
- Eating problems such as overeating or anorexia
- Self-harm or mutilation, sometimes leading to suicide attempts
- Saying they have secrets they cannot tell anyone about
- Substance or drug abuse
- Suddenly having unexplained sources of money
- Not allowed to have friends (particularly in adolescence)
- Acting in a sexually explicit way towards adults

Please note that throughout the world the minimum age of consent varies between 11 and 21.
In the UK:

- the age of consent to any form of sexual activity is 16.
- The age of consent is the same regardless of gender or sexual orientation.
- The age of consent is 18 if the adult is in a position of Trust (e.g. teacher)

In Cambodia the age of consent is 15. In Madagascar the age of consent is 14 for heterosexual relations and 21 for same-sex relations.

Emotional abuse *is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express themselves, deliberately silencing them or 'making fun' of what they say or how they communicate.*

It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Emotional abuse can be difficult to measure, as there are often no outward physical signs. There may be a developmental delay due to a failure to thrive and grow, although this will usually only be evident if the child puts on weight in other circumstances, for example when hospitalised or away from their parents' care. Even so, children who appear well-cared for may nevertheless be emotionally abused by being taunted, put down or belittled. They may receive little or no love, affection or attention from their parents or carers. Emotional abuse can also take the form of children not being allowed to mix or play with other children. It can also include hearing or seeing domestic violence in their home.

Changes in behaviour which can indicate emotional abuse include:
- Neurotic behaviour e.g., sulking, hair twisting, rocking
- Being unable to play
- Fear of making mistakes
- Sudden speech disorders
- Self-harm
- Fear of parent being approached regarding their behaviour
- Developmental delay in terms of emotional progress

Neglect *is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:*
- *provide adequate food, clothing, and shelter (including exclusion from home or abandonment);*
- *protect a child from physical and emotional harm or danger;*
- *ensure adequate supervision (including the use of inadequate caregivers); or*
- *ensure access to appropriate medical care or treatment.*

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Neglect can be a difficult form of abuse to recognise yet have some of the most lasting and damaging effects on children. The physical signs of neglect may include:
- Constant hunger, sometimes stealing food from other children and young people
- Constantly dirty or 'smelly'
- Loss of weight, or being constantly underweight
- Inappropriate clothing for the conditions.

Changes in behavior which can also indicate neglect may include:
- Complaining of being tired all the time
- Not requesting medical assistance and/or failing to attend appointments

- Having few friends
- Mentioning being left alone or unsupervised.

Safeguarding Adults at risk
Adult safeguarding is the process of protecting adults at risk of abuse or neglect. It is a key responsibility of local authorities (Care Act 2014 and Care and Support Statutory Guidance).

An adult may be at risk because of a temporary condition that requires care and support i.e., depression, substance dependency etc. or it could be that an adult has a permanent condition that places them as at risk for safeguarding.

The aims of adult safeguarding are to:

- stop abuse or neglect wherever possible;
- prevent harm and reduce the risk of abuse or neglect to adults with care and support needs;
- safeguard adults in a way that supports them in making choices and having control about how they want to live;
- promote an approach that concentrates on improving life for the adults concerned;
- raise public awareness so that communities as a whole, alongside professionals, play their part in preventing, identifying and responding to abuse and neglect;
- provide information and support in accessible ways to help people understand the different types of abuse, how to stay safe and how to raise a concern about the safety or wellbeing of an adult; and
- address what has caused the abuse or neglect

The safeguarding duties apply to an adult (over 18 years) who:

- *has care and support needs (whether or not the local authority is meeting any of those needs) and;*
- *is experiencing, or at risk of, abuse or neglect; and*

as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

Definitions of adult abuse or neglect
Physical abuse. *Including assault, hitting, slapping, pushing, misuse of medication, restraint, or inappropriate physical sanctions. Domestic violence – including psychological, physical, sexual, financial, emotional abuse; so, called 'honour' based violence.*

Indicators of physical abuse:

- A history of unexplained falls, minor injuries, or malnutrition
- Unexplained bruises in various stages of healing
- Unexplained fractures in various stages of healing
- Injuries reflecting the shape of an object
- Unexplained burns, particularly to the soles of the feet, palms of the hands or back
- Immersion burns, rope burns, or cigarette burns
- Injuries to the head, face, or scalp
- Varicose ulcers, pressure sores
- Being left in wet clothing or bedding
- Signs of under or overuse of medication

Sexual abuse. *Including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.*

Some examples of sexual abuse/assault include the direct or indirect involvement of the adult at risk in sexual activity or relationships which:

- they do not want or have not consented to
- they cannot understand and lack the mental capacity to be able to give consent to
- they have been coerced into because the other person is in a position of trust, power, or authority, for example, a care worker
- they may have been forced into sexual activity with someone else or may have been
- required to watch sexual activity.

Some adults will be unable to give informed consent to a sexual act, even if they are over the age of legal consent. This may be due them being an adult at risk or due to a power imbalance. This is particularly pertinent to our UK staff who travel overseas; recognizing the perceived or actual wealth status of white UK nationals in some countries. In such cases there is always such an imbalance of power (perceived or real) that truly informed consent can never be given. This would include even in countries where prostitution is legal (or decriminalized).

Indicators of Sexual Abuse:
- A significant change in sexual behaviour
- Sexually implicit/explicit behaviour around certain individuals
- Unexplained changes in behaviour
- Unusual difficulty in walking or sitting
- Torn, stained or bloody underwear
- Sexually transmitted disease
- Urinary tract or vaginal infection
- Full or partial disclosure or hints of sexual abuse

Domestic Abuse. *Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence, or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to psychological, sexual, financial, and emotional abuse*.

Domestic violence or abuse can be characterised by any of the indicators of abuse outlined in this briefing relating to:
- psychological
- physical
- sexual
- financial
- emotional.

Domestic violence and abuse include any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence, or abuse between those aged 16 or over who are or have been, intimate partners or family members regardless of gender or sexuality. It also includes so called 'honour' based violence, female genital mutilation and forced marriage. Note that children in the household who have also witnessed domestic violence are now also included in legal definitions regarding domestic abuse and child abuse.

Coercive or controlling behaviour is a core part of domestic violence. Coercive behaviour can include:
- acts of assault, threats, humiliation, and intimidation
- harming, punishing, or frightening the person
- isolating the person from sources of support
- exploitation of resources or money
- preventing the person from escaping abuse
- regulating everyday behaviour.

Possible indicators of domestic violence or abuse
- Low self-esteem

- Feeling that the abuse is their fault when it is not
- Physical evidence of violence such as bruising, cuts, broken bones
- Verbal abuse and humiliation in front of others
- Fear of outside intervention
- Damage to home or property
- Isolation – not seeing friends and family
- Limited access to money

Psychological abuse. *Including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks*.

Indicators of Psychological Abuse
- The person appears to be withdrawn, agitated or anxious in general
- The person appears to be intimidated or subdued in the presence of the carer/relative
- The person appears to be frightened of making choices or expressing his/her wishes
- The person appears to be fearful or flinches on approach
- There may be changes in sleep patterns
- The person may be tearful
- Threats of medical or legal consequences if individuals do not comply with desired behaviour

Financial or material abuse. *Including theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions, or benefits*.

Indicators of Financial or Material Abuse:
- Disparity between assets and living conditions, reluctance to incur expenses when finances should not be a problem (e.g., little food in the house, wearing worn out clothes)
- Denying the right of someone who may be competent to handle financial affairs
- Unexplained withdrawals from Bank and Building society accounts
- Unexplained disappearance of financial documents
- Sudden inability to pay bills
- Disparity between assets and apparent living conditions
- Carer asking financial questions of the person, does not ask about care or wellbeing
- Person managing finances is uncooperative
- Carers or professionals fail to account for expenses incurred on a person's behalf
- Exploitation either opportunistically or premeditated, unfairly manipulating someone for profit or personal gain.

Modern slavery. *Encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive, and force individuals into a life of abuse, servitude, and inhumane treatment*.
Types of modern slavery
- Human trafficking
- Forced labour
- Domestic servitude
- Sexual exploitation, such as escort work, prostitution, and pornography
- Debt bondage – being forced to work to pay off debts that realistically they never will be able to.

Possible indicators of modern slavery
- Signs of physical or emotional abuse
- Appearing to be malnourished, unkempt or withdrawn
- Isolation from the community, seeming under the control or influence of others

- Living in dirty, cramped, or overcrowded accommodation and or living and working at the same address
- Lack of personal effects or identification documents
- Always wearing the same clothes
- Avoidance of eye contact, appearing frightened or hesitant to talk to strangers
- Fear of law enforcers

Please refer to the WWT Anti Human Slavery & Anti Human Trafficking Policy

Discriminatory abuse. *Including forms of harassment, slurs, or similar treatment; because of race, gender and gender identity, age, disability, sexual orientation, or religion*.

Indicators of discriminatory abuse:
- Inappropriate remarks or comments
- Poor quality care to certain groups of beneficiaries
- Beneficiary prefers not to be cared for by certain member of staff
- Staff member may seem to avoid caring for certain groups of beneficiaries

Organisational abuse. *Including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home. This may range from one-off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes, and practices within an organisation*.

Neglect and acts of omission. *Including ignoring medical, emotional, or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition, and heating*

Indicators of neglect:
- Inadequate food, fluids, heating, or lighting
- Poor physical condition, poor hygiene, varicose ulcers, pressure sores
- Clothing in a poor condition
- Failure to seek medical advice or summon assistance when required
- Failure to access dentistry, chiropody services etc.
- Refusal to allow access to appropriate callers or visitors

Self-neglect. *This covers a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding*.

Indicators of self-neglect
- Very poor personal hygiene
- Unkempt appearance
- Lack of essential food, clothing, or shelter
- Malnutrition and/or dehydration
- Living in squalid or unsanitary conditions
- Neglecting household maintenance
- Hoarding behaviours
- Collecting a large number of animals in inappropriate conditions (animal hoarding)
- Non-compliance with health or care services
- Inability or unwillingness to take medication or treat illness or injury

Further information can be found at: https://www.gov.uk/government/publications/care-act-statutory-guidance/care-and-support-statutory-guidance

It is recognized that vulnerable people (whether a child or an adult at risk) are at increased risk of being preyed upon by criminality. This can include

- county lines (moving drugs between rural and urban areas)
- cuckooing, also known as 'home invasion'. This is where a criminal befriends an individual who lives on their own. The criminal then moves in and uses the property to operate unlawful activity.
- Ensnaring or tricking someone on the internet for financial gain
- **Radicalisation and Extremism** is where someone holds views that are intolerant of people who are of a different ethnicity, culture, religion, gender or sexual identity. Extremists may try to force their views on others and, in some cases, may believe that these views can justify the use of violence in order to achieve certain aims.

    Indicators may include:

    - Use of inappropriate language;
    - Possession or accessing violent extremist literature;
    - Behavioural / appearance changes;
    - The expression of extremist views;
    - Advocating violent actions and means;
    - Association with known extremists;
    - Articulating support for violent extremist causes or leaders;
    - Using extremist views to explain personal disadvantage;
    - Joining or seeking to join extremist organisations;
    - Seeking to recruit others to an extremist ideology

    The Counterterrorism and Security Act 2015 (the Act) places a duty on certain bodies ("specified authorities" listed in Schedule 6 to the Act), including Charities in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This is sometimes called the Prevent duty.

Related WWT policies

- health and safety policies and associated codes of practice
- disciplinary policy and procedure
- recruitment related policies and procedures
- bullying and harassment policy
- social media policy
- play safety policy statement
- Anti modern day slavery & Anti Trafficking policy
- whistle blowing Policy
- Complaints Policy
- Blue Prescribing Media Policy for Vulnerable People
- diversity, inclusion and belonging Policy

Safeguarding our supporters

WWT fundraising is carried out in line with the latest guidance provided in the Institute of Fundraising Guide – '*TREATING DONORS FAIRLY: Responding to the needs of people in vulnerable circumstances and helping donors make informed decisions'* including sections on:

- Identifying people who may be in a vulnerable circumstance
- When fundraisers shouldn't take donations
- Steps that fundraisers can take to help donors make an informed decision
- Whether donations can be returned
- Issues around mental capacity and power of attorney

The IOF Guide is found here

- We provide training for our face-to-face fundraising & Supporter Services staff regarding vulnerable people or those in vulnerable circumstance.
- Our Supporter Services team have an internal guidance document as to how they are going to implement IOF guidance
- We ensure that we do not send fundraising asks to donors that have been identified as vulnerable or in vulnerable circumstance. We always offer a refund to a donor that is either found to be or reports themselves that they are vulnerable or in vulnerable circumstance.
- We ensure that agencies working on our behalf have a policy and training in place regarding vulnerable donors and donors in vulnerable circumstance.

Support in exercising your best judgement

When you witness or suspect abusive or neglectful behaviour towards a child or Adult at risk you should use the Guidelines found within this Policy. It is appreciated that this may call for use of your own professional judgment and even courage however it is important to take appropriate action in a timely manner. As long as you honour the guidance given here, you will have the practical and moral support of senior colleagues.

If you witness or suspect abusive behaviour towards a child or Adult at risk and fail to take action, this may result in disciplinary action and significant failure may potentially be considered as gross misconduct. In addition, a failure to take action (in line with this Policy) may lead to referral to the DBS. See Disciplinary Policy & Procedure and Disclosure and Barring Policy on Wetlands.

Confidentiality

It is impossible to promise complete confidentiality when a concern is raised, or an allegation made. This is because WWT owes a duty of care to its staff, volunteers, visitors, and those it interacts with e.g. on Conservation projects that cannot be fulfilled unless WWT takes action on the basis of information that may have been provided in confidence.

The duty of confidentiality must be weighed against the duty of care, in case of potential or actual harm to an individual. However, at all stages, only those people who need to be made aware of an incident or concern, whether internal or external to WWT, should be informed. Failure to maintain discretion may result in disciplinary action.

It is not always easy to recognise a situation where abuse may occur or has taken place and WWT employees are not expected to be experts at such recognition. However, each person has a responsibility to act if they have any concerns about someone's behaviour towards a child or Adult at risk. It is important that the recipient of any complaint or accusation that a child or Adult at risk has been or is being abused listens carefully without making or implying any judgment as to the truth of the complaint or accusation. The key is to Trust Your Gut Instinct.

Where an individual suspects or is informed that a child or Adult at risk has been, is being or could be harmed as a result of taking part in a WWT activity/event or through contact with WWT staff or volunteers, it is not the responsibility of that person to decide whether abuse has taken place. Instead, the individual aware of these suspicions or allegations must contact the local Appointed Person on duty (Duty Manager or Centre Manager) immediately for guidance and assistance on the action that must be taken. Following this, the Appointed Person on duty will contact WWT's national Safeguarding Lead (the Head of Safety Management). Staff who are worried about sharing concerns about abuse are encouraged to speak with an appropriate agency for further advice (for example, the NSPCC Child Protection Helpline on 0808 800 5000).

Where a complaint of abuse is reported to WWT's national Safeguarding Lead, they will carefully consider the information available and decide on the appropriate course of action. Such situations may require contact with the relevant external agencies (including Social Services and the Police) for them to investigate the matter and determine any necessary action.

In emergency circumstances (for example, where there is certain immediate and significant danger to an individual or a criminal act has been witnessed), staff should make referrals to the police, social services or other appropriate authorities themselves prior to consulting with WWT's national Safeguarding Lead. Where this is necessary, the Safeguarding Lead should be informed immediately afterwards.

WWT has a legal duty to refer an individual to the DBS if they have been removed from working in regulated activity with children or persons at risk because they caused harm or posed a risk of causing harm. The duty to refer is absolute and overrides any concerns about data protection. See Disclosure and Barring Policy for further information.

Roles and responsibilities

The Head of Safety Management is the WWT's Appointed Safeguarding Lead, for the entire Trust including outside the UK. As such, he/she takes overall ownership of the policy and will promote the importance of child and adult protection within WWT. The Head of Safety Management will report to Executive Leadership Team safeguarding and protection issues at WWT and report to external authorities beyond WWT if necessary.

The nominated Director for Safeguarding is the WWT Deputy Chief Executive. Supporting the Head of Safety Management, the Chief Operating Officer will have oversight on the implementation of this Policy and will represent the Board on safeguarding matters.

The Duty Manager (or Site Lead if on duty) will be the designated Appointed Person on duty at Centre level. This person's role is to ensure that this policy is consistently applied on a day-today basis. It is the Site Lead/ Centre Manager's responsibility to ensure that staff and volunteers are informed and trained on this policy.

The Appointed Person on duty (which will be the Site Lead/ Centre Manager if they are on duty) will be the initial point of contact where any allegations of abuse against children and persons at risk are raised. They will be responsible for escalating this immediately via the operational line to WWT's Appointed Safeguarding Lead. WWT's Appointed Safeguarding Lead will deal with any reported suspicions and allegation of abuse of children or persons at risk, providing appropriate information when making referrals to external agencies (such as Social Services or the Police). The WWT Appointed Safeguarding Lead will also ensure that any incident in relation to suspected abuse and child protection is recorded, in writing, immediately in the correct confidential format and that all records are kept in confidential files.

On a day-to-day basis, safeguarding at WWT is everyone's responsibility, so all staff and volunteers must:

- Be aware of serious hazards to children and persons at risk and take all reasonable steps to protect children and persons at risk from them.
- Report any incident to the Appointed Person on duty who will advise on the appropriate action to be taken.
- Undertake training every 3 years

In addition to this, all WWT staff commissioning contractors, consultants, agencies, and individuals, must ensure WWT's safeguarding guidelines are shared appropriately.

What staff and volunteers should do

What to do if someone is being violent towards a child or adult at risk

If you come across someone hitting, hurting, or violently shouting at a child or Adult at risk, you should not put yourself in any danger, either physically or legally. If you see any violence towards a child or Adult at risk, by anyone (including their parent or guardian or by a colleague), you should follow the reporting procedure for emergency incidents immediately, including speaking to WWT's Appointed Person on duty for their specialist advice, and following the policy guidelines. We do not advise that you intervene yourself directly. The same principles apply if

there is an alleged 'flasher' on site or someone behaving suspiciously towards children or Adult at risk. The WWT Safeguarding lead should also be informed.

Filming / photography of children and Adult at risk by members of the public
If you witness, or are alerted to, a member of the public photographing or filming children or persons at risk in a suspicious way, covert way or in a way which is making other people feel uncomfortable, then you should approach the person and point out that their actions may make other visitors feel uncomfortable. In most cases, the action will be completely innocent, and drawing attention will be enough to stop it. Call for back up if you need it. If the person continues to act suspiciously, then call the police.

Allegations of child or Adult at risk abuse perpetrated by others
This policy requires that any suspicions and allegations involving abuse or neglect to babies, children and adults at risk are referred to WWT's Safeguarding Lead to determine what action, if any, must be taken. This will enable each situation to be investigated thoroughly, whilst treating the parties involved fairly and with sensitivity. It will also ensure that suitable steps are taken as a result of any investigations, which may include contacting the police and/or fulfilling the legal duty to refer information to the DBS as required.

The procedure for managing suspicions and allegations against staff and volunteers, aims to strike a balance between the need to protect children and persons at risk from abuse and the need to protect staff and volunteers from false or unfounded accusations. Examples of allegations of abuse might be: a child or Adult at risk telling you of something that has happened to them while visiting one of our centres or at an event, or you might become suspicious about the behaviour of a colleague or volunteer, or a member of the public might make an allegation of abuse involving someone working with us.

If a disclosure or allegation is reported to you:
1. Listen carefully and sensitively, stay calm. Reassure the person making the disclosure or allegation that they have done the right thing by telling someone.
2. Check your understanding of the situation, without being investigative. Use open questions and avoid using leading questions or making assumptions. Let the reporter know that you may have to pass on the information to help keep them safe and explain what will happen next.
3. Record what you have been told in the reporter's words as much as possible. Include where the disclosure took place and who else was present, including decisions made and the reason for these decisions. Sign, date, and time the record.
4. Report the incident within 24hours to the Appointed Person on duty and before you finish work for the day. The Appointed Person on duty will report to WWT's national Safeguarding Lead, who in turn will offer support and guidance, as well as ensuring the record is entered on to the Prime Incident database.

If you become suspicious about the behaviour of a colleague or someone associated with WWT where children and Adult at risk are concerned, contact the Appointed Person on duty, WWT's Safeguarding Lead, WWT's lead Director or if you judge the situation to be sufficiently serious and urgent, the Police.

Do not let anxiety that you might have jumped to a wrong conclusion deter you from reporting any genuine worries that you have. Procedures in place will be used to follow up any such report, and it will not be held against you should a well-intentioned but mistaken report be made. If you feel you need expert support because you come across child or Adult at risk abuse while working with us, we recommend that you discuss this with your line manager or with WWT's Safeguarding Lead.

Whistleblowing arrangements
The Public Interest Disclosure Act 1998 introduced protection for employees from reprisals for disclosing information in the public interest. It emphasises the importance that the role 'whistle-blowing' can play in deterring and detecting malpractice and abuse of babies, children and adults at risk.

Staff and volunteers will be supported to bring matters of concern to the attention of senior management and/or relevant external agencies. This is particularly important where the welfare of babies, children and adults at risk.
WWT will:

- ensure it has appropriate whistle-blowing procedures in place (see policy and guidance on Netlands)
- ensure that it has clear procedures for dealing with allegations against employees.
- empower and support employees to report any behaviour by colleagues or professionals that raises concerns or dangers regardless of source.

Employees will be encouraged to contact their line manager unless the disclosure concerns that person; in which case they will be asked to contact the WWT's Safeguarding Lead (Head of Safety Management).

Allegations of abuse made against you

If allegations are made against you, then WWT has a duty to investigate under three areas: criminal activity, safeguarding concerns and internal disciplinary processes. In the case of a safeguarding concern or suspicion of a criminal act having been committed, WWT will have an obligation to refer the matter to the relevant authorities. Please ask your line manager or refer to WWT's Disclosure and Barring Policy on the intranet for further information.

Complaints against you

Any complaint against a member of staff or volunteer that is identified as a safeguarding concern will be referred into these safeguarding Policy and guidelines.

Admission policy to centres

Children and Persons at Risk are welcome at all WWT centres. Children under 16 must be accompanied by a responsible adult. In individual cases, if children under 16 are on site and unaccompanied, the responsible adult should be contacted immediately and informed of our admission policy. This admissions policy is clearly displayed at points of entry at centres and is also stated on the WWT website.

Protection from serious hazards or rash behaviour

It is impossible to ensure that no child or Persons at Risk ever comes to harm at a WWT centre, indeed our Play Safety Policy reflects that a certain level of risk is tolerable. What we must all do is take all reasonable steps to adequately control likely risks that might happen on site or when we run activities or events where children and Persons at Risk are present. 'Reasonable' and 'likely' are the important terms here. This means allowing for factors such as the following:

- Children are usually smaller than adults. So, for example, something set at a reasonable height for an adult may be dangerous for a child or above their sight line.
- Children may differ in strength to adults. This may affect the design or operation of doors or gates.
- Children naturally explore and play games. This means that we have to do our best to anticipate adventurous behaviour and assess the risks involved.
- Children and persons at risk may have less experience or comprehension of dangers, so may not recognise when they are at risk of harm or know how to act in an emergency situation

You have a duty to prevent babies, children and persons at risk from coming to harm through their own behaviour.

You need to judge carefully when and how to intervene. Predict and prevent a situation if you can, perhaps highlighting a potential danger to a parent or guardian, who may be distracted at the time.

If it is clear you need to interact directly with a child or Adult at risk, often the best course is to guide them into a safe course of action, rather than just telling them to stop what they are doing. It is better to use positive but assertive language (e.g. "Walk here as it's slippery, thank you", instead of "Stop running!".) Or it may work to distract them from something dangerous.

If you have to tell them to stop what they are doing, try to be calm, clear, and definite about it. It helps to take a deep breath before you say anything.

Avoid being officious or challenging. You need to exert your authority, not 'prove' it. If, despite your efforts, a child or Adult at risk persists in jeopardising their own or other people's safety, involve the parent or guardian, highlighting the dangers of the child or Adult at risk's behaviour. You may have to consider asking them to leave the site.

If they are in serious danger and you cannot persuade them away from it, (for example in a situation with unpredictable currents or tides), consider contacting the emergency services

Restraint: If you think it is necessary to restrain a child or Adult at risk from doing something, first try non-physical approaches. For example, by talking to them, by asking them not to move if they are injured, or by standing in the way. If you do have to use physical restraint, it should be the minimum necessary for their safety and only as a last resort. If they are in imminent danger, you might need to hold them by their clothing. Whatever the circumstances, physical restraint must be appropriate and reasonable; otherwise it may be regarded as assault. All incidents of restraint should be reported to the Appointed Person on duty.

Alcohol & illegal drugs: If there appears to be underage drinking in or around one of our centres, or you see children or Adult at risk apparently taking drugs, giving them to others or being given them, you should not try to stop them, but you should notify the Police. Try to keep an eye on the situation to make sure that the children or Adult at risk do not otherwise endanger themselves. Police involvement does not mean necessarily that they will be charged with any offence, but it should result in experienced handling of the situation.

Preventing hazardous situations: You must take all reasonable steps to ensure that no other member of staff, volunteer or member of the public puts a child or Adult at risk at serious risk. For example, suggesting an inherently risky activity. This means intervening to stop or improve a potentially hazardous situation. Be sensitive to the fact that actions are likely to have been taken with the best intentions.

What to do if an ACCIDENT happens

- Follow the accident procedures at your centre. Call a first aider if you need to.
- With children and persons at risk, it can be harder to tell the seriousness of injuries. If in doubt, or you think that an accident is not being treated seriously enough, err on the side of caution and, with permission of the parent / guardian if present, contact the emergency services.
- Ensure the accident is recorded and reported in accordance with WWT procedures.

First Aid

- A qualified First Aider (or emergency first aider) should be on site at all times.
- Unless there is good reason, First Aid should not be administered without the permission of the child or Adult at risk's parent, teacher or accompanying adult. A child or Adult at risk cannot give consent. If the parent or guardian is not on site, get their phone number, if possible. However, if a child or Adult at risk is alone and, say, unconscious, the situation should be dealt with as for any other visitor.
- If at all possible, treatment should only be given by a trained First Aider
- First aid treatment should be given with more than one adult present unless a delay would be life-threatening.
- Always tell the child or Adult at risk exactly what you are doing and why.
- Ask the child or Adult at risk if they use any medication (e.g. for asthma, diabetes, epilepsy) or have any allergies. Some children and persons at risk have allergic reactions to stings. Unless it is a first occurrence, a parent, guardian, or teacher should know of any such conditions.
- Any treatment should be as little as necessary without threatening the child or Adult at risk's well-being.

If a child or Adult at risk comes to you for comfort because of an accident or fright, try to avoid physical contact. If the child initiates contact, then it is ok to accept. Make sure:

- That you know about any injury and do nothing to make it worse.

- That physical contact is what the child or Adult at risk wants, and the kind of contact between you is appropriate to their age and stage of development.
- Unless absolutely unavoidable, stay within the sight of other adults.

If emergency services have been called, stay on site, and wait for the ambulance. If an injury is serious, only under exceptional circumstances will emergency services ask someone to take a child or Adult at risk to hospital, and a parent/guardian/teacher must do this. This is a stressful situation for the adult responsible for the child or Adult at risk, so remind them to make sure that they have made adequate plans for what will happen to any children or Adult at risk in the group or family left on site. In the case of school visits, the school should have their own risk assessment for external trips and a procedure to follow. The school must be notified of the incident and the injured child should be taken to hospital by an appointed person from the school. The remaining pupils should continue to be accompanied on site by a staff member/ adult from the school.

Lost children or Adult at risk

What to do if a child or Adult at risk is reported as missing
If you are the member of staff or volunteer first approached by the parent/guardian, you are responsible for following centre procedures. If you are HQ staff or are visiting another site, please find the nearest member of site staff and alert them.

- Reassure and calm the parent/guardian and ask for as much information as possible regarding the missing child or adult at risk, including name, age, hair colour/style, clothing, height, etc.
- Confirm where in the centre/grounds the child or Adult at risk was last seen.
- Immediately but calmly put out a radio call to advise all staff that a child or Adult at risk is lost – confirm where the individual was last seen and provide a full description. Do not issue a name. Request that the individual be taken to your centre's pre-agreed area if found.
- Escort the parent/guardian immediately to the pre-agreed area. Explain that all found children and Adult at risk are taken to this area for safety. The Appointed Person on duty should make their way to the pre-agreed area. However, if the parent or guardian insists on continuing the search for the lost child or Adult at risk, make arrangements to stay in contact (e.g. via mobile phone) so you can take appropriate action when the missing person is found.
- All available staff with radios should assist in the search for the child or Adult at risk.
- When the individual is found, immediately take them to the pre-agreed area and put out a radio call to advise that the lost person has been found.
- For their safety, ensure the child or Adult at risk waits in the area until the parent/guardian arrives rather than walking to meet their parent/guardian.
- If the child or Adult at risk is not found quickly, ask the parent/guardian for further information, i.e. does the child or Adult at risk have any medical condition we should be aware of, do they regularly run off and hide, are there any family or other circumstances we should be aware of, etc. Also ask members of staff or volunteers if they have any information that may help.
- If anyone reports anything suspicious, or the child or Adult at risk was last seen near water, and there is a suspicion they may have fallen in, call 999.
- In accordance with your centre procedures, the Appointed Person on duty must organise an immediate thorough sweep of the centre and if the child or Adult at risk has still not been found, call 999 and explain that a child or Adult at risk has gone missing from the Centre. Due to our centres containing large water bodies, conduct a sweep for only 20 minutes prior to calling 999.

What to do if you find a lost / unaccompanied child or Adult at risk
In the event of a child or Adult at risk being found alone without a parent or guardian present, take the following action:

- As soon as it is apparent that you have a found a lost or separated child or Adult at risk, a radio call must be made to inform the Duty Manager. Subsequently, take the individual to your centre's pre-agreed area.

- Whilst calming them, explain who you are and try to obtain their name, age, and details of who they are with.
- A radio call must then be made to notify all staff and volunteers that a lost person has been found and that they are in the centre's pre-agreed area. Advise of the sex of the individual and where they were found, but do not issue a name.
- The member of staff who found the person or receiving staff member if handed to them by other visitors, should remain with the person until the parent/guardian is found.
- All available staff should assist and look around the centre for any visitors who seem to be looking for a missing person, in accordance with the centre's procedures.
- When the parent/guardian is found, take them to the pre-agreed area where the lost person will be waiting. It should be obvious that the person has been reunited with their parent/guardian but if you are unsure, ask the parent or guardian to confirm the person's name.
- In the rare circumstance of a person being found but no parents/guardians reporting someone missing, it would be appropriate to call the police and report that a child or Adult at risk has been found and we have been unable to locate a parent or guardian.

Key details to obtain about a lost child or Adult at risk:
- name and age and gender
- any disabilities/ vulnerabilities / communication issues- in broad terms and relevant
- accompanying person's name
- child or Adult at risk's address or name of school/group
- physical description of the child or Adult at risk (height, colour of hair, ethnicity, distinctive clothing)
- where the child or Adult at risk is now or where & when the child or Adult at risk was last seen

Guidance for staff dealing with organised groups

All groups
This section is most relevant to education staff and volunteers. All education staff and volunteers are expected to follow these guidelines, for any type of group visit:
- Ensure safety information is sent to lead adults prior to any group visit.
- Set expectations of the standards of behaviour required from participants in an activity/event and encourage them to accept responsibility for their own behaviour.
- Ask participants in an activity/event to take reasonable steps to ensure their own safety and that of others.
- As WWT is an inclusive organisation, avoid showing favouritism towards particular participants.
- Ensure that all activities organised will be safe, including giving appropriate safety instructions to participants.
- Ensure that all equipment and materials used in the activities are well maintained and adequate for the task in hand.
- Pay special attention to arrival and departure procedures to ensure the safe transit of children or persons at risk around the site and to and from the car park.

Accompanied groups
Organised groups where accompanying teachers/leaders take full responsibility for the children or Adult at risk in their charge (teachers/leaders are regarded as having a 'higher duty of care' or being 'in loco parentis'). This type of group includes visiting school groups – pupils aged 4-18 (formal education), pre-school groups – under 4 years e.g. playgroups, mother & toddler groups and visiting organisations e.g. Scouts, Guides, Special Educational Needs etc.

- All teachers/leaders are to be issued with the standard WWT pre-visit pack prior to the visit and are requested to acknowledge acceptance of the terms and conditions of the booking.
- These terms and conditions should make clear the teacher/leader's supervisory responsibilities and highlight the various risks associated with a visit (including elements of health and safety e.g. pond dipping, handfeeding of birds, etc.), to enable teachers/leaders to complete their risk assessments.
- Terms will also include bringing a recommended minimum ratio of adults: children or Adult at risk for the purposes of safe supervision during the visit. This is

Pre-school	1:2
Reception & KS1	1:5
KS2	1:10
KS3+	1:15

However, individual circumstances may merit increasing the required number of adults, and it is the centre's responsibility to agree an acceptable level of adult supervision with the visiting group leader. Under normal circumstances, centre staff and volunteers should not be counted as part of the ratio of supervisory adults.

- All teachers/supervisors should adhere to the relevant Local Education Authority guidelines for the taking of children out of school. Teachers of independent/private schools or any non-formal groups will, similarly, be expected to adhere to the relevant institutional guidelines in force and follow guidance on pupil to adult ratios as found on WWT's website.

Unaccompanied groups

These are organised groups where WWT staff and volunteers take responsibility for children or adult at risk (WWT staff have a higher duty of care) for example as members of WWT organised clubs, regular weekend or other activities or irregular one-off events in school holiday periods. In order to operate within our capabilities and best practice for the organisation, WWT will not offer unaccompanied group activities to participants under the age of 8.

For all activities organised by WWT where children (aged 8 – 18 years) are left in our care, the completion of a standard Parental Consent Form is required. No children will be allowed to participate in activities without this consent. This form will include details of any medical conditions, special diet, contact details of parent/guardian throughout the period of the activity, and details of who will be collecting the child at the end of the activity. Parent/guardians will be informed in advance of proposed activities, including any risks, and will be given a contact name and number at WWT in case of emergencies. (The form may also include a model release section where permission is given by the parent for any photos etc. taken of their child whilst they are visiting us to be used in publications).

The WWT staff member responsible for the group will maintain a register of attendance and ensure that every child is collected at the end of the activity by the appropriate adult (as indicated on the Consent form). There must be a policy in place should a parent/ carer not pick up the child or an unexpected adult arrives to pick up the child. This is very important as even if the unexpected adult is one of the child's parents, that parent may not have access rights.

Guidance for staff and volunteers who work outside of the UK

Please refer to the WWT Overseas Travel Policy.

WWT recognises that safeguarding is an issue throughout the world and in all societies. We also recognise that in some of the countries our staff and volunteers work, safeguarding law and attitudes towards the enforcement of it may differ to that in the UK. At all times when representing WWT, staff and volunteers abroad should make concerted efforts to uphold the principles of this Policy and be a positive role model for children and persons at risk. Being culturally aware is very important so you can conduct yourself in a culturally sensitive way, whilst also adhering to WWT policies and expectations.

Where WWT is working with PHD students, contractors and partner organisations, if WWT staff or volunteers witness any behaviours by those colleagues which breach the principles of this policy, they should exercise their judgement as to what action to take at the time however the matter should be reported to the Director of Conservation (or in their absence a member of Conservation Management Group) as soon as is practicable; who in turn can seek advice from the WWT Safeguarding Lead about if any action can or should be taken (recognising our limited control over such a situation).

The Conservation Directorate should consider including a safeguarding related clause in their Grant agreements and any contracts with third party providers of services.

WWT will not normally employ anyone abroad who is under 18 or is an adult at risk as this may be seen as inappropriate, exploitative, or harmful given the person's age or developmental capacity.

Support will be given both internally and via our international occupational health providers (Thrive Worldwide) where a member of staff or volunteer is distressed or traumatised by something that they have witnessed whilst working abroad.

Personal Conduct outside Work or Engagement with Us
We do not dictate the belief and value systems by which Staff and volunteers conduct their personal lives. However, actions taken by them out of working hours, whilst overseas due to the requirements of their WWT role, that are seen to contradict this policy will be considered a violation of the policy. Staff and volunteers are required to adhere to the principles of this Policy both at work and outside work. Please refer to appendix A for more information

Employment of staff and volunteers who are under 18 or an adult at risk

WWT has policies in place for the safe and fair recruitment of staff and volunteers and we encourage all sectors of society to work or volunteer for us. In the case of employment/ volunteering by someone who is under 18 or an adult at risk, we will ensure that appropriate control measures are in place to protect the health, safety, and welfare of those persons. This applies to all roles however particular emphasis will be placed on those roles which are public facing.

Taking of photos or videos of children, young people and adults at risk

Nobody should take or publish any images of people without being absolutely certain that the necessary forms have been completed and are on file.

Is it strictly forbidden to take secret or covert recordings or images. Contributor Consent forms must be signed by anyone (who is not a member of staff or a volunteer) who appears in images or recordings that WWT use for any purpose. If the image subject is under 18 or a person unable to give their own consent, a parent or legal guardian must sign.

Where possible, WWT owned cameras should be used when taking images or video of persons on our sites and WWT retains the property rights to those images/ recordings. Where a staff/ volunteer owned camera is used, any images / video taken as part of their role (either within hours or because of special access), which includes images children or persons at risk, **remain the property of WWT**.

For support on this topic, please contact the WWT Media Team.

For further information

Please see the Safeguarding section of Wetlands or speak to the WWT Head of Safety Management.

Reporting arrangements

The Head of Safety Management will include a specific section regarding safeguarding in his/ her annual report, which is presented to both Executive Leadership Team and Council, with the Deputy Chief Executive as the sponsor of this section of the paper. In addition, safeguarding is included in the Safety 5-year work plan.

Exception reporting (for example after a serious safeguarding incident) will be made to Executive Leadership Team by the Head of Safety Management at the earliest opportunity following investigation.

Reporting to the Charity Commission

The Charity Commission requires charities to report serious incidents. Therefore, if a serious incident takes place within WWT, it is important that there is prompt, full and frank disclosure to the Commission. The Deputy Chief Executive will advise the Board of Trustees when an incident meets the criteria for reporting to the Commission. The Board of Trustees have ultimate responsibility for reporting serious incidents to the Charity Commission in a timely manner.

In the event of an allegation being raised about a trustee, the Charity Commission will be notified by the Chair of the Board of Trustees.

Monitoring and Review

WWT will regularly review and update this policy to ensure it remains effective and aligned with evolving legal requirements, best practices, and the organization's operations. The Head of Safety Management is responsible for ensuring that adequate monitoring and audit processes are in place.

This policy will be reviewed no later than September 2028

Agreed at WWT Executive Leadership Team September 2025

International helplines (child safeguarding)

Madagascar

Cambodia

Appendix A: safeguarding code of conduct when working at WWT sites.

When dealing with babies, children and adults at risk, you must:

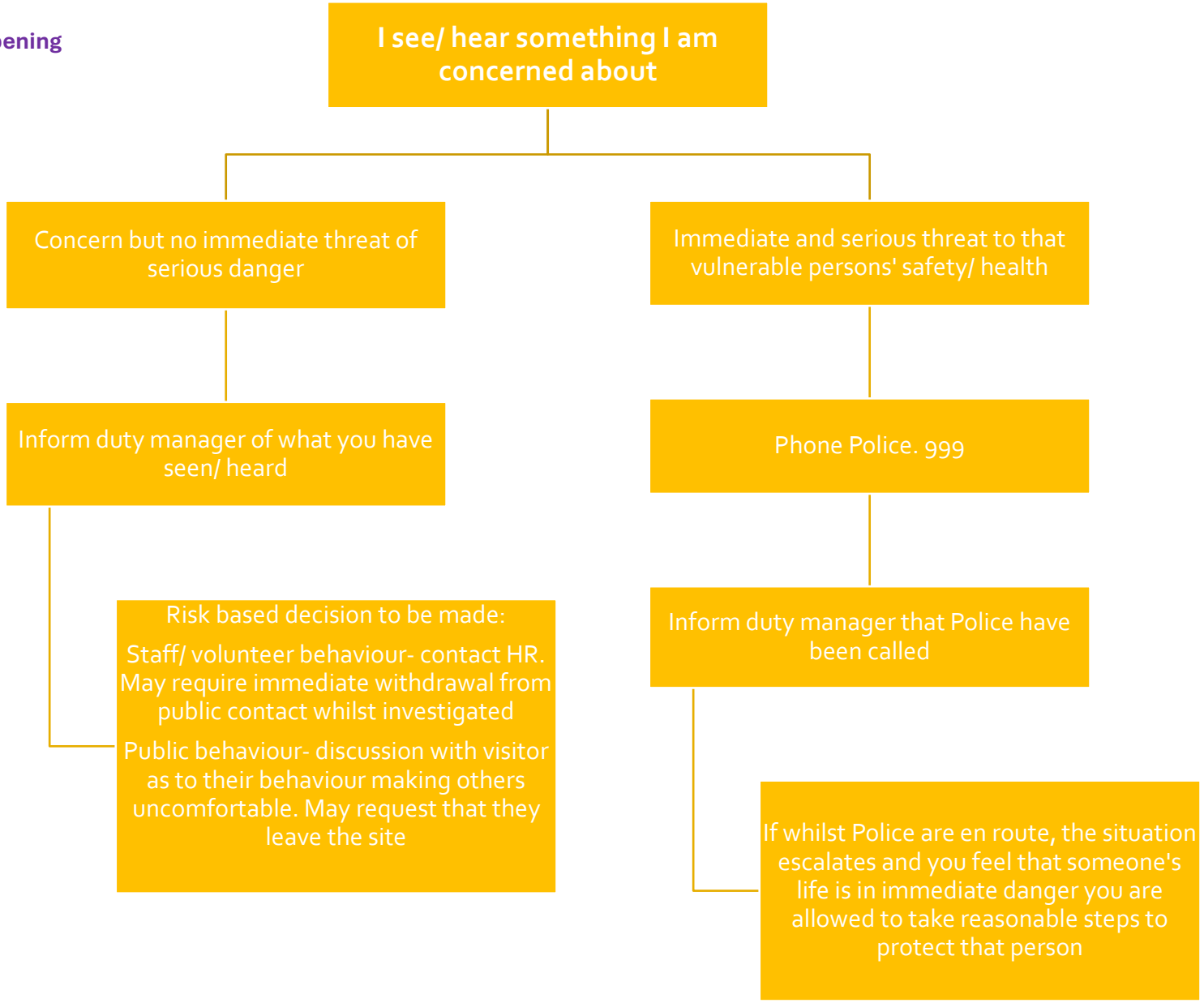
- Ensure you carry out your role in line with this policy
- Plan ahead to ensure the safety of all visitors
- Avoid being alone with a baby, child or Adult at risk. If needed, ask a colleague to accompany you.
- Do your best to comfort a hurt or distressed child or Adult at risk but be mindful of their dignity and use your professional judgement.
- Where possible, avoid physical contact. You should only touch someone if they need and initiate it, for example allowing a child to hold your hand or helping them up if they have fallen.
- Directly ask permission before touching, otherwise it may be unwelcome. If possible, make sure you can be seen by another adult.
- Put the needs of the child or Adult at risk first in a situation where you have to use your own judgement.
- Be open and friendly, but avoid being over-familiar in what you say or do
- Report any accidents to the Duty Manager and Appointed Person on duty for recording and investigation if needed.
- Not take photos or videos of children or persons at risk, without first obtaining written consent (from parents/guardians) beforehand. This is to comply with GDPR. Personal details and photos which clearly identify an individual must only be published where he/she (or his/her parent/guardian) has given specific agreement.
- If relevant, refer to the social media and internet use policies.

When dealing with children and persons at risk, you must NEVER:

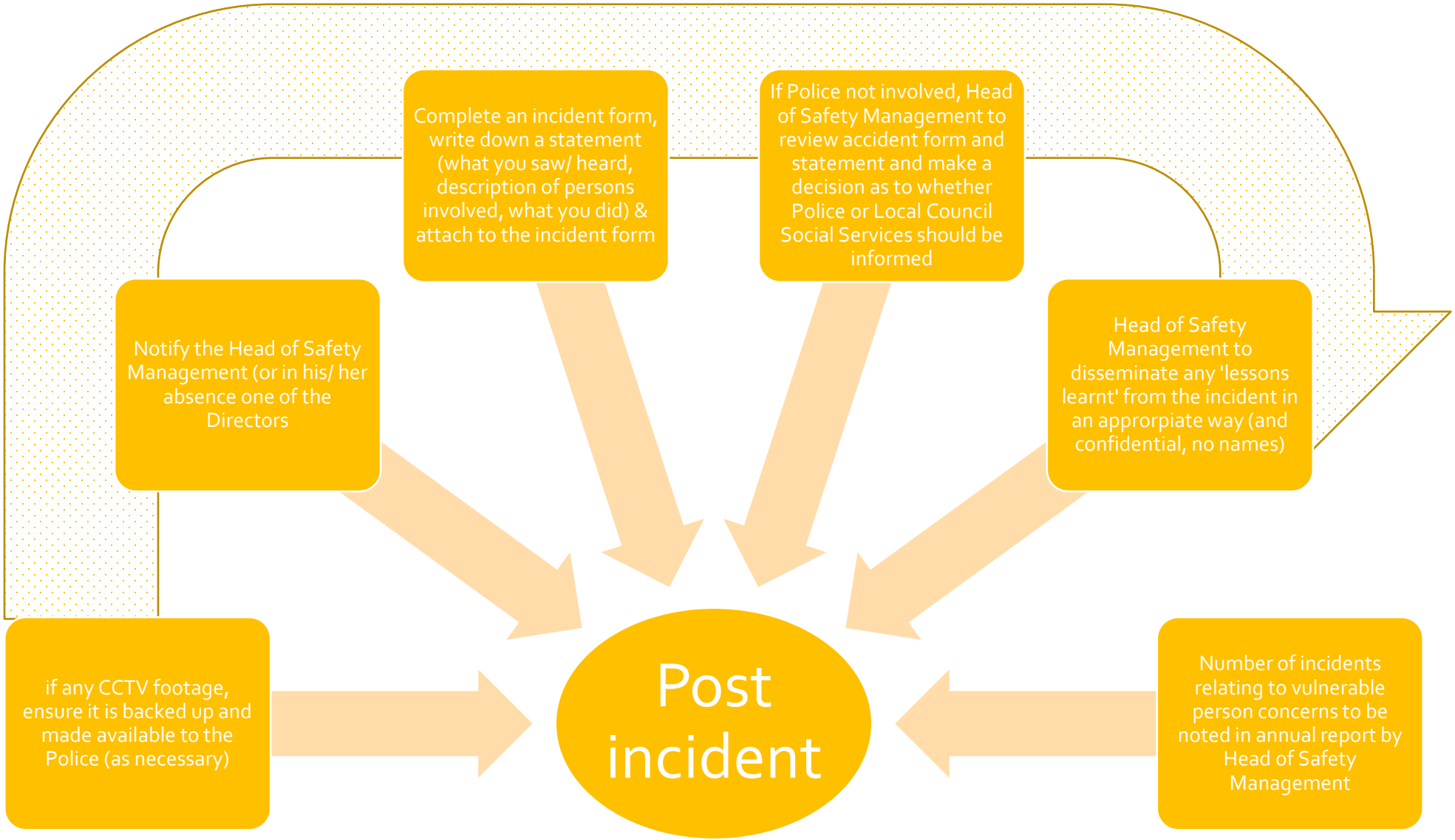
- Make suggestive or inappropriate remarks to or about a child or Adult at risk, even in fun, as this could be misinterpreted.
- Distress a child or Adult at risk by shouting at them or calling them names or using derogatory words.
- Slap or shake a child or Adult at risk or hold them in a way that causes pain.
- Physically hold a child or Adult at risk except to protect them from harming themselves or others.
- Take part in horseplay or rough games.
- Allow or engage in inappropriate touching of any kind.
- Do things of a personal nature for children or Adult at risk that they can do for themselves, or an accompanying adult can do for them; this includes going to the toilet with a child unless another adult is present.
- Allow or engage in sexually suggestive behaviour or make suggestive comments within a child or Adult at risk's sight or hearing.
- Give, show or allow a child or Adult at risk to see anything which could be construed as being pornographic or of a sexual or suggestive nature.

Appendix B: Flowchart for concerns about behaviour towards an ADULT AT RISK or a CHILD

As the situation is happening



After the situation has occurred



Appendix C: WWT code of conduct when away from home

Background

Conduct expected of staff and volunteers when away from home.

It is expected that you will:

- Be culturally aware and conduct yourself accordingly.
- Adhere to all WWT policies and procedures including those topics covered by mandatory training such as health & safety and data protection.
- Have full adherence to the WWT Safeguarding Policy & Guidance at all times. When working abroad, legislation may be different around safeguarding, age of consent etc. Where the local country's law is of a lower standard, staff and volunteers must apply UK standards to their behavior.
- Treat all people with respect and dignity regardless of their
    - Age
    - Gender and gender assignment
    - Sexual orientation
    - Nationality
    - Ethnicity and race
    - Pregnancy
    - Language
    - Religion or belief
    - Marital status (including civil partnership)
    - Physical or mental health including disability.
- Avoid words and deeds that might bring WWT into disrepute.
- Abide by the WWT Data Protection policy and the law when handling personal, sensitive or confidential data and information.
- Will seek authorization before communicating externally in WWT's name to avoid any unintended detrimental repercussions for yourself, colleagues or WWT.
- Behave in such a way as to avoid any unnecessary risk to the safety, health and welfare of yourself and others, including partner organizations and beneficiaries.
- Be particularly aware of any risks arising from your work which may affect children (under 18) or persons at risk and take appropriate action.
- Comply with UK law and the law of the country you are visiting/ working in, whichever is the higher in standard.

You must not:

- Use your position at WWT for private advantage or gain.
- Exploit or take advantage of any individuals you come into contact with at any time in particular with regard to work, personal or sexual relationships. WWT considers that prostitution is inherently an unequal balance of power and is therefore likely to be non-consensual and exploitative. Payment by WWT staff or volunteers to a person for a sexual relationship is not tolerated by WWT and is seen as a form of slavery.
- Work inhibited due to the influence of alcohol or recreational drugs and you must not possess, store, trade or sell alcohol or drugs in the course of conducting your role unless it is a necessary requirement of the role. Pre-project risk assessments for overseas work should take into account the possibility of culturally appropriate drinking of alcohol and what suitable control measures to put in place. It is recognized that alcohol in some countries is a social norm and may even be expected when integrating into a community or when socializing with people you are working with; staff and volunteers should exercise their own judgement in order to ensure appropriate behavior and also the safety of themselves and those around them.
- Use, or be in possession of, illegal substances or articles on WWT premises, in vehicles or accommodation. When working abroad, use the law of the country you are in, recognizing that some articles and substances are banned in the UK but not in other countries and vice versa.

It is recognized that WWT staff and volunteers are often in a dynamic situation and must make a decision based on instinct despite proper planning and risk assessments of our projects. WWT will support your judgments made in good faith however it is imperative that your Project Manager or a Director is made aware of any concerns you have or problems you have faced implementing this code of practice. This includes you own behavior, that of your colleagues and also of partner organizations. This will mean that your concern is appropriately noted, managed and that you receive support from HQ.