



WWF-UK

Registered office
The Living Planet Centre
Rufford House, Brewery Road
Woking, Surrey GU21 4LL

Tel: +44 (0)1483 426444
info@wwf.org.uk
wwf.org.uk

WWF UK Safeguarding Policy

Author: Director of Safeguarding

Executive Group oversight: Executive Director for Advocacy and Campaigns

Approver: WWF-UK Board of Trustees

Applicable to: All UK employees and those that represent WWF-UK

Effective date: 1 November 2024

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To REPORT A SAFEGUARDING CONCERN, YOU CAN

- Visit https://www.wwf.gr/en/whistle_b_b/

- Email safeguarding@wwf.org.uk

1.1 Policy Statement

WWF-UK believes anyone who is involved in our work or connected to it, especially children and adults at risk, should be safe from harm. Our priority will always be to safeguard anyone at risk of harm or abuse. WWF-UK will proactively create and maintain a culture and environment that aims to prevent harm and abuse.

This policy includes all types of abuse and harm including what can be referred to as safeguarding children, adults at risk of harm, and sexual exploitation, abuse and harassment (SEAH). This includes sexual harassment, stalking and domestic abuse.

We believe that everyone has the right to protection from abuse and neglect regardless of their age, disability, gender identity, sex, nationality or immigration status, race, religion or belief, sexual orientation, marriage or civil partnership, pregnancy, or maternity.

The best interest of children and those at risk will always be our first consideration, taking precedence over all other considerations.

This policy applies globally to our employees and those that represent us, including volunteers (including trustees), consultants, contractors, delivery partners, visitors, ambassadors and artists and influencers, all of whom have a part to play in safeguarding.

WWF-UK defines children as anyone who has not yet reached their 18th birthday, regardless of local legislation.

WWF-UK recognises that some adults (those aged over 18) may be at risk of abuse and more vulnerable. We recognise that vulnerability can be transient.

All breaches of this policy and any allegations of abuse and neglect will be taken seriously and may lead to disciplinary action up to and including dismissal for gross misconduct, or the equivalent for volunteers, trustees, and contractors.

Staff with delegated authority can report allegations of abuse and neglect by staff or those representing WWF to the relevant authorities, this may include:

1. Reporting to the Charity Commission and donors
2. Consideration of referral to law enforcement agencies for criminal investigation
3. Consultation with child or adult social services
4. Relevant barring authorities

Referral and investigation by an external authority may result in internal disciplinary action, subject to the outcome of an investigation.

There is no time limit on our obligation to those at risk of harm and who have been abused. Non-recent and anonymous allegations will be dealt with under this policy.

WWF-UK will not tolerate the abuse of, or any form of bullying or retaliation against, anyone raising a legitimate concern for the safety and wellbeing of anyone else. Any form of reprisal is considered gross misconduct would be investigated and may lead to dismissal or other disciplinary action.

1.2 Application

All staff and WWF representatives must:

- Ensure that all WWF UK activities, programmes and operations are planned and designed with safeguarding in mind for anyone who may be reasonably expected to engage with our work.
- Respect and maintain appropriate boundaries, in person, digitally, on social media and online with those with whom they come into contact through our work.
- At all times follow the WWF UK Safeguarding Code of Conduct.
- Proactively engage with children and communities with whom you come into contact through work, ensuring that they are informed of this policy, how to raise concerns and the WWF UK Safeguarding Code of Conduct.
- Respect the privacy of others and ensure that children and adults at risk of harm are never identified online through posts and social or digital media. This includes never combining information such as someone's full name, school, specific location and any form of identifying image of them.
- Be mindful of the position of trust and power they hold as a result of their WWF-UK position, ensuring that any contact with others is not exploitative, abusive or an abuse of a position of power or trust.

- Ensure that when planning any form of event (including online or remote) that may involve contact with children or adults at risk of harm or who are vulnerable, that a risk assessment is documented and that a Designated Safeguarding Lead (DSL) is consulted to ensure appropriate safeguards are in place. Advice and direction in this regard from a DSL must be followed.
- Include and address safeguarding risks in the written risk assessment of any event or activity that may involve contact with children or adults at risk, including online activities.
- Ensure that WWF-UK systems are not misused or exploited in any way that may cause harm to children or adults at risk.
- Ensure that any contract awarded that may bring a contractor into contact with children or adults at risk includes provisions for the prevention, response and reporting of abuse and harm, that contractors have adequate safeguarding arrangements in place equivalent to or of a higher standard than this policy.
- Ensure that any grant awarded that may bring a grant recipient into contact with children or adults at risk includes provisions for the prevention, response and reporting of abuse and harm, and that grant recipients have adequate safeguarding arrangements in place equivalent to or of a higher standard than this policy.
- Sign the safeguarding declaration on appointment as an employee, volunteer, contractor, or trustee.
- Maintain their safeguarding knowledge through the completion of mandatory annual online individual safeguarding training, in addition to team-based development and learning sessions. New staff should complete safeguarding induction training within three weeks.
- Declare to the Director of Safeguarding immediately any relevant allegations, investigations, civil or criminal proceedings that might bring into question their ability of follow this policy during their employment, appointment as a trustee, volunteer, or representative of WWF-UK.
- Report and share information in accordance with this policy regarding all allegations, suspicions, and concerns of any type of abuse of another person. Everyone within the scope of this policy must co-operate fully with any request for information. The withholding of any information which relates to abuse or neglect can delay work to safeguard those at risk and prevent care and protection. Failure to report, withholding information or mishandling of allegations of abuse are breaches of this policy would be investigated and may lead to disciplinary action for gross misconduct.

All staff, volunteers, trustees, consultants, and contractors must never:

- Engage in any form of sexual activity with other staff, volunteers, trustees, partner/supplier representatives, grant recipients and programme or activity participants where there is a power imbalance.
- Support, take part in or condone any form of sexual exploitation, trafficking or abuse of any other person.
- Imply or suggest that employment (paid or otherwise), opportunity, programme participation or any form of benefit is received as a result of any form of sexual activity or exploitative behaviour.
- Take part in any form of transactional sexual activity, regardless of local legislation.
- Engage in or support the marriage of anyone under the age of 18 regardless of local legislation.
- Agree, engage in, negotiate or support any form of settlement or agreement between a victim of abuse, a witness, or their family. Such agreements must be reported in accordance with this policy.

- Fail to, or delay, the reporting of any safeguarding allegations or concerns in accordance with this policy. An anonymous or non-recent allegation or the lack of evidence is never reasonable grounds to delay or fail to report any concern of abuse, neglect, or exploitation. Any failure to report or delay to such a report would be investigated and may result in disciplinary action.

1.3 Mandatory Procedures

If you have or receive any report of concern, suspicion or allegation of any form of abuse, neglect or exploitation it is your duty to act.

If you believe that anyone is at risk of imminent harm you must contact the police by calling 999 without delay and then report the matter using the process below.

Staff, partners volunteers and other WWF representatives have a duty to report concerns and allegations. Your duty includes concerns and information relating to abuse or exploitation that may have occurred in the past or that where the identity of those involved is unknown. There is no time limit to our safeguarding commitments.

WWF-UK recognises that making a report of abuse can be challenging or potentially unsafe. If you feel unable to make a report or have made one and remain concerned that it has not been acted upon, you can make a report under this policy via our Whistleblowing system WhistleB anonymously at <https://report.whistleb.com/en/wwf>.

Staff should report concerns to a Designated Safeguarding Lead by calling them ([see Bamboo for details](#)) or emailing safeguarding@wwf.org.uk. This email address is only accessible to Designated Safeguarding Leads and the responsible Directors.

Partners, contractors, volunteers and others should follow reporting procedures set out in contracts and agreements or contact safeguarding@wwf.org.uk, or use the Whistle B process described above.

If the concern or allegation relates to the Director of Safeguarding, you must immediately inform the Executive Director of People and Culture.

Victims or survivors of abuse aged over 18 have a right to decide whether or not they wish to participate in any investigation. Nothing in this policy mandates a victim or survivor to make a report of abuse. If a victim or survivor declines to engage with any investigation, WWF-UK will assess and determine whether any investigation should take place.

Anyone appointed to any staff or volunteer position, or awardee of a contract or grant must be aware that any allegation of abuse or neglect made against them will result in a thorough response that prioritises safeguarding:

- Through consideration of a referral to law enforcement when appropriate.
- Through engagement with the local Children's or Adults Services (or equivalent) for concerns regarding the safety of children and adults at risk or for concerns regarding those that work/volunteer with children the Local Authority Designated Officer (if applicable).
- Through a robust internal investigation using this policy and any relevant disciplinary policy and process, which could lead to dismissal.

- Through compliance with WWF-UK's legal obligation to refer individuals to the relevant barring authorities those who have been found to have harmed a child or adult with whom we work or placed them at risk of harm. Where the threshold for a barring referral may not have been reached, a referral will be made out of an abundance of caution.

The Director of Safeguarding will commission and oversee all investigations of breaches of this policy in a victim/survivor centred manner and maintain a suitable investigative resource. Where an allegation that this policy has been breached by the Director of Safeguarding, the Executive Director of People and Culture may commission an investigation.

The Director of Safeguarding will maintain appropriate procedures for the conduct of investigations and referrals under this policy.

Where any individual leaves their position at WWF-UK before the completion or commencement of any investigation under this policy or related disciplinary action the process will continue, and an outcome will be clearly recorded.

Before the commencement of any investigation, permission must be sought from the Local Authority Designated Officer (or equivalent) and/or the police in any relevant cases.

No one in WWF-UK, including trustees or executive leaders, may prevent an allegation of abuse or neglect from being reported to a statutory agency or a consultation taking place with a Local Authority Designated Officer, Children's or Adult services (or equivalent).

1.4 Safer Recruitment Mandatory Procedures

The recruitment to any staff or volunteer position, including trustees must follow safer recruitment procedures which will include, but not be limited to, completion of an interview, pre-employment or engagement checks and declarations, references and criminal records checks prior to joining.

All employees, trustees and volunteers, where the safeguarding level of their role requires a criminal records check, will renew their criminal records checks every three years or upon appointment to a role with a different safeguarding level (see below).

At any time, WWF-UK may require a criminal record check to be undertaken, seek clarification of a reference previously provided or require additional references.

Recruiting managers must ensure that all roles are assessed against the relevant safeguarding level and, with Human Resources, ensure the completion of the appropriate checks prior to any role being undertaken. Every candidate for every role (paid or otherwise) where the safeguarding level requires a criminal records check must be asked a values related question from the safeguarding question bank (which may be adapted).

Any failure to follow safer recruitment procedures or attempt, successful or otherwise to mislead or frustrate this process is a breach of this policy and a disciplinary matter which may result in dismissal or the withdrawal of any offer of employment or volunteering opportunity.

During the annual performance review of all employees, managers must discuss and evidence their report’s contribution to improving safeguarding at WWF-UK.

1.5 External standards

WWF UK adheres to the Inter-Agency Standing Committee (IASC) Minimum Operating Standards on Six Core Commitments on protection from sexual exploitation and abuse.

1.6 Related policies and procedures

WWF has a number of policies that relate to safeguarding:

- Vulnerable supporter policy
- Safeguarding Code of Conduct
- Whistleblowing policy
- Online safeguarding policy
- Modern slavery policy
- Social media policy
- Diversity and inclusions policy
- Disclosure and barring policy and procedure
- Bullying and harassment policy
- Disciplinary policy.

WWF also has an [Environmental and Social Safeguards Framework](#) that helps deliver better conservation outcomes, and enhances the social well-being of local communities in the places where WWF operates. The safeguards framework is designed to address a broad range of environmental and social risks, mindful of the different challenges and needs in different parts of the world. It systematizes good governance practices to achieve human rights, transparency, non-discrimination, public participation, and accountability, among other goals.

Safeguarding Level Matrix

| Level | Criteria | Vetting and onboarding |
|-------|--|--|
| Zero | No access to systems, premises or software. No contact with beneficiaries, children or adults at risk. Limited contact with employees. Likely to be to consultants working remotely on limited projects. Not suitable for any employees (temporary or otherwise), or agency staff. | <ul style="list-style-type: none"> • Sign safeguarding declaration, code of conduct - through procurement process. |
| One | No un-supervised contact with children or adults at risk, role unlikely to have incidental, but supervised contact with vulnerable populations. | <ul style="list-style-type: none"> • X 2 employment references • Sign safeguarding declaration & code of conduct • Sign declaration of criminal convictions |

| Level | Criteria | Vetting and onboarding |
|-------|---|---|
| Two | <p>No un-supervised contact with children or adults at risk, role likely to have incidental, but normally supervised contact with vulnerable populations, including: visiting WWF programmes inside or outside the UK, monitoring of social media channels, receipt and reply to email correspondence with vulnerable groups, phone calls with supporters, mental health first aiders, supporting staff with HR matters.</p> <p>Note: Includes trustees (who will be required to have a Basic DBS check) and a significant number of employees.</p> | <ul style="list-style-type: none"> • Basic DBS check • X 2 employment references • Sign safeguarding declaration & code of conduct • Sign declaration of criminal convictions |
| Three | <p>Un-supervised contact with children, responsibility for teaching/caring for children, work in schools moderating an online chatroom or similar. Contact not frequent i.e., undertaken for less than 3 days in a 30-day period or working overnight.</p> <p>Or working with adults at risk infrequently i.e., no more than 3 days in any 30-day period or overnight if adults are in receipt of care.</p> <p>Note: Likely to apply to employees working directly with children in education roles or having responsibility for managing a safeguarding response e.g., moderating online engagement with children. Caring for children or vulnerable people would normally include personal care e.g., with washing or toileting. Includes work undertaken outside of the UK.</p> | <ul style="list-style-type: none"> • Standard DBS check • X 2 employment references • Sign safeguarding declaration & code of conduct • Sign declaration of criminal convictions • If previous work with children/vulnerable people one reference from this work |
| Four | <p>Un-supervised contact with children with responsibility for teaching/caring for children, work in schools moderating an online chatroom or similar. Frequent contact for more than 3 days in a 30-day period or overnight. Line managers of any role meeting the above criteria are also at this level.</p> <p>Or</p> <p>Un-supervised contact with adults at risk teaching, caring (e.g., help with using the toilet) or formally with frequent contact for more than 3 days in a 30-day period or overnight. Line managers of any role meeting the above criteria are also at this level.</p> <p>Note: Likely to be employees with specific responsibility for caring, teaching etc. These roles would usually be work that is similar to a teacher/school staff, youth worker or care home staff.</p> | <ul style="list-style-type: none"> • Enhanced DBS check with barred list for adults/children (as applicable) • X 2 employment references (one must be verbally checked for authenticity) • Sign safeguarding declaration & code of conduct • Sign declaration of criminal and disciplinary record • If previous work with children/vulnerable people at least one reference from this work |

1.7 Partnership and Grant Agreements

Staff who manage any formal or contractual arrangements between WWF-UK and any delivery partner, grant holder, or supplier which bring them into contact with people with whom we work, including any form of image and data, must ensure that contracts include provisions for the prevention, response and reporting of abuse and harm.

Delivery partners, grant holders and suppliers must have policies in place to maintain safeguarding arrangements at least equivalent to this policy, this will be verified by WWF-UK Due Diligence processes. If any of WWF-UK's direct partners, grantees or suppliers use sub-grantees or contractors to carry out work funded by WWF-UK, they must undertake Due Diligence to be able to provide assurance that there are equivalent safeguards in place Any party without such policies must give a written undertaking to ensure standards in this policy are met (for verification within an agreed time frame).

All agreements with partners, grant holders and suppliers must include a provision for WWF-UK to terminate any agreement or contract if the partner is judged by WWF-UK to have failed to prevent, respond, and report any abuse or harm.

Should any concerns regarding a party's safeguarding arrangements or response arise, the Director of Safeguarding must be notified without delay.

1.8 Definitions

| Word/Term | Definition |
|--------------------|--|
| Adult At Risk | Anyone who is 18 or over who may be or is unable to care or protect themselves for any reason. This can be due to a disability, illness or age. Sometimes referred to as vulnerable adults. It can also apply to those suffering from addiction, trauma or their immigration status. Vulnerability may be temporary and transient. |
| Child | Anyone under the age of 18. |
| Child Abuse | Any action or inaction by an adult or child that causes harm to a child. There are five categories of abuse: emotional abuse, physical abuse, neglect, sexual abuse and exploitation. Child abuse can occur online using technology and social media as well as in person. |
| Child Exploitation | An umbrella term used to describe the abuse of children who are trafficked, forced or coerced into exploitative activities for another's gain. |
| Child Sexual Abuse | The involvement of a child in any forced or coercive sexual activity, the child may not understand or be aware that they are being abused. This may be by another child, adolescent or adult. This includes showing or sending a child sexual material or taking sexually exploitative images of children. |
| Domestic Abuse | Being subject to abuse by a partner, family members or carer. |
| Emotional Abuse | Psychological harm caused by bullying, belittling, gas-lighting and manipulation that harms another person's emotional wellbeing |
| Financial Abuse | The exploitation of another person for financial gain, this includes theft, use of their funds the acquisition of unwanted goods or credit. This includes Modern Slavery. |

| Word/Term | Definition |
|---|---|
| Gaslighting | Gaslighting is a form of psychological abuse. It is the manipulation of a person by psychological means into questioning his or her own sanity, for example trying to convince someone they're wrong about something even when they aren't. |
| Harassment | Harassment is unwanted conduct affecting the dignity of others. It is any behaviour, even if unintentional, that is demeaning and unacceptable to the recipient and, when linked to a protected characteristic, can be unlawful. |
| Inappropriate Behaviour | Any behaviour that breaches our values or the safeguarding code of conduct. |
| Neglect | Failure to meet the basic needs of another through action or inaction including the denial of food, water, medical assistance, clothing, and personal care. |
| People with whom we work | Individuals, communities, or groups who come into contact with our work through programmes and our operations. |
| Physical Abuse | Deliberate action that causes harm or physical injury it can involve biting, hitting, kicking, being restrained, or struck with objects. |
| Position of Power or Trust leading to power imbalance | Any position which one person has more authority or power over another through a formal mechanism for example, a leadership role or control of resources or an informal role such as volunteer who co-ordinates others. Positions of trust can also be formal through appointment to a role inside or outside of WWF-UK such as a trustee or sports coach. |
| (Abuse of) Power | Abuse of Power consists of improper behaviour by a someone with more power (or someone in a position of trust) to the detriment of a person in a junior or dependency role, including children. |
| Sexual Abuse & Exploitation (Adults) | Being forced to take part in or exposed to sexual activity or material, being photographed, filmed or observed for sexual purposes (including for financial gain) without their consent, by force or under unequal or coercive conditions, sexual touching, assault, and rape, this can occur without knowledge of the victim. This would include forced marriage and sexual slavery and also includes sexual activity with a child (any person under the age of 18), |
| Sexual Harassment | Any form of unwanted conduct of a sexual nature towards an adult, which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual. This includes all forms of direct or indirect contact. |
| Transactional Sexual Activity | The exchange of money, goods, services or employment for sex or any sexualised activity. This includes activity that may be lawful such as sex work. WWF-UK does not judge those that experience such transactions, we do however recognise that those exchanging something for sexual services do so through an inherent abuse of power. |

Version control

| Version | Version date | Revisions made |
|-----------------|---------------------|--------------------------------------|
| SG-1.0 | 24 June 2022 | Fully revised policy |
| SG internal-1.1 | 12 September 2022 | Added safeguarding levels |
| SG 2.0 | 27 September 2024 | Bi-annual review amends/additions |