



WWF-UK SAFEGUARDING CHILDREN POLICY

Purpose:	The policy and related procedures describe WWF-UK's commitment to safeguarding and child protection procedures
Applicable to:	<ul style="list-style-type: none"> ✓ All WWF-UK employees (including hosted employees and temporary employees), volunteers, trustees and contractors ✓ Partners and suppliers
Owned by:	Child Safeguarding Director
Linked to:	Online Safeguarding Policy, Safeguarding Code of Conduct
Version:	2.0
Approved by:	Executive Group February 2021
Last reviewed:	February 2021
Next review:	February 2022

Contents

1. Safeguarding Children Policy	3
2. Child Safeguarding governance arrangements.....	6
3. Safeguarding Procedures.....	10
4 Respond: what to do if you have a safeguarding concern about a child	11
5. Information sharing, consent and confidentiality.....	14
6. Respond and manage an allegation of abuse made against WWF-UK staff, volunteers, contractors	15
7. Recording, record keeping, retention and destruction.....	21
8. Escalation	22
9. Working with third parties and partners	22
10. Use of Images Policy.....	22

Appendix 1: Underpinning legislation and guidance27

Appendix 2: Defining child abuse and neglect.....28

Appendix 3: Types and indicators of child abuse and neglect30

Appendix 4: Grooming behaviour31

Appendix 5: Additional guidance on children and young people abused in specific circumstances.....32

Appendix 6: Barriers to help seeking for children37

Appendix 7: Safeguarding Contacts.....38

Appendix 8: WWF-UK Safeguarding Report Form40

Appendix 9: WWF-UK Safeguarding Action Log43

Appendix 12: Safeguarding Checklist for Partner Organisations working with WWF-UK3

Appendix 13 Consent Form: Photographs, Film and Interviews7

Appendix 14 Serious Incident Reporting10

1. Safeguarding Children Policy

1.1 Policy Statement

WWF-UK (WWF-UK) is a conservation organisation and charity which aims to create a world where people and wildlife can thrive. In so doing, WWF-UK engages with children in a range of ways including: school based workshops, at the Living Planet Centre (LPC), fundraising, youth ambassadors programme, youth changemaker events and trainings, social media and campaigning.

It is WWF-UK's policy to create and proactively maintain an environment that aims to prevent and deter any actions or omissions, whether deliberate or inadvertent, that places children at risk of any kind of abuse. We have a duty of care towards children that engage with our campaigns, activities or events. This applies to all our work both within the UK and internationally.

This policy applies to children we work with both face to face and online. The UK legal definition of a child is any person up to the age of 18 years.

WWF-UK believes that:

- All children have an equal right to protection from abuse and neglect, regardless of their age, disability, gender reassignment, sex, nationality, race, religion or beliefs, sexual orientation, marriage and civil partnership, pregnancy or maternity, or any other additional vulnerability.
- The best interests of the child are paramount in all considerations about their welfare and protection, including when to maintain confidentiality and when to share information.
- The entire staff contingent, volunteers (including trustees), consultants and visitors all have a role to play in safeguarding children
- Concerns or allegations that WWF-UK staff, volunteers, consultants or visitors have abused or neglected a child will be managed sensitively and fairly in accordance with this policy, relevant legislation and local safeguarding procedures.
- Working together with children, their parents, carers and authorities is essential in promoting welfare and ensuring the protection of children.
- As part of working together, WWF-UK expect the relevant authorities to act on our concerns. We will escalate our concerns, where necessary, in our efforts to be satisfied that our concern has been taken seriously and the child at risk has been protected.

Child abuse can have both short and long-term consequences. The impact can include serious injury, disability, threats to survival or even death. It can affect a person's development, mental health, ability to form relationships, self-esteem, confidence or achievements in education or work. It may impact on the ability to parent and have a decent family life. It can have huge personal and economic consequences for the individual, their family, community and society. Hence the necessity of doing everything possible to prevent abuse wherever possible and to protect children and adults at risk whenever we identify it may be happening.

1.2 Purpose and Scope

WWF-UK International requires us to meet minimum child safeguarding standards¹ and we are doing this through this policy, related procedures and the safeguarding code of conduct. Protecting people and safeguarding responsibilities are a fundamental part of operating as a charity too.

The policy and the accompanying procedures are essential because they provide clear processes for all our staff, volunteers (including trustees), contractors and visitors. This ensures that everyone is clear about their roles, responsibilities and expectations to protect children from harm.

WWF-UK's safeguarding children policy and procedures must be followed alongside local inter-agency procedures, protocols and arrangements as devised by local Safeguarding Children Partnership (or equivalent) in the UK or standards that are applicable to our international work.

¹ WWF-UK Network Standards (2018) Child Safeguarding and Protection of Rights

It is the responsibility of all staff to consider the child safeguarding implications of all existing and proposed new projects or developments in their area in conjunction with their line manager.

It is the responsibility of staff, volunteers, contractors and visitors to act if there is a cause for concern about a child or the behaviour of an adult towards a child but it is not their responsibility to determine if abuse has occurred or what action is required to protect the child. Responsibility for deciding whether to escalate a concern to the appropriate authority lies with WWF-UK's designated safeguarding staff.

WWF-UK recognises that the Charity Commission requires charities to ensure that **all persons** who come into contact with the charity (whether supporters, beneficiaries, donors, volunteers or the general public) are protected from harm. This policy intentionally deals only with safeguarding children and the specific issues which arise in relation to safeguarding children.

1.3 Application

This policy and the safeguarding children code of conduct and procedures apply to WWF-UK's entire staff contingent, volunteers (including trustees), contractors, third parties delivering on our behalf and visitors including WWF International staff who may be onsite in our offices

WWF-UK requires that our partners, current and future, share our commitment to safeguard children. We expect them to demonstrate this to us by having their own safeguarding children policy and procedures in place that are 'fit for purpose' before any partnership is agreed or continued.

1.4 Breaches

The Leadership Team is committed to taking appropriate action, including disciplinary, legal or other action in response to breaches of the Safeguarding Children Policy, Procedures and the Safeguarding Children Code of Conduct.

1.5 Our commitment to safeguard

WWF-UK will fulfil its commitment to safeguarding children by:

- Valuing, listening to and respecting children who engage with our cause
- Providing a safeguarding code of conduct for staff, volunteers, consultants and visitors which links to the capability/disciplinary procedures
- Ensuring suitable staff and volunteers are recruited to work with children by adopting safer recruitment, selection and vetting processes
- Building awareness and skills through a safeguarding children induction and training appropriate to roles and responsibilities
- Risk assessing and mitigating for any risks in our activities or events that involve children, in order to create safe environments
- Establishing safeguarding children governance arrangements with assigned roles and responsibilities, including the identification of operational and strategic safeguarding children roles and a Safeguarding Lead Trustee
- Responding in a timely and appropriate manner to safeguarding children concerns or allegations
- Promoting a culture of safeguarding children where staff, volunteers and consultants feel able to speak out without fear of recrimination, harassment or bullying
- Providing effective management through induction, supervision, appraisal and support
- Perform due diligence, which includes safeguarding, with other organisations that deliver activities or events involving children on behalf of WWF-UK
- Maintaining a risk register which includes any outstanding safeguarding risks
- Raising awareness of our safeguarding children policy and procedures, both within WWF-UK and with all those whom we engage including on internal and public websites
- Monitoring and reviewing our safeguarding children practice to identify any lessons learnt and implications for policy and practice

- Reviewing our safeguarding children policy, procedures and code of conduct every two years or sooner if it is required due to legal changes or learning from safeguarding incidents.

1.6 Terminology

For the purposes of this policy and procedures, the following terms and definitions apply:

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults, or another child or children.

Child: Legally, a child includes babies, children and young people from pre-birth up to 18 years. The fact that a young person has reached the age of 16, is living independently or is in further education, is a member of the armed forces, is in hospital or in custody does not change his/her entitlement to protection. This applies to England, Wales and Northern Ireland.

In Scotland, there is a variance to this where a child is someone up to the age of 16 years unless the child is subject to a supervision requirement by a Children's Hearing, in which case they are considered a child until the age of 18 years².

Safeguarding and promoting the welfare of children³

Safeguarding is the action that is taken to promote the welfare of children and protect them from harm. Safeguarding means:

- protecting children from abuse and maltreatment
- preventing impairment to children's physical and mental health and/or development
- ensuring children grow up with the provision of safe and effective care
- taking action to enable all children and young people to have the best outcomes
- educating those around children to recognise the signs and dangers of abuse and neglect

Child protection: This is part of safeguarding and promoting welfare. It refers to the activity that is undertaken to protect specific children who are suffering, or at risk of suffering, significant harm. Different types of abuse (e.g. physical, emotional, sexual or neglect) may constitute significant harm. More details about abuse are presented in Appendices 1-6.

Significant harm: is the threshold that justifies compulsory intervention in the family in the best interests of the child. Section 31 of the Children Act 1989 states 'where the question of whether harm suffered by a child is significant turns on the child's health or development, his health or development shall be compared with that which could reasonably be expected of a similar child.' **Harm** is ill treatment or impairment of health and development, including impairment suffered from seeing or hearing the ill treatment of another.

Contextual safeguarding: Children and young people may be vulnerable to abuse or exploitation from outside their families such as at school, from their peer group, or from within their wider community or online. These threats can take different forms such as exploitation by criminal gangs, trafficking, online abuse and radicalisation. Assessments of children in such cases should consider

² See *National Guidance for Child Protection in Scotland* 2014 (para 21-24) for more detailed guidance

³ Department for Education (DfE), 2018; DfE, 2020; Department of Health, 2017; Wales Safeguarding Procedures Project Board, 2019; Welsh Government, 2020

whether wider environmental factors are present in a child’s life and are a threat to their safety or welfare. Interventions should focus on addressing these wider environmental factors.

Early identification and help: Statutory guidance⁴ stresses the importance of children having the opportunity of early help and support to avoid child protection intervention later. Early identification and help may consist of one or more professionals supporting a child, adult or family once an assessment of needs has been made by the local authority.

Paramountcy principle A key principle of the Children Act 1989 is that the welfare of the child is paramount. This refers to a child centred approach which is fundamental to safeguarding every child. It means keeping the child’s best interests in focus and at the heart of all decisions about them.

1.7 Relevant WWF-UK policies and procedures

Safeguarding and promoting the welfare of children is a broad concept. WWF-UK policies and procedures which contribute to safeguarding must also be followed by those to whom they apply or when relevant to the situation. They are as follows:

Safeguarding Code of Conduct
Online safeguarding policy
Serious incident reporting principles
Speak up/Whistleblowing policy and procedures
Disclosure & Barring policy & procedure
Capability policy & procedure
Record keeping and records management policy
Health & Safety policy
Safeguarding training strategy
Recruitment policy
Privacy policy
Social media policy
Working from Home guidelines
Harassment and bullying policy
Crisis response policy

1.8 Law, guidance and standards

WWF-UK’s safeguarding children policy and procedures is underpinned by UK legislation, statutory guidance and the requirements of: - the Charity Commission for England and Wales [**Charity Commission**] and the Office of the Scottish Charity Regulator [**OSCR**].

See **Appendix 1** for further details of the legislation.

2. Child Safeguarding governance arrangements

2.1 Roles and responsibilities

All WWF-UK staff, volunteers and consultants have a responsibility to:

- Identify and share safeguarding children concerns,
- Consider the child safeguarding implications of all existing and proposed new projects or developments in their area in conjunction with their line manager
- Consult with the DCSO if they have any queries

In addition to the above, the roles listed below hold additional responsibilities for safeguarding:

2.1.1 Board of Trustees

⁴ HM Government (2018) *Working Together to Safeguard Children* (amended 2020)

The Charity Commission and the OSCR hold trustees to account for safeguarding. They expect trustees to promote a fair, open and positive culture and ensure all involved feel able to report concerns, confident that they will be heard and responded to. Safeguarding is the responsibility of all trustees but there is an expectation that there is a lead trustee for safeguarding. The responsibilities of trustees are to:

- Ensure safeguarding policies and procedures are in place and being followed
- Ensure there are checks to confirm people are suitable to act in their roles with children
- Ensure there is ongoing monitoring and review processes in place to check safeguards are being implemented in practice and that the controls in place are effective
- Actively promote a culture and environment whereby all staff, volunteers, contractors and visitors are enabled to raise concerns and understand their safeguarding responsibilities
- Identify a nominated leadership team member to hold a strategic safeguarding brief (referred to as the Child Safeguarding Director).
- Appoint a Safeguarding Lead Trustee on the Board whose role is one of providing additional assurance to the Board on its safeguarding responsibilities, keeping up to date with the Charity Commission and OSCR requirements for safeguarding and to support the Child Safeguarding Director in assessing and managing safeguarding risks. The Terms of Reference for the Safeguarding Lead Trustee set out the scope of the role in more detail.
- Ensure that serious incidents are reported to the Charity Commission and the Disclosure and Barring Service (DBS) for England and Wales or equivalents in devolved nations⁵ if someone is dismissed following safeguarding allegations.
- Ensure that WWF-UK allocates sufficient resources, including trained staff, volunteers and trustees, for arrangements to safeguarding and protect children.

2.1.2 Executive Group (EG)

Executive Group are accountable for the implementation of the child safeguarding policies and procedures ensuring:

- The provision of appropriate supervision and support for staff and volunteers, including child safeguarding training, a mandatory induction, and regular reviews of their practice with line managers;
- Developing a culture and environment whereby staff and volunteers, are enabled to raise concerns and feel supported in their child safeguarding role
- Consider the child safeguarding implications of all existing and proposed new projects or developments in their area in conjunction with the Child Safeguarding Director
- Ensure that safe recruitment practices and ongoing safe working practices, including when to obtain a criminal record check and other vetting checks, are in place and in operation for appointment of staff and volunteers engaged in regulated activity
- Assist in the management of child safeguarding allegations against staff, volunteers, consultants or visitors.

2.1.3 Executive Director of Advocacy & Campaigns

- Act as the Executive Group lead for child safeguarding, including ensuring safeguarding is regularly considered by the Executive Group
- Appoint and provide oversight and direction to the Child Safeguarding Director
- Ensure the Child Safeguarding Director has adequate resources and support to perform their role

2.1.4 Child Safeguarding Director (CSD)

- Provide support and direction to designated child safeguarding officer

⁵ Scotland: Office of the Scottish Charity Regulator and Disclosure Scotland
Northern Ireland: AccessNI

- Alert the Safeguarding Trustee of any risk or deficits in organisational safeguarding arrangements or practices
- Lead on the implementation of WWF-UK's Safeguarding children policy and Online child safeguarding policy, with the support of Executive Group
- Identify and be accountable for a robust system to quality assure and monitor compliance with safeguarding children requirements
- Ensure that staff and volunteers are inducted, trained and supported relevant to their role and responsibility for safeguarding children
- Chair the Safeguarding Committee and report on its activities to trustees quarterly
- Manage any child safeguarding allegations that arise against staff, volunteers or contractors
- Develop a safeguarding children action plan and oversee its implementation
- Ensure the safeguarding children policy and the online child safeguarding policy are reviewed
- Ensure communication of lessons learned throughout WWF-UK with the ultimate objective of preventing reoccurrence of any safeguarding children incidents
- Ensure that safeguarding children is integrated into contractual arrangements with partners or third parties delivering on our behalf where this involves children
- Ensure reporting to the Charity Commission, in conjunction with the Safeguarding Trustee, if there has been a serious safeguarding incident

For contact details see **Appendix 7**

2.1.5 Designated child safeguarding officer (DCSO)

- Determine what response is necessary to address a safeguarding concern about a child or young person
- Refer cases of suspected abuse or allegations to children's social care and/or police or the equivalent authorities in each devolved nation
- Ensure accurate written records of referrals/concerns are made, stored securely and shared appropriately
- Ensure that an individual case record, including the outcome, is maintained of any response and action taken by WWF-UK
- Provide information and advice on safeguarding children to staff and volunteers
- Keep abreast of developments within the safeguarding children arena and be familiar with local and national safeguarding children procedures and guidance
- Liaise with the Child Safeguarding Director and Executive Director of People & Culture, as per the reporting procedures,
- Support other colleagues across WWF-UK with any safeguarding queries or planning for the safeguarding elements of any activities or events involving children

There is a deputy designated child safeguarding officer who will assume the responsibilities of the DCSO in their absence.

For contact details see **Appendix 7**

2.1.6 Director of Individual Marketing & Legacies

- Ensure that child safeguarding is considered and addressed in all marketing and communications in all media
- Ensure that when children are involved in any aspect of marketing, that the need to safeguard them is considered at the outset and any risks mitigated for

2.1.7 Director of Events & Community Fundraising

- Ensure that child safeguarding is considered in delivery of any activities or events involving children
- Ensure any external event organiser is aware of, and agrees to, comply with WWF-UK's child safeguarding policy and procedure

- Ensure that any third party event organiser has adequate child safeguarding arrangements in place for the event
- Ensure roles and responsibilities for child safeguarding are agreed with any third party event organiser

2.1.8 Director of Digital & Content

- Ensure staff and volunteers understand and adhere to the procedure regarding the creation and use of images and film and their retention, storage and destruction
- Ensure that safeguarding is appropriately integrated within all social media activities
- Advise on the online safeguarding aspects of any proposed online delivery for children and young people.
- Ensure that any third party creating content involving children has adequate child safeguarding arrangements in place
- Ensure roles and responsibilities for child safeguarding are agreed with any third party creating content involving children
- Act as the online safeguarding co-ordinator

2.1.9 Director of IT

- Ensure that IT systems remain robust and secure
- Ensure that WWF-UK are Data Protection compliant in respect of all data concerning records of children.

2.1.10 Executive Director of People & Culture

- Ensure the staff handbook and HR policy reflects the principles of safeguarding children including safer recruitment and vetting policies.
- Ensure roles are identified which require DBS (or equivalent) checks and checks are carried out (and repeated at appropriate intervals) on staff as necessary
- Ensure all staff and volunteers have agreed to adhere to staff safeguarding policies including the Safeguarding Code of Conduct, Harassment and Bullying, and Whistleblowing Policies.
- Alert the DBS in cases where a person is dismissed or left WWF-UK due to the harm or risk of harm they present to children or young adults.
- Coordinate and monitor compliance with the safeguarding training plan
- Ensure safeguarding is included in the induction process for staff and volunteers

2.1.11 Strategic Communications Director

- Ensure that safeguarding children is considered and addressed in all strategic communications
- Ensure that any third party creating content involving children has an adequate child safeguarding structure in place
- Ensure roles and responsibilities for child safeguarding are agreed with any third party creating content involving children
- Ensure that child safeguarding is considered in delivery of any activities or events involving children
- Ensure any external event organiser is aware of, and agrees to, comply with WWF-UK's child safeguarding policy and procedure
- Ensure that any third party event organiser has an adequate child safeguarding structure in place for the event
- Ensure roles and responsibilities for child safeguarding are agreed with any third party event organiser

2.1.12 Campaigns Director

- Ensure that safeguarding children is considered and addressed in all campaigns
- Ensure that any third party creating campaigns involving children has an adequate child safeguarding structure in place
- Ensure roles and responsibilities for child safeguarding are agreed with any third party creating campaigns involving children

- Ensure that child safeguarding is considered in delivery of any campaigns involving children
- Ensure any external campaign organiser is aware of, and agrees to, comply with WWF-UK's child safeguarding policy and procedure
- Ensure that any third party campaign organiser has an adequate child safeguarding structure in place for the event
- Ensure roles and responsibilities for child safeguarding are agreed with any third party campaign organiser

2.1.13 Head of Procurement

- Ensure that appropriate contract terms are put in place with third parties who may be delivering activities events or services involving children on behalf of WWF-UK

2.1.14 Director of Insights & Product Development,

- Ensure that safeguarding children is considered and addressed in all research and product development
- Ensure that any third party doing research involving children has adequate child safeguarding arrangements in place
- Ensure roles and responsibilities for child safeguarding are agreed with any third party doing research involving children

2.1.15 General Counsel

- Ensure that there is an appropriate governance framework to keep the trustees informed about child safeguarding
- Ensure that child safeguarding issues are considered in internal audits
- Advise on compliance with the relevant legislation and guidance

2.1.16 Safeguarding Committee

- The role of the Safeguarding Committee is to act as a cross organisational group for reviewing and reporting on the safeguarding compliance framework at WWF-UK as set out in its terms of reference.

3. Safeguarding Procedures

3.1 The Five R's

These procedure follows the *five R's* as follows:

- **Recognise** that a child is being harmed or is at risk of harm
- **Respond** appropriately to someone who is telling you what is happening to them
- **Refer** the concerns to the Designated Child Safeguarding Officer (DCSO) who will decide what action to take next
- **Record** the concerns and all other actions
- **Resolution** by the DCSO of the referral, follow up referrals made to other agencies and possible escalation if concerns remain.

3.2 Recognise that child has been abused or neglected

Different types of abuse may be occurring simultaneously or sequentially. **Appendices 2-6** contain the following information to supplement the policy and procedures so that everyone is more confident about how to recognise child abuse and neglect concerns:

- statutory definitions of child abuse and neglect - Appendix 2
- indicators of types of child abuse - Appendix 3

- grooming behaviour – Appendix 4
- additional guidance on children and young people abused in specific circumstances- Appendix 5
- barriers to help seeking - Appendix 6

3.3 Non-recent historic allegations of abuse.

Any disclosure or concerns that relate to abuse that happened more than a year ago, whether involving anyone working at WWF-UK or outside of it, must be taken seriously and acted upon in line with the procedures outlined in Section 5 and 7. Often survivors of abuse take years to come forward due to shame and a fear of being disbelieved however, the alleged perpetrator may remain a risk to others and therefore all non-recent historic allegations should be examined. WWF-UK will work in partnership with local authorities and/or the police in such cases.

3.4 Additional vulnerabilities

Some children are particularly vulnerable to abuse. For example, research shows that disabled children are more likely to be a target for abuse. Equally care-experienced children and young people, or those that have already experienced harm, may be more vulnerable. For further details about abuse in specific circumstances and vulnerabilities see Appendix 5.

3.5 How Safeguarding Concerns may arise at WWF-UK

A concern about the safety of a child or young person might arise because:

- a child says that they are being abused or says something that might have harmed them
- you notice signs of abuse or neglect
- somebody else says child is being harmed or is at risk of harm
- the behaviour of an adult (e.g. staff or volunteer) to a child or the behaviour of a child towards another child
- a child says they were abused in the past – i.e. historical or non-recent abuse.
- a child, parent or carer, staff or volunteer or contractor makes a complaint about someone's behaviour

4 Respond: what to do if you have a safeguarding concern about a child

4.1 If you identify a safeguarding concern either in face to face contact, online contact, through social media or any other contact which is not immediately life-threatening or presents a high risk of serious harm, you must:

Step 1 Contact the DCSO to discuss your concern. This should be done on the same day that you identify the concern.

Step 2 A record of what was seen, said and done needs to be made on the Safeguarding Report Form – see **Appendix 8**. If you have this form to hand then complete it otherwise the DCSO will complete it when you speak with them.

Step 3 The DCSO will determine what action is necessary. The options are:

- no action is required as it does not constitute a safeguarding concern
- monitor the situation and arrange to speak with the person concerned again
- seek advice from one or more of the following: other DCSO or CSD, children's social care, police, NSPCC Helpline, Professionals Online Safety Helpline
- notify children's social care and in addition, the police should be notified if it is thought a crime has been committed
- explore whether any additional support is required for the child or signposting to sources of help

- discuss with the CSD whether the relevant charity commission needs to be notified of this under serious incident reporting. See **Appendix 13** for further detail
- initiate the crisis response process only if the harm was committed by staff, volunteers or contractors

Step 4 The DCSO must record whatever decision is made with a rationale even if no further action is to be taken. A decision to take no further action or monitor a situation is as serious as a decision to make a referral out. The DCSO must follow the reporting procedures as detailed by the relevant local authority in notifying them of a safeguarding concern.

Step 5 The DCSO must consider if consent is required from the child's parents/carers in order to share the concern with the local authority and/or police. Normally a child should be made aware if information is going to be shared. The consent of the child is not necessary but is ideal to gain if possible.

Step 6 If the DCSO decides to make a referral to children's social care services or police⁶ then they must:

- make a phone call and put the notification in writing within 48 hours by using the relevant process in the local authority area which will be found on their website
- seek feedback after three working days of having made the notification to check it's been received and action taken and implications for the child and family.

Step 7 The DCSO must keep a record of all the actions taken, any crime reference number, decisions made and any outcomes in accordance with good practice on recording, information storage and retention.

Step 8 The DCSO must consider if the person who first raised the concern needs any support and who is best able to provide it.

4.2 Response from children's social care

If WWF-UK makes a child protection referral to children's social care then they will evaluate the concerns and risks involved to determine whether:

- the child needs immediate protection and urgent action is necessary; or
- the child is suffering, or at risk of suffering, significant harm and enquiries need to be made under section 47 of the Children Act 1989; or
- the child is in need and should be assessed under section 17 of the Children Act 1989.

4.3 WWF-UK will:

- cooperate with children's social care and the police in any emergency action they take using their legal powers for immediate protection of the child. This may involve removing the child from their home.
- participate in any multi-agency discussions (strategy discussions), if invited to do so, and share information about the child to plan the response to concerns.
- share any known information about the child for section 47 enquiries and family assessments
- ensure that a relevant staff member participates in any meetings held by the local authority if we are invited to participate.

4.4 Responding to a direct disclosure of abuse

Sometimes a child will tell a member of staff about their experience of abuse or the way they are or have been treated by someone else. Respond in the following ways and then follow the steps outlined before.

⁶ In the devolved nations contact:

Scotland: contact the local social work team and Police Scotland

Northern Ireland: Health and Social Care Trust Gateway Service Team and Police Service Northern Ireland(PSNI)

Wales: local child protection services and the police

Do

- Show you care, help them open up: give your full attention to the child and keep your body language open and encouraging. Be compassionate, be understanding and reassure them their feelings are important. Phrases such as 'you've shown such courage today' help.
- Take your time, slow down: respect pauses and don't interrupt the young person – let them go at their own pace. Recognise and respond to their body language.
- Show you understand, reflect back: make it clear you're interested in what the child is telling you. Reflect back what they've said to check your understanding – and use their language to show it's their experience.
- Reassure them that they've done the right thing in telling you. Make sure they know that abuse is never their fault.
- Explain what will happen next in terms of the process.

Do not:

- React strongly – for instance saying, 'that's terrible.'
- Jump to conclusions especially about the alleged abuser.
- Tell them you can keep this a secret.
- Ask leading questions.
- Make promises you cannot keep.
- Stop them from speaking freely.
- Tell them to stop talking so that you can fetch a DCSO.

4.5 Responding to a child protection emergency

In some circumstances, you may have immediate concerns about a child's safety arising from the information disclosed to you either face to face or online, for example:

- A child has expressed suicidal thoughts/intentions or intentions to harm another child or person
- Information that a child could be subject of further abuse if they go home
- Information that a child has contact with a registered sex offender
- Information that a child is being groomed into terrorism
- A serious crime has been committed

In such circumstances, you should:

- Ring 999 and ask for the emergency service required - police and/or ambulance.
- Inform a DCSO afterwards.
- If the DCSO is not available then inform the deputy DCSO or CSD
- The procedures in 4 .1 must then be followed by either the DCSO, Deputy DCSO or CSD.
- Alert the child's family if appropriate otherwise this is the responsibility of the social worker/police.

4.6 Responding to peer to peer abuse and bullying

Children can harm each other, for example there is evidence of domestic abuse in teenage relationships, sexual exploitation, exploitation in a gang context and serious online bullying. These types of harmful behaviours would need to be reported to the DCSO as for any other safeguarding concern.

Bullying of a less serious nature between children is prevalent and will need addressing if you identify it is happening. (See **Appendix 5** for types of bullying). This could involve speaking with the child who has been bullied and the child who has done the bullying. It may be necessary to involve the parents/carers but this will depend on the nature of the bullying, its seriousness, its impact on the victim and the attitude of the bully. Bystanders to the bullying may also need support.

Bullying behaviour should not be passed off as “banter” or as “part of growing up”. It is important to be conscious that a child who is engaging in bullying or abusive behaviour towards others may have been subject to abuse from other children or adults. This should be kept in mind when responding to child on child bullying.

4.7 Children under the supervision of a school or college. If a safeguarding concern is identified in these circumstances then the DCSO would report the concern to the school or college as they have hold responsibility for their pupils. Ideally the DCSO should pass the concern onto the designated safeguarding lead at the school or college but otherwise the teacher in charge of the party/pupil. The concern and the action taken should always be recorded by the DCSO.

The DCSO should follow up with the school’s designated safeguarding lead to check they have received the concern and are taken appropriate action to address it. A record of the outcome should be made.

4.8 Child seems worried but unwilling to confide in staff

If a child indicates they may be worried about abuse or other issues that are upsetting them but they are hesitant to discuss them, give them the contact details for agencies that can help such as NSPCC Childline or The Mix. Make a record of having given such advice and inform the DCSO.

4.9 The need for support services

Where you think that a child needs further support services for their welfare and development (Children Act 1989, section 17, Child in Need) rather than a need for protection, then staff should speak to the DCSO about what to do. No referral can be made to any support service without the consent of the child’s parents/carers therefore a discussion with them would be necessary and possible signposting. Always record what action has been taken.

5. Information sharing, consent and confidentiality

5.1 In general terms, people have a right to expect that their personal information is not shared with other organisations and that their consent is obtained before sharing.

5.2 WWF-UK has a duty to share information with other agencies to safeguard children and young people in certain circumstances when it is in the public interest, i.e. when there is a concern about actual or possible abuse/neglect or if we believe a crime has been committed.

Whilst consent to share information should be sought where it is safe and appropriate to do so, information may be shared without consent if there is good reason to do so as it is lawful to share such information without consent for the purpose of safeguarding and promoting the welfare of a child.

Any information that is shared will only be shared on a need to know basis and these decisions will be made by the DCSO or CSD.

You must never promise any adult or child to keep information confidential when it is about safeguarding concerns or allegations.

5.3 Government advice⁷ about when and how information can be shared is laid out in ‘seven golden rules’:

- i. the General Data Protection Regulation 2016 (GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about individuals is shared appropriately.

⁷ HM Government (2018) *Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers*

- ii. be open and honest with the individual (and/or their family) from the start about why, what, how and with whom information may be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
- iii. seek advice from others including external agencies, if there is any doubt about sharing the information without disclosing the identity of the individual.
- iv. where possible, share information with consent, and where possible, respect the wishes of those who do not consent to having their information shared. You may share information without consent if you consider on the facts presented that there is a lawful basis such as where safety may be at risk.
- v. consider safety and well-being: base information sharing decisions on the safety and well-being of the individual and others who may be affected by their actions.
- vi. necessary, proportionate, relevant, adequate, accurate, timely and secure: ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely.
- vii. keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

6. Respond and manage an allegation of abuse made against WWF-UK staff, volunteers, contractors

6.1 Application of the procedure

WWF-UK takes seriously all allegations of abuse made against staff members, including temporary or fixed term contractors, and will follow the defined processes outlined here. WWF-UK recognises its duty of care to employees and will act to manage and minimise the stress inherent in the allegations process.

The procedure applies to all adults working in our services i.e. all staff, volunteers and contractors (where WWF-UK is the primary employer or has engaged the contractor).

If WWF-UK is not the primary employer (e.g. agency staff) we will notify the primary employer of the allegation and they will be responsible for the case management of the allegation with support from the DCSSO.

The allegations management procedure will be used in cases where it is alleged that a staff member, has:

- behaved in a way that has harmed a child, or may have harmed a child; or
- possibly committed a criminal offence against or related to a child; or
- behaved towards a child or children in a way that indicates that they would pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children

6.2 Identifying an allegation

Allegations may arise in several ways, for example a report from a child, a complaint from a parent/carer, or a concern raised by another adult. An allegation may concern someone's behaviour or actions within their job or a voluntary activity, or within their family or private life.

The concerns may be about any form of child abuse or neglect. This will include concerns about inappropriate relationships between adults and children. For example:

- bullying behaviour
- aggression or physical assault
- a sexual relationship between a child aged 16 or 17 years with an adult in a position of trust with them, even if the relationship may appear to be consensual
- grooming, i.e. meeting a child under 16 with intent to commit a relevant offence (section 15 of the Sexual Offences Act 2003); or
- other behaviour that gives rise to concerns, such as possession of abusive images of children or

inappropriate contact through texts or online, inappropriate messages, gifts or socialising with children outside of work-related activity

- concern about a colleague's posts on their personal social networks

If an allegation or concern arises about a staff member outside of their work for WWF-UK, then this may present a risk to children for whom the staff member is responsible and the general principles outlined in these procedures will apply.

6.3 Roles and responsibilities

Anyone who has concerns about, or has received an allegation about, the behaviour of a staff member must report the concerns immediately to the DCSO. In their absence, or if a DCSO is the subject of the allegation, concerns must be reported to the deputy DCSO or CSD.

If no senior staff are available then report the allegation to the Local Authority Designated Officer (LADO)⁸ or NSPCC helpline and inform the DCSO of having done so as soon as possible.

The CSD will normally act as the CSD for investigations of allegations and liaise with the relevant LADO and the Executive Director of People and Culture as necessary. The LADO is involved in the overall management and oversight of individual cases. They will provide advice and guidance to the CSD, liaise with the police and other agencies and monitor the progress of cases to ensure that they are dealt with as quickly as possible, consistent with a thorough and fair process.

6.4 Initial action by the person noticing concerns or receiving an allegation first

- Treat the matter seriously and keep an open mind.
- Do not make assumptions or offer alternative explanations.
- Do not investigate or ask leading questions, if seeking clarification.
- Do not promise confidentiality but give assurance that the information will only be shared on a need-to-know basis.
- Act quickly.
- Make a written record of the information. Where possible, record the exact words of the person making the allegation or the child's own words.
- Record the time, date and place and names of people present when the allegation was made or concerning behaviour was observed. Record the time, date and place of alleged incidents, persons present and what was said, if these were mentioned by the person making the allegation.
- Immediately report the matter to the DCSO
- DCSO to notify the CSD unless the matter is clearly not a safeguarding allegation and has another explanation.

6.5 Initial response by the CSD

- Obtain written details of the concern or allegation by the person reporting it and date it. Record any decisions made and the rationale. Complete the safeguarding report form – see Appendix 7 if it has not already been done.
- Decide if any further clarifying information is needed or advice from a relevant authority (see Appendix 7 for contacts).
- Decide if any equipment (e.g. lap top or mobile phone) needs to be removed from the individual, as it might hold evidence of online abuse, or if their access to WWF-UK channels must be suspended.
- Contact the LADO immediately to report the allegation if it meets one or more of the criteria described in 6.1 or to consult with them if uncertain as to how to proceed. There is a need to distinguish between an allegation, a concern about poor practice or a complaint.
- Contact the police if it is thought a criminal offence has been committed including online abuse

⁸ The role of the LADO exist in England only. In the devolved nations contact:

Scotland: the local social work team and Police Scotland

Northern Ireland: The Health and Social Care Trust Gateway Service Team and Police Service Northern Ireland (PSNI)

Wales: the local child protection services and the Police

- If the allegation requires immediate attention but is received out of hours, contact the children's social care Emergency Duty Team or the police and then inform the LADO as soon as possible thereafter.
- Refer allegations against a staff member who is no longer working at WWF-UK to the police in the first instance and then inform the LADO.
- If the allegation does not meet the criteria described in 6.1, then consider if the matter needs to be addressed through other employment process.

6.6 Further actions by the CSD and the LADO

- The CSD and the LADO will consider the nature, content and context of the allegation and agree a course of action, including whether further information is needed. Many cases may well either not meet the criteria in 5.1, or may do so without warranting consideration of either police investigation or enquiries by children's social care services. In these cases, local arrangements should be followed to resolve cases without delay.
- The CSD may need to obtain relevant additional information, such as previous history, whether the child or their family have made similar allegations in the past and the staff member's current contact with children.
- If the allegation is not demonstrably false and there is cause to suspect that a child is suffering or likely to suffer significant harm, the LADO will refer the case to children's social care and ask them to convene a strategy meeting.
- The LADO will consult the police if a criminal offence may have been committed. If the threshold for significant harm is not reached but a police investigation may be needed, the LADO will immediately inform the police.
- If an investigation by children's social care or the police is deemed as not necessary, the CSD and the LADO will discuss the options open to the service depending on the nature of the allegation and the evidence available. This will range from taking no further action to dismissal or a decision not to use the staff member's services in the future.
- If the initial evaluation leads to no further action against the staff member concerned, the decision and justification should be recorded by both the CSD and the LADO. Agreement should be reached on what information should be put in writing to the individual and what action should follow, including informing the person who made the allegation originally.

6.7 Persons to be notified

- After consultation with the LADO, the CSD should inform the accused person about the allegation as soon as possible.
- However, if a strategy discussion is needed, or the police or children's social care need to be involved, the CSD should not inform the accused person until those agencies have been consulted and have agreed what information can be disclosed to the individual.
- In principle, the CSD should inform the child's parents/ carers about the allegation. The LADO should be consulted first to ensure that this will not impede any investigation or disciplinary process. In some cases, the parents/carers may need to be informed right away, e.g. if a child is injured and needs medical attention.
- The parents/carers and the child, if sufficiently mature, should be helped to understand the process and kept informed about the progress of the case and the outcome if no criminal prosecution will take place.
- The relevant charity commission may need to be notified under the serious incident reporting procedures if meets the criteria– see **Appendix 14** for further detail on this.
- If the allegation meets the threshold for high risk complaint set by WWF International, then the CSD must initiate the Crisis Response process.

6.8 Confidentiality

- Every effort should be made to maintain confidentiality and guard against publicity while an allegation is being investigated. Information sharing should be restricted to those who need to know in order to protect the child concerned, carry out the enquiries and manage the disciplinary process, if applicable.
- The boundaries of confidentiality and information sharing equally apply to those involved in the

internal crisis response processes.

- The CSD should inform the parents/carers concerned about the implications of publishing details of the allegation in any form of media or on social networking sites.
- The CSD should discuss with the LADO how best to manage speculation, leaks and gossip within the charity and the community at large, and press interest, if it arises.

6.9 Supporting people

- The CSD together with children's social care and the police, if they are involved, will consider the impact on the child concerned and provide support as appropriate. In some cases, there may be no known victim e.g. if the concern is about the distribution of obscene images of children.
- The CSD will ensure that the child and family are kept informed of the progress of the investigation.
- The staff member who is the subject of the allegation will be advised to contact their union, professional association, or a colleague for support.
- The Executive Director of People and Culture will be consulted at the earliest opportunity to ensure that the staff member is provided with appropriate support, if necessary, through occupational health or welfare arrangements.
- The CSD will appoint a named representative to keep the staff member updated on the progress of the investigation; this will continue during any police or section 47 investigation or disciplinary investigation.

6.10 Managing risk during the investigation

- The perceived level of risk during the investigation needs to be considered and managed. In some situations, the level of risk may require the staff member/volunteer/contractor not to be working with a specific child or all children.
- Based on an assessment of risk, the CSD will determine what action to take with regards to the employment of the person – whether it is appropriate to suspend them, or redeploy them into another role without child contact, provide another person to be present when the individual has contact with children, whilst the investigation is carried out. Suspension should not be the default position: an individual should be suspended only if there is no reasonable alternative.
- Decisions about risk are best made in a multi-agency forum such as the strategy discussion. The LADO will canvass the views of the agencies participating and inform the CSD. However, only the employer has the power to redeploy or suspend.
- If immediate suspension is considered necessary, the rationale and justification for such a course of action should be agreed and recorded by the CSD and LADO. This should also include what alternatives to suspension have been considered and why they were rejected.
- Possible risks to the child involved and any children in the accused staff member's home, work or community life will be evaluated and managed by children's social care and the police.

6.11 Timescales

- Cases will be resolved as quickly as possible, consistent with a thorough and fair investigation.
- It is expected that most cases should be resolved within one month and all but exceptional cases should be resolved within 12 months.
- However, the timing will depend on the nature, seriousness and complexity of the case and the right outcome is far more important than meeting timescales.
- Cases where it is immediately apparent that the allegation is unsubstantiated or malicious should be resolved within one week.
- The CSD should discuss the timing of actions with the LADO for all allegations that do not require police involvement but for which there are child protection concerns.
- Disciplinary action should normally not be taken until the outcome of any external investigation has been completed. The decision to take such action lies with WWF-UK and will follow the Grievance Policy.

6.12 Resignations and compromise agreements

- The allegation will be investigated according to the Grievance Policy, even if the accused staff member resigns or ceases to provide their services.
- Every effort will be made to reach a conclusion to the case should the staff member refuse to cooperate, having been given a full opportunity to answer the allegation and make representation.
- Although it would not be possible to apply disciplinary sanctions if the period of notice expires before the conclusion of the investigation, the outcome of the disciplinary process will be recorded.
- WWF-UK will not use 'compromise/settlement agreements' in respect of where there has been a safeguarding allegation, for example where the staff member agrees to resign provided that disciplinary action is not taken and that a future reference is agreed.

6.13 Outcomes of an investigations

The following categories should be used in recording the outcome:

- **Substantiated** – there is sufficient evidence to prove the allegation
- **Malicious** – there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive
- **False** – there is sufficient evidence to disprove the allegation
- **Unsubstantiated** – there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.
- **Unfounded** - there is no evidence or proper basis which supports the allegation being made

6.14 Malicious or unsubstantiated allegations

If an allegation is determined to be unsubstantiated or malicious, the LADO should refer the matter to children's social care services to determine whether the child needs services, or may have been abused by someone else

6.15 Disciplinary or suitability process and investigations

The LADO and the CSD will discuss whether disciplinary action is appropriate in all cases where:

- it is clear at the outset, or decided by a strategy discussion, that a police investigation or section 47 enquiry is not necessary: or
- the police or the Crown Prosecution Service informs that the criminal investigation and subsequent trial is complete, or that an investigation is to be closed without charge, or prosecution is discontinued.

The discussion will consider any potential misconduct or gross misconduct by the staff member, and consider:

- the information provided by the police and children's social care
- the result of any investigation or trial; and
- the different standards of proof in disciplinary and criminal proceedings.

In the case of contractors, the LADO and the CSD will work with the providing agency in deciding whether to continue using the person's services.

6.16 Record keeping

- The CSD will keep a clear and comprehensive summary of the case record and provide a copy to the accused staff member. A copy of the record should also be given to the LADO.
- The record will include details of how the allegation was investigated and resolved and the decisions reached. It will be completed in collaboration with the LADO.
- Details of allegations that are found to be malicious should be removed from personnel records. However, for all other allegations, it is important that a clear and comprehensive summary of the allegation, details of how it was followed up and resolved, and a note of any action taken

and decisions reached, is kept on the confidential personnel file of the accused, and a copy provided to the person concerned.

6.17 References

- If the allegation was proven to be malicious, false, or unsubstantiated, it will not be included in any employer references.
- A history of repeated concerns or allegations which have all been found to be malicious, false, or unsubstantiated will also not be included in any references.

6.18 Notifying the Disclosure and Barring Service (DBS) or equivalent⁹

The LADO will discuss with the CSD whether WWF-UK needs to refer the staff member to the DBS (or equivalent in devolved nations), if the allegation is substantiated and the person is dismissed or the charity ceases to use the person's services, or the person resigns or ceases to provide their services.

- There is a legal requirement for employers to make a referral to the DBS where they think that an individual has engaged in conduct that harmed (or is likely to harm) a child; or if a person otherwise poses a risk of harm to a child; or
- if there is reason to believe that they have committed one of a few listed offences (as set out in the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009), and have been removed from working in paid or unpaid regulated activity or would have been removed had they not left.

6.19 Notifying the Registered Body or Regulator

Where an individual is a registered practitioner with a professional body e.g. teacher or medical professional or social worker, WWF-UK may also need to notify them. The responsibility for doing this rest with the CSD.

6.20 Learning lessons

At the conclusion of a case in which an allegation is substantiated, the CSD, Executive Director of People and Culture, and the LADO should review the circumstances of the case to determine whether any improvements could be made to WWF-UK's procedures or practice to help prevent similar incidents in future.

6.21 Additional considerations concerning online abuse images

6.21.1 What to do if a member of staff/consultant/volunteer is inadvertently exposed to child sexual abuse images whilst using the internet:

- The URLs (webpage addresses) which contain the suspect images should be reported to the Internet Watch Foundation via www.iwf.org.uk – staff /volunteers/consultants should refer to a DCSO who will carry out the report. This is to avoid duplication – a key principle is that WWF-UK must avoid sending actual copies of the images to the Internet Watch Foundation. DCSO also to notify the online safeguarding co-ordinator.
- Any copies that exist of the image, for example in emails, should be deleted.

6.21.2 What to do if abusive images of children are found on WWF-UK devices:

- Staff/ volunteers/consultants must report what they have found to the DCSO immediately
- The URLs (webpage addresses) which contain the suspect images should be reported on to the Internet Watch Foundation via www.iwf.org.uk by the DCSO. Copies of the actual images must not be sent to the Internet Watch Foundation. DCSO also to notify the online safeguarding co-ordinator.

⁹ For the devolved nations notify:

Wales - DBS

Scotland - Disclosure Scotland

Northern Ireland - AccessNI

- CSD to contact the police regarding the images. If there is a doubt about whether the images are criminal, then a discussion will take place with the police regarding the best way for them to receive copies to determine whether they are criminal or not.
- Discuss with the police what to do about the device that the images are on.
- Quarantine the device in question and discuss with the police about checking for any other images on that device or any others.
- If any copies of images need to be stored at the request of the police, then they should be stored securely where no one else has access to them.
- Follow the allegations management procedures above in respect of who has been using the device.

7. Recording, record keeping, retention and destruction

7.1 Purpose

Good record keeping is an important part of our accountability to children and their families and will help us in meeting our key responsibility to respond appropriately to welfare concerns about children. Records should be factual, accurate, relevant, up to date and auditable. Where opinions are included this must be made clear. Where people are referred to, they should be identified clearly by role.

Records should support monitoring, risk assessment and planning for children and enable informed and timely decisions about appropriate action to take.

7.2 Storage

Safeguarding records will be held in a SharePoint folder with restricted access.

7.3 The DCSO must:

- record all consultations and decision-making regarding a safeguarding concern or allegation
- create a stand-alone file if one does not exist.
continue to update the file, including the chronology, as work progresses.

7.4 Checklist for a good safeguarding record:

- Structured and easily accessible
- Legible
- Clear, concise and precise
- Writer's meaning clearly conveyed and writer's name is included
- Includes all relevant information
- Free from jargon and abbreviations
- Separates fact from opinion and hearsay
- Professional judgment supported by evidence
- Decisions reached are clearly recorded
- Dated and timed.

7.5 Records retention and destruction schedule

WWF-UK keeps child records until the person reaches the age of 18 years. If the charity were ever to be wound up then these records would be archived in line with WWF-UK's policy.

In the case of safeguarding allegations, a summary will be placed in the staff member's personnel file and kept until the person reaches retirement age or for a period of 10 years from the date of the allegation, if that is longer.

7.6 Responsibility for the destruction of records lies with the records owner.

8. Escalation

8.1 When WWF-UK has made a referral out to either the police or social care and has followed it up, if WWF-UK remain concerned then this can be escalated. The DCSO and CSD should share their concerns first and agree what steps to take. Options include:

- a formal letter to the local authority laying out the concerns, or
- In each local authority area, there is a Local Children's Safeguarding Partnership (formerly called Local Safeguarding Children Boards) who is responsible for writing interagency child protection procedures. These procedures will explain how a matter can be escalated.

8.2 If any staff member or volunteer considers that the DCSO has not taken appropriate action to address a concern raised, they should raise the matter with the CSD. If still dissatisfied there is the option of using the WWF-UK whistleblowing process or the WWF-International WhistleB whistleblowing process.

8.3 The NSPCC also offers a whistleblowing helpline to give advice when processes to whistle blow internally have not brought a satisfactory resolution.

9. Working with third parties and partners

9.1 WWF-UK sometimes works with other partners to deliver an activity, event or campaign. Whenever this work involves children, there are safeguarding considerations to be addressed and the manager of the project/activity/campaign is responsible for doing this. There is not a 'one size fits all' approach, rather thought needs to be given to:

- the potential risks and identifying where responsibility lies for mitigating these risks
- agreement about whose safeguarding policies, procedures and code of conduct apply

Such considerations should be discussed and documented at the planning stages of any activity or campaign involving children be it online or face to face. Advice and support with this can be sought from one of the DCSOs.

9.2 Where an organisation is going to deliver an activity, event or campaign on behalf of WWF-UK with children, it is important to check that they have their own safeguarding arrangements in place as part of the due diligence process for contracting. The safeguarding checklist (**Appendix 12**) can be used for this purpose. This must be shared and approved by a DCSO or the CSD.

10. Use of Images Policy

10.1 Policy aims

The aim of this policy is to ensure that any images (still or moving) of children or young people taken or used for WWF-UK purposes are done in a manner that safeguards them and protects their dignity. This is consistent with the aims of WWF-UK's Safeguarding Children Policy.

The purpose of this policy is to:

- Protect children and young people who engage with WWF-UK
- Provide staff and volunteers with overarching principles that guide our approach to safeguarding children and the use of their images.

10.2 Definitions

A child is defined in law as anyone under the age of 18

The term 'use of images' for the purpose of this policy refers to any means of capturing images of children or young people, whether still, moving or live streaming, whether held in hard copy or digital format and where these may be used for commercial (used to sell a product, promote something, or raise money for a cause) or editorial (used to illustrate an article, story or educational text) purposes in order to further the aims of WWF-UK's campaigns and marketing activities.

Images of a person constitute 'personal data' and therefore data protection legislation and regulations apply. At the same time images provide valuable evidence of the work that WWF-UK is doing and therefore 'tell a story' which is beyond the image of the individual.

10.3 Application

WWF-UK staff, WWF-UK volunteers, and anyone engaging with youth activities.

Staff and representatives of other agencies and any other individual guests of WWF-UK who are participating in activities that involve contact with children or young people – unless it has been agreed expressly that the partner may enforce its own use of images policy.

10.4 Legal framework:

- Data Protection Act 2018
- General Data Protection Regulation 2018
- United Nations Convention on the Rights of the Child 1991

10.5 Policy statement

WWF-UK seeks to engage young people in its campaigns in accordance with key articles of the United Nations Convention of the Rights of the Child:

- **Article 12: Respect for the views of the child** – every child has the right to express their views, feelings and wishes in all matters affecting them
- **Article 13: Freedom of expression** - every child must be free to express their thoughts and opinions and to access all kinds of information, if it is with the law.

However, in engaging young people in our activities and campaigns we also need to do this in ways that safeguard and promote their welfare in accordance with the law.

WWF-UK takes and uses images of children and young people for a variety of purposes to fulfil its aims and objectives. Images may be captured by those working for, or on behalf of, WWF-UK. These images may be used in print or online and retained both as hard copies or digitally.

Most occasions when people take photographs or film of children and young people are valid and do not provide any cause for concern. Unfortunately, there are occasions when this is not the case. A policy on the use of images is required because of the potential risks associated with photographing or filming children and young people:

- Children may be identifiable and therefore could be traced by someone who intends to harm them in some way using facial recognition software. Contact may be made with a view to facilitate abuse or to bully/troll them because of their views;
- There may be direct and indirect risks when images are shared online or in print with personal information attached to them;
- There could be legal restrictions in place to prevent a child from being identified to protect them e.g. if a child is in local authority care or if they have been adopted;
- The images may be inappropriate or undignified;
- Photos and film can be edited to create illegal content including child abuse images;
- Images may be collected and shared.

Given the potential harm that the misuse of images could bring to children or young people it is essential to minimise the risks by having appropriate safeguards in place.

The General Data Protection Regulation 2018 (GDPR) explicitly states that children's personal data merits specific protection because they may be less aware of the risks involved in using their data. The GDPR allows for the processing of personal data on the basis of consent:

- **The right to be informed** (articles 13 and 14). You must be clear about the context of how any images are going to be used. For example, WWF-UK cannot use photographs for social media if permission had only been given for it to be used in a printed newsletter.
- **The right to access** (article 15). Individuals have the right to access their personal data on request, and receive confirmation about how it's being used.
- **The right to erasure** (article 17). Individuals have the right to request their images be removed from websites, social media or future versions of printed materials.
- **The right to object** (article 21) Individuals have the right to object, on grounds relating to their situation, at any time to processing of personal data concerning them unless the data controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defense of legal claims.

10.6 Informing and gaining consent - individuals and small groups

When taking images of **individuals or small groups where people may be identified** it is essential to obtain explicit written consent of all those featured. This includes any WWF-UK staff or volunteers too. The best way to achieve this is via the Consent Form for Photography, Film and Interviews (**Appendix 13**). This must be signed by a parent or legal guardian. It should include clear information about how and where the images will - or could - be used or seen, will they be shared with any other organisation, how long they will be retained for, and who to contact if consent is being withdrawn.

We expect the following in terms of obtaining written consent:

- For those aged 0 – up to 13 years: a parent/guardian must consent (however, it is still important for them to check the child agrees to their image being taken and used)
- For those aged 13 - up to 18 years: a parent/guardian and the young person must consent

Consent will only be valid if it is freely and explicitly given, documented and you do not create or use images for any other purpose than the one for which consent was given. It is imperative that children and young people are not put under pressure by anyone from WWF-UK or anyone else acting on our behalf to be photographed or filmed.

In schools. If you are working in schools or colleges and you want to take photographs or film then you must ensure that written consent has been obtained and have this confirmed in writing by the school or college prior to the visit taking place and before any photographs or films are taken and used. If the school offers to

take photographs and pass them onto WWF-UK then clarification must be sought from the school as to how the images or film can be used (this will depend on the terms contained within their own policy and release form) and that parental consent has already been granted.

Looked after children. All requests for images to be taken or filmed of Looked After Children (i.e. children in care) should be referred to the social worker responsible for the child or young person in question.

Managing those where there is no consent. Where consent has not been obtained, you should be careful not to exclude any child or young person from an activity. Rather, the photographer / videographer should be informed of any restrictions and they and the teacher / facilitator should take joint responsibility for ensuring that children who should not be documented are not featured in any outputs or archived media.

Withdrawal of consent. Anyone who consents to WWF-UK taking their image in any form needs to be informed about how they can ask for that image to be removed from the WWF library and not included in any future publication or communication. To do this they would need to contact the Supporter Care team who will then pass the request on to the relevant team/department to action.

WWF-UK cannot be responsible for how others use images once published and nor would we be able to give any guarantee that we can withdraw published images (particularly those in print) from public view even if consent for them is subsequently withdrawn. We can however, confirm when we will stop using the image in any new outputs if consent is withdrawn.

10.7 Informing and gaining consent - crowd scenes

10.7.a In public spaces (eg streets, town squares, parks) It is not necessary to gain consent from children and young people involved in a scene in which they as individuals are not the subject. IE if the subject of the photo or video is the event or location, people present are not the subject as individuals. If portraits/video sequences are taken of individuals or small groups (eg family units) then consent should be sought to ensure the subjects and their parents/carers are happy with their photo being used. Provided the images or video are not to be used commercially it is not a legal requirement to get consent for photos taken in a public place, so oral consent or consent provided written in a format other than the full consent form is sufficient.

Beyond these restrictions, is important to consider if the activity is a sensitive one whereby someone might not want to be recognised even in a crowd scene because of the nature of the event or demonstration. Photos and footage of crowd scenes should be closely checked before public use to ensure there is no inappropriate activity or exposure of young people. If in doubt, check photos or footage with a DCSSO to determine if it presents a safeguarding risk before releasing.

At a public event it is key to be open and non-secretive about documenting, and to ensure that no one is filmed or photographed if they request not to be, or if they show discomfort or unwillingness. You should be communicative and clear with anyone who asks for information about the reason for documenting, your role and organisation etc. It is helpful to have business cards or a small printed explanation of the reasons for documenting to give people who express interest or concern. You should respect any requests to avoid or delete photos or video of individuals, even though no formal written consent is required in a public setting unless there are plans to use the images commercially (eg fundraising/marketing as opposed to campaign/communication).

10.7.b In a private place (eg school, private venue, home) consent should be given in writing for any children or young people who can be identified – even if they are not the subject of the photo.

Photos or videos taken of an event or workshop in which no individuals are recognisable (eg taken from the back of the room with no faces or unique distinguishing features (body art, birthmarks, or distinctive clothing

and accessories), or close-up of hands performing an activity) can be used without consent from all individuals, though the photographer / videographer should be careful that they are not causing discomfort or anxiety to any individuals when documenting an activity.

10.8 Taking and using images

WWF-UK expects that in taking any images you will follow these best practice guidelines:

- Images should only be taken that are respectful and dignified
- Images should not be taken if a child or young person is wearing overly revealing clothes, and any images that inadvertently capture a state of nudity or exposed private parts should be deleted
- Consider if there are images in the background which could locate a child or symbols they are wearing (e.g. school uniform) that might locate them
- In general only the first name of the child or young person (or a fictional name if this is agreed with the subject and their carer) should be used in text accompanying a photo in print or online. If it is thought necessary and appropriate to use the full name with the image (eg in a newspaper article) then consent must have been sought for this to happen, unless the subject is a public figure whose name is already part of a public profile.
- Do not take images of children or young people engaged in private activities e.g. washing, bathing, dressing, getting changed etc
- The photographer/videographer and staff approving the selection of images for public release should ensure they are aware of any cultural sensitivities that determine when activities or dress may be inappropriate to document (eg an image in which a girl's hair is visible when she is a member of a strict Muslim community)
- Do not take images of children or young people behaving recklessly or dangerously

10.9 Capturing, editing and storage

Under the GDPR there needs to be a process that helps us to find and delete personal data (including photographs) at a later date and this is a part of managing WWF-UK's digital assets. This requires us to have a system for labelling the content and being able to locate it should it be necessary.

Each Consent Form for Photography, Film and Interviews must be kept in a secure manner and password protected as this is personal data so its storage must comply with data protection requirements. Rather than store hard copies of the release form, these should be scanned electronically and kept with either the specific folder for the project or campaign and/or in Hive. It is best practice to keep the Photography and Filming Release forms separate from the images/film but with cross reference to it.

All photographs and films once taken on a WWF-UK device should be uploaded to a WWF-UK laptop or server and deleted from mobile devices. Images should not be stored on unencrypted portable equipment such as laptops, memory sticks and mobile phones. Care should also be taken when images are being transported on any equipment or as hard copies.

All images and films need to be stored securely with restricted access to them so that no one can accidentally use them without being clear who they belong to and the context in which they may be used. Any printed photographs should be stored in a locked cabinet at a secure site with restricted access to them.

Digital photographs and film should be stored on the WWF-UK's Hive database (not hard drives or mobile devices) and accompanied by all information about permitted usage and expiration of consent.

10.10 Retention and Destruction

Photographs and film should only be retained for the period specified in the Consent Form for Photography, Film and Interviews. This may be 'in perpetuity' if the images are taken to record activities and events for

historical archive and future communications. Once the retention period has been reached then photographs or film should to be destroyed/deleted unless further consent has been obtained to keep them for longer. The process for destroying photographs/film is as follows unless they are being retained for our organisational archive:

- Hard copies of photographs should be placed in confidential waste for destruction or shredded.
- Digital images should be deleted
- Photography or film of no use should be removed at source or in any copies when no longer needed.
- A record of destruction should be made wherever possible.

At WWF-UK office responsibility for ensuring destruction happens lies with the DCSO.

10.11 Equipment

Images/film may be taken using a range of equipment including cameras, mobile phones, laptops and notebooks. Wherever it is possible, equipment owned by WWF-UK must be used. If personal equipment has to be used then all photographs or film should be uploaded onto a WWF-UK server or laptop. These images should not be stored on any mobile phones or shared with anyone other than for the purpose specified.

10.12 Existing images

If existing photographs (those taken before the date of this policy) are not going to be used for the purpose for which they were originally taken, the holder is responsible for endeavouring to contact the subject to gain consent for further use. Where there is uncertainty, a risk assessment should be undertaken specifically focusing on measurable harm and distress and a record made of any decision taken to use the images/film with a rationale.

10.13 Use of external photographer

There are times when we sub-contract with a freelancer or agency to take photographs or film on behalf of WWF-UK. In such instances, the contract must include our expectations about safeguarding children and young people as per this policy and our Safeguarding Code of Conduct.

10.14 Safeguarding concerns

If anyone has a concern about the taking and using of images and film that is inappropriate or harmful to children and young people then you must follow the WWF-UK Safeguarding Policy and Procedures.

Appendix 1: Underpinning legislation and guidance

United Nations Convention on the Rights of the Child 1991

Protection of Children Act 1978

Children Act 1989 and 2004

Sexual Offences Act 2003

Female Genital Mutilation Act 2003

Safeguarding Vulnerable Groups Act 2006

Protection of Freedoms Act 2012

Communications Act 2003
Malicious Communications Act 1988
Counter Terrorism and Security Act 2015
Serious Crime Act 2015
Modern Slavery Act 2015
Defamation Act 2013
Digital Economy Act 2017
Data Protection Act 2018, GDPR 2018
Privacy and Electronic Communications Regulations (PECR)
HM Government (2018) Working Together to Safeguard Children
Voyeurism Act 2019
Communications Act 2003
Malicious Communications Act 1988

Social Services and Well-being (Wales) Act 2014,
Working Together to Safeguard People, Volume 1, 2014
Wales Accord on the Sharing of Personal Information (WASPI) 2013
Wales Safeguarding Procedures 2019
Well-being of Future Generations (Wales) Act 2015

Children and Young People (Scotland) Act 2014
National Guidance for Child Protection in Scotland (Scottish Government 2014)
Getting It Right for Every Child (Scottish Government 2015)

The Children (Northern Ireland) Order 1995
Co-operating to Safeguard Children and Young People in Northern Ireland 2017
Malicious Communications (Northern Ireland) Order 1988
Safeguarding Board Northern Ireland Core Policy and Procedures 2018
Criminal Law Act 1967

Appendix 2: Defining child abuse and neglect

There are four categories of harm¹⁰ although often children may suffer more than one type of harm.

1. Physical abuse 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.

¹⁰ HM Government (2018) [Working together to safeguarding children](#)

2. 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 and unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include:

- not giving the child opportunities to express their views;
- deliberately silencing them, 'making fun' of what they say or how they communicate;
- 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;
- seeing or hearing the ill-treatment of another;
- 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.

3. Sexual abuse and exploitation 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.
- 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 can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Child sexual exploitation is a form of child sexual abuse. It occurs when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 years into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur using technology.

4. 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 because 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 harm or danger;
- ensure adequate supervision (including the use of inadequate care-givers);
- ensure access to appropriate medical care or treatment.

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

Appendix 3: Types and indicators of child abuse and neglect

<p>Physical abuse Possible indicators are children who have:</p> <ul style="list-style-type: none"> • frequent injuries • unexplained or unusual fractures or broken bones unexplained: bruises, cuts, burns, scalds, bite marks. • bruising in pre-mobile babies 	<p>Sexual Abuse and Exploitation Possible indicators of sexual abuse are children who:</p> <ul style="list-style-type: none"> • display knowledge or interest in sexual acts inappropriate to their age • use sexual language or have sexual knowledge beyond their years ask others to behave sexually or play sexual games • self-harming behaviours • have problems with physical sexual health problems, including soreness in the genital and anal areas, sexually transmitted infections or underage pregnancy. <p>Possible indicators of child sexual exploitation are children who:</p> <ul style="list-style-type: none"> • appear with unexplained gifts or new possessions • associate with other young people involved in exploitation • have older boyfriends or girlfriends • suffer from sexually transmitted infections or become pregnant • suffer from changes in emotional well-being • misuse drugs and alcohol • go missing for periods of time or regularly come home late • regularly miss school or education
<p>Emotional abuse Possible indicators are:</p> <ul style="list-style-type: none"> • Children who are excessively withdrawn, fearful, or anxious about doing something wrong • Parents or carers who withdraw their attention from their child, giving the child the 'cold shoulder' • Parents or carers always blaming their problems on their child • Parents or carers who humiliate their child, for example, by name-calling or making negative comparisons. 	<p>Neglect Possible indicators are:</p> <ul style="list-style-type: none"> • Children who are living in a home that is persistently dirty or unsafe • Children who are frequently left hungry or dirty • Children who are left without adequate clothing for the weather conditions • Children who are living in dangerous conditions, i.e. around drugs, alcohol or violence • Children who are often angry, aggressive or self-harm • Children who fail to receive basic health care • Parents who fail to seek medical treatment when their children are ill or are injured • Children who are left alone when they are young or left in the care of unsuitable adults or dangerous adults.

Appendix 4: Grooming behaviour

'Grooming' is the process through which a person attempts to befriend a child with the intention of later developing a sexual relationship with them. It involves making the child feel comfortable through a variety of methods thus developing trust, before initiating physical contact and abusing that trust. Some argue that the term *entrapment* or *control* better describes this process.

An offender is likely to look to groom the adults as well as the child to gain their trust. This process can happen within a family or within an institution or organisation. Those who sexually abuse children are often experts at gaining confidence, and can look for situations where they can have unsupervised access to children. Signs that an individual may be grooming a child or young person include:

- Being dressed inappropriately around the child or young person
- Spends most of his/her spare time with children and has little interest in spending time with someone of his/her own age
- Giving special attention to a child or young person
- Isolating a child or young person from other people
- Hugging, touching, kissing, tickling, wrestling with or holding a child or young person
- Giving gifts (including cigarettes/alcohol/drugs) or money for no apparent reason
- Treating a child as an equal/peer or like a spouse
- Finding ways to be alone with a child or young person when other adults are not likely to interrupt, e.g. taking the child for a car ride, arranging a special trip, etc.
- Not respecting the privacy of a child or young person
- Discussing their own sex life or asking a child or young person to discuss sexual experiences or feelings;
- Viewing abusive images of children
- Abusing alcohol or drugs or encourages children or young people to use them. The use of such substances reduces inhibitions.
- Allowing children or young people to consistently 'get away' with inappropriate behaviors
- Encouraging silence or secrets
- Makes fun of a child's body parts – uses sexualised names for the child or young person
- Not adhering to the rules, authority or code of conduct in the setting, organisation or within an activity

Appendix 5: Additional guidance on children and young people abused in specific circumstances

Abuse by peers. Young people, particularly those living away from home, are vulnerable to physical, sexual and emotional bullying and abuse by their peers. Such abuse should always be taken as seriously as abuse perpetrated by an adult. It is subject to the same safeguarding children procedures as apply in respect of any young person who is suffering or at risk of suffering significant harm from an adverse source. A significant proportion of sexual offences are committed by teenagers. Staff should not dismiss some abusive sexual behaviour as “normal” between young people.

Bullying behaviour can be described as follows:

- deliberately causes hurt (either physically or emotionally)
- repetitive (though one-off incidents such as the posting of an image on the internet, or the sending of a text or sexting (sexually explicit photographs or messages) which is then forwarded to a group, can quickly become repetitive and spiral into bullying behaviour); and
- involves an imbalance of power (the person on the receiving end feels like they cannot defend themselves).
- Bullying is not:
 - teasing and banter between friends without intention to cause hurt
 - falling out between friends after a quarrel or disagreement; or
 - behaviour that all parties have consented to and enjoy (though this needs to be carefully monitored as coercion can be very subtle)

Bullying can take the following forms:

- emotional – being unfriendly, ignoring someone, not involving them in activities, sending hurtful or tormenting texts, humiliating or ridiculing someone
- physical – pushing, kicking, hitting, punching or pinching or any use of violence
- racist – racial taunts, graffiti or gestures
- related to a disability – because of how somebody looks or presents related to their disabilities (children with disabilities are more likely than their non-disabled peers to be excluded from activities)
- sexual – unwanted physical contact or sexually abusive comments (sexual bullying can also relate to gender and gender identity and includes those who do not fit with the gender role prescribed to them)
- homophobic – because of, or focusing, on the issue of a young person’s actual or perceived sexual orientation; or
- verbal (in the case of children with hearing disabilities this can take place in sign language) – name calling, sarcasm, spreading rumours or teasing.

Child abuse linked to belief in “spirit possession” or “witchcraft”. The belief in “possession” and “witchcraft” is widespread in some communities. It is not confined to particular countries, cultures or religions. The number of known cases of child abuse linked to accusations of “possession” or “witchcraft” is small, but young people involved can suffer damage to their physical and mental health, capacity to learn, ability to form relationships and self-esteem due to extreme physical and emotional abuse that may be wrongly justified on the basis of spirit possession or witchcraft.

Child abuse and social media. The internet has become a significant tool in the distribution of abusive images of children. Social media is used as a means of contacting young people with a view to grooming them for inappropriate or abusive relationships. Contacts made initially in a chat room can be carried on via email, instant messaging services, mobile phones or text messaging. Cyberbullying, including sexting (which is illegal), is now widespread and can be very harmful to young people. Further advice and guidance on this topic are on the websites of the NSPCC, CEOP, Internet Watch Foundation and the UK Safer Internet Centre.

Children and families who go missing. Local agencies and professionals should bear in mind, when working with young people and families where there are outstanding concerns about the young person’s safety and

welfare that a series of missed appointments may mean the family have moved. Young people who are looked after (i.e. in care) sometimes go missing from their placements. There will be procedures in place, which should be followed if this occurs and the care home/foster placement must be immediately informed.

Child trafficking. Child trafficking is child abuse. This is where children are recruited, moved or transported and then exploited e.g. for sexual exploitation or domestic servitude. They are often subject to multiple forms of abuse. Children may be trafficked into the UK from abroad but can also be trafficked from one part of the UK to another.

Child on Parent Violence (CPV) or Adolescent to Parent Violence and Abuse (APVA) is any behaviour used by a young person to control, dominate or coerce parents. It is intended to threaten and intimidate and puts family safety at risk. Whilst it is normal for adolescents to demonstrate healthy anger, conflict and frustration drawing their transition from childhood to adulthood, anger should not be confused with violence. Violence is about a range of behaviours including non-physical acts aimed at achieving ongoing control over another person by instilling fear.

Most abused parents have difficulty admitting even to themselves that their child is abusive. They feel ashamed, disappointed and humiliated and blame themselves for the situation, which has led to this imbalance of power. There is also an element of denial where parents convince themselves that their son or daughter's behaviour is part of normal adolescent conduct.

Child criminal exploitation. It occurs when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for financial advantage or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. Child criminal exploitation does not always involve physical contact; it can also occur using technology.

County Lines. This term is used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of 'deal line'. They are likely to exploit children and vulnerable adults to move and store drugs and money, and they will often use coercion, intimidation, violence (including sexual violence) and weapons.

Disabled children. Children with a disability or additional health needs are a particularly vulnerable group as signs of abuse and neglect may be masked or misinterpreted as being due to underlying impairments. Disabled young people are three times more likely than non-disabled children to experience abuse due to several factors:

- have fewer outside contacts than other young people;
- may receive personal care, possibly from several carers, which may both increase the risk of exposure to abusive behaviour and make it more difficult to set and maintain physical boundaries;
- have an impaired capacity to resist or avoid abuse;
- have communication difficulties that may make it difficult to tell others what is happening or to be believed;
- be inhibited about complaining because of a fear of losing services;
- be especially vulnerable to bullying and intimidation and /or, abuse by their peers.

Domestic violence and abuse is 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 these harms:

- psychological
- physical
- sexual
- financial
- emotional

Controlling behaviour is: a range of acts designed to make a person subordinate or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means for independence, resistance and escape and regulating their everyday behaviour.

Coercive behavior is: an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish or frighten their victim.

Children and young people living in families where they are exposed to domestic violence have been shown to be at risk of behavioural, emotional, physical and long term developmental problems. Everyone working with young people and families should be alert to the frequent inter-relationship between domestic violence and the abuse and neglect of young people.

Families living in temporary accommodation. Living in temporary accommodation, often at a distance from previous support networks, can lead to young people and families falling through the net and becoming disengaged from services. Where there are concerns about a young person in temporary accommodation, safeguarding procedures should be followed.

Female genital mutilation (FGM). (also known as ‘female genital cutting’ or ‘female circumcision’.) Communities tend to use local names for referring to this practice including “sunna”. FGM-practicing families do not see it as an act of abuse; however, FGM has significant physical and mental health consequences both in the short and long term and, therefore, must not be excused, condoned or accepted. FGM cannot be left to personal preference or cultural custom as it is an extremely harmful practice that violates basic human rights. Girls are at risk of FGM during school summer holidays. This is the time when families may take their children abroad for the procedure. Many girls may not be aware that they may be at risk of undergoing FGM. FGM is illegal in the UK and where it is suspected it must be referred onto children’s social care.

Forced marriage. A forced marriage is where one or both people do not (or in cases of people with learning difficulties or who are under-age, cannot) consent to the marriage and where duress is used to enforce the marriage. ‘Duress’ includes psychological, sexual, financial or emotional pressure and physical violence.

Forced marriage is a violation of human rights and is seen in the UK as a form of domestic violence or child abuse. It may affect girls, boys, women and men from any community or background. However, existing statistics show that greater numbers of women are affected.

Forcing someone to marry without their consent is a criminal offence. It is illegal to take someone overseas to force them to marry (whether or not the forced marriage takes place) or to marry someone who lacks the mental capacity to consent to the marriage (whether they are pressured to or not).

A forced marriage is entirely different from an arranged marriage, and the two should not be confused. In an arranged or assisted marriage, the families take a role in choosing and introducing the marriage partners but the marriage is entered freely by both people, without pressure. In a forced marriage, this consent does not exist. If this form of harm is suspected, advice should be sought from the Forced Marriage Unit prior to any discussion with the young person or family on 0207 008 0151 or out of office hours contact: 0207 008 1500 (ask for Global Response Centre).

Parental adversity. Parental drug misuse can cause harm from conception to adulthood, including physical and emotional abuse and neglect. Where drug misuse co exists with domestic violence and mental illness the risk of harm to a child is even greater.

Race and racism. Young people from black and minority ethnic groups may have experienced harassment, racial discrimination and institutional racism. The experience of racism is likely to affect the responses of the young person and parents/carers to other intervention in their lives. There is also a danger that professionals working with children and young people may not intervene soon enough for fear of being seen as racist and in so doing, offer the child less protection.

Unaccompanied asylum-seeking children (UASC). A UASC is an asylum-seeking child under the age of 18 who is not living with their parent, relative or guardian in the UK. They can be more vulnerable to abuse and exploitation because they lack the necessary support networks, protection and communication skills.

Adolescent risks. The nature of abuse and neglect for teenagers is different from that of younger children. Behaviours by parents/adults that might be deemed abusive or neglectful for a very young child may be considered appropriate for teenagers. Additionally, they may face a wider range of risks due to the relationships they have, social media that they use, lifestyles that they lead and with their increasing independence. Risk taking and experimentation is a normal part of growing up but also can place young people in harm's way.

Young people whose behaviour indicates a lack of parental control. When young people are brought to the attention of the police or wider community because of their behaviour, this may be an indication of vulnerability, poor supervision, abuse or neglect in its wider sense. It is important to consider whether these are young people in need of protection as well as support services and not to view them as only an offender as they may well be also victims themselves.

Young people and gang activity. Overall, young people can be particularly vulnerable to suffering harm in the gang context are those who are:

- not involved in gangs, but living in an area where gangs are active, which can have a negative impact on their ability to be safe;
- not involved in gangs, but at risk of becoming victims of gangs;
- not involved in gangs but at risk of becoming drawn in, for example, siblings or children of known gang members; *or*
- gang-involved and at risk of harm through their gang-related activities e.g. drug supply, weapon use, sexual exploitation and risk of attack from own or rival gang members.

Young carers. A young carer is a person under 18 who provides or intends to provide care for another person (of any age except for where that care is provided for payment or as voluntary work). Young carers may require support services either for them or for the person they care for to ensure that their health and welfare does not suffer. In some instances, young carers may also need protection due to the adverse circumstances they may be experiencing or where the behaviour of the person that they are caring for is abusive.

Radicalisation and violent extremism. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism. Extremism is defined by the Government in the 2011 Prevent Strategy as: *Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.* It also includes calls for death of members of the armed forces, whether in this country or overseas.

Children or adults may become susceptible to radicalisation through a range of social, personal and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals. Indicators of radicalisation and violent extremism may include:

- showing sympathy for extremist causes
- contact with extremist recruiters;
- justifying the use of violence to solve societal issues;
- joining or seeking to join extremist organisations;
- glorifying violence, especially to other faiths or cultures
- making remarks or comments about being at extremist events or rallies
- possessing illegal or extremist literature
- advocating messages like illegal organisations or other extremist groups
- out of character changes in dress, behaviour and peer relationships secretive behaviour
- online searches or sharing extremist messages or social profiles
- intolerance of difference, including faith, culture, gender, race or sexuality
- graffiti, art work or writing that displays extremist themes

- attempts to impose extremist views or practices on others
- verbalising anti-Western or anti-British views

Children or young people who are showing signs of radicalisation and violent extremism will need to be considered as at risk of harm to themselves or others and therefore such concerns should be acted upon by following safeguarding procedures.

Appendix 6: Barriers to help seeking for children

Many children and young adults are reluctant to seek help because they feel that they do not have anyone that they can turn to for support. They may have sought help in the past and had a negative experience, which makes them unlikely to do so again. In an NSPCC study of child maltreatment (2000), only a quarter of the people that had experienced sexual abuse as a child had told anyone at the time. Being unable to tell someone that you are being abused can be very stressful and may leave a vulnerable child at risk of continuing or further abuse.

Young people may not seek help because they:

- fear of not being believed
- feel too embarrassed to talk to an adult about a private or personal problem
- worry that their concern will not be taken seriously
- worry about confidentiality and lack trust in both the people around them (including parents) and in the services provided to help them
- fear the consequences of asking for help
- fear the situation could become worse
- experience of disclosure in which they were not listened to

Some groups of children and young people experience more barriers. For example, boys are often more reluctant to seek help than girls. Children with communication difficulties may lack the language necessary to enable them to express what is worrying them. Children that are more isolated are less likely to share their concerns for example children living in residential care.

Barriers for adults to listen

Sometimes there is reluctance by adults to listen to what children are telling them and to act on it. Adult fears may be due to:

- Not knowing how to react or who to tell
- Fear of getting it wrong
- Loyalty to the family or colleagues
- Lack of trust in the child protection system
- Not recognising the significance of the indicators.

How to encourage children and young people to seek help and support

- Make it easier for young people to take up the offer of help
- Listen to the people you help - see the whole person
- Build trust - treat young people with respect
- Empower young people to find their own solutions
- Advertise the benefits of seeking help
- Help to tackle the myths about those who seek help – seeking help is not a sign of weakness.

Appendix 7: Safeguarding Contacts

Name and job title	Safeguarding Role	Contact details
Rosalind Mist	Child Safeguarding Director (CSD)	RMist@wwf.org.uk
Matt Larsen-Daw	Designated Child Safeguarding Officer (DCSO)	MLarsenDaw@wwf.org.uk
Kellie Rollings	Deputy Designated Child Safeguarding Officer(DCSO)	KRollings@wwf.org.uk
Darragh Field	Online safety co-coordinator	DField@wwf.org.uk
Police		999 in an emergency
Local authority Children's Social Care (England)	Use the following website to find out the details of who to report to https://www.gov.uk/report-child-abuse-to-local-council	
NSPCC Helpline	Helpline for advice on child protection matters for professionals and adults. It can make referrals to the police and children's social care	0808 800 5000
ChildLine	24-hour helpline for children and young people	0800 1111
The Mix	Free, confidential advice service for young people under 25 via online, social and mobile media	0808 808 4994
WhistleB for WWF International	Whistleblowing hotline to WWF International	https://report.whistleb.com/en/wwf
Whistle blowing advice line (external)	Advice can be sought from NSPCC if the WWF-UK whistleblowing procedure has not resolved the concern about appropriate action being taken	0800 028 0285
Professionals Online safety helpline (POSH)	Advice for professionals about online safeguarding concerns	0344 381 4772 helpline@saferinternet.org.uk
National Crime Agency's Child Exploitation and Online Protection Centre(CEOP) Command	Advise and can investigate inappropriate online behaviour such as grooming online or sexual exploitation	0870 000 3344
Internet Watch Foundation (IWF)	Removes child sexual abuse images or video and non -photographic child sexual abuse images (e.g. cartoons or computer generated)	01223 203030 Or report online to: report.iwf.org.uk
Police Counter Terrorism Internet Referral Unit	To report online materials terrorism promoting terrorism or extremism	www.gov.uk
Disclosure and Barring Service (DBS)	Advice line for criminal records checks and barring in England and Wales	03000 200 190

Disclosure Scotland	Advice line for criminal records checks and barring in Scotland	0300 020 0040
NAPAC (National Association for People Abused in Childhood)	Support for adult survivors of child abuse, their friends and family	Tel 0808 801 0331 Email support@napac.org.uk
National Domestic Abuse Helpline	24 hour advice line	Tel 0808 2000 247
Victim support	For victims of crime	Tel 0808 168 9111 www.victimsupport.org.uk

Appendix 8: WWF-UK Safeguarding Report Form

- Enter as much detail as possible.
- Don't delay making a referral if there is information missing.

Part 1 Details of the Child/children		
Name of Child/ren		
Gender:	Age:	Date of Birth:
Religion	Ethnicity	Any additional needs (e.g. disability)
Parent/Carer name(s):		
Home address of child/ren		
Place/time/date where the concern was identified		
Part 2 Details of a safeguarding allegation against employees/volunteers/ third parties		
Name and role of person who is the subject of the allegation		
Age and/or Date of Birth		
Home address		
Place/time/date where the concern was identified		
Part 3 Your Details:		
Your Name:	Your Position:	Your contact details

Part 4 Report:		
Are you reporting your own concerns or responding to concerns raised by someone else?		
<input type="checkbox"/> Responding to my own concerns <input type="checkbox"/> Responding to concerns raised by someone else	If responding to concerns raised by someone else, please provide their name, role and contact details (if known):	

<p>Please provide details of the safeguarding concern or allegation including times, dates or other relevant information. Make it clear whether you are giving a fact, expressing your opinion or expressing the opinion of someone else.</p>
<p>The child or adult's account of what happened (e.g. of any incident, injury, disclosure, behaviour) if known</p>
<p>Please provide details of the person alleged to have caused the incident/injury if known (e.g. names(s) /address/ incident address /relationship to child</p>
<p>Please provide details (name, role contact details if known) of any witnesses to the incident/concerns:</p>

--

Part 5: Actions Taken	
State any risk of immediate harm	
Identify any action taken already e.g. contact with police, CEOP, IWF, children's services, NSPCC helpline etc.	
Is the child and parents/carers or accused person aware that a report has been made	
Any known previous records of safeguarding concerns or allegations	
Any further information or comments or actions to be taken	

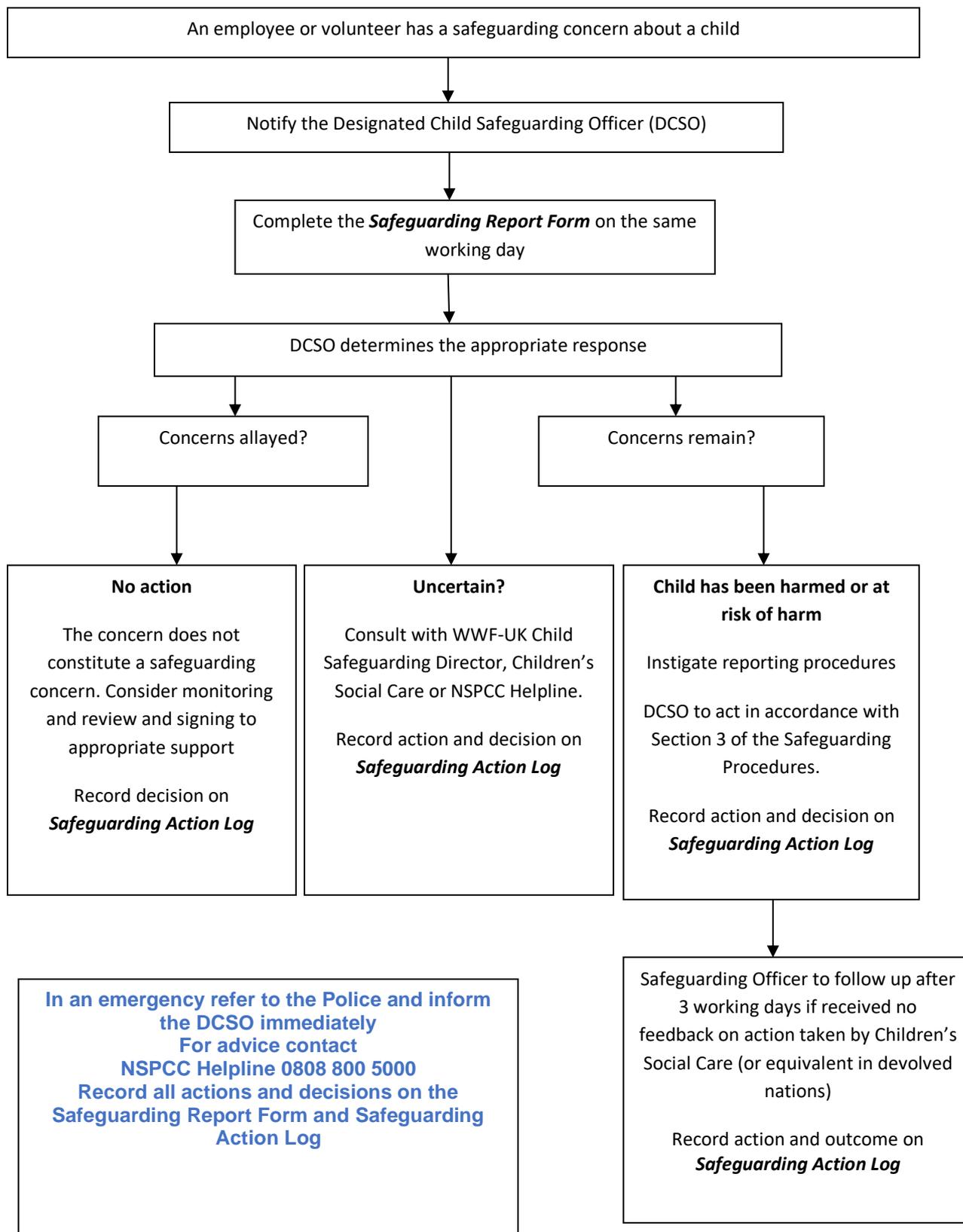
Date and time of report being submitted and to whom.....

Part 6: Immediate action and decisions by DCSO

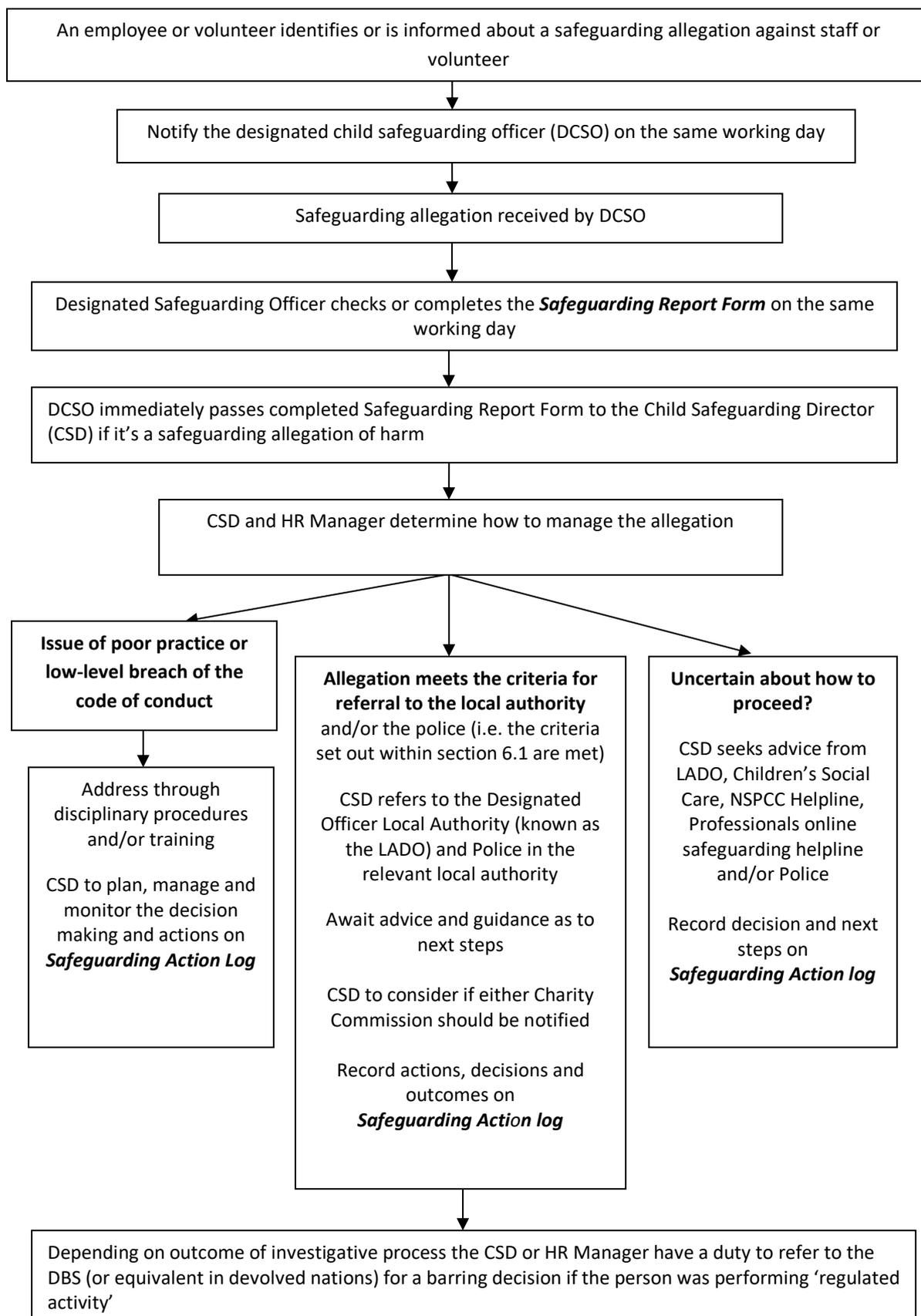
Appendix 9: WWF-UK Safeguarding Action Log

Date & time	Name	Notes	Action	By Whom

Appendix 10 Flowchart: Responding to a child safeguarding concern



Appendix 11 Flowchart: Responding to a safeguarding allegation



Appendix 12: Safeguarding Checklist for Partner Organisations working with WWF-UK

WWF-UK are committed to promoting the safety and welfare of all children and young people as a part of its duty of care. To this end we want to be satisfied that where we have partnership arrangements that these fully include safeguarding arrangements. Therefore, please complete this form and return to [add name].

WWF-UK is not responsible for quality assuring your policies and procedures. By completing and signing this document you are confirming that what you have in place is suitable and fit for purpose and complies with relevant law, guidance and best practice.

Name of partner organisation.....

Name of person completing this form & job title

Section 1: Safer staff and volunteers - recruitment, selection induction and support

You have in place	Yes or No	Additional comments
A written recruitment and selection policy and procedure which includes:		
An application form		
A face to face interview conducted by interviewers that have relevant knowledge and experience of current safeguarding practices.		
Interview questions that draw out people's attitudes and values in relation to the protection of children		
A request for 2 references, 2 pieces of identification and original copies of necessary qualifications before staff appointment or commencement as a volunteer.		
Different levels of recruitment and security checks commensurate with safeguarding requirements of the role.		
Criminal records checks with a process to risk assess any positive disclosures.		
Induction and support is provided for all staff/volunteers.		

Section 2: Child protection

You have in place:	Yes or No	Additional information

A written statement of your organisation's commitment to protecting all children and young people from harm. Such a policy should ensure no child is discriminated against.		
Written procedures for dealing with situations where a child or young person says they are being abused or neglected or is showing signs of harm.		
Written procedures for dealing with situations where allegations of abuse are made against staff or volunteers		
Written details about how any information regarding children and their families will be held and under what circumstances such information may be shared with other agencies.		
Mandatory training on safeguarding for new trustees/staff/volunteers within a suitable and appropriate timeframe of them joining your organisation		
Regular mandatory refresher training on safeguarding to staff and volunteers		
A nominated/designated person in your organisation with a lead responsibility for managing any safeguarding concerns or allegations and reporting regularly to the senior leadership and Board		
Information for parents of children with whom it has contact giving details of its child protection procedures and how they may make complaints if they have any concerns about the treatment of their child/ren.		

Section 3: Safeguarding Code of Conduct

You have in place:	Yes or no	Additional information
A code of behaviour for staff and volunteers that sets out clear expectations of behaviour and what will happen in the event of non-compliance or breach of these standards		
A policy on harassment, sexual harassment and bullying of staff or volunteers which makes the organisation's commitment to zero tolerance and a process for dealing with such concerns if they arise		

Staff and volunteers are provided with training on the code of conduct as part of their induction		
---	--	--

Section 4 Risk Management

You have in place	Yes/no	Additional information
A risk register that captures any safeguarding risks in your organisation		
Regular oversight of your risk register by senior management or Board		

Section 5: Whistleblowing

You have in place:	Yes or No	Additional information
A whistle blowing policy which protects the whistle blower from reprisals and includes clear processes for dealing with concerns raised and by whom and the timescales involved.		

Section 6: Avoiding accidents and running safe activities

You have in place:	Yes or No	Additional information
An accident prevention policy and procedures.		
Risk assessment procedures regarding activities with children		
Regular checks on equipment used by children and young people carried out in accordance with health and safety guidance.		
Adult to child ratios which are appropriate and safe.		
A policy on parental consent to activities for children up to their 18 th birthday unless those young people are living away from home or being cared for by the local authority		
Information about each person's medical and dietary needs, allergies and specific individual requirements.		
Parent/carer/guardian contact details.		
Public liability insurance with no exclusions for child abuse.		

Signature. *I confirm that the measures listed above are in place. I also understand that if a child is at risk of harm or is harmed or there is a serious concern about the behaviour of an adult while delivering services on behalf of WWF-UK I will notify [insert name] at WWF-UK within one working day of the concern being identified. This is for information purposes only.*

Signature and date.....

For WWF-UK use only:

Form seen and approved/not approved by:

Any notes:

Appendix 13 Consent Form: Photographs, Film and Interviews

WWF-UK CONSENT FORM FOR PHOTOGRAPHY, FILM AND INTERVIEWS

Thank you for letting us document your actions and/or perspectives through photographs/video.

We will use these images, and accompanying text that you supplied where relevant, to show the world the work we're doing – and to demonstrate how people like you are inspiring others to help us achieve a world where people and nature thrive. Your story, pictures and video may be shown in magazines, newspapers, other printed materials, on the internet, on social media such as Facebook and Twitter, on television, in our advertising and in other ways. People from all over the world may be able to see your pictures and hear your story as may your friends and neighbours.

We will keep your contributions securely and we may reuse them in future communication materials.

If you agree to these terms and understand all of the below then please provide your details and sign this form.

What you agree to (the legal details):

1. You grant to WWF-UK the right to distribute free of charge the specified photograph/video, and for WWF-UK and the WWF global network to use your contributions in any media (whether already known or developed in the future) throughout the world and without any payments.
2. WWF-UK and the WWF global network may edit, adapt or translate your contribution and you confirm that you waive all 'moral rights' to enable the uses set out above.
3. WWF-UK will credit your photograph/video in accordance with your specification (see form opposite) and you retain full copyright in your work.
4. WWF-UK and the WWF global network may also share your materials with trusted partners (eg Backyard Nature) and your photograph may appear in their communications.

If you are signing on behalf of a child, then you are:

1. declaring that you are the parent/legal guardian (please delete as appropriate) of the child(ren) named below who is/are under the age of 18 and that you are also over the age of 18. If you are under 18, please ask a parent/legal guardian over the age of 18 to sign on your behalf; and
2. confirming that you have read this agreement and are satisfied that it is clearly in the interest of the child(ren) named; and
3. to the extent of your interest in the agreement on behalf of your children/your charge/ward, you are granting and confirming to WWF-UK all rights, consents and waivers granted under the agreement; and
4. agreeing that you will remain responsible for the child/ children at all times.

We need consent for anyone recognisable in the photo/video.

This section should be filled out by an adult, aged 18 or over.

Note: If the parent is under the age of 18, please ask a parent/legal guardian who is over the age of 18 to sign.

Please fill out this form in CAPITAL LETTERS.

- I am filling out this form for myself (adult aged 18 or over) and/or
 on behalf of a child/children (I am the parent/legal guardian and I am over 18)

Full name (adult):

First name(s) of child/children only:

Email (adult):

Telephone (adult):

Address (adult):

I confirm I have authority to assign rights to use of this photo.

Signature of adult:

Are you happy for us to use your real name/s? (delete as appropriate) **Yes** **No**

We will automatically change your name if we feel we need to for your safety.

Restrictions:

The consent that you give can be changed or withdrawn at any time by contacting the WWF-UK Supporter Care team. They are here to help and can be contacted on: +44 (0)1483 426333 Monday to Friday 9am-5pm. Please note that for training and quality purposes, your call may be recorded.

Please note that we cannot withdraw images from the public domain where they are already published.

All information will be kept securely by WWF-UK in accordance with the Data Protection Act.

WWF-UK is a registered charity in England and Wales (1081247) and in Scotland (SC039593) and a company limited by guarantee registered in England and Wales (4016725)

FOR LOCATION USE

Producer/WWF-UK staff member:

Type of content gathered: Photography Film footage Audio Written case studies

Other (please describe):

Location:

Date of recording:

Original image ref:

FOR OFFICE USE

WWF-UK contact:

Email address:

Telephone:

Appendix 14 Serious Incident Reporting

WWF-UK must comply with the serious incident¹¹ reporting procedures as required by the Charity Commission for England and Wales and the OSCR Scottish Charity Regulator¹². The Board of Trustees has approved the Serious Incident Reporting Principles which should be followed if an incident needs to be reported.

These bodies expect a report if a serious safeguarding risk materialises. This will usually be if any of the following occur¹³:

- incidents of abuse or mistreatment (alleged or actual) of beneficiaries of the charity (adults or children) which have resulted in, or risk, significant harm to them and:
 - this happened while they were under the care of the charity
 - someone connected with the charity, for example a trustee, staff member or volunteer, was responsible for the abuse or mistreatment (alleged or actual)
- other incidents of abuse or mistreatment (alleged or actual) of people who come into contact with the charity through its work, which have resulted in or risk significant harm to them and are connected to the charity's activities
- breaches of procedures or policies at the charity which have put people who come into contact with it through its work at significant risk of harm, including failure to carry out relevant vetting checks which would have identified that a person is disqualified in law from holding their position within the charity. This might be, for example, because they are disqualified under safeguarding legislation from working with children and or adults.

The above may include incidents in the workplace that have resulted in or risk significant harm to trustees, staff or volunteers. This does not mean that the Charity Commission expects charities to report every internal staffing incident - charities need to make a judgement call about which incidents either individually, or as a collection, are serious in the context of the charity.

However, a report should always be made where the level of harm to the victims and/or the likely damage to the reputation of, or public trust in, the charity is particularly high (for example, sexual misconduct by the charity's Chief Executive or another person in a senior position or position of specific responsibility, such as the Child Safeguarding Manager). The Commission would also expect to receive a report if the number and nature of staffing incidents indicate there are widespread or systematic issues connected to sexual harassment, abuse and/or other misconduct in a charity. This is because abuse can thrive in such conditions or people may be fearful of sharing concerns because of the consequence treatment they may receive from colleagues.

WWF-UK may be alerted to alleged abuse of a beneficiary, staff member, volunteer or someone else who it encounters through its work, which has occurred outside of the charity (e.g. in the family home or community) and:

- The abuse was not connected to its activities in any way
- The person responsible for the abuse was not a trustee, staff member or volunteer.

¹¹ In Scotland, this is referred to as 'Notifiable Events'

¹² https://www.oscr.org.uk/media/2155/2016-03-15_guidance-for-notifiable-events_web-version.pdf

¹³ <https://www.gov.uk/guidance/how-to-report-a-serious-incident-in-your-charity> Accessed online on 5/1/21

In such incidents, WWF-UK are **not** expected to report to the Commission unless it's found (or alleged) that the incident wasn't handled appropriately by us and this resulted in harm to the person or persons concerned. In such circumstances, a report should also be made to the police and local authority.

The guidance (How to report a serious incident in your charity, June 2019) provides examples of the types of incidents that should be reported¹⁴.

A report should be submitted to the Charity Commission or OSCR. Both have online forms available to complete for this purpose.

The Commission's role in relation to safeguarding incidents

The Commission's role is to ensure that trustees are handling the incident appropriately and, where necessary, putting in place improved governance and internal controls, to prevent further harm.

The Commission is not responsible for dealing with incidents of actual abuse or mistreatment and it does not administer safeguarding legislation. It cannot prosecute or bring criminal proceedings although it may refer concerns on to 'lead agencies', such as police, local authorities and the Disclosure and Barring Service/Disclosure Scotland, as well as to specialist bodies responsible for designated areas, such as education or health and social care.

What to report to the Charity Commission

The Commission's Serious Incident Reporting Guidance notes that it is important to provide enough detail in the report to give the Commission a clear picture of what happened and when, the extent of any loss or harm, how the charity is dealing with it and the planned/possible next steps. It is important to balance the fact-finding exercise with the need to report incidents promptly.

The SIR Guidance says that if, having submitted a report to the Commission, the charity becomes aware of any material changes to the facts reported or significant developments, the charity must inform the Commission as soon as it becomes aware of them.

Information to be included in the report to the Commission:

Contact details

- the individual submitting the report and their connection to WWF-UK;
- the charity name and its registration number
- reference number and contact details if it's been reported to other organisations such as the police or children's social care
- who within the WWF-UK trustee body is aware of the incident

Incident details

- date of the incident
- what happened
- date the charity found out about the incident
- how the charity found out about the incident

¹⁴ Examples table - deciding what to report:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/752170/RSI_guidance_what_to_do_if_something_goes_wrong_Examples_table_deciding_what_to_report.pdf

Accessed 5/1/21

- what impact the incident has had on the charity's beneficiaries, staff, operations or reputation
- whether trustees are aware of the incident

How the incident is being handled

- which of the charity's policies or procedures relate to the incident and whether they were followed?
- what steps the charity has taken to deal with the incident?
- what steps the charity has taken to prevent similar incidents?
- where applicable, the charity's media handling or press lines, including a link to press release if available
- it is not necessary to provide the names or any other personal details of any individuals involved in the incident in the initial report – the Commission will request this information if they need it.

Confidentiality and data protection

All serious incident reports should be marked as confidential (unless the information is already wholly available in the public domain, which is highly unlikely). In addition:

- any personal data should be removed to the greatest extent possible and, if appropriate, the risk of identification of individuals (though unnamed) should be highlighted
- any particularly sensitive information in the report should be identified;
- any specific exemptions from disclosure (such as an exemption under the Freedom of Information Act) should be specifically referred to and relied upon; and
- the report should contain a request that it is not disclosed to third parties and that the Commission notifies the charity if it receives a request to disclose information to third parties (e.g. the media or individuals).

What happens next?

The Commission will acknowledge receipt of the report. It will assess the risk and look at how WWF-UK is dealing with the incident, and may take steps to verify the details, for example and where relevant, by contacting the police. The Commission may also follow up if it:

- needs more information about the incident
- thinks WWF-UK needs regulatory advice and guidance
- has to use its legal powers to protect the charity and/or the people who come into contact with the charity through its work
- decides to request updates on future development
- needs to monitor the charity's progress in dealing with it
- in very serious cases the Commission may take steps to exercise its enforcement powers, for example, issuing a warning or opening a statutory inquiry into the charity, though it is rare that it would do so without some form of preliminary communication or dialogue.

Learning from serious incidents

It is important that WWF-UK appropriately manages and responds to a serious incident. This includes learning from the incident and taking steps to minimise further harm in consequence of the incident and to prevent similar incidents from occurring in the future.

The CSD and lead trustee for safeguarding should consider whether WWF-UK has taken appropriate

steps to respond to a serious incident and ensure that sufficient controls and procedures are put in place to mitigate and manage any future risks to the charity and its beneficiaries.