

Integrated Management System	P06	
Safeguarding Policy		
Version: 9.0	Date: December 2024	

Looking for guidance related to a safeguarding disclosure or concern?

- WRAP APAC – [Appendix 1](#)
- WRAP Americas – [Appendix 2](#)
- All others - [ANNEX 4](#)

1. WRAP and Safeguarding

A commitment to the principles of safeguarding is integral to WRAP’s ethos. Just as its work is designed to make the world a healthier, sustainable place, its Safeguarding Policy is designed to protect from harm and keep safe its employees and vulnerable groups with whom it has contact through its work. This includes developing, enabling, and nurturing a strong safeguarding culture within the organisation.

Although WRAP’s direct contact with children and adults at risk is limited due to our current work portfolio, we remain steadfastly committed to protecting those we interact with from harm.

Many of our interactions are through third parties acting on our behalf, an example of our direct contact is our occasional work in the UK with youth organisations such as the Scouts and Guides. Similarly, work with schools is through the institution rather than child focussed, and, again, managed and overseen by individuals employed by school authorities and Disclosure and Barring Service (DBS) checked by them.

Elsewhere, WRAP colleagues may come into contact with children and adults at risk through its digital and social media campaigning work. WRAP, like many organisations, is growing its social media presence and as such must ensure it is learning from best practice in this area.

WRAP’s employees could also include adults at risk both ordinarily, and when an individual normally not considered at risk becomes so due to circumstances.

WRAP’s employees within all teams must be fully aware of their safeguarding responsibilities. During the due diligence process partners are required to declare and demonstrate they have a Safeguarding Policy and procedures in place - including but not limited to risk assessments, relevant checks (including DBS or equivalent checks) and maintaining knowledge of the law in this area. Compliance with all relevant regulations and government guidelines on safeguarding is a contractual obligation.

Our work is guided and supported by a contemporary safeguarding policy base that is consistent with professional best practice, is compliant with the law and relevant regulations, and which reflects the nature of our work and that of our partners. Our safeguarding framework comprises the following 3 standards:

Standard 1: Safeguarding Policy which is supported by a Whistleblowing Policy and Code of Conduct and Accountability Framework.

- Standard 2: People and Partnerships which comprises, Safer Recruitment and Partner Due Diligence.
- Standard 3: Risk Management Policy and Risk Log.

Safeguarding of all those WRAP come into contact with is of critical importance to us.

Through the implementation of our safeguarding framework, our intention is to promote the development of a safeguarding culture that prioritises the safety and well-being of our beneficiaries, customers, suppliers and partners, as well the general public through our social media activities. The safety and well-being of our employees is managed through our human resource management policies which are coherent with our approach to safeguarding.

This document outlines the key areas of consideration for WRAP as a global NGO with specific sections relating to WRAP APAC ([Appendix 1](#)) and WRAP Americas ([Appendix 2](#)).

Contact Information

For any queries about Safeguarding at WRAP please contact our Designated Safeguarding Lead, Fay Charlett – Head of Commercial directly or use Safeguarding@wrap.ngo.

2. WRAP Policy Statement

WRAP's Safeguarding Policy puts those children and adults at risk with whom we come into contact, our employees and our partners' wellbeing at the centre of all we do. WRAP works to the UK Charity Commission's description of the role of safeguarding, which is to "protect people who come into contact with your charity through its work from abuse or mistreatment of any kind".

WRAP considers that **safeguarding** comprises safeguarding **by** employees/partners, safeguarding **of** employees/partner employees and safeguarding **from** employees/partner's employees. This policy relates to safeguarding of children and adults at risk who come into contact with us through our work. The safeguarding of employees/partner employees is managed through our human resource management policies.

Although the terms used may be different in different geographies, the concept of safeguarding as described above is a universal principle WRAP applies globally.

Consequently, WRAP will:

Take all possible steps to safeguard and protect children and adults at risk who come into contact with the activities of WRAP during its work, from abuse or mistreatment.

Safeguarding applies consistently and without exception across all areas of the organisation with contact with children and adults at risk. It applies to **all** children and adults at risk regardless of their background and requires proactively identifying, preventing, and guarding against all risks of harm, exploitation, and abuse. We commit to having robust, accountable, and transparent systems for response, reporting, and

learning when safeguarding risks materialise. Those systems include a duty of care to report incidents, allegations, and concerns, and to adopt a survivor-centred approach to the alleged victim by all individuals working for WRAP.

We require that our partners' working practices represent a commitment to a safe, inclusive, and nurturing safeguarding environment for all. When agreed as part of the due diligence process, WRAP will assess its capacity to help partners develop policies consistent with these values.

We require employees to bring to WRAP's attention through our safeguarding reporting system any concerns, or allegations against any employee team, partners and all people associated with our work. WRAP commits to responding constructively and in a timely manner to reports or allegations that are made to us.

3. The scope of this policy

WRAP's Safeguarding Policy applies to all Trustees, employees (full time or part time), consultants, service providers and, and visitors, including journalists and associated personnel around the world. As stated above our implementing partners, (grantees, sub-grantees, contractors, and sub-contractors) whose work involves contact with children and adults at risk should have and implement a safeguarding policy and, further, demonstrate that they are applied along their supply chains.

This framework applies to all WRAP entities around the world. In all cases local reporting requirements, where these exist, must also be followed. Any questions should be directed to the Designated Safeguarding Lead, Fay Charlett – Head of Commercial directly or via Safeguarding@wrap.ngo.

4. Definitions

For the purpose of this policy:

Child: Any person under the age of 18.

Adult at risk: Any person aged 18 or over who is or may need care and support, (e.g., health, personal or social care), is experiencing or is at risk of abuse or neglect and because of this is unable to protect themselves from either the risk or experience of neglect or abuse. Any beneficiary of our partner organisations who is reliant on the services provided falls under this category. An adult at risk can also be an adult not needing care or support but who becomes at risk due to external factors or protected characteristics.

Harm: the following is the UK Charity Commission's list of potential harm children and adults at risk could face:

- sexual harassment, abuse and exploitation;
- a charity's culture, which may allow poor behaviour and poor accountability;
- people abusing a position of trust they hold within a charity;
- bullying or harassment;

- health and safety;
- discrimination on any of the grounds in the Equality Act 2010;
- data breaches, including those under General Data Protection Regulations (GDPR);
- domestic abuse;
- self-neglect;
- physical or emotional abuse;
- extremism and radicalisation;
- forced marriage;
- modern slavery and human trafficking; and
- female genital mutilation.

Further definitions with categories of abuse for children and adults at risk to be referred to when assessing allegations of harm, and key terminology commonly associated with safeguarding can be found in [Annex 1 - Additional Definitions](#).

5. Legal Framework

WRAP has implemented a Safeguarding Policy that acknowledges both international and national legal frameworks for the protection of children and adults at risk. WRAP's policy implements the UK Charity Commission's instruction that every charity should be "taking reasonable steps to protect from harm people who come into contact with your charity".

WRAP understands that the Charity Commission will hold its Trustees to account if it is found that it did not follow the Charity Commission's guidance and the law, or if it is found not to have taken reasonable steps to protect from harm people who come into contact with the charity.

WRAP Trustees will promote a fair, open and positive culture and ensure all involved feel able to report concerns, confident in the knowledge that they will be heard and responded to.

For those subsidiaries outside the UK all local and national laws and regulations about safeguarding will also apply – these may be referred to under other terms including 'child protection' and 'protecting vulnerable adults'.

A full list of statutes and statutory guidance can be found in [Annex 2 - Legal Framework](#).

6. Safer Recruitment

Safer recruitment is an integral part of WRAP's commitment to build an organisational culture wherein the safety and wellbeing of everyone involved is paramount. The overall purpose of safer recruitment is to help identify and deter or reject individuals who are deemed to pose a danger to children and adults at risk.

7. Code of Conduct

WRAP has a [Code of Conduct](#) that describes the ethics and behaviours required of all stakeholders to ensure a robust safeguarding environment. It is designed to create a culture of safeguarding best practice. Those making overseas visits are expected to uphold local law wherever it operates, except where WRAP's Code of Conduct is more stringent, in which case this will apply. Breaches of the Code of Conduct are grounds for disciplinary action.

We expect our partners to have their own Code of Conduct that clarifies the values, principles, and acceptable behaviour within their organisations and which influences and drives their organisation's culture.

8. Partner Selection and Due Diligence

WRAP works with a range of partners in the corporate, statutory, and voluntary (charity) sectors to further its vision and mission.

WRAP requires all partners who come into contact with children and adults at risk in delivering our work together to have and to implement at a minimum a Safeguarding Policy, a Code of Conduct and a Whistleblowing Policy and to report all safeguarding incidents to us.

9. Risk Management

WRAP will manage risk responsibly. Risk is defined as uncertainty, whether positive or negative, that will affect the outcome of an activity, or the well-being of individuals or the reputation of an organisation. WRAP's risk management log includes safeguarding risks. WRAP's Executive team is committed to review and assess regularly the risks faced by the organisation in all areas of our work and to plan for the management of those risks.

10. Whistleblowing

WRAP's Whistleblowing Policy allows concerns to be raised and resolved at the appropriate level. The policy elaborates a clear process ([Whistleblowing Policy and Procedure](#)) that is widely understood and accessible to all employees, for dealing with concerns and a handling framework with identified owners of each step. The policy makes explicit that there can be no reprisals for the whistle blower where concerns are reported in good faith and without malice. It identifies a clear process to follow if the concern is being raised against an individual in the organisation who manages internal complaints or concerns.

11. Reporting and responding to concerns

WRAP's responsibility for recognising and reporting safeguarding concerns applies across the organisation and with our partners. Designated employees are responsible for responding to safeguarding concerns. Roles and responsibilities for employees and Trustees with designated safeguarding responsibilities and accountability lines can be seen in [Annex 3 - Accountability Framework](#).

12. WRAP's procedure for responding to safeguarding concerns

Safeguarding concerns may arise from the recognition of potential signs of abuse, suspicion of harmful behaviours, and direct disclosure by a survivor. Guidelines stated in [Annex 4 - Handling Disclosure](#) should be followed when responding to disclosures.

12.1. Information sharing and data protection

WRAP will always seek and facilitate consent of alleged adult victims and children's care givers before sharing safeguarding concerns with the relevant authorities. However, in cases where information suggests an immediate risk of harm, data protection legislation is not a barrier to sharing safeguarding concerns. Those representing WRAP as employees cannot keep confidences when they involve concerns about an adult at risk or a child who is at risk or likely risk of harm. It is important that everyone providing services on behalf of WRAP is prepared to explain the limits of confidentiality.

This includes complying with all local and national reporting requirements.

12.2. Reporting concerns relating to WRAP personnel

All safeguarding concerns relating to WRAP employees or Trustees must be reported to the Designated Safeguarding Lead (DSL). If you are unsure whether a situation constitutes a safeguarding concern, you should feel confident to contact the DSL to discuss it. When safeguarding issues are suspected, the person to whom the concern has been reported must immediately inform the DSL. The reporting of suspected or actual abuse is a professional and organisational obligation. Failure to report information can lead to disciplinary action.

Your concern will be treated with respect and dealt with professionally. You can speak to the DSL face-to-face where this is possible, electronically (Teams, Email) or by telephone. If you have witnessed an incident, you may be asked to document the details in a written report. A template will be provided to facilitate this. If you are not able to do this, the DSL will help you. The DSL will document the discussion and agreed actions. Depending on the nature of the incident, they may make a report to the police, a referral to social care, and/or file a Serious Incident Report with the UK Charity Commission (or national equivalent), and inform donors, and will comply with all local and national reporting requirements.

WRAP takes all reports of safeguarding concerns seriously and will treat them confidentially. WRAP aims to acknowledge all reported concerns within 24 hours. It will then respond according to the severity of the incident. All serious incidents, as defined by the UK Charity Commission, will be prioritised for action.

12.3. Reporting concerns identified through direct contact with children

WRAP engages with children in school settings, and through specific groups such as Guides and Scouts. Although these institutions and organisations have their own safeguarding policies and procedures, it is important for WRAP to clarify roles and responsibilities. WRAP commits to the measures set out in [Annex 5 - Checklist for Engaging with Organisations](#).

12.4. Reporting concerns in partner organisations

Partners are required to report serious safeguarding incidents through WRAP's [serious incident reporting form](#). A report from a partner should include the actions that are being taken to act on the concern raised. Allegations of inappropriate behaviour between WRAP employees and partner employees/volunteers will be managed through WRAP's HR management processes. Allegations of inappropriate behaviour between partner employees and volunteers/beneficiaries will be managed by the partner organisation. Support can be sought from WRAP who will comment, and advise where necessary, on any steps being taken by the partner organisation. Should the concern be connected to an allegation of harm, abuse or exploitation by the manager or coordinator of one of our partner organisations, WRAP will consider its capacity to support the partner's governing body to manage the investigation as appropriate to the situation. Decisions about suspending funding will be made following a risk assessment of the partner organisation. If it is felt that the situation has not been dealt with in line with the severity of the incident, WRAP will advise on the next steps and, if appropriate, report to the relevant authorities. The intention is to do this sensitively, in a non-judgemental manner and with the best interests of the people we support at the centre of decision-making processes.

Partners who have contact with children and adults at risk are expected to develop and communicate clear reporting pathways to their employees and those with whom they have contact to ensure that reporting mechanisms are fully understood by those that they work with.

13. Sanctions

Where partners do not demonstrate a commitment to WRAP's safeguarding compliance requirements, we will engage with the partner to resolve the situation through negotiation.

If the partner remains high risk in relation to safeguarding, WRAP will take steps to terminate the partnership. Such actions will only be taken after careful consideration of all relevant factors by the Executive team.

If the deficient persists, the DSL will present the results from the incident investigation and other relevant information, along with a recommendation for action, to the Trustee Board via the CEO and Safeguarding Lead Trustee.

14. Recording

All concerns and allegations must be recorded as soon as possible, and the record will form the basis for sharing information with the DSL and onward referral.

Records will be kept in line with Data Protection requirements and information will be shared observing GDPR requirements. All incident reports will be clearly recorded with concerns raised and actions taken and securely stored with password protected access.

15. Media and Communications

Through its use of photographs, video and written case study material, WRAP commits to representing information about its partners and beneficiaries in ways that respect the dignity of the people portrayed. WRAP respects the wishes of the individual when requesting permission for photographs/video/and written information.

Informed consent must be obtained by anyone whose photograph/video/case information will be used for the purpose of communicating WRAP's work. WRAP will not photograph anyone who is concerned about the use or impact of the image. Consent must be provided by the parent or guardian for children under the age of 18.

Likewise, for an adult who lacks the capacity to provide informed consent, a family member/care giver must give consent on their behalf ([Consent Form - All Media Types](#)).

The quality of consent obtained must be considered. If there is a real or perceived imbalance of power between photographer and the person being photographed, gaining true consent may not be possible. It is often the case that people receiving services or benefits find it difficult to refuse a request to be photographed. It is good practice to ensure that the subject of the photograph/video/case study understands how, when, and where the information is going to be used and where it will be stored and for how long.

Absolutely no payments or any other form of compensation are to be provided to any person being photographed/videoed in exchange for their video film or photograph or to encourage consent.

WRAP understands that in today's digital landscape, photographs can be shared widely beyond their originally intended use. Consequently, we work hard to ensure that individuals who have their photographs taken in relation to our work are used for the purpose for which consent is given. We will ensure that people who give us consent have clear pathways for contacting us through our Communications and Media teams and that they are aware that options to withdraw consent remain open, without a time limit.

When using photographs, video film or case study material the names of children will always be changed to protect their identity. WRAP's Media and Communication teams will ensure that no photographs/videos of children or adults at risk will be used that could be regarded as degrading or sexually provocative. Photographs of children or adults at risk that are partially clothed or naked will neither be taken nor used. Photographs or videos will not be manipulated or taken out of context.

WRAP will ensure that any photograph or recorded case study history of a child or vulnerable adult does not place them in a position of harm or render them vulnerable to any form of exploitation or abuse. WRAP will disguise their identity and will not provide any information that could lead to a child or vulnerable adult being identified or tracked.

All social media and case studies used through digital channels generated by WRAP will be subject to the same safeguarding guidelines as outlined in this policy. [Social Media Guidelines](#) must be followed at all times. Information about a child/children or

vulnerable adult's life and any photographs/videos of children or adults at risk will be kept confidential in secure files. Access to photographs is limited to those that need them during the course of their work.

16. Working with news and communications media

WRAP works with media around the world every day to provide briefings, commentary, the latest data, opinions, insights, and evidence of what works – and why. Please contact us for more information on our approach to information, communication and safeguarding.

Our media relations specialists are here to help, Monday to Friday 09:00am to 17:00pm (GMT) on 07951 346196 and media.enquiries@wrap.ngo

17. E- Safety

The safe and responsible use of technology is an important consideration at WRAP. Our E-safety arrangements apply to the use of the internet and other means of communication using electronic media (e.g., text messages, gaming devices, email etc). WRAP has measures in place to ensure that confidential material transmitted electronically is encrypted so that it cannot be viewed "in flight", and that all email arriving or leaving WRAP can be traced to ensure it has been delivered successfully. WRAP has an [Acceptable Use Policy](#) that all employees are required to read and sign as part of their onboarding. This policy also outlines WRAP's data security processes and includes a specific code of conduct which sets out expected standards of behaviour online. Employees are regularly updated and sent reminders about E-Safety issues through our internal channels.

Our servers also have a firewall in place to detect and mitigate cyber security threats and we have systems in place that continually monitor our e-safety arrangements.

18. Implementation and Review

WRAP's suite of safeguarding policies will be available to all employees via The Loop and to the wider public via its external website.

WRAP employees with specific safeguarding responsibilities will be trained to receive and respond professionally to safeguarding concerns and allegations.

All our partners will be informed about our requirements in relation to safeguarding arrangements that must in be in place to safeguard children and adults at risk that they come in contact with through their work.

Safeguarding will be integrated in our monitoring and evaluation activities.

The Designated Safeguarding Lead, together with the CEO, will contribute to Trustee Board meetings summarising safeguarding activity, analysing safeguarding data and trends, and identifying any key areas for improvement where relevant.

WRAP will continually evaluate its safeguarding practice and update its policy following an annual review by the Designated Safeguarding Lead, collaborating with colleagues across the organisation.

Annex 1 - Additional definitions used throughout the policy

Beneficiaries - Any person supported by our partners. In our daily work, we do not use this terminology, preferring instead to talk about people. For the purpose of this policy, and, again in line with Charity Commission guidance, we define a beneficiary as "*a person or group of people eligible to benefit from a charity.*"

Implementing partner - an organisation, collective or individual who is funded or supported by WRAP to carry out work supporting beneficiaries.

Categories of harm and safeguarding terminology

Children

Abuse of trust: a relationship of trust can be described as one in which one party is in a position of power or influence over the other by virtue of their work or the nature of their activity. An abuse of trust can be committed by an employee or volunteer. It is vital that those in a position of trust clearly understand the power this gives them over those they care for and the responsibilities this carries. They must be given clear guidance to ensure they do not abuse their position or put themselves in a position where allegations of abuse, whether justified or unfounded, can be made. This is particularly important in the context of humanitarian aid, when those in positions of power also control aid and resources.

Child 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 online, either wholly, or by its use to facilitate offline abuse. Children may be abused by an adult or adults, or another child or children. Working Together to Safeguard Children, 2018.

Child protection: Part of safeguarding and promoting welfare. This refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

Child criminal exploitation: Where an individual or group takes advantage of an imbalance of power to coerce, control, 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 the financial 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 through the use of technology.

Child safeguarding Incident: Refers to when an allegation is made, even if it is unsubstantiated, that a child is at risk of harm or has experienced harm.

Child sexual exploitation is a form of child sexual abuse. It occurs where 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 sexual activity in exchange for something the victim needs or wants, and/or for the 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 through the use of technology.

County Lines: a term 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 the drugs and money, and they will often use coercion, intimidation, violence (including sexual violence) and weapons.

Emotional Abuse: 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 a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Extremism: Extremism goes beyond terrorism and includes people who target the vulnerable – including the young – by seeking to sow division between communities based on race, faith, or denomination; justify discrimination towards women and girls; persuade others that minorities are inferior; or argue against the primacy of democracy and the rule of law in our society. Extremism is defined in the Counter Extremism Strategy 2015 as the vocal or active opposition to our fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. We also regard calls for the death of members of our armed forces as extremist.

Female Genital Mutilation: Female genital mutilation (FGM) is the partial or total removal of external female genitalia for non-medical reasons. It is also known as female circumcision, cutting, or sunna. Religious, social, or cultural reasons are sometimes given for FGM. However, FGM is child abuse. It's dangerous and a criminal offence. FGM is illegal in the UK.

Forced Marriage: One entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into marriage. Not to be confused with an arranged marriage.

Neglect: 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 and emotional harm or danger, or to ensure adequate supervision (including the use of inadequate caregivers), or to ensure access to appropriate

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

Online abuse: Is any type of abuse that happens on the internet. It can happen across any device that's connected to the web, like computers, tablets, and mobile phones. And it can happen anywhere online, including, social media, text messaging, emails, online chats, online gaming. It can include cyber bullying, emotional abuse, sexual abuse, sexual exploitation, grooming, sexting.

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

Radicalisation: a process whereby someone has their vulnerabilities or susceptibilities exploited towards terrorism or crime – most often by a third party with their own agenda.

Safeguarding and promoting children's welfare: Defined for the purposes of this guidance as: a, protecting children from maltreatment b, preventing impairment of children's health or development c, ensuring that children are growing up in circumstances consistent with the provision of safe and effective care, and d, taking action to enable all children to have the best outcomes. (*Working Together to Safeguarding Children 2020*)

Sexual Abuse: Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. 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.

Terrorism: is the use or threat of action, both in and outside of the UK, designed to influence any international government organisation or to intimidate the public. It must also be for the purpose of advancing a political, religious, racial or ideological cause.

Young carer: A young carer is a person under 18 who provides or intends to provide care for another person (of any age, except generally where that care is provided for payment, pursuant to a contract or as voluntary work).

Adults at risk

Discriminatory abuse including forms of harassment, slurs or similar treatment, verbal abuse because of race, gender and gender identity, age, disability, sexual orientation, religion, (protected characteristics under the Equality Act 2010).

Domestic abuse including psychological, physical, sexual, financial, emotional abuse, so called 'honour' based, female genital mutilation and forced marriage. Coercive or controlling behaviour is a core part of domestic violence. Coercive behaviour can include acts of assault, threats, humiliation and intimidation, harming, punishing, or frightening the person, isolating the person from sources of support, exploitation of resources or money, preventing the person from escaping abuse, regulating everyday behaviour.

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

Gender based violence: This term is often used interchangeably with "violence against women" and "sexual and gender-based violence". The term, "gender-based violence" highlights the gender dimension of these types of acts. In other words, the relationship between females' subordinate status in society and their increased vulnerability to violence. It is important to note, however, that men and boys may also be victims of gender-based violence, including sexual violence (SV), particularly when they are subjected to torture and/or detainment. GBV includes sexual violence, including rape, sexual abuse, sexual exploitation and forced prostitution, domestic violence, forced and early marriage, harmful traditional practices such as female genital mutilation (FGM) honour crimes, widow inheritance, trafficking!

Internet abuse and abusive images of vulnerable adults: an abusive image of vulnerable adults is defined as any representation without informed consent, by whatever means, of the vulnerable adult engaged in real or simulated explicit sexual activities or any representation of the sexual parts of the adult for sexual purposes. These images are then shared on social media without their consent. Technology has also meant that vulnerable are now subject to additional abuse and cyber-bullying through the internet and other forms of social media. Vulnerable adults may also be at risk of coming into contact with people who want to harm them through their use of the internet.

Modern slavery encompasses slavery, debt bondage, human trafficking, forced labour and domestic servitude, traffickers and slave masters using whatever means they have at their disposal to coerce, deceive, and force individuals into a life of abuse, exploitation, servitude, and inhumane treatment.

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

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

Physical abuse: Hitting, slapping, punching, hair-pulling, biting, pushing, kicking, scalding, and burning, opening windows or removing blankets, physical punishments,

inappropriate or unlawful use of restraint, involuntary isolation or confinement, misuse of medication (e.g., over-sedation), forcible feeding, rough handling, assault.

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

Safeguarding Adults: Safeguarding means protecting an adult's right to live in safety, free from abuse and neglect. It is about people and organisations working together to prevent and stop both the risks and experience of abuse or neglect, while at the same time making sure that the adult's wellbeing is promoted including, where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action. This must recognise that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear, or unrealistic about their personal circumstances. There may be instances whereby the risk is so high that referrals for support need to be made without an adult's consent. Care and Support Statutory Guidance, March 2020.

Self-neglect: includes lack of self-care to an extent that it threatens personal health and safety, neglecting to care for one's personal hygiene, health or surroundings, inability to avoid self-harm, failure to seek help or access services to meet health and social care needs, inability, or unwillingness to manage one's personal affairs

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

Survivor-centred Approach: A survivor-centred approach to violence against women seeks to empower the survivor by prioritising her rights, needs and wishes. It means ensuring that survivors have access to appropriate, accessible, and good quality services including health care, psychological and social support, security, legal services. (UNFPA 2012)²

Annex 2. Legal framework underpinning WRAP's Safeguarding Policy

International instruments

- United Nations Convention for the Rights of the Child (UNCRC), a legally binding international agreement setting out the civil, political, economic, social and cultural rights of every child, regardless of their race, religion or abilities
- Convention on the Elimination of All Forms of Discrimination against Women. (CEDAW). Countries that have ratified or acceded CEDAW are legally bound to put its provisions into practice, and thereby agree to submit national reports on measures taken to comply with its obligations.
- The United Nations Convention on the Rights of Persons with Disabilities is an international human rights treaty of the United Nations intended to protect the rights and dignity of persons with disabilities.

Legislation and Guidance - England

- Children Act 1989, 2004, and Children and Social Work Act 2017.
- Human Rights Act 1998.
- Safeguarding Vulnerable Groups Act 2006.
- The Care Act 2014.
- Data Protection Act 2018.
- Sexual Offences Act 2003.
- Charities Act 2011 and 2016.
- Charity Commission Guidance 2019.
- Care and Support statutory guidance 2018.
- Working Together to Safeguard Children 2019.

Legislation and Guidance - Wales

- Children Act 1989.
- The Social Services and Well-being (Wales) Act 2014 came into force in April 2016. It provides the legal framework for social service provision in Wales.
- Sexual Offences Act 2003.
- Working together to safeguard people guidance 2017.
- Charities Act 2011 and 2016.
- Charity Commission Guidance 2019.

Legislation and Guidance - Scotland

- The Children (Scotland) Act 1995.
- Public Bodies (Joint Working) (Scotland) Act 2014.
- Children and Young People (Scotland) Act, 2014.

- Sexual Offences Act (Scotland) 2009.
- Community Empowerment (Scotland) Act 2015.
- Adult Support and Protection (Scotland) Act 2007.
- National guidance for child protection in Scotland (Scottish Government, 2014).
- Charities and Trustee Investment (Scotland) Act 2005.

Legislation and Guidance - Northern Ireland

- The Children (Northern Ireland) Order 1995.
- Safeguarding Board Act (Northern Ireland) 2011.
- Co-operating to Safeguard Children and young people in Northern Ireland (Department of Health, 2017).
- Sexual Offences (Northern Ireland) Order 2008.
- Adult Safeguarding Operational Procedures Adults at Risk of Harm and Adults in Need of Protection 2016.

Legislation and Guidance - Australia

- Australian Charities and Not-for-profits Commission Act 2012.
- Australian Human Rights Commission Act 1986.
- Crimes Act 1914.
- Fair Work Act 2009.
- Age Discrimination Act 2004.
- Disability Discrimination Act 1992.
- Racial Discrimination Act 1975.
- Sex Discrimination Act 1984.
- Children and Young People (Safety) Act 2017.
- Equal Opportunity Act 1984.
- Disability Inclusion Act 2018.
- Family and Community Services Act 1972.
- Criminal Law Consolidation Act 1935.
- Child Sex Offenders Registration Act 2006.
- Child Safety (Prohibited Persons) Act 2016.

Annex 3 - WRAP – Accountability Framework

1. Introduction

Accountability is a fundamental principle underpinning the expectations and obligations of WRAP employees, its management, and its governance. This reflects an organisational culture of responsibility and transparency for its decisions and actions across all functions of the organisation.

2. Scope

This framework applies to all those with safeguarding responsibilities. This includes all employees and contracted employees, Designated Safeguarding Leads (DSLs) and managers at all levels, and the Board of Trustees, which holds ultimate accountability to the UK Charity Commission and WRAP's donors.

3. Safeguarding accountability

Accountability is the relationship between NGOs and their regulatory bodies and donors. It reflects a set of obligations by NGOs to report and to be held accountable.

WRAP delivers services directly as well as through partners. It ensures that clear lines of reporting and accountability are in place from partners to WRAP, that safeguarding incidents are appropriately dealt with and that the procedures set out in WRAP's Safeguarding Framework are followed.

4. Accountability at WRAP

4.1. Board Level

4.1.1. WRAP is a registered charity with its own Board of Trustees which meets quarterly. The Trustee Board has appointed a lead Trustee with responsibility for safeguarding. The role of the Safeguarding Lead Trustee is to ensure that safeguarding is maintained as a priority for the Board of Trustees (see below). This includes the responsibility to ensure that all serious incidents are reported to the Charity Commission and donors and other regulators as appropriate.

4.1.2. Role of Safeguarding Lead Trustee

The Board of Trustees will have a designated Safeguarding Lead Trustee to:

- consider the organisation's strategic plans and make sure they reflect safeguarding legislation, regulations specific to WRAP activities, statutory guidance, and the safeguarding expectations of the Charities Commission and its donors;
- be responsible for all safeguarding governance, management and performance as guided by the Chair of the Board;

- check the organisation's risk register reflects safeguarding risks properly and plans sensible measures to take, including relevant insurance for organisational liability;
- ensure that safeguarding is maintained as a priority for the Board of Trustees;
- ensure that safeguarding is a standing agenda item and safeguarding activity is included in management reports to the Board;
- ensure that the CEO and Designated Safeguarding Lead Implement WRAP's safeguarding policy;
- oversee safeguarding allegations against employees or volunteers, together with CEO and designated safeguarding lead;
- provide safeguarding supervision to the CEO;
- ensure that a serious incident is reported reflecting WRAP's protocol to appropriate accountable bodies such as the Charities Commission, donors, and other relevant regulatory bodies;
- be a point of contact for employees or volunteers if someone wishes to complain about a lack of action in relation to safeguarding concerns;
- champion safeguarding throughout the organisation;
- attend relevant safeguarding training events and conferences; and
- make sure there is an annual review of safeguarding policies and procedures and that this is reported to the Board of Trustees.

Dario Soto-Abril, SafeguardingTrustee@wrap.ngo

4.2. Operational Level

At the operational level, the Chief Executive Officer (CEO) is responsible for promoting a culture conducive to the implementation of WRAP's safeguarding policy framework.

The Designated Safeguarding Lead (DSL) is responsible for ensuring that partners are assessed in accordance with WRAP's Due Diligence Framework and have arrangements in place to fulfil their safeguarding obligations. The Designated Safeguarding Lead is accountable to the CEO at WRAP.

The DSL and/or CEO will report on safeguarding matters to the Safeguarding Lead Trustee and the Board. The CEO is accountable to the Board of Trustees and will keep the Board fully informed of any safeguarding situation and will recommend the appropriate course of action in response to any reported incident. In addition, WRAP will report any serious incident and action taken to the Charity Commission, other regulators, and our donors as appropriate. Any reviews of our safeguarding policy framework will be presented to the Board of Trustees for approval by the CEO.

4.2.1. The role of the CEO

- To ensure that the organisational culture is conducive to facilitate the implementation of the safeguarding framework.
- Be the accountable officer for the management of all safeguarding concerns and must be informed of complaints and allegations by the Designated Safeguarding Lead

- To include safeguarding activity in reports to the Board.
- To provide supervision and support to the Designated Safeguarding Lead.

4.3. Managing Safeguarding

The Designated Safeguarding Lead (DSL) is responsible for managing all safeguarding reports made to WRAP. The DSL is also responsible for ensuring that WRAP is compliant with all safeguarding requirements along with facilitating training and awareness raising according to levels of responsibility. The DSL is accountable to the CEO.

4.3.1. The role of the Designated Safeguarding Lead (DSL)

The Designated Safeguarding Lead is appointed within WRAP to be the first point of contact for all safeguarding concerns.

The DSL will:

- operate within WRAP's Safeguarding Policy guidelines;
- report suspicions and allegations of child and adult safeguarding concerns to the statutory authorities in the UK and in other relevant geographies;
- create and maintain links with the statutory authorities and other relevant agencies and resource groups;
- facilitate the provision of support to any victim making a report and to the person against whom an allegation has been made;
- advise the CEO and, at his/her discretion, the Safeguarding Lead Trustee of a case or suspicion of abuse. In the case of serious incidents, the allocated safeguarding Trustee must be informed of the details so to follow the appropriate protocol regarding reporting to the Charities Commission and donors;
- advise on good safeguarding practice utilising guidance and resources from Charity Commission and UK and International lead agencies;
- facilitate training on guidelines in safeguarding to employees and volunteers, including leading the virtual team of safeguarding focal points;
- maintain proper records on all cases referred to him/her in a secure and confidential manner; and
- keep up to date on current developments regarding provision, practice, support services, legal obligations/requirements, and policy. This will include attending mandatory safeguarding training.

The DSL reports to the CEO on a regular basis and keeps them informed of any safeguarding concerns which may arise in WRAP.

4.3.2. Safeguarding Focal Points

Key Responsibilities

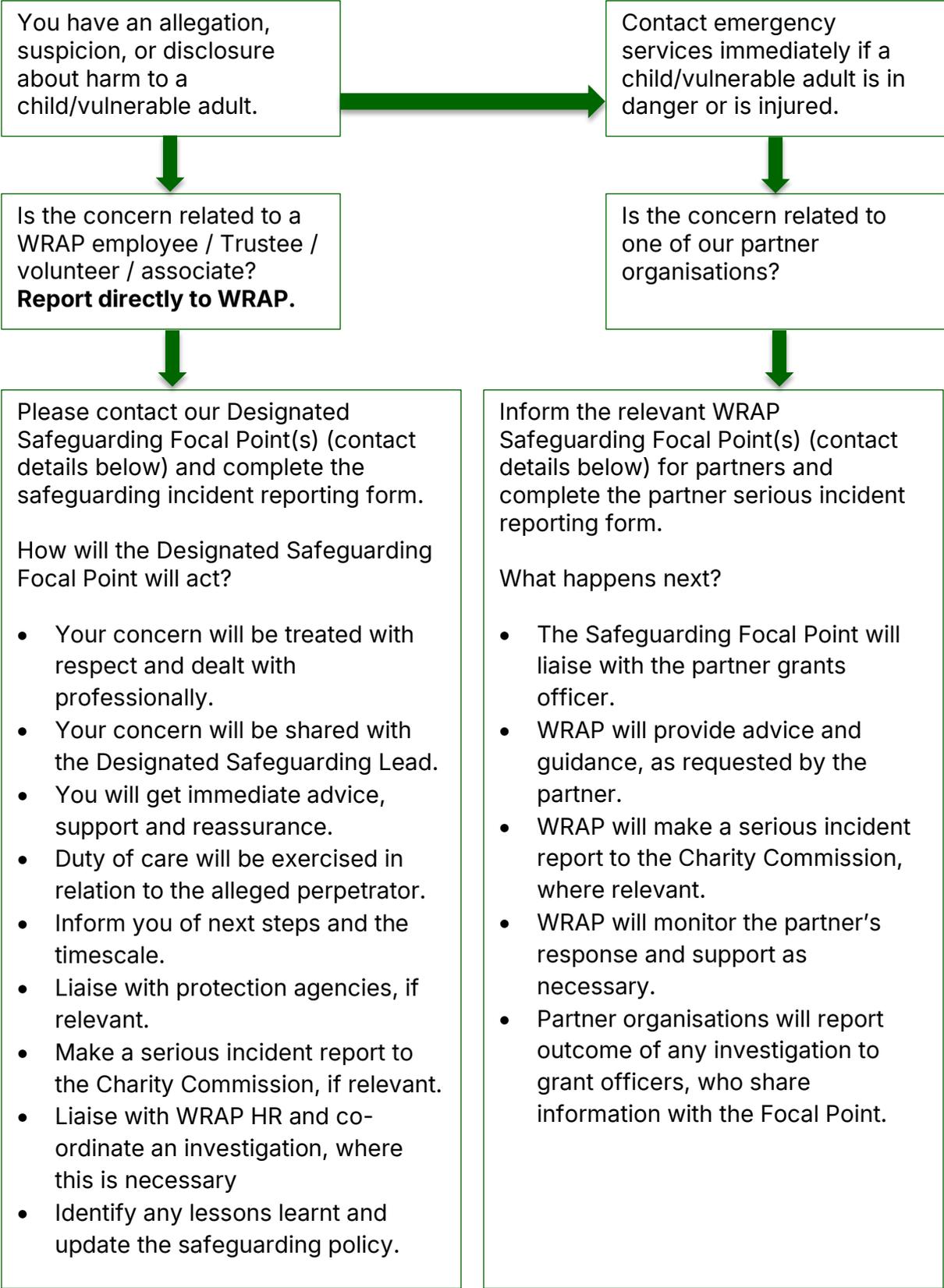
- Be a point of contact for safeguarding concerns or complaints and document all concerns, supporting the work of the Designated Safeguarding Lead and covering in their absence.
- Act as a virtual team to help manage safeguarding risks, learn from best practice, and create a positive culture of safeguarding.
- Discuss safeguarding concerns with the designated safeguarding lead and agree and support decisions for next steps.
- Signpost implementing partners to safeguarding resources and trainings.
- Facilitate support for survivors including referral to appropriate services.
- Support safeguarding risk assessments for partner due diligence where relevant.
- Ensure that WRAP's Safeguarding Framework, including reporting pathways for raising concerns, is visible for team members at country offices/workspaces being used.
- Meet with the Designated Safeguarding Officer to share specific safeguarding issues and highlight any support required.
- Maintain proper records on all cases referred to him/her in a secure and confidential manner.
- Assist with safeguarding risk identification and management where appropriate

4.4. Serious incident reporting

In all instances WRAP will follow relevant Charity Commission guidance in the UK and report serious incidents as necessary

Where incidents occur outside the UK, we will follow relevant national guidance and reporting requirements.

5. WRAP Safeguarding Reporting Procedure



Key contacts

Name	Role	Contact
Fay Charlett	Designated Safeguarding Lead	Fay.charlett@wrap.ngo
Nikki Roche	Safeguarding Focal point for HR	Nikki.roche@wrap.ngo
Gary Bird	Safeguarding Focal point for Communications	Gary.bird@wrap.ngo
Polly Knight	Safeguarding Focal point for Behaviour Change Limited	polly@behaviourchange.org.uk
TBC	Safeguarding Focal point for WRAP Americas	TBC
Mel Uzzell	Safeguarding Focal point for WRAP APAC	Mel.uzzell@wrap.ngo
Kate Bygrave	Safeguarding Focal point, Business Programmes & Behaviour Change	Kate.bygrave@wrap.ngo
Emma Hallett	Safeguarding Focal point, Insights & Innovation	Emma.hallett@wrap.ngo
Dario Soto-Abril	Safeguarding Lead Trustee	SafeguardingTrustee@wrap.ngo

Annex 4 - Handling a disclosure - practical advice

If a person decides to make a disclosure concerning abuse, harm or exploitation, they will likely have overcome many barriers before they chose to speak. They will have decided to disclose this information because they trust you and believe that you will act. They may simply wish to share the information so someone else is aware.

Disclosures or concerns could happen to any volunteer or employee within an organisation, so it is important that everyone in the organisation receives training on how to handle a disclosure.

Listen carefully to the person who is making the disclosure. Avoid expressing your own views on the situation or asking any leading questions. Reacting with shock or disbelief could cause the person to stop talking, freeze or retract their statement.

Reassure the person they have done the right thing by speaking with you.

Say you will take them seriously. It takes a lot of effort to disclose information of this nature. They have told you because they want help and to be listened to.

Stay calm and open-minded about the information being disclosed. Try not to write notes as the disclosure is happening, as this removes eye contact and approachable body language and may break up the flow of someone speaking.

Never promise confidentiality. Clearly explain what you will do next and say that if the information that has been disclosed puts the individual or anyone else at risk, that you will need to pass this onto someone else who can support them and is responsible for these incidents. Never promise to keep it a secret.

Don't delay in reporting. After speaking with the individual, write down a written report, with as many details as possible whilst it is fresh in your mind. Follow relevant reporting procedures.

Don't ask leading questions. Allow the child/ adult who is speaking freely to do so, making prompts such as 'Can you say some more about that?' to seek clarity.

Don't stop the child/adult who is speaking freely

Record the information as soon as possible. Make sure you make an accurate recording of the disclosure as soon as possible, quoting words used by the person. Sign, date, and record the time of the disclosure and anyone else who was present.

CONTACT THE DESIGNATED SAFEGUARDING LEAD:

Fay Charlett – Head of Commercial directly or use Safeguarding@wrap.ngo.

Annex 5 - Safeguarding checklist for engaging with organisations working with children

WRAP does not often directly work with children or go into schools. However, as part of its schools' programme we work with schools to develop resources aimed at reception age through to end of primary school, using practical activities and experiential learning to promote food sustainability and recycling.

Elsewhere, WRAP works through voluntary organisations such as the Scouts and Girl Guiding movements, which work with children and young people. WRAP's aim is to instil child friendly messages about healthy sustainable eating, preventing food waste and recycling unavoidable food waste. To enable children to receive these messages WRAP creates resources that can be integrated within existing school curricula and delivered by teachers. In all work with children's organisations WRAP observes the following guidelines:

- WRAP's due diligence process ensures that its partners have appropriate safeguarding arrangements in place.
- The contractual agreement (Memorandum of Understanding or other partnership document) between WRAP and its partners clarifies their respective roles and responsibilities for reporting safeguarding concerns.
- The agreement details how to access WRAP's safeguarding policy and key safeguarding contacts.
- WRAP employees are aware of the organisation's safeguarding policy and reporting procedures and are provided with the contact details of key safeguarding contacts.
- WRAP employees have signed the organisation's Code of Conduct before engaging in work with children's organisations.
- Regarding the use of photographs and videos, WRAP employees are conversant with and committed to the principles of the organisation's Consent Form – Photographs, Video and Case Studies. WRAP employees ensure that consent has been obtained for the taking and use of photographs and videos.
- Information about WRAP's complaints procedure is shared with children and with partners.
- A review of safeguarding work with children's organisations is conducted annually to identify lessons learnt to further strengthen WRAPs safeguarding framework.

Appendix 1: Safeguarding concerns – working for WRAP APAC

Purpose

This incident response plan is a mandatory procedure that ensures:

- WRAP APAC complies with both the global Safeguarding Policy and all specific laws and regulations
- WRAP APAC manages risks to people when there is reasonable suspicion that an incident has taken place, is taking place, or will take place as defined within the policy;
- WRAP APAC takes opportunities to improve its safeguarding approach.

Scope

This plan applies to:

- All managers, employees and volunteers;
- All operations carried out by third parties that are funded by WRAP APAC in part or in full;

Failure to follow this plan may be considered a serious disciplinary matter.

Legislative requirements

There are legislative requirements governing WRAP APAC approach to safeguarding. These requirements will be met in parallel with the actions of this plan and will take precedence.

The legislative requirements are as described in [Annex 2](#).

Defining an incident

WRAP APAC policy for safeguarding provides the following examples of abuse, neglect or exploitation all defined in [Annex 1](#) of this policy.

For the purposes of this plan, an incident begins when there are reasonable grounds to suspect actual, potential, or perceivable cases of abuse, neglect or exploitation may have occurred, may be occurring, or could occur in connection with WRAP APAC or its work.

Responding to a suspicion of an incident

WRAP APAC will follow this workflow for all incidents. WRAP APAC will follow a survivor-centric approach, as laid out in the safeguarding policy, in all cases. At any time during this process, if there is suspicion of imminent harm to a person, contact the police on 000. WRAP APAC may refer the incident to the police or relevant criminal judicial authority at any point.

Phase 1: Forming a suspicion

An incident is any time a perceived or real incident has occurred, this should be reported to the Designated Safeguard Lead and/or one of the Focal Points defined in the [Key Contacts](#) section of the Policy.

The Designated Safeguard Lead and/or the Focal Point will assist with the remaining steps.

Failure to report or attempts to conceal instances, allegations, disclosures or concerns about safeguarding will be viewed as a serious matter that may, depending on the circumstances, result in disciplinary action or dismissal.

Phase 2: Reporting a suspicion

The way to report a safeguarding suspicion/incident is to contact the Designated Safeguarding Lead or any of the Focal Points, either directly or through the safeguarding@wrap.ngo email address.

If you contact a Focal Point they will notify the Designated Safeguarding Lead (a role defined in the safeguarding policy), who will be responsible for managing the incident.

When receiving a report:

- Use active listening, be calm, supportive and reassuring with any potential victim or witness. Concentrate on making the person providing information feel that they are doing the right thing and that you are there to help them.
- Explain what you will do with the information.
- Explain that you are required to pass the information to WRAP APAC and that WRAP APAC will take the matter seriously.
- Get as much information as possible from the source of the concern, if appropriate in the circumstances.

When receiving a report, do not:

- Make promises to any person, except to say that WRAP APAC will take the matter seriously.
- Investigate the matter yourself.
- Disclose the information to people other than those you are required to tell.
- Approach the suspect about the incident, challenge the suspect or share information about the incident with the suspect.
- Make judgements about the validity, credibility or veracity of the information.

Phase 3: Managing WRAP APAC response to a suspicion

Upon being notified of the incident, the Designated Safeguarding Lead will:

- Ensure that all people, especially any survivor, are safe;
- Seek further information to help make decisions

- Initiate a rule that states the information will only be made available to people who need to know.

All in line with WRAPs Safeguarding Policy.

If there is suspicion of imminent physical harm, including sexual abuse, notify the police immediately.

The Safeguarding Lead will convene an Incident Committee to work with them to resolve the incident. The members of this committee will be individuals from the [Key Contacts](#) list.

The purpose of the Committee is to provide accountability and guidance to the Designated Safeguarding Lead, as well as knowledge and experience across different areas of the charity to help successfully manage an incident.

All incidents require investigation. If a matter has not been referred to the police then, depending on the nature of the matter, the Incident Committee will be guided by the principles of the Safeguarding Policy.

Phase 4: Taking action following a suspicion

The Incident Committee will consider the outcomes following an investigation

Following every incident, WRAP will document the lessons learned with the aim of improving the way it manages incidents. This will take a holistic approach, framed by questions like:

- How will WRAP APAC better deter persons from behaving in this way again?
- How could WRAP APAC better detect an incident like this again?
- How could WRAP APAC better manage an incident like this again?

The Incident Committee will be responsible for meeting any obligations to report to an external body.

Phase 5: Concluding the response to a suspicion

To close an incident, the Designated Safeguarding Lead must be satisfied that, all records and paperwork are completed, that any individuals effected by the incident are safe, that the Designated Safeguarding Lead and any of the Focal Points have sought help if they have been effected by the activities of the investigations, reports have been issued to the correct people and any external reporting has been managed.

Appendix 2: Safeguarding concerns – WRAP Americas

WRAP works via a fiscal sponsor, NEEF (National Environmental Education Foundation) in the US, and thus is subject to NEEF's policies and procedures, including in relation to safeguarding and child protection.

Should a concern arise, colleagues should follow NEEF's guidance and seek advice as necessary. In addition, and in the case of any queries, concerns should be reported to WRAP's Designated Safeguarding Lead, Fay Charlett – Head of Commercial directly or via Safeguarding@wrap.ngo.