

GLOBAL SAFEGUARDING POLICY

REVIEW DATE – 20.04.2024

REVISION LEVEL – EXECUTIVE COMMITTEE

SPONSOR – SIMON LEE

1. SCOPE

This policy is mandatory for, and requires compliance from, all ZSL staff, registered students, registered volunteers, trustees, consultants, EDGE Fellows, and partners and (where applicable to the services being provided to ZSL) our suppliers (henceforth 'staff and other representatives') wherever in the world they are based or operating. It applies in full during and outside office hours, within and outside ZSL premises, when dealing with safeguarding concerns that may arise in relation to staff and other representatives, to our zoo visitors, or to the communities or other beneficiaries we engage with in our work.

Some staff or other representatives will have greater day to day contact with potential safeguarding concerns than others, but everyone must consider safeguarding when dealing with children or adults at risk.

Partner and contractor organisations are expected to agree to work under this policy as a condition of their involvement with ZSL or demonstrate their own equivalent policy standards.

2. POLICY STATEMENT

All people have the same right to freedom from abuse and exploitation. ZSL believes that everyone who comes into contact with our work and activities, regardless of age, gender identity, disability, sexual orientation or ethnic origin, or of their life circumstances, has the right to be protected from all forms of harm, abuse, neglect and exploitation. Therefore, ZSL staff and other representatives must never engage in any form of humiliating, degrading, abusive, exploitative or other forms of unacceptable behaviour under any circumstances.

The purpose of this zero-tolerance policy is, therefore, to ensure that our staff and other representatives, and the communities and other beneficiaries we engage with in our projects, are protected from all forms of abuse and harm, either direct or indirect, intentional or unintentional as a

result of unintended consequences; and to ensure that our organisational integrity and reputation, and that of our partners, is also protected from harm. These goals are achieved by actively promoting awareness, good practice, and sound procedures

ZSL fully supports and is committed to strong and accountable leadership in the area of safeguarding. Through proactive leadership and senior management role modelling, ZSL will promote and enable a safe working environment and a culture of safe practice for our staff and other representatives, our zoo visitors, and our project beneficiaries.

3. BACKGROUND

Founded in 1826, the Zoological Society of London (ZSL) is an international scientific, conservation and educational charity whose purpose is to inspire, inform and empower people to stop wild animals going extinct. By actively 'Working for Wildlife' and showcasing our conservation work, we hope to motivate others to take conservation action in their daily lives. This includes all visitors to our zoos – families, adults and children, groups of school-children and teenagers; all those whom we reach through the media; and all the communities and other beneficiaries with whom we work and have contact in all our project locations around the world.

The development of this Global Safeguarding Policy has been undertaken against the backdrop of an international crisis that hit the humanitarian/aid sector in 2018. The public and media scrutiny that followed galvanised the global donor community, including DFID (now known as the FCDO) and the UN, to undertake a comprehensive examination of systems and processes that underpin the distribution and granting of aid within a context of safeguarding. Responses to, and the prevention of, sexual abuse, sexual harassment and bullying directed towards beneficiaries (adults and children) and staff and other representatives, took on an operational emphasis that defines an essential component of our current understanding of safeguarding. More broadly the requirement of organisations to comply with internationally recognised safeguarding standards is now at the heart of both regulatory and donor due diligence.

ZSL operates two zoos in the UK and has offices or permanent representatives in ten other countries. All offices including the UK manage projects in the field and among communities located in a total of ~ 50 countries. Translating child protection and protection of adults at risk

across these different contexts and cultures is a fundamental requirement. While legal and cultural frameworks may vary, the commitment from ZSL to protect children and adults at risk remains constant.

Please see also the Safeguarding of Children and Adults at Risk in the [UK Policy](#) for further information on aspects of safeguarding specific to our zoo visitors and/or to UK legislation.

4. WHAT IS SAFEGUARDING?

Safeguarding is the responsibility of organisations to make sure their staff or other representatives, operations, and programmes do no harm to children and adults at risk nor expose them to abuse, exploitation, bullying or harassment. It also covers how we safeguard our staff and other representatives at all times, including protecting them from harm and inappropriate behaviour such as bullying and harassment including sexual harassment.

Please see Appendix 1 for definitions of other terms used throughout this policy, such as 'child', 'adult at risk', 'sexual exploitation'.

5. POLICY FRAMEWORK & LEGISLATION

ZSL has a set of interlinked policies and procedures that effectively constitute a safeguarding policy framework and provide an open and transparent organisational culture to ensure prevention of all forms of abuse, exploitation, bullying and harassment. This framework is in harmony with international human right instruments and UK legislation and seeks to provide a safe and supportive environment for all staff and other representatives, and all communities and other beneficiaries of any ZSL supported programme, particularly children and adults at risk; so as to ensure prevention of all forms of abuse, particularly sexual harassment, exploitation, abuse and bullying.

A number of additional policy and procedure documents constitute the safeguarding policy framework. All are referenced with live links below and/or elsewhere in this document, forming a basis and framework for establishing a culture of safeguarding within ZSL:

- [The 4 Rs Safeguarding Procedure](#)
- [Global Whistleblowing Policy](#)

- Dignity and Respect at Work Policy
- Disciplinary Policy
- Recruitment and Selection Policy
- Violence and Aggressive Behaviour Policy
- Data Protection Policy
- Multimedia (Image and video) Usage and Consent Guidance
- Records Retention and Classification Policy

Principles

ZSL observes the following safeguarding principles:

- **Best Interest** – all safeguarding processes and decisions must serve the best interest of children as a priority, and this prioritization is evidenced particularly in relation to investigations of abuse.
- **Empowerment** - people should be supported to make their own decisions based on the best possible information.
- **Victim/Survivor centred approach** - ensuring that victims and survivors are treated with dignity and respect and that their needs, rights and wishes are at the forefront of any response. This approach underpins all reporting, investigation and response activity that falls within the remit of this safeguarding policy
- **Cultural sensitivity and recognition of local context** in decision making and in informing procedures
- **Do No Harm** - the guiding humanitarian principle that requires actions and decisions to be taken to avoid causing further damage and harm
- **Prevention** - it is better to take action before harm occurs
- **Protection** - those in greatest need require our support and protection.
- **Partnership** - safeguarding is about different people, professions, groups and communities working together to cover all the angles in preventing, detecting and reporting neglect and abuse.
- **Proportionality** - what we do should be proportionate to the risk: we don't want to be over-protective if the risk is low, as this in itself can disadvantage people and deprive of them of the opportunity to make their own decisions.
- **Accountability** - as in all our activities, we need to be accountable for what we do in safeguarding.
- **Confidentiality** - It is essential that confidentiality is maintained at all stages of the process when dealing with safeguarding concerns. Information relating to the concern and subsequent case management should be shared on a need to know basis only, and should be kept secure at all times.

6. GLOBAL CODE OF CONDUCT

Application of and compliance with ZSL's Global Code of Conduct is integral to the implementation of this Safeguarding Policy and is required from all our staff and other representatives. The Code of Conduct commits signatories to abiding by ZSL's policies and procedures, including those governing their interactions with vulnerable children and adults at risk, communities and other beneficiaries of our work including children, use of children's images and information, as well as reporting concerns.

Consequences of breaching the Code of Conduct or this policy are explicit and include disciplinary action up to and including dismissal, or termination of contract, along with possible further action as required e.g. referral to national statutory authorities.

7. WHISTLEBLOWING

ZSL's Global Whistleblowing Policy is designed to enable those who become aware of wrongdoing in ZSL affecting some other person, animal or service to report their concerns immediately in order that they be investigated appropriately. Whistleblowing in the context of safeguarding applies to incidences of sexual abuse, sexual exploitation, harassment and bullying. All incidents will be investigated fairly and confidentially, in line with reporting procedures as detailed in the 4Rs Safeguarding Procedure . ZSL is committed to non-retaliation against staff or other representatives who report any malpractice concerns including safeguarding.

ZSL will take treat malicious allegations with the utmost seriousness and will take the appropriate disciplinary action required.

Our staff and other representatives, and the communities and other beneficiaries with whom we work around the world, will all be made aware of this policy and how it can be used and implemented as part of ZSL's safeguarding commitment.

8. COMMITMENT

This is a **zero-tolerance** policy approved and endorsed by ZSL's Executive Committee and signed off by Council (Trustees). This means that all necessary measures will be taken to prevent such incidents from happening, and appropriate disciplinary action will be taken against all

persons who are found to be in breach of this policy and/or the Global Code of Conduct.

ZSL is committed to safeguarding the well-being of all those who come into contact with our work and activities anywhere in the world.

This commitment includes:

Protecting **zoo visitors and beneficiaries of our activities and programmes (both children and adults at risk)** from all forms of abuse and exploitation.

Protecting **ZSL staff** from all forms of abuse and exploitation and any potential false or malicious allegations of misconduct.

Protecting **ZSL's organisational integrity and reputation**, as well as that of its partners, by introducing a sound Global Safeguarding Policy that helps to ensure rights and responsibilities of concerned parties

9. PREVENTION

9.1. ZSL's organisational responsibilities

ZSL will:

- Ensure all staff and other representatives have access to, and know their responsibilities under, this policy. This includes (but is not limited to) the Dos and Don'ts in Appendix 2
- Design and undertake all its programmes and activities in a way that protects people from any risk of harm that may arise from their coming into contact with ZSL. This includes the way in which information about individuals is gathered and communicated
- Implement stringent safeguarding procedures when recruiting, managing and deploying staff and other representatives
- Ensure staff and other representatives receive training on safeguarding at a level commensurate with their role in the organization
- Follow up on reports of safeguarding concerns promptly and according to due process

- Ensure that all relevant contracts and agreements, such as employment contracts, volunteer agreements, consultant, contractor, and partner agreements or contracts, make reference to and require compliance with the principles and practices of our Global Code of Conduct, this Global Safeguarding Policy, the Global Whistleblowing Policy, the Dignity and Respect at Work Policy and the 4Rs Safeguarding Procedure.

9.2 Responsibilities of staff and other representatives

All

ZSL staff and other representatives must familiarise themselves with, and follow, the Dos and Don'ts list in Appendix 2.

Child safeguarding

ZSL staff and other representatives must not:

- Engage in sexual activity with anyone under the age of 18
- Sexually abuse or exploit children
- Subject a child to physical, emotional or psychological abuse, or neglect
- Engage in any commercially exploitative activities with children including child labour or trafficking

Adult safeguarding

ZSL staff and other representatives must not:

- Engage in sexual activity with adults at risk
- Sexually abuse or exploit at risk adults
- Subject an at risk adult to physical, emotional or psychological abuse, or neglect
- Engage in any commercially exploitative activities with adults at risk including trafficking

Protection from sexual exploitation and abuse

ZSL staff and other representatives must not:

- Exchange money, employment, goods or services for sexual activity, whether the money, services etc in question lie within or outside the scope of any project being implemented

Additionally, ZSL staff and other representatives are obliged to:

- Contribute to creating and maintaining an environment that prevents safeguarding violations and promotes the implementation of the Global Safeguarding Policy
- Report any concerns or suspicions regarding safeguarding violations by a ZSL staff member or other representative to the appropriate staff member Please see the 4Rs procedure for guidance on reporting.

9.3 Reporting

In accordance with the reporting procedures detailed in the 4Rs Safeguarding Procedure ZSL will ensure that safe, appropriate, accessible means of reporting safeguarding concerns are made available to staff and the communities we work with.

Any staff reporting concerns or complaints through formal whistleblowing channels (or if they request it) will be protected by ZSL's Dignity and Respect at Work Policy and the Global Whistleblowing Policy.

ZSL will also accept concerns or complaints from external sources such as members of the public, partners and official bodies.

ZSL will support communities/beneficiaries and partners to report concerns or complaints through raising awareness as necessary and appropriate.

9.4 Response

ZSL will follow up safeguarding reports and concerns according to policy and procedure, and legal and statutory obligations (see the 4 Rs Procedure for reporting response to safeguarding concerns).

ZSL will apply appropriate disciplinary measures to staff found in breach of the Global Safeguarding Policy and/or the Global Code of Conduct.

9.5 Education and Training

ZSL recognises that in order to have a 'living' Global Safeguarding Policy with proactive staff, partner and beneficiary engagement and effective implementation, it is essential that there are high levels of awareness and understanding regarding the policy and that staff and other representatives are competent in putting the policy and related procedure into practice.

All staff, volunteers, and EDGE Fellows receive a briefing on the Global Safeguarding Policy as part of their induction, in addition to signing up to the Global Code of Conduct and being made aware of what that means for safeguarding and personal conduct.

Staff and trustees (Council members) who have specific responsibility for safeguarding receive the appropriate level of safeguarding training to ensure they can respond appropriately to concerns, assess and advise on safeguarding risk and provide the appropriate level of support to colleagues and partners as necessary.

9.6 Partners

All partner organisations that work with ZSL are required either to have to have their own safeguarding policy, incorporating response and reporting procedures of a similar standard to those of ZSL; or to sign up to ZSL's policy and procedures and demonstrate compliance with these as a contractual requirement. Due diligence processes will be in place to ensure the appropriate level of compliance and these will form part of ZSL's partner monitoring arrangements.

ZSL will ensure that partners have sufficient safeguarding training to develop and implement safeguarding policy and procedures within their agencies and organisations, and this will be covered in agreements with partners.

9.7 Recruitment and Selection

ZSL is aware that organisations can be used, both in a targeted way and opportunistically, to access children and adults at risk for purposes of abuse, and that abuse can also occur within organisations. ZSL will take specific steps during the recruitment and selection of staff and volunteers and (where applicable) consultants to prevent abuse. These steps will include police checks (where possible, and in line with our DBS and Criminal Conviction Policy), reference checks, safeguarding information in

job descriptions as necessary, as well as ensuring compliance as appropriate with any applicable laws and regulations regarding work with children. Please see also the [Recruitment and Selection Policy](#).

No person who is prohibited by their local laws from working with children and adults at risk may take up any role working with ZSL.

9.8 Communication, Information, and Informed Consent

When ZSL portrays beneficiaries, children and/or adults at risk through its external communications, best practice in safeguarding will be observed. The use of images and narratives for organisational purposes that appear in the public domain present a considerable risk unless significant protections are in place.

ZSL will not use images of children or adults in a state of undress, as doing so may promote the sexualisation of children.

All images and information that may identify children and adults at risk should be stored and used only in compliance with relevant data protection and privacy laws. Please refer to the [Multimedia usage and consent guidance](#) for further information.

9.9 Monitoring Implementation

ZSL will ensure implementation of this policy is subject to regular monitoring and that the policy is reviewed annually. Changes can be made outside this period in response to changes in related legal requirements or policy/practice changes.

Regular briefings will be provided to the Executive Committee on the progress being made in relation to implementation of this policy including how gaps are being addressed, if there have been any breaches of the policy and lessons learned from safeguarding incidents and investigations.

APPENDIX 1 - DEFINITIONS

The following terms are used throughout the policy and are defined here. Please see also section 4 'What is Safeguarding'.

- **Staff and other representatives** – staff, registered volunteers, registered students, consultants, contractors, trustees, EDGE Fellows, partners, and official visitors.
- **Child** – any person under the age of 18 years.
- **Adult at risk** – a person aged 18 years or over whose exposure to harm through abuse, exploitation or neglect may be increased by personal characteristics such as mental or other disability, age or illness, or by life circumstances such as living conditions, finances and work, or isolation and loneliness. Such a person may be unable to take care of him or herself or unable to protect him or herself against significant harm or exploitation.
- **Beneficiary** – a person, adult or child, who is being supported by our organisation or receiving a service or benefits through our work. For example, a community member (irrespective of gender, or of social, economic or political status) who stands to benefit from or consume anything we do or produce e.g. through project intervention, employment, etc.
- **Partner** – an agency which is associated with us in the implementation of our projects or programmes; including, but not limited to, community groups, NGOs, and government departments.
- **Do No Harm** - the guiding humanitarian principle that requires actions and decisions to be taken to avoid causing further damage and harm
- **Whistleblowing** – the act of reporting a concern about a (safeguarding) risk, wrongdoing or illegality.
- **SEAH** – the commonly used acronym for Sexual Exploitation, Abuse and Harassment to signify the organisational policy and procedure commitments that address these particular risks towards adult beneficiaries, and staff and other representatives, as distinct from those in relation to children.
- **Bullying** – repeated behaviour which is intended to hurt someone either emotionally or physically and is often aimed at certain people because of their race, religion, gender or sexual orientation or any other aspect such as appearance or disability.
- **Violence against Women** – any act of gender-based violence that results in, or is likely to result in, physical, sexual or psychological harm or suffering to women, including threats of such acts, coercion

or arbitrary deprivation of liberty, whether occurring in public or in private life.

- **Exploitation** – the deliberate maltreatment, manipulation or abuse of power and control over another person. Exploitation includes, but is not limited to, slavery, forced labour, trafficking and prostitution.
 - Sexual Exploitation – any actual harm or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. Sexual exploitation includes e.g. purchasing the services of prostitutes and asking for sex in exchange for providing employment or other provisions/resources.
- **Harassment** - when someone behaves in a way that causes offence, distress or intimidation. This could be abusive comments or jokes or insulting gestures.
 - Sexual harassment – any form of sexual overtures or soliciting that is clearly unwelcome to the person for whom it is intended or any clearly unwelcome comment, gesture or behaviour with sexual undertones.
- **Harm** – any detrimental effect of a significant nature on a person's physical, psychological, or emotional well-being. For harm to be significant, the detrimental effect of a person's wellbeing must be substantial and serious.
- **Abuse** – all forms of physical and /or emotional ill-treatment, sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to a child or adult's health, survival, development or dignity in the context of misuse of a relationship of responsibility, trust or power.
 - Physical abuse of a person is that which results in actual or potential physical harm from an interaction or lack of an interaction, which is reasonably within the control of a parent or person in a position of responsibility, power or trust. There may be single or repeated incidents. It includes, but is not limited to, hitting, pushing, pinching, punching and misuse of restraint.
 - Emotional or Psychological Abuse includes the failure to provide a developmentally appropriate, supportive environment, including the availability of a primary attachment

figure, so that a child can develop a stable and full range of emotional and social competencies commensurate with her or his personal potential and in the context of the society in which the child lives. There may also be acts towards the child or adult that cause or have a high probability of causing harm to health or physical, mental, spiritual, moral or social development. These acts must be reasonably within the control of the parent or person in a relationship of responsibility, trust or power. Acts include restriction of movement, patterns of belittling, denigrating, scapegoating, threatening, scaring, discriminating, ridiculing or other nonphysical forms of hostile or rejecting treatment.

- Neglect is the persistent failure to meet a person's basic physical and/or psychological needs, likely to result in the serious impairment of a child's health or development.
- Sexual Abuse means actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions." Sexual abuse" is a broad term, which includes but is not limited to rape, sexual assault, sex with a minor and sexual activity with a minor.
- Child Sexual Abuse involves forcing or enticing a child or a 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 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 in abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males; women can also commit acts of sexual abuse, as can other children

APPENDIX 2 – DOS & DON'TS

When working with children or adults at risk YOU MUST ALWAYS:

- Ensure that interactions with children are appropriate, safe and sensitive to the needs and feelings of the child;
- Avoid working alone with children and plan your work so that at least two adults are present at any time;
- Make sure that language is used in such a way so as not to cause offence;
- Avoid inappropriate physical contact;
- Be sensitive to local norms and standards of behaviour;
- Listen to what children or adults at risk are saying and respond appropriately;
- Be aware of how to report safeguarding concerns or incidents to the local Designated Safeguarding Officer or your line manager; and
- Report any concerns relating to the safety or welfare of a child or adult at risk to the local Designated Safeguarding Officer or your line manager;

When working with children or adults at risk YOU MUST NEVER:

- Develop relationships with them that could be in any way considered exploitative or abusive;
- Develop physical/sexual relationships with them;
- Hit or otherwise physically assault, harm or abuse them;
- Place them at risk of abuse;
- Act in a manner that is sexually provocative or use language that is offensive or abusive;
- Act in ways intended to shame, humiliate, belittle or degrade them, or otherwise perpetrate any form of emotional abuse, discriminate against or show differential treatment;
- Allow allegations made or concerns expressed by others about their welfare, to go unrecorded or not acted upon;
- Have them stay overnight at your home or other personal accommodation in which you are staying; and
- Use any computer or other electronic device to view, download, distribute or create indecent or inappropriate images.