


<b>Integrated Management System</b>	<b>Ref: P06</b>	
<b>SAFEGUARDING POLICY</b>		
<b>Version: 4.0</b>	<b>Date: November 2021</b>	<b>1 of 9</b>

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## 1. WRAP and Safeguarding

WRAP's direct contact with children and vulnerable adults is limited, being largely carried out and supervised by partner employees: 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 DBS checked<sup>1</sup> by them. Elsewhere, WRAP may come into contact with children and vulnerable adults through its digital and social media campaigning work.

WRAP provides grants to more than 200 food redistribution organisations, some of which will directly provide food to vulnerable people, while others will supply food to food banks and similar for delivery. WRAP may also come into contact with children and vulnerable adults working with partners under a service contract.

WRAP's grants and international development teams are fully aware of their safeguarding responsibilities. During the due diligence process partners are required to declare and demonstrate they have a Safeguarding Children and Vulnerable Adults Policy and Procedures in place, share their risk assessment approach and explain the relevant checks and assessments (including DBS or equivalent checks) that they carry out. Compliance with all relevant regulations and government guidelines on safeguarding is a contractual obligation; it is checked during contract negotiations and communicated again within a grant welcome pack. WRAP maintains regular contact with grant recipients throughout the contract period. Grant recipients and sub-contractors are required to report back on all relevant compliance and risks matters, including safeguarding, health and safety and environmental risks.

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.

Our work is guided and supported by a contemporary safeguarding policy base that is consistent with professional best practice, which 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 three 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.

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 partners and their beneficiaries. The safety and well-being of our employees is managed through our human resource management policies.

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<sup>1</sup> Disclosure and Barring Service

## Contact Us

For any queries about Safeguarding at WRAP please contact our Designated Safeguarding Lead Emmanuel Agyei – Head of Commercial

## 2. WRAP Policy Statement

WRAP's Safeguarding Policy puts those we employ, our partners and the children and vulnerable adults with whom we come into contact at the centre of all we do. WRAP works to the 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".<sup>2</sup>

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

Consequently, WRAP will:

- Take all possible steps to safeguard and protect children and vulnerable adults 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 vulnerable adults. It applies to **all** children and vulnerable adults 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 all actors to report incidents, allegations and concerns, and to adopt a survivor centred approach<sup>3</sup> to the alleged victim.

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 member of our staff 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 its trustees, directors, its employees (full time or part time), consultants, service providers and, and all visitors, including journalists and associated personnel. As stated above our implementing partners, (grantees, sub-grantees, contractors and sub-contractors) whose work involves contact with children and vulnerable adults should have and implement a safeguarding policy and, further, to demonstrate that they are applied along their supply chains.

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<sup>2</sup> <https://www.gov.uk/guidance/safeguarding-duties-for-charity-trustees#children-adults-at-risk>

<sup>3</sup> <https://www.endvawnow.org/en/articles/1499-survivor-centred-approach.html>

## 4. Definitions

### For the purpose of this policy:

**Child:** Any person under the age of 18<sup>4</sup>.

**Vulnerable adult:** 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.<sup>5</sup>

Further definitions with categories of abuse for children and vulnerable adults 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's policies are consistent with international instruments underpinning safeguarding work, with the United Kingdom's national legal frameworks for the protection of children and vulnerable adults, and with the requirements and regulatory framework of the Charity Commission, specifically, "taking reasonable steps to protect from harm people who come into contact with your charity".<sup>6</sup>

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<sup>7</sup>.

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.

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 vulnerable adults. Our safer recruitment policy states our procedures to reduce the risk of unsuitable people entering our organisation.

## 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. All staff members, and all those who act on our behalf, will read and sign it, and are expected to adhere to its values and minimum standards. Those making overseas visits are expected to uphold

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<sup>4</sup> Reference: United Nations Convention on the Rights of the Child.

<sup>5</sup> Consistent with the UK's Safeguarding Vulnerable Groups Act 2006, section 59.

<sup>6</sup> <https://www.gov.uk/guidance/safeguarding-duties-for-charity-trustees#children-adults-at-risk>

<sup>7</sup> <https://www.gov.uk/guidance/safeguarding-duties-for-charity-trustees>

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 the 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 vulnerable adults to have and to implement at a minimum a Safeguarding Policy, a Code of Conduct, a Whistleblowing Policy and Safer Recruitment and Accountability Policy and to report all serious safeguarding incidents to us. Our partner due diligence and selection policy can be accessed here. ([Partnership Due Diligence](#))

## **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 senior leadership 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 staff, 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 staff are responsible for responding to safeguarding concerns. Roles and responsibilities for staff and trustees with designated safeguarding responsibilities and accountability lines can be seen in [Annex 3 - Accountability Framework](#).

### **11. WRAP's procedure for responding to safeguarding concerns**

Safeguarding concerns may arise from 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.

### **11.1. 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 staff cannot keep confidences when they involve concerns about a vulnerable adult 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.

### **11.2. Reporting concerns relating to WRAP personnel**

All safeguarding concerns relating to WRAP staff/trustees must be reported to the Designated Safeguarding Lead (DSL). If you are unsure whether a situation constitutes a safeguarding concern, you are encouraged 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 (Zoom, 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. ([Safeguarding Incident Reporting Form](#)). 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, s/he may make a report to the police, a referral to social care, and or file a Serious Incident Report to the Charity Commission and inform donors.

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 Charity Commission<sup>8</sup>, will be prioritised for action.

### **11.3. 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 the 'Safeguarding checklist for Engaging with Schools, Guides and Scouts', [Annex 5 - Checklist for Engaging with Organisations](#).

### **11.4. Reporting concerns in partner organisations**

Partners will be required to report serious safeguarding incidents through WRAP's serious incident reporting form ([Partner 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 staff and partner staff/volunteers will be managed through WRAP's HR management processes. Allegations of inappropriate behaviour between partner staff 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

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<sup>8</sup> <https://www.gov.uk/guidance/how-to-report-a-serious-incident-in-your-charity>

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.

A standardised flowchart on reporting safeguarding concerns will be laminated and displayed at WRAP's Head Office. Partners who have contact with children and vulnerable adults are expected to develop and communicate clear reporting pathways to their staff and those with whom they have contact to ensure that reporting mechanisms are fully understood by those that they work with.

## **12. Sanctions**

Where partners do not demonstrate a commitment to WRAP's minimum 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 consequences by the senior management team.

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.

## **13. Recording**

All concerns or 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.

## **14. 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 take photograph of 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 is essential. 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 original intent of 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 communication 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 team will ensure that no photographs/videos of children or vulnerable adults will be used that could be regarded as degrading or sexually provocative. Photographs of children or vulnerable adults 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 vulnerable adults will be kept confidential in secure files. Access to photographs is limited to those that need them during the course of their work.

## **15. 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 on 07951 346196 and [media.enquiries@wrap.org.uk](mailto:media.enquiries@wrap.org.uk).

## **16. 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 ([Acceptable Use Policy for WRAP IT Systems](#)) that all staff are required to read and sign as part of on-boarding. This policy also outlines WRAP's data security processes and includes a specific code of conduct which sets out expected standards of behaviour



online. Staff 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.

## **17. Implementation and Review**

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

All staff will sign the code of conduct as part of the induction process; Head of Commercial will ensure that all partners and contractors receive a copy and comply, particularly for high-risk activities.

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 vulnerable adults 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 HR Director, will contribute to the quarterly trustee board meetings summarising safeguarding activity, analysing safeguarding data and trends, and identifying any key areas for improvement.

WRAP will continually evaluate its safeguarding practice and update its policy following an annual review by DSL/Head of Commercial.