



TRAFFIC

SAFEGUARDING POLICY

Version 1 – May 2026

VERSION CONTROL

Title	Safeguarding Policy
Developed By	Global Operations Team
Date Approved	18-06-2026
Applicable to	All who work for or carry out work for TRAFFIC
Related Documents	See Additional Reference Documents.
Distribution	All TRAFFIC staff worldwide. Available on TRAFFIC's Intranet under Key policies.

DOCUMENT HISTORY

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1. Scope

This policy is applicable to all staff employed directly or on behalf of TRAFFIC, irrespective of location, length of service or position within the organisation. It includes any individual that serves as a board trustee of a TRAFFIC entity, any volunteers or consultants working for TRAFFIC and any seconded staff to TRAFFIC. All individuals will be collectively referred to as “TRAFFIC staff” for the purpose of this policy. Official visitors such as donor representatives will also be expected to comply with the policy during their visit.

This Policy complements the general principles established in the Code of Conduct and clarifies

the expected standards of conduct and professional ethics, including the respect for other people’s dignity and integrity. It sets clear obligations for TRAFFIC Staff, volunteers and consultants to refrain from condoning, encouraging, participating in, activities that would breach safeguarding rules. This may go beyond the physical premises and normal business hours of TRAFFIC, such as conduct at meetings, events, workshops, training, or on social media.

TRAFFIC has zero tolerance for bullying and harassment and all forms of sexual exploitation and abuse in all its activities.

2. Background

TRAFFIC is a leading non-governmental organisation working globally to ensure that trade in wild species is legal and sustainable, for the benefit of the planet and people.

TRAFFIC International is registered as a company limited by guarantee and a registered charity in England and Wales and is subject to laws, regulations and guidance for the operation of charitable companies. The Board of Trustees, formed under the Articles of Association, is TRAFFIC’s primary governing body. The registered office of TRAFFIC International is located in Cambridge, UK.

TRAFFIC International is a global, multicultural and multilingual organization that strives to ensure best practice in its everyday operations. TRAFFIC’s local engagement is managed through Programme Offices with staff based in a hub office and at other strategic locations where necessary. Programme offices are established as locally registered branches or subsidiaries of the TRAFFIC International charity or through hosting agreements with a third-party organisation.

By agreeing to work for TRAFFIC, staff members undertake to uphold the highest standards of professional behaviour and to ensure that TRAFFIC’s integrity and reputation shall at all times be safeguarded by their actions. Therefore, the highest standards of conduct and professional ethics are expected from its Staff in their conduct when performing their work for TRAFFIC.

This includes refraining from infringing the physical and mental health, safety, privacy and human rights of others; refraining from any kind of coercion or harassment.

While we do not carry out aid-funded relief work, we do recognize the importance of ensuring that our work does not have adverse social or environmental impacts at any level and aims where possible to incorporate the CAPSEAH (Common Approach to Protection from Sexual Exploitation Abuse and Harassment) standards into the design and implementation of relevant activities.

All TRAFFIC employees are expected to comply with this Policy and failure to do so will be treated as a disciplinary matter which may result in the imposition of a disciplinary sanction, up to and including dismissal.

3. Policy

TRAFFIC believes that everyone we come into contact with, regardless of age, gender identity, disability, sexual orientation or ethnic origin has the right to be protected from all forms of harm, abuse, neglect and exploitation. We will not tolerate abuse and exploitation by staff or associated personnel.

The purpose of this policy is to protect people who come into contact with our organisation.

This includes harm arising from:

- The conduct of our staff or personnel associated with us.
- The design and implementation of our programme and activities

This policy does not cover:

- Sexual harassment in the workplace – this is dealt with under TRAFFIC's Anti Bullying and Harassment Policy
- Safeguarding concerns in the wider community not perpetrated by our staff. These would be referred to the relevant local authorities.

DEFINITIONS

Safeguarding means protecting peoples' health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect.

Child/Children

Is defined as anyone under the age of 18.

Human Rights

These universal rights are inherent to us all, regardless of nationality, sex, national or ethnic origin, colour, religion, language, or any other status. They range from the most fundamental - the right to life - to those that make life worth living, such as the rights to food, education, work, health, and liberty.

Harm

Psychological, physical and any other infringement of an individual's rights

Harassment

Harassment may consist of any act or conduct, whether verbal, physical or visual, which is offensive, humiliating or intimidating on the grounds of marital status, family status, sexual orientation, religion, age, disability, race, colour, nationality, ethnic or national origin, including acts of physical intimacy, spoken word, gestures or the production or display or circulation of written material or pictures. Harassment is behaviour which could reasonably be regarded by an ordinary person as offensive and which is also unwelcome, unreciprocated and offensive to the recipient resulting in them feeling threatened or

compromised.

The behaviour itself and the impact on the recipient determines what constitutes harassment, not the intention of the offender. Harassment may be conducted by one or more persons against another or others, which could reasonably be regarded as undermining the individual's right to dignity at work. Even isolated incident of the behaviour described in this definition may be an affront to dignity at work.

Harassment can occur both inside the workplace and outside, for example at training venues or social functions. It can occur in person or online including social media.

Harassment includes bullying which involves an abuse or misuse of power by one employee over another, often, but not necessarily, by someone in authority. It should not, however, be confused with ordinary management. It can be perpetrated by customers, clients or business contacts.

Modern Slavery

An individual is exploited by others, for personal or commercial gain. Whether tricked, coerced, or forced, they lose their freedom. This includes slavery, human trafficking, forced labour, debt bondage and domestic servitude.

Psychological harm

Emotional or psychological abuse, including (but not limited to) humiliating and degrading treatment such as bad name calling, constant criticism, belittling, persistent shaming, solitary confinement and isolation

Protection from Sexual Exploitation and Abuse (PSEA)

The term refers to policies and processes to prevent, reduce the risk of sexual exploitation and abuse of people by people work for or on behalf of TRAFFIC. It pays specific attention to preventing and responding to harm from any potential, actual or attempted abuse of power, trust, or vulnerability, especially for sexual purposes.

Safeguarding

Safeguarding means protecting people's health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect.

Sexual abuse

The term 'sexual abuse' means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

Sexual exploitation

The term 'sexual exploitation' means any actual 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. This definition includes human trafficking and modern slavery.

Survivor

The person who has been abused or exploited. The term 'survivor' is often used in preference to 'victim' as it implies strength, resilience and the capacity to survive, however it is the individual's choice how they wish to identify themselves.

Safeguarding puts beneficiaries and affected persons at the centre of all we do.

At risk adult

Sometimes also referred to as vulnerable adult. A person who is or may be in need of care by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.

Safeguarding applies consistently and without exception across our programs, partners and staff. It requires proactively identifying, preventing and guarding against all risks of harm, exploitation and abuse and having mature, accountable and transparent systems for response, reporting and learning when risks materialize. Those systems must be survivor-centred and also protect those accused until proven guilty.

TRAFFIC commits to addressing safeguarding throughout its work, through the three pillars of prevention, reporting and response.

4. Implementing procedures

WHO IS RESPONSIBLE FOR SAFEGUARDING

(a) Ultimately The UK Charity Board of Trustees has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

(b) The organisation's Chief Operating Officer (COO) has primary responsibility for implementation of TRAFFIC's safeguarding measures and for monitoring its use and effectiveness and dealing with any queries on its interpretation. The COO is the organisations designated Safeguarding Focal Point, The Chief Operating Officer may delegate responsibility for day-to-day implementation to other staff members.

c) The Senior Leadership Team (SLT) Set the tone and influence the safeguarding culture within the organisation, communicate TRAFFIC's approach to safeguarding across the organisation and set the standards and expectations of staff with respect to conduct.

d) TRAFFIC unit leaders and teams must be aware of safeguarding risks that fall into their area of responsibility. Each office/project must have a safeguarding focal point who will put in place appropriate procedures based on the activities being undertaken including due diligence checks of implementing partners.

e) The Risk and Compliance Officer champions organisational safeguarding. Facilitates the identification of organisational safeguarding risks and the adoption of appropriate organizational policies, procedures and processes and monitors compliance with them. Builds capacity for safeguarding supports the development of an appropriate safeguarding culture.

f) Individual staff members should understand their responsibilities for safeguarding and understand that safeguarding is a key part of the organisation's culture. They should report any gaps in existing control measures to managers.

PREVENTION

TRAFFIC will :

- . Ensure all staff have access to, are familiar with, and know their responsibilities within this policy
- . Design and undertake all its programme and activities in a way that protects people from any risk of harm that may arise from their coming into contact with us. This includes the way in which information about individuals is gathered and communicated
- . Implement necessary and stringent safeguarding procedures when recruiting, managing and deploying staff.
- . Ensure staff receive training at induction and at regular intervals thereafter 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

TRAFFIC Staff 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.
- . Use their position to abuse, exploit, or harass, sexually or otherwise any person implementing, engaged in, or benefiting from TRAFFIC-related activities.

Additionally, TRAFFIC staff are obliged to:

- . Contribute to creating and maintaining an environment that prevents safeguarding violations and promotes the implementation of the Safeguarding Policy
- . Report any concerns or suspicions regarding safeguarding violations by people working for or on behalf of TRAFFIC to the appropriate staff member in accordance with the Sexual Harassment/Bullying and Harassment policies.

REPORTING

TRAFFIC has a Whistleblowing Policy and anyone who reasonably and in good faith reports, attempts to report, is believed to be about to report, or is believed to have reported suspected or actual SEAH (including concerns of suspected SEAH) in TRAFFIC related activities will be entitled to all the protections (which include anonymity), confidentiality, and protection from retaliation), and remedies afforded to whistle blowers.

TRAFFIC also has an external complaints mechanism available via the TRAFFIC website for members of the public to raise concerns: <https://www.traffic.org/feedback>

RESPONSE

TRAFFIC will follow up safeguarding reports and concerns according to relevant policies and procedures (Sexual Harassment/Bullying and Harassment/External Complaints Mechanism), and legal and statutory obligations.

TRAFFIC will apply appropriate disciplinary measures to staff found in breach of policy.

We will offer support to survivors of harm caused by staff, regardless of whether a formal internal response is carried out (such as an internal investigation). Decisions regarding support will be led by the survivor.

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.

This Policy will be reviewed at least every 3 years in line with TRAFFIC's Policy Register commitment

5. Additional reference documents

TRAFFIC policies and documents reference standards expected and how to raise concerns. The primary references are

- *Guidelines for the Operation of the TRAFFIC Network* – includes reference to working values, grievance procedures, whistle-blowing and obligations of consultants;
- *TRAFFIC Staff Handbook* - Every employee will have a relevant document for their location
- *Code of conduct*
- *TRAFFIC Whistleblowing policy* – guidance on how to raise a complaint.
- *TRAFFIC External Complaints Mechanism guidance for members of the public to raise concerns*
- Data Protection Policy
- Law Enforcement Support Guidelines
- Market Monitoring Manual
- Bullying and Harassment Policy
- Protection from Sexual Exploitation, Sexual Abuse and Sexual harassment Policy.
- Anti Human Trafficking Compliance Plan
- *Preparing Risk Monitoring Tools*