

Safeguarding Children and Vulnerable Adults Policy

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1. Purpose

The purpose of this policy is to protect children and vulnerable adults, from any harm that may be caused by coming into contact with the activities of Botanic Gardens Conservation International (BGCI). This includes harm arising from the conduct of staff or personnel associated with BGCI, and the design and implementation of BGCI activities. This policy sets out the commitments made by BGCI and informs personnel of their safeguarding responsibilities.

2. Scope

This policy is mandatory and requires compliance from all BGCI employees, consultants, volunteers, interns, trustees, as well as agency staff, students or anyone else working on behalf of BGCI (collectively referred to as BGCI *personnel* throughout this policy).

This policy is mandatory and requires compliance from partners unless they have their own safeguarding policy which meets the criteria within the [Bond Safeguarding Policy checklist](#).

This policy applies inside and outside of office hours, inside and outside of BGCI offices when dealing with safeguarding concerns that may arise in relation to our personnel, and children and vulnerable adults. Whilst some of the principles, standards and requirements on which this policy is based originate in the UK, the general principles of this policy apply in all geographies where BGCI operates. Implementation may vary to account for local laws and appropriate safeguarding practices within specific countries.

This policy does not cover allegations of harassment, bullying or sexual harassment between staff, which is covered by the *BGCI Anti-Harassment and Bullying Policy*.

This policy does not cover safeguarding concerns in the wider community not involving BGCI personnel.

3. Commitment

BGCI believes that everyone who comes into contact with BGCI activities regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have the right to equal protection from all types of harm, abuse, or exploitation and the right to a safe, positive and enjoyable environment.

BGCI will not tolerate any form of abuse, harassment, or ill-treatment of anyone involved with BGCI activities. This means that proportionate and appropriate measures will be taken to prevent an incident and respond effectively if an incident does arise. BGCI expects our partners to do the same.

BGCI recognises that the welfare and interests of children and vulnerable adults are paramount in all circumstances. This policy addresses the safeguarding of children and vulnerable adults and their protection from sexual exploitation, harassment and abuse.

BGCI is committed to ensuring safeguarding practice reflects statutory responsibilities, government guidance, complies with best practice, and BGCI requirements.

BGCI is committed to the standards of the Common Approach to Protection from Sexual Exploitation, Abuse and Harassment (CAPSEAH) and commits to responding to all safeguarding and SEAH concerns in line with a survivor-centred approach, which prioritises the safety, dignity, wishes, and well-being of the survivor.

BGCI will take disciplinary action against those found to be in breach of this policy, which may include dismissal, or in the case of partner organisations suspension or repayment of funding or termination of partners agreements or contracts. Where appropriate, cases will be referred to the relevant authorities for criminal prosecution.

BGCI is committed to a culture of openness and continual learning and improvement.

4. Definitions

Child: A child is anyone under the age of 18 years regardless of the age of majority or the age of sexual consent in the country in which they are living

Vulnerable adult: A vulnerable adult is anyone 18 years or over who needs support services because of (this list is not exhaustive):

- frailty due to ill health, disability or cognitive impairment
- mental health issues including dementia or a personality disorder
- learning disability
- physical disability or a sensory impairment
- impairment in the ability to communicate with others
- long-term illness or condition
- misuse of substances or alcohol
- provision of care to adult family members or friends and is subject to abuse
- lack of mental capacity to make decisions.

Abuse: Abuse may be intentional or unintentional and involves the misuse of power and control that one person has over another. Many abuses constitute a criminal offence. Examples include:

- **cyber bullying** - occurs when someone repeatedly makes fun of another person online or repeatedly picks on another person through emails or text messages
- **discriminatory abuse** - centres on a difference or perceived difference, particularly with respect to race, gender, disability, or any of the protected characteristics of the Equality Act.
- **domestic abuse** - includes psychological, physical, sexual, financial, and emotional abuse perpetrated by anyone within a person's family, together with "honour" based violence
- **emotional or psychological abuse** - includes threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation, or withdrawal from services or supportive networks
- **financial or material abuse** - includes theft, fraud, internet scamming, and coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions.
- **forced marriage** - a marriage in which one or both of the parties are married without their consent or against their will
- **harmful traditional practice** - practices based on traditional beliefs or values, for example, child marriage
- **mate crime** - vulnerable people are befriended by members of the community who go on to exploit and take advantage of them
- **modern slavery** - encompasses slavery, human trafficking, forced labour, and domestic servitude

- ***neglect and acts of omission*** - includes ignoring medical or physical care needs and failing to provide access to appropriate health social care or educational services, or withdrawing of the necessities of life (including medication, adequate nutrition, and heating)
- ***organisational abuse*** - includes neglect and poor care professional practice within an organisation and can range from one-off incidents to ongoing ill-treatment
- ***physical abuse*** - hitting, slapping, pushing, kicking, restraint, and misuse of medication
- ***radicalisation*** - inspire new recruits, embed extreme views and persuade vulnerable individuals to the legitimacy of a cause (this may be direct through a relationship, or through social media)
- ***self-neglect*** - covers a wide range of behaviour but can be broadly defined as neglecting to care for one's personal hygiene, health, or surroundings
- ***sexual abuse*** - the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions (includes sexual assault, rape and molestation)
- ***sexual exploitation*** - 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
- ***sexual harassment*** - unwelcome behaviour of a sexual nature
- ***spiritual abuse*** - using text from spiritual books or quoting scripture as an excuse to perpetrate abuse and violence or to instil fear in children and vulnerable adults.

5. Responsibilities

BGCI will designate a Safeguarding Officer, a Safeguarding Delegate, and a Safeguarding Trustee.

BGCI Safeguarding Officer

The BGCI Safeguarding Officer is responsible for:

- Ensuring all personnel are familiar with, can access, and know their responsibilities within this policy
- Ensuring all personnel receive training on safeguarding at a level commensurate with their role
- Ensuring activities are designed and undertaken in a way that protects people from any risk of harm
- Implementing safeguarding procedures when recruiting, managing and deploying personnel
- Acting on reports of safeguarding concerns promptly and according to due process
- Ensuring confidential, detailed and accurate records of all safeguarding concerns are maintained and stored securely
- Supporting partners to meet minimum requirements of safeguarding
- Reporting on safeguarding to the BCGI Senior Management Team and the BGCI Board of Trustees.

BCGI Safeguarding Trustee

The BGCI Safeguarding Trustee is responsible for:

- Reviewing and updating this policy in line with legislative and organisational developments
- Reporting on safeguarding to the Charities Commission on behalf of the Board of Trustees.

BGCI personnel

All BGCI personnel are responsible for:

- Promoting safeguarding good practice during their work at BGCI in accordance with this policy and the BGCI Code of Conduct, to help create a safe environment for all
- Raising any concerns related to safeguarding (through the routes described below). It is not the individual's responsibility to decide whether safeguarding infringements have occurred.

Partners

BGCI partners are required to work in accordance with this policy as a condition of their involvement with BGCI, unless they confirm to BGCI that they have their own Safeguarding Policy which meets the criteria with the [Bond Safeguarding Policy checklist](#).

6. Child safeguarding

BGCI personnel shall not:

- Engage in sexual activity or marriage with anyone under the age of 18 years (regardless of the age of majority or the age of sexual consent in the country in which they are living). Mistaken belief about the age of a child is not a defence
- 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.

7. Adult safeguarding

BGCI personnel shall not:

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

8. Protection from sexual exploitation, abuse and harassment

BGCI personnel shall not:

- Exchange money, employment, goods, or services, for sexual activity, including sexual favours or other forms of humiliating, degrading and exploitative behaviour
- Engage in any sexual relationships with programme participants or people BGCI works with since they are based on inherently unequal power dynamics and undermine the credibility and integrity of BGCI work.

BGCI personnel shall:

- Report any concerns or suspicions regarding sexual abuse or exploitation by BGCI personnel
- Contribute to creating and maintaining an environment that prevents sexual exploitation and abuse and promotes adherence to the BGCI Code of Conduct and this policy. Managers, at all levels, have specific responsibilities to support and develop systems that uphold this environment.

9. Employment of staff

BGCI is committed to rigorous recruitment and selection procedures which minimise the risk of engagement individuals who pose a risk to children and vulnerable adults. Further details are available in the BGCI Recruitment Process and from the Head of HR.

10.Training

All BGCI personnel are required to undertake mandatory introductory level safeguarding training as part of the BGCI onboarding process, and all existing staff are required to undertake periodic refresher training. The Safeguarding Officer, Safeguarding Delegate, and Safeguarding Trustee will undertake enhanced safeguarding training and periodic refresher training, to ensure effective implementation of this policy.

All BGCI personnel are required to undertake mandatory training.

11.Data protection

All data and information which may identify children, and vulnerable adults shall be processed in accordance with the BGCI Data Protection Policy.

12.Reporting

Reporting internally to BGCI

If you have experienced, witnessed or suspect a safeguarding incident, you must report it as soon as is reasonably possible via one of the following routes, and complete a confidential reporting form:

1. BGCI Safeguarding Officer
2. BGCI Safeguarding Delegate
3. BGCI Safeguarding Trustee

Reporting to the Charity Commission

BGCI personnel are encouraged to report any concerns internally in the first instance. If you feel it is inappropriate to report internally, you may report concerns of serious wrongdoing directly to the Charity Commission by using the email address whistleblowing@charitycommission.gov.uk. Further guidance is available here: [Report serious wrongdoing at a charity as a worker or volunteer - GOV.UK](#).

13.Whistleblowing

BGCI personnel who have a reasonable belief that there has been a failure to report, respond to or manage a safeguarding incident or concern will be protected by the BGCI Whistleblowing Policy.

14.Response

BGCI will respond to all reports of potential safeguarding concerns made in good faith and will conduct a thorough, objective and timely investigation. The findings will be documented and reported, with information redacted and shared on a need-to-know basis.

BGCI will incorporate learning into its systems, processes and training, and take appropriate corrective action to minimise risk of future safeguarding harms.

15.Confidentiality

Confidentiality will be maintained at all stages of dealing with safeguarding concerns to protect the integrity of the investigation, preserve evidence, and to prevent intimidation, discrimination or retaliation to individuals

involved. Information relating to the concern will be shared on a need-to-know basis only and will always be kept secure.

16.Reporting and monitoring

Anonymised summary reports of safeguarding concerns will be reported to the BGCI Senior Management Team and the BGCI Board of Trustees. In the event of a serious safeguarding concern, BGCI will notify the Charity Commission and relevant donors in accordance with contractual and statutory obligations.

17.Policy implementation and review

This policy and its implementation will be reviewed regularly, including in the event of changes to legislation and good practice, or after a serious safeguarding concern.

18.Law and guidance supporting this policy

This policy has been drawn up based on law and guidance, namely:

- Common Approach to Protection from Sexual Exploitation, Sexual Abuse and Sexual Harassment
- Data Protection Act (2018)
- Data (Use and Access) Act (2025)
- Human Rights Act (1998)
- Safeguarding Vulnerable Groups Act (2006)
- Sexual Offences Act (2003)
- The Children Act (2004)
- Protection of Freedoms Act (2012)
- United Nations Convention of the Rights of the Child (1989)
- <https://capseah.safeguardingsupporthub.org/>

19. Associated policies and procedures

- BGCI Anti-Harassment and Bullying Policy
- BGCI Code of Conduct
- BGCI Data Protection Policy
- BGCI Recruitment Process
- BGCI Whistleblowing Policy
- BGCI SOP Guidelines for activities involving children and vulnerable adults
- BGCI SOP Guidelines for SEAH prevention and response
- BGCI SOP Template for confidential reporting
- BGCI SOP Template for incident logging

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