The Global Biodiversity Standard

# Safeguarding Children and Adults at Risk Policy

October 2026

| | |
|---|---|
| **Status** | Approved and in force |
| **Version** | 1.1 |
| **Policy owner** | CEO, with Board oversight |
| **Approved by** | TGBS Ltd Board of Directors |
| **Approval date** | 21 October 2026 |
| **Effective date** | 21 October 2026 |
| **Next review** | Annually, and after any serious incident or legal change |

**The Global Biodiversity Standard (TGBS Ltd)**

# Safeguarding Children and Adults at Risk Policy

TGBS Ltd company policy

**TGBS will prevent and respond to harm involving children and adults at risk across its work, hubs and delivery partners. Safety, dignity, informed participation, confidentiality and survivor-centred action come first.**

## 1. Purpose

TGBS activities may involve site visits, fieldwork, community engagement, training, events, images, travel or digital communication. TGBS will identify safeguarding risks, reduce them proportionately and respond to every credible concern.

TGBS respects cultural diversity and local leadership. No custom, tradition, religious belief, organisational interest or local practice can justify abuse, exploitation, sexual misconduct, trafficking, forced marriage, female genital mutilation, child labour, neglect or another violation of fundamental human rights.

## 2. Scope

This policy applies to TGBS Ltd directors, officers, employees, workers, consultants, contractors, volunteers and interns. It also applies, to the extent stated in contract or appointment terms, to TGBS hubs, certified assessors, technical reviewers, committee members, delivery partners and any other person acting for or representing TGBS.

This policy covers harm caused by TGBS personnel or representatives and risks arising through TGBS-funded or contracted activities. Safeguarding concerns within an applicant or certified project that are not caused by TGBS remain relevant where they affect eligibility, evidence, stakeholder safety or certification integrity and must be routed to the appropriate process.

- **Child:** any person under 18, regardless of local age of majority.
- **Adult at risk:** an adult who has care and support needs, is experiencing or at risk of abuse or neglect, and because of those needs may be unable to protect themselves. Local legal definitions must also be considered.
- **Abuse** includes physical, sexual, emotional/psychological, financial/material, discriminatory, organisational or domestic abuse, neglect, exploitation, modern slavery, harmful practices and online abuse.
- **Sexual exploitation and abuse** includes actual or attempted abuse of vulnerability, differential power or trust for sexual purposes, including exchange of money, opportunity, assistance or advantage.
- **Safeguarding concern:** information that a child or adult at risk has been harmed, is at risk, or that conduct or systems may create such risk.

# 3. Policy principles

## 3.1. Safer recruitment and deployment

- Assess safeguarding responsibilities in role design and use identity, qualification, reference, employment-history and criminal-record checks proportionate to the role and lawful in the relevant country.
- Use Disclosure and Barring Service checks only where the role is legally eligible; a DBS check does not replace supervision or risk management.
- Include safeguarding duties and sanctions in contracts, codes and induction.

## 3.2. Contact with children and adults at risk

- Plan activities so that one-to-one isolated contact is avoided where practicable; use visible, accountable arrangements and appropriate adult supervision.
- Obtain informed consent and, for children, appropriate parent/guardian consent while listening to the child's views. Consent does not make exploitative conduct acceptable.
- Do not engage in sexual activity with a child, exchange assistance for sexual conduct, use exploitative images, engage in grooming, or form a relationship that abuses professional power.
- Do not use corporal punishment, humiliating treatment, unnecessary physical contact or personal communication channels that evade oversight.
- Assess travel, accommodation, transport, toilets, field hazards, interpreters, photography, digital contact and complaints access.

## 3.3. Images, stories and information

- Use informed, specific consent; explain intended use and avoid coercion linked to services or certification.
- Do not publish identifying details or precise locations that create risk. Represent people with dignity and avoid stereotypes or demeaning narratives.
- Store safeguarding and identity data securely with strict need-to-know access.

# 4. Roles and responsibilities

- The Board oversees safeguarding risk.
- The CEO will act as or designate a competent Safeguarding Lead. The lead coordinates risk assessment, advice, referral, records, training and Board reporting.
- Managers and activity leads must complete safeguarding risk assessments and ensure appropriate supervision, consent, communications and reporting arrangements.
- Hubs and delivery partners must adopt this policy or demonstrate an equivalent policy, identify a local focal point, comply with local reporting law, flow requirements to subcontractors and notify TGBS of material concerns within 24 hours or sooner where safety requires.
- All covered persons must prevent harm, maintain boundaries, report concerns immediately and must not investigate or confront an alleged perpetrator without authority.

# 5. Policy requirements

TGBS will maintain procedures, controls, training and contractual requirements proportionate to the risks addressed by this policy.

# 6. Reporting and escalation

A person may raise a concern orally or in writing and may be accompanied or supported where appropriate. Anonymous reports will be considered as far as the available information allows. Reports should include the facts known, relevant dates, people involved and any evidence that can be preserved safely.

| Situation | Route |
|---|---|
| Ordinary route | Report to the CEO and copy the Board Chair or another non-conflicted director. |
| Concern involves the CEO | Report to the Board Chair and at least one other non-conflicted director. The CEO must not receive, direct or decide the matter. |
| Concern involves the Board Chair | Report to the CEO and at least one other non-conflicted director. The Chair must not receive, direct or decide the matter. |
| Concern involves both the CEO and Chair, several directors, or internal independence is reasonably in doubt | Report to any non-conflicted director or to the Governance Contact, who must notify at least one other non-conflicted director and arrange an independent response. External professional advice or an external investigator must be used where necessary. |
| Immediate danger or suspected crime/regulatory breach | Contact emergency services, law enforcement or the relevant regulator where appropriate. Internal reporting is not a precondition. |

The Board will maintain a current Policy Contact Register containing direct contact details for the CEO, Chair, Governance Contact and at least two other directors. The Governance Contact means the Company Secretary, if appointed, or a non-conflicted director designated by the Board.

No person may investigate, influence, decide or hear a review of a matter in which they are implicated or have an actual, potential or perceived conflict of interest. A report received by an implicated person must be forwarded immediately to a non-conflicted route without screening or alteration.

Retaliation, victimisation, obstruction, concealment, destruction of evidence and knowingly false or malicious allegations are prohibited. A report made honestly will not attract action merely because it is unsubstantiated.

If the Safeguarding Lead is implicated or unavailable, use the alternate and Board route. If the CEO, Chair or directors are implicated, the standard conflict-free escalation routes apply. An external safeguarding professional must be used for serious or senior-level concerns.

# 7. Response and resolution

## 7.1. Responding to a disclosure or concern

1. If there is immediate danger, contact emergency or competent local services where safe and lawful.
2. Listen calmly, take the person seriously, do not blame or promise secrecy, and explain that information will be shared only to protect people and obtain help.
3. Ask only open questions needed to clarify immediate safety; do not investigate or repeatedly interview.
4. Make a factual record using the person's own words where possible and report to the Safeguarding Lead immediately, normally within 24 hours.
5. The Safeguarding Lead will assess safety, wishes, legal duties, referral options, conflicts, data protection, support and implications for TGBS activities. Specialist advice must be obtained where needed.

Responses will be survivor-centred, trauma-informed and non-discriminatory. The wishes of an adult with capacity will be respected unless law or an overriding risk requires action. The best interests and voice of the child are primary considerations for children.

## 7.2. Case management and organisational action

- Separate protective action, employment/contract decisions, certification consequences and any criminal or statutory investigation while coordinating them safely.
- Consider interim measures such as changing contact arrangements, suspension from duties or restricting systems without treating them as a finding of guilt.
- Refer to local authorities, police, regulators, funders or insurers where law, contract or safety requires. Companies House is not a safeguarding regulator and is not a substitute for competent authorities.
- Provide appropriate support and information to affected people and avoid retaliation or repeated retelling.
- Conduct a lessons review after serious cases and track actions to completion.

# 8. Confidentiality and records

Information will be shared only with those who need it to protect people, assess the matter, comply with law, obtain advice or take action. Absolute confidentiality cannot be promised where disclosure is necessary for a fair process or legal duty.

Safeguarding records will be kept separately, securely and on a strict need-to-know basis. Retention will reflect applicable safeguarding law, limitation periods, the age of any child, advice from authorities and the TGBS retention schedule.

Personal data will be handled under the TGBS Data Protection Policy. Records must be factual, access-controlled and kept separately from general personnel or project files where sensitivity requires it.

# 9. Breaches and corrective action

Safeguarding breaches may result in immediate protective measures, removal from contact or assignment, disciplinary or contractual action, loss of assessor or hub status, referral to authorities and correction, suspension or withdrawal of affected certification decisions where justified and procedurally fair.

## 10. Monitoring and review

The Safeguarding Lead will provide the Board with at least annual anonymised assurance on risks, training, partner compliance, concerns, response times and lessons. Serious concerns will be reported promptly on a need-to-know basis.

## 11. Related documents and legal framework

- TGBS Code of Conduct; Anti-Harassment and Bullying Policy; Modern Slavery Policy; Whistleblowing Policy; Data Protection Policy; Complaints Policy; Certification Appeals Policy.
- Children Acts 1989 and 2004; Safeguarding Vulnerable Groups Act 2006; Care Act 2014; Sexual Offences Act 2003; Modern Slavery Act 2015; Equality Act 2010; Data Protection Act 2018; applicable local safeguarding and mandatory-reporting law.