



TABLE OF CONTENTS

01	Background
02	TRAFFIC Operations
03	Duty of care
04	Project development and implementation
05	Policy dissemination & monitoring
05	Statutory compliance
05	Feedback from general public

SAFEGUARDING STATEMENT

BACKGROUND

TRAFFIC International takes very seriously its responsibility to protect people, including our staff, volunteers, partners, consultants, contractors, trustees and others affected by our work, from any harm that may result from coming into contact with our organisation.

TRAFFIC is a wildlife conservation charity primarily involved in researching legal and illegal wildlife trade globally, and encouraging necessary action by governments, businesses, and others. TRAFFIC employs around 150 staff carrying out a wide range of activities in different countries and works with a wide range of public and private sector partner organisations in carrying out work related to people and their use of natural resources.

Although TRAFFIC does not usually work directly with children or with adults who could be seen as at risk nor carry out aid-funded relief work, we recognize the importance of ensuring that our work does not have adverse social or environmental impacts at any level and the need to incorporate these considerations into the design and implementation of our activities as well as in the conduct of our staff and implementing partners.

The current statement details TRAFFIC's approach to safeguarding and the various tools we have in place to inform TRAFFIC staff and implementing partners of their responsibilities to protect the health, welfare and human rights of individuals.

TRAFFIC OPERATIONS

The **Guidelines for the Operation of TRAFFIC** (2018) or the 'TRAFFIC Guidelines' provide the overarching framework for all TRAFFIC staff irrespective of country of residence or local hosting arrangements. The TRAFFIC Guidelines provide higher level guidance on professional behaviour and standards with more detailed guidance given in specific policies and guidance documents. TRAFFIC has the appropriate oversight, recruitment, and performance management policies and practices in place to support the standards of behaviour set out in its relevant policy documents.

Professional conduct

TRAFFIC is a global, multicultural and multilingual organisation and an equal opportunities employer who aims to provide a supportive and flexible environment to encourage productivity, creativity and collaboration. TRAFFIC applies objective and fair criteria to ensure that staff members are selected, assessed and treated on the basis of their merits, abilities and experience relevant to their post.

TRAFFIC is committed to excellence, transparency and accountability in delivering its work, responding to the needs of its constituencies, and in conducting business with its stakeholders and suppliers. Staff members have the obligation to protect and promote the organisation's interests, avoiding or declaring conflicts of interest should they arise, and acting with due respect for other people. This obligation includes refraining from infringing the physical and mental health, safety, privacy and human rights of others; refraining from any kind of coercion or harassment; and adopting practices that enhance human value and development in the workplace.

It is the policy of TRAFFIC to conduct its business in an honest and ethical manner. TRAFFIC takes a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all its business dealings and relationships wherever it operates. TRAFFIC will uphold all laws relevant to countering bribery and corruption. In particular, it is bound by the laws of the UK, including the Bribery Act 2010, in respect of its conduct both in the UK and abroad. TRAFFIC's board has adopted an Anti-bribery Policy (2016).

It is the policy of TRAFFIC to monitor and control the risks that the organisation faces. Managing these risks helps TRAFFIC meet its objectives more successfully. It helps protect donor funds, staff, and the organisation's reputation. TRAFFIC's board has adopted a Risk Management Policy (2016).

TRAFFIC is committed to protecting against retaliation those staff members who report, as provided for hereunder, what they reasonably and in good faith believe to be ethical misconduct in accordance with any TRAFFIC policy. TRAFFIC's board has adopted a Whistleblowing Policy (2019).

DUTY OF CARE

Wildlife trade policy work

TRAFFIC's policy engagement covers a wide spectrum of activities with potential engagement at various levels - inter-governmental level, regional and national - and engagement is with a large variety of stakeholders, ranging from UN organisations, and regional economic integration organisations to individual national and state/provincial governments. TRAFFIC provides input as an expert NGO in the form of research, analysis and policy recommendations. These activities all potentially involve varying degrees of risk in terms of the impact of the analysis and recommendations.

A variety of processes in the development of TRAFFIC reports, briefings and policy recommendations are in place to ensure that social, political and economic considerations are taken into account in developing those recommendations and, where relevant, alternative approaches or mitigating measures are taken to eliminate, offset or minimize any negative impacts. A stakeholder analysis that is part of the planning process specifically asks project executives to identify stakeholders or interest groups that could be impacted by TRAFFIC's work, how much the recommended programme action will have an impact on the stakeholder and the strategy for engaging the stakeholder to mitigate any negative impacts. Page 3 content

Information collection procedures and data security – safety and integrity

Some aspects of TRAFFIC's work deal with gathering sensitive information about illegal or unsustainable wildlife trade, carrying out analyses and providing actionable reports to responsible authorities and businesses. As part of this, TRAFFIC has a duty of care to its staff. There is a recognised risk assessment process that must be completed and receive appropriate authorisation prior to work/activities commencing. TRAFFIC Directors must be informed whenever projects involving sensitive activities are planned and must inform TRAFFIC's Global Office.

TRAFFIC must ensure all staff (including consultants) are adequately insured to carry out such work, including full medical and emergency evacuation insurance when on overseas duty travel, and that emergency contact details are held on file for all staff.

Similarly, TRAFFIC also has a duty of care to protect those who provide information and to ensure the information is graded and evaluated so its quality and confidentiality is recorded and issued with a handling code to ensure correct dissemination.

Any work of this type must be in compliance with the laws of the country where they are carried out, including data protection laws, and in accordance with TRAFFIC's *Sensitive Activity Management Policy* (revised 2020). The *Sensitive Activity Management Policy* provides guidance on risk classification (Low, Medium, High) with reference to four basic factors: 'what are we looking for?'; 'where are we looking (physical and online locations)?'; 'how are we looking?'; and 'with whom we are engaging?'. As part of the policy, TRAFFIC applies a screening tool which categorises activities into risk levels and identifies necessary levels of oversight and authorisation reflecting the residual risk. Examples of types of risk considered are physical, reputational, human rights and financial. These are applied to all stakeholders including indigenous peoples and local communities.

Additional guidance for staff is provided in TRAFFIC's *Law Enforcement Support Guidelines* (2020) and *Market Monitoring Guidelines* (2018).

Information Management Policies

TRAFFIC'S *IT Policy* (2017) includes guidelines and procedures designed to ensure global consistency in approach to information technology and clarity regarding the use of equipment and related information management resources. All TRAFFIC staff are expected to follow this policy and to adhere to the recommendations to ensure the protection of TRAFFIC's data and information.

Under the EU's *General Data Protection Regulation* (GDPR) introduced in 2018, TRAFFIC needs to maintain records about the personal data it holds, how it uses it, and how it keeps it secure. Central principles of data protection legislation include ensuring that is that personal data is i) accurate; ii) not be kept for longer than necessary. Data protection requirements extend to staff, consultants, volunteers, and supporters in the wider sense (e.g. individuals who make donations, subscribers to newsletters, etc.).

TRAFFIC's *Data Protection Policy* (2020) includes guidelines and procedures to ensure consistency in TRAFFIC's approach to handling personal data. Compliance with the Data Protection Policy is compulsory within TRAFFIC and with external implementing partners and service providers. *TRAFFIC's Privacy Statement* (2018) is on its website; internal *Data Protection Notices* can be found on its intranet site.

PROJECT DEVELOPMENT AND IMPLEMENTATION

At the project design stage, activities are assessed by project managers and allocated a risk level using a *Safeguarding Risk Assessment Tool*. The risk level is agreed by senior operations and programme staff before a full risk assessment and mitigation plan is developed. The *Risk Assessment and Mitigation Plan* is approved before the project design is finalised and utilised throughout project implementation, monitoring and evaluation as necessary to ensure adaptive management and proper implementation of environmental and social safeguard plans.

Key stakeholders are involved during the project design process and views and concerns with regards to safeguarding are considered and acted on by decision makers. Where activities are being implemented by partners, the risk assessment is developed collaboratively but is adapted under the leadership of a TRAFFIC project manager following consultation. Projects are reviewed for risk concerns on a quarterly basis by TRAFFIC's senior management team and risks are reviewed and escalated as appropriate following discussion with project leads /managers.

After contracting, a project inception meeting is organised where the risk assessment and mitigation plans are shared and assessed by the project team and TRAFFIC ensures that partners, project staff, and consultants have confirmed their understanding and compliance with TRAFFIC's safeguarding standards.

POLICY DISSEMINATION & MONITORING - STAFF

Staff are taken through the above referenced policies as part of their induction and are sent copies by email to ensure that there is a record that the person has received them. All staff are also asked to sign annual statements on conflict of interest of which a record is kept on the HR Database (IUCN's HRMS) and is monitored by the Global HR Manager. All volunteers and interns receive contracts which include clauses on professional conduct, harassment and anti-bribery.

Periodic mandatory online training is provided to staff including training on cybersecurity, anti-bribery, data protection, bullying and harassment, and, from Spring 2020, on WWF's *Human Rights in Conservation and WWF's Making sense of Safeguards* modules. Internally, TRAFFIC has a clear grievance process with defined channels of communication and responsibility starting with individual staff members up to the Board level.

POLICY DISSEMINATION & MONITORING - IMPLEMENTING PARTNERS AND SERVICE PROVIDERS

TRAFFIC carries out due diligence assessments (pre-award surveys) when engaging with new project implementing partners or awarding service contracts via tender. The assessment specifically refers to safeguarding, fraud and anti-bribery. Copies of the partner organisation's conflict of interest policy and code of ethics policy are requested in addition to the most recent externally audited or prepared Financial Statements.

TRAFFIC attaches its Standard Terms to third-party agreements /contracts which include obligations with respect to Commitment, Conflicts of Interest, Professional Conduct, Safeguarding, Counter-terrorism, Anti-Bribery and Anti-Fraud. The standard terms also state the need for a similar level of due diligence with any sub-contracts.

STATUTORY COMPLIANCE

TRAFFIC International is aware that it is bound by the laws of the UK in respect of conduct both at home and abroad. We are committed to acting professionally, fairly, and with integrity in our business dealings and relationships wherever we operate. This includes implementing and enforcing effective systems including maintenance of a serious incidents register and reporting to the appropriate authorities.

FEEDBACK FROM THE GENERAL PUBLIC

TRAFFIC will follow up safeguarding reports and concerns according to relevant policies and procedures, and legal and statutory obligations.

Anyone wishing more information regarding TRAFFIC's approach to safeguarding or to raise any concerns can contact TRAFFIC [here](#)