

Policy and Procedures

Safeguarding

Objective

The purpose of this policy is to protect people, particularly children, vulnerable adults, beneficiaries of assistance and all MWF stakeholders from any harm that may be caused due to their coming into contact with Mauritian Wildlife Foundation (MWF). This includes harm arising from:

- The conduct of staff or personnel associated with MWF.
- The conduct of people involved in the design and implementation of MWF's projects and activities.

Scope

The policy lays out the commitments made by MWF and informs **staff** and **associated personnel** of their responsibilities in relation to safeguarding.

- This policy applies to all persons who are interacting with MWF in the workplace under MWF supervision and will include staff, volunteers, interns, students, researchers, and students on work placements, hereby referred to as '**staff**'. Staff who are integrated with MWF through another partner like Durrell, Chester Zoo or any other institution must ensure to comply to policies of both parties.
- **Associated personnel** whilst engaged with work or visits related to MWF, including but not limited to the following: service providers; consultants; contractors; authorities; project visitors including funders; journalists; celebrities and politicians.

This policy does not cover:

- General code of conduct at MWF in the workplace – this is dealt with under MWF Information, Policies and Procedures.
- Safeguarding concerns in the wider community that are not perpetrated by MWF or associated personnel.

It is recognised that MWF works with people from many different backgrounds, cultures, belief systems, experiences, and countries. Acceptable behaviour to one person is not acceptable to another. This will be considered for mild behaviours but is no excuse for extreme ones nor behaviours set out in this policy as not acceptable.

What is Safeguarding?

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

In our sector, we understand it to mean protecting people who come into contact with our MWF programs from harm caused by us and protecting each other from harm caused by others.

Safeguarding means taking all reasonable steps to prevent harm, particularly sexual exploitation, abuse (of power, trust, or vulnerability) and harassment from occurring; to protect people, especially vulnerable adults, and children, from that harm; and to respond appropriately when harm does occur.

Safeguarding applies consistently and without exception across our programmes, 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 materialise. Those systems must be survivor-centered and protect those accused until proven guilty.



MWF Policy Statement

MWF believes that everyone we encounter, 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. MWF will not tolerate abuse and exploitation by or to staff or associated personnel.

This policy will address the following areas of safeguarding [as appropriate]: **child safeguarding, adult safeguarding, and protection from any physical, emotional, financial, or sexual exploitation and abuse.**

MWF commits to addressing safeguarding throughout its work mainly through **Prevention**, else through the three pillars of **Recognising**, **Reporting** and **Responding**.

1. PREVENTION

MWF Responsibilities

MWF will:

- Implement stringent safeguarding procedures when recruiting, managing, and deploying staff and associated personnel.
- Ensure all staff have access to, are familiar with, and know their responsibilities within this policy and other MWF Information, Policies and Procedures.
- Ensure staff receive training on safeguarding at a level commensurate with their role in the organisation.
- Design and undertake all its programmes and activities in a way that protects people from any risk of harm that may arise from their coming into contact with any staff and Associated personnel. This includes the way in which information about individuals in our programmes is gathered and communicated.
- Follow up on reports of safeguarding concerns promptly and according to due process.

Staff Responsibilities

Child safeguarding

MWF staff and associated personnel should be aware of the power imbalances that may arise from their role and therefore they **SHOULD NOT**:

- Have sexual relations with service users, taking into account factors such as their age, vulnerabilities and their ability to make decisions and protect themselves from harm.
- Sexually abuse or exploit children.
- Expose a child to physical, emotional, financial, or psychological abuse, or neglect.
- Participate in any commercially exploitative activities with children, such as child labour or trafficking.

Adult safeguarding

MWF staff and associated personnel **MUST NOT**:

- Sexually or financially abuse or exploit adults.
- Subject any adult to physical, emotional, financial, or psychological abuse, or neglect.
- Some examples but not limited to are:
 - Fight, play tricks on others, or behave in any way that might be dangerous to other people.
 - Exchange money, employment, goods, or services for sexual activity. This includes any exchange of assistance that is due to beneficiaries of assistance.
 - Engage in any sexual relationships with beneficiaries of assistance since they are based on inherently unequal power dynamics.



Additionally, MWF staff and associated personnel 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 a MWF staff member or associated personnel. (See section **3. Reporting**).

2. RECOGNISING

Recognizing safeguarding issues is crucial to ensuring the protection of the people, particularly children, vulnerable adults, beneficiaries of assistance and all other MWF stakeholders. Some tips to recognize safeguarding issues are:

- **Know the signs, observe any behavioural Changes:** Pay attention to any sudden or significant changes in behavior, mood, or demeanor. These changes could indicate that something is wrong and might be related to a safeguarding issue.
- **Trust Your Instincts:** If something doesn't feel right, it's important to take it seriously. Trust your instincts and don't dismiss your concerns.
- **Follow Reporting Procedures:** If you have reasonable grounds to believe that someone is at risk of harm, follow the appropriate reporting procedures as outlined by your organization.

Some signs could be:

1. **Physical Abuse or domestic violence:** Unexplained or inconsistent explanation of marks, bruises, welts, cuts, or injuries in different areas of body example eyes, neck, changes in behaviour when the suspected abuser is present.
2. **Emotional or Psychological Abuse:** Extreme changes in behaviour, such as becoming withdrawn or excessively anxious, sudden changes in self-esteem, displaying fear towards a particular person.
3. **Neglect or Self Neglect:** Poor personal hygiene, unwashed clothes, or being inappropriately dressed for the weather, malnutrition or significant weight loss, untreated medical conditions, or lack of necessary medical aids (glasses, hearing aids).
4. **Sexual Abuse:** Unexplained pain or discomfort in the genital or anal areas, inappropriate sexual behaviours or knowledge for their age, sudden reluctance, or fear of being alone with certain individuals, sexually explicit language or drawings that are inappropriate for their age.
5. **Financial Exploitation:** Unexplained withdrawals or transactions from bank accounts, sudden changes in financial circumstances or depletion of savings, transfer of assets or property without reasonable explanation.

3. REPORTING

Any staff who believes they have observed, experienced, or listened to someone reporting any kind of safeguarding concerns within the organisation has a choice of actions depending on what they feel most comfortable with and what is appropriate in the circumstances.

If a safeguarding concern is disclosed directly to you: Listen; Empathise with the person; Ask who, when, where, what but not why; Repeat / check your understanding of the situation and Report as described below within 24hours.

MWF will also accept complaints, concerns and reports from external sources such as members of the public, partners, and official bodies through defined channels.

Staff members who have a complaint, concern or report relating to safeguarding should report it immediately to the General Manager verbally or by email.



If the staff member does not feel comfortable reporting to the General Manager, they may report to any other appropriate Senior staff member who **must** report their concern to the General Manager (or a Director) but can retain confidentiality if that is requested. For example, the Senior staff member could be a senior manager or a member of the HR Team, or the Executive Director or the President of the Board.

- General Manager: Noveena Wong: nwong@mauritian-wildlife.org: 59446912
- Executive Director: Deborah de Chazal: ddechazal@mauritian-wildlife.org: 57210189
- President: Ehsan Dullo: edulloo@mauritian-wildlife.org: 59360444

Reporting channels for staff

- Policies and procedures of safeguarding are shared to all managers and staff by mail or by training sessions, so they know the reporting process.
- In person reporting at Head Office or at specific Workplace; By phone or text.
- Confidential reporting through the <https://forms.office.com/r/ntiCjF1uXW> - accessible by General Manager only.
- Visible Signs with QR Code in each workplace to report instantly a case through an online form.
- Locked Suggestion Boxes with clear label on topics that can be reported, accessible to HR only (If needed).

Reporting channels for external sources

- A space available on website with the safeguarding policy and contact information.
- Visible Signs with QR Code, phone number, email or address in each public space to report instantly safeguarding case through an online form.
- Email signatures of Managers include '*Kindly [click here](#) to complete a quick survey to help us serve you better*' to access to generic service form including a question on safeguarding.
- Locked Suggestion Boxes with clear label on topics that can be reported, accessible to HR only (If needed).
- Writing a letter by postal service.

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 always be kept secure. **Maintain Privacy:** It's important to respect the privacy of the individual involved. Share information only with those who have a legitimate need to know and follow established protocols for confidentiality.

The reporting staff will be asked to send their concern via writing and/or to fill in a safeguarding concern form so that information is gathered in a structured way.

MWF will ensure that safe, appropriate, accessible means of reporting safeguarding concerns are made available to staff and the communities we work with. Any staff reporting concerns or complaints through formal channels will be protected by our MWF Disclosure and Confidentiality policy dealt with under MWF Information, Policies and Policies.

4. RESPONDING

MWF will follow up safeguarding reports and concerns according to policy and procedure, and legal and statutory obligations. Any breach of the safeguarding policy will be investigated in the same manner as any other staff disciplinary action: an investigation will take place, reports obtained, situation assessed, and appropriate action identified and implemented.



a) Report is received.

Prior to taking necessary actions, the report will usually need to escalate to the Executive Director within 24 hours (unless it involves that person, in which case the President will decide who deals with it) if the matter is considered to fall under this policy.

b) Assess how to proceed with the report.

A very specific report will be needed as to the circumstances of the alleged abuse, who was involved and any witnesses that can confirm the behaviour (or testify to having experienced similar behaviour from the same person) to be able to assess the situation and take appropriate action.

Vague descriptions are not able to be assessed and care will be taken by Management to ensure that allegations are not made maliciously.

The evaluation will determine whether it is possible to take this report forward based on:

1. Does the reported incident(s) represent a breach of safeguarding policy? *(To note that the reported incident may fall under another breach of MWF's policies and procedures so would be taken forward in that context).*
2. Is there sufficient information to follow up this report?
 - If there is insufficient information in the report, and no way to ascertain this information (for example if the reporting person did not leave contact details or where confidentiality is required or a complaint is made anonymously), the options for addressing the behaviour are limited and may not be able to be fully confirmed. However, Management will investigate and be on the lookout for further inappropriate behaviour. The report will be filed in case evidence emerges later and corroborates the complaint.

c) Appoint roles and responsibilities for case management.

If the decision is made to take the report forward, MWF will ensure that relevant expertise and capacity is appointed to manage the safeguarding case. If at any point in the process, it becomes apparent that anyone involved is a child or vulnerable adult, the Executive Director will seek expert advice immediately before proceeding.

If this expertise is not available in-house, immediate assistance will be sought, through external capacity if necessary, including but not limited to authorities such as Ministry of Gender Equality, Child Development, and Family Welfare; Child Development Unit (CDU); Police Family Protection Unit and/or other private legal services as per specific requirements.

The Executive Director will define what, how and with whom information will be shared relating to this case and then appoint specific senior managers and/or external advisers where appropriate to discuss on the next steps to take, including any protection concerns and support needs for the survivor and other stakeholders. The person involved should not be implicated or involved in the case in any way.

The Executive Director will do their best to ensure that there are no reprisals, victimisation of the person reporting abuse or dismissal as long as the report was not found to be malicious.

d) Provide support to survivor where needed/requested.

Appropriate support will be provided to survivor(s) of safeguarding incidents as a duty of care even if the report has not yet been investigated. Support could include (but it is not limited to)

- Psychosocial care or counselling
- Medical assistance
- Protection or security assistance (for example being moved to a safe location)



All decision making on support should be agreed to by the survivor.

e) Assess any protection or security risks to stakeholders.

For reports relating to serious incidents: an immediate risk assessment will be undertaken to determine whether there are any current or potential risks to any stakeholders involved in the case and develop a mitigation and communication plan if required. The risk assessment and plan will be updated on a regular basis throughout and after the case as required.

f) Decide on next steps.

The Executive Director decides the next steps. These could be (but are not limited to):

- No further action (for example if there is insufficient information to follow up, or the report refers to incidents outside the organisation's remit)
- Investigation is required to gather further information.
- Including where relevant, organisations (e.g Durrell) or Supervisors of students to participate in enquiry.
- Immediate disciplinary action if no further information needed.
- Referral to relevant authorities.

In any case, the report should go to the Executive Director who will:

- **For Staff with second reporting line:** inform their responsible party to participate in the investigation and decisions.
- **For Staff who are integrated with MWF:** Inform and involve the person's responsible party to agree on appropriate actions.
- **For Associated staff:** Inform and involve the person's responsible party to agree on appropriate actions.
- **For Member of the public:** an internal investigation will be carried out and legal advice sought
- **Inform the President:** so, they have an overview of actions taken and actions to be taken.

If the report concerns associated personnel (contractors, consultants, or suppliers), the decision-making process will be different. Although associated personnel are not staff members, we have a duty of care to protect anyone who comes into contact with any aspect of MWF activities from harm. We cannot follow disciplinary processes with individuals outside our organisation, however decisions may be made for example to terminate a contract with a supplier based on the actions of their staff.

g) Manage investigation if required.

MWF will apply appropriate disciplinary measures to staff or other stakeholders found in breach of policy, provide necessary support to those affected by any harm as well as reinforce its internal policies and procedures to prevent recurrence of such incidents.

If there are legal implications, the Executive Director will consult with an expert and refer the case to the relevant authorities if appropriate.

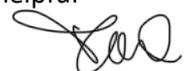
h) Make decision on outcome of investigation report.

The Executive Director decides based on the information provided in the investigation report, in consultation with relevant persons and in accordance with MWF policies and local regulations.

i) Conclude the case.

- Document all decisions made resulting from the case clearly and confidentially.
- Store information relating to the case confidentially, and in line with MWF policy and local laws.

Record and implement any specific improvements or learnings from this case that could be helpful for future.



Internal and Legal References

Associated MWF Policies & Procedures

- MWF Information, Policies and Policies 2025 as MWF Code of Conduct
- Other policies and procedures as appropriate

Relevant definitions, laws and regulations

- A **vulnerable adult** is defined as an individual over the age of 18 who is not able to care for themselves due to physical, mental, or functional disabilities.
- Child Protection Act 30 of 1994 and Children’s Act 2020:
 - **Child** means any unmarried person under the age of 18;
 - **Harm** includes physical, sexual, psychological, emotional, or moral injury, neglect, ill-treatment, impairment of health or development.
- Protection for Elderly Persons Act (2005)
 - Protects persons aged 60+ from abuse/neglect.
- Protection and Promotion of the Rights of Persons with Disabilities Act (2024)
 - A newer law providing rights protections for persons with disabilities, which also addresses vulnerability due to disability.
- Criminal, Domestic Violence and Other Laws
 - Abuse of adults and threats / harassment are covered in various provisions of the **Criminal Code** and **Protection from Domestic Violence Act**.
- Workers Rights Act 2019:
 - **Child** means a person under the age of 16;
 - **Young person** is defined as someone (other than a child) under 18 years of age
- Part II Measures against Discrimination in employment and occupation
(5) In this section – “**discrimination**” includes affording different treatment to – (a) different workers attributable, wholly or mainly, to their respective description by age, race, colour, caste, creed, sex, sexual orientation, HIV status, impairment, marital or family status, pregnancy, religion, political opinion, place of origin, national extraction or social origin, which has the effect of nullifying or impairing equality of opportunity or treatment in employment or occupation;
- Part XI Violence at Work
114. Violence at work (1) No person shall – (a) harass, sexually or otherwise; (b) assault; (c) verbally abuse, swear at or insult or humiliate in any manner whatsoever; (d) express the intention to cause harm to; (e) bully or use threatening behaviour towards; (f) use aggressive gesture indicating intimidation, contempt or disdain towards; or (g) by words or act, hinder, a worker, in the course of or as a result of his work.
(7) In this section –
“**bullying**” includes a pattern of offensive, intimidating, malicious, insulting, or humiliating behaviour or an abuse or misuse of power or authority which attempts to undermine an individual or group of individuals, gradually eroding their confidence and capacity which may cause them to suffer stress.
“**harassment**”, in relation to a worker, includes any unwanted conduct towards the worker, whether verbal, non-verbal, visual, psychological or physical, based on age, impairment, HIV status, domestic circumstances, sex, sexual orientation, race, colour, language, religion, political, trade union or other opinion or belief, national or social origin, association with a minority, birth or other status, which occurs in circumstances where a reasonable person would consider the conduct as harassment of the worker; “verbal abuse” includes screaming, yelling, name calling and making mean and disrespectful remarks with a view to humiliating a person.



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