



# Safeguarding Policy and Procedures

**If you need to report a Safeguarding concern urgently** you can:

- Complete a [Safeguarding Incident Report Form](#)
- Email: [safeguarding@coolearth.org](mailto:safeguarding@coolearth.org) or [salvaguardia@coolearth.org](mailto:salvaguardia@coolearth.org)
- Whatsapp: +51 916612629

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# Scope

This Safeguarding Policy is applicable to all individuals directly associated with, representing or conducting work on behalf of Cool Earth. This includes staff members, employees, consultants, contractors, interns, volunteers, board members, partners, suppliers, journalists, celebrities, and any other person or organisation conducting work on behalf of Cool Earth.

This policy is designed to prevent safeguarding incidents and minimise risks to vulnerable populations caused or initiated by individuals associated with Cool Earth and to protect and provide support to any survivors of or people affected by safeguarding incidents. Survivors and people affected may have no prior connection to Cool Earth and could be members of the general public.

# Policy Statement

Cool Earth is dedicated to strengthening the rights and resilience of Indigenous Peoples and Local Communities (IPLCs) living in rainforests. Cool Earth believes that a child, young person, or adult should never experience abuse of any kind. Protecting their safety and their freedom is integral to our work and our values.

Cool Earth's Safeguarding Policy sets out our commitment to keeping the IPLCs we work and engage with safe from any harm that could be caused by coming into contact with our organisation. This includes potential harm arising from the conduct and behaviour of staff, partners, or affiliates of Cool Earth, or the design and implementation of our programmes and activities.

We maintain a strict zero-tolerance approach towards any attitudes, behaviours or actions that put children, young people or adults at risk of harm. Any safeguarding incidents are considered acts of gross misconduct and may result in disciplinary action such as dismissal or referral to the authorities for legal action.

# What is Safeguarding?

Safeguarding means taking all reasonable and responsible steps to prevent the occurrence of harm that could result from interactions with Cool Earth or its activities; protecting people – especially children, LGBTQIA+, at-risk adults, and those in vulnerable situations – from such harm; and responding appropriately if harm does occur. This includes addressing harm caused by our staff, partners, or affiliates, as well as social risks that may arise indirectly from the design or implementation of our programs, policies, or interventions. Safeguarding extends to mitigating the risk of exacerbating

pre-existing community vulnerabilities or conflicts through our actions, ensuring that human rights are upheld and that our work contributes to well-being, not harm.

## What is harm?

Harm encompasses a wide range of abuses, violations, and infringements that can affect individuals or communities. This includes, but is not limited to:

- Sexual Exploitation, Sexual Abuse, and Sexual Harassment (PSEA/SEAH): Acts of sexual misconduct that exploit power dynamics and violate personal autonomy and dignity.
- Psychological and Emotional Harm: This may include emotional or psychological abuse such as humiliation, persistent criticism, belittlement, shaming, or isolating individuals.
- Physical Abuse and Neglect: Actions that cause physical injury or failure to provide basic needs and care.
- Exploitation and Coercion: Any form of manipulation or pressure that compromises the safety, dignity, or rights of individuals.
- Community-Level Harm: Unintended negative consequences of development work, such as exacerbating existing social tensions, creating power imbalances, or disrupting livelihoods, which can harm community cohesion or individual well-being.
- Infringements on Rights: Any action or omission that violates the fundamental rights of individuals, such as denying freedom, equity, or dignity.

Cool Earth recognises that harm may occur not only through direct misconduct by our staff or affiliates but also through designs in our programmes, policies, or partnerships that create unintended safeguarding risks. Our safeguarding approach aims to address potential risks proactively and to strengthen resilience and rights within the communities we work with.

## Limitations

Incidents of abuse, bullying, harassment or other concerns of harm occurring in the wider community that are not directly caused by individuals associated with Cool Earth fall outside the direct scope of this Policy. However, we are committed to acting with care and responsibility. This includes signposting survivors and people affected to other organisations and support services that can provide appropriate assistance.

Cool Earth recognises its responsibility to consider the broader context of harm within the communities we work with: As an external organisation providing resources to IPLCs and not owned or fully led by the communities that we support, there could occasionally be unintended consequences of our presence and operations that have the ability to cause harm. While we are committed to doing everything we can to prevent and mitigate this, we acknowledge that they could occur despite our best efforts. As an organisation we

have to assess the risks of this happening and, in some cases, may face difficult decisions to withdraw from partnerships or projects (following an ethical exit strategy) if the risks of exacerbating harm or vulnerabilities are too high.

## Raising a Safeguarding Concern or Reporting a Safeguarding Incident

**IMPORTANT:** In case of emergency, crime, or imminent danger or threat, you should contact emergency services, police or law enforcement if you feel safe to do so.

There are several ways to report<sup>1</sup> a safeguarding concern to Cool Earth:

- By email to [safeguarding@coolearth.org](mailto:safeguarding@coolearth.org) (English) or [salvaguardia@coolearth.org](mailto:salvaguardia@coolearth.org) (Spanish)
- By Whatsapp on +51 916612629 (Spanish or English)
- By completing the [Safeguarding Incident Report Form](#) on the Cool Earth website
- By contacting Cool Earth on +44 1326 536 136 and asking to speak to the Safeguarding Lead or a Safeguarding Officer.
- By speaking in person to a Safeguarding Focal Point or Designated Safeguarding Officer.

Further details on staff and representatives who have safeguarding roles, and their responsibilities, can be found on pages 9-12.

When reporting a concern, the following information should be detailed where possible:

- Name and contact details of person making report
- Name(s) of alleged survivor(s) / person(s) affected by safeguarding incident(s), if different from above;
- Name(s) of alleged perpetrator(s);
- Description of incident(s);
- Date(s), time(s) and location(s) of incident(s).
- If you would like to receive information on the outcome of an investigation into the reported concern then please indicate and make sure you have provided contact details.

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<sup>1</sup> While the word “report” is used throughout here, this can refer to raising a concern, generating an alert, or verbally reporting an incident. The word “report” does not automatically mean completing a formal report.

Providing any personal details is optional. Providing contact details (for example, a phone number or an anonymised email address) may be beneficial in case Cool Earth needs to seek further details as part of an investigation.

## Receiving a Report

Survivors or people affected may choose not to report incidents through the means stated above. Reports can be received through various other means, including formal written reports, complaints mechanisms, informal reports through Whatsapp or social media, or direct disclosures made to staff members.

If a report is received by a staff member, it should be passed on to a Safeguarding Officer as soon as possible (ideally within 24 hours).

**IMPORTANT:** In case of emergency, crime, or imminent danger or threat, the staff member who received the report should inform a Safeguarding Officer immediately in case the incident needs emergency services.

## Reporting Process

Any staff member who is informed of a safeguarding concern is responsible for completing a safeguarding incident report by:

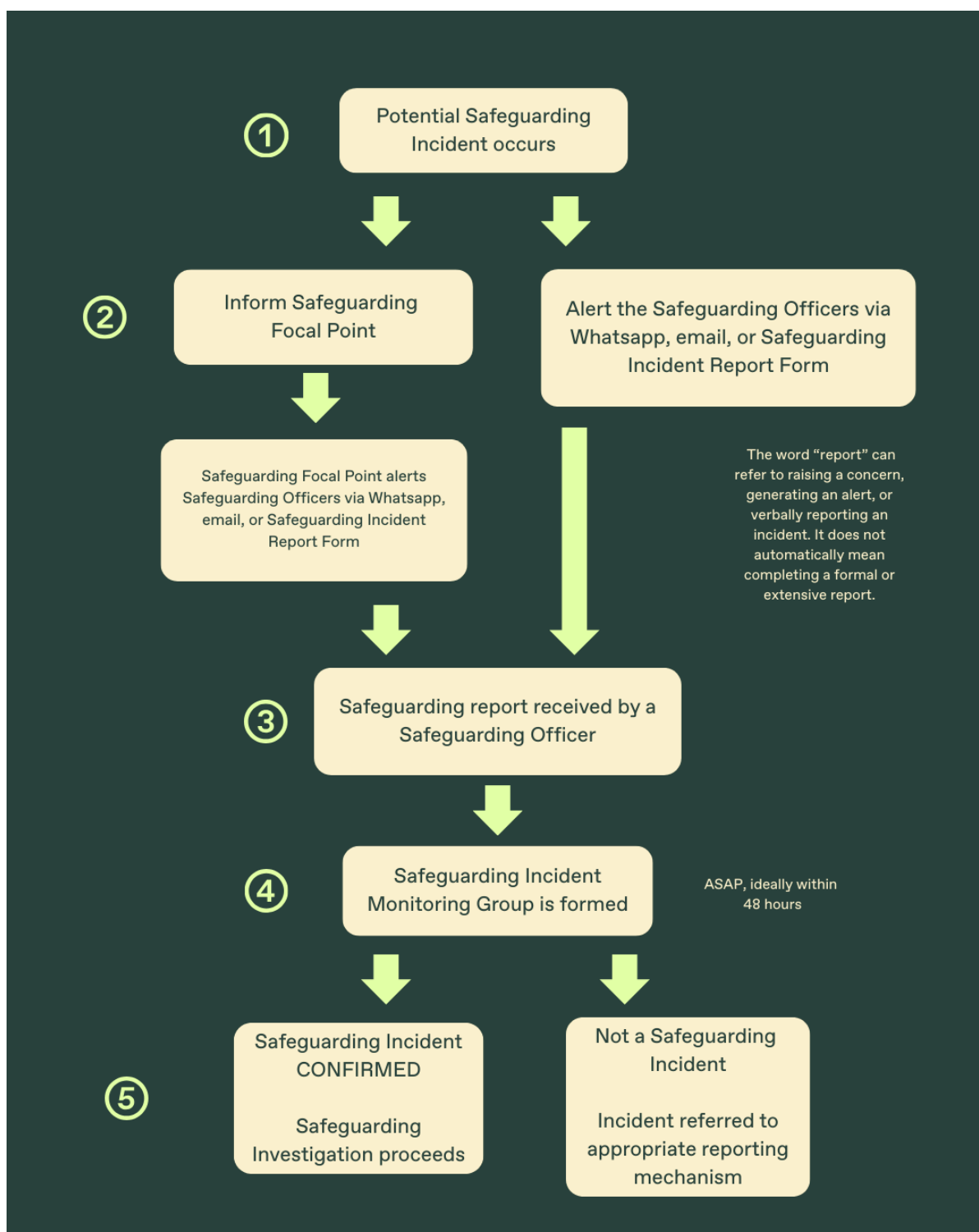
- Submitting the [Safeguarding Incident Report Form](#), or
- Sending details of the concern by email to [safeguarding@coolearth.org](mailto:safeguarding@coolearth.org) or [salvaguardia@coolearth.org](mailto:salvaguardia@coolearth.org)

The report will then be reviewed by the Safeguarding Officers who will agree to the formation of a Safeguarding Incident Monitoring Group.

If there are any concerns that a Safeguarding Officer may be implicated in the incident or might not act objectively, it is advised to report the safeguarding incident directly to another person within Cool Earth with a safeguarding role, to a member of the Senior Leadership Team, or to your line manager.

The Safeguarding Incident Monitoring Group will form within 48 hours of receiving a report to determine whether they believe a safeguarding incident has occurred and whether an investigation is warranted.

Further details on staff and representatives who have safeguarding roles, and their responsibilities, can be found on pages 9-13.



Confidentiality

Maintaining confidentiality throughout safeguarding procedures is crucial. This means sharing information only with those who need to know. Cool Earth will always look to ensure that persons affected will have control over the disclosure of their case.

Individuals reporting safeguarding concerns will receive minimal information following the submission of a report to protect confidentiality. It's essential that they refrain from discussing their suspicions with others or conducting further investigations, as this could hinder the process and cause distress or harm to survivors, persons affected, or individuals wrongly accused.

## Investigations

Once a safeguarding incident has been confirmed, the Safeguarding Incident Monitoring Group will decide whether it can be investigated internally or whether an external investigator is required. This will depend on the severity or scale of the incident.

Any incident involving the Safeguarding Lead, Director and/or Board members should be investigated by external investigators.

The purpose of an investigation is to:

- Protect individuals from abuse or exploitation
- Determine if a staff member or any individual associated with Cool Earth has breached the Safeguarding or any other policies
- Identify any organisational failings or shortcomings
- Highlight aspects of programme delivery that may elevate risks of abuse or exploitation by staff
- Make recommendations for appropriate responses to incidents
- Identify and action any organisational learnings and required change

Throughout the process, the safety of everyone involved – including the survivor/person(s) affected, the subject of the complaint, and any other individuals – will remain the priority.

## Investigation process

The investigation process involves:

1. Planning and preparation
  - a. Appoint the Investigation Lead (usually the Safeguarding Lead)
  - b. Establish Terms of Reference
  - c. Determine whether an external investigation team needs to be appointed
  - d. Determine who needs to be made aware of the incident, and inform them



- e. Determine who should be called to an investigation meeting
- f. Determine what evidence should be gathered, and how\*

\*when a translator is required for the investigation, where possible use someone from outside the community to ensure confidentiality.

## 2. Investigation

- a. Gather evidence
  - i. Witness statements (where possible)
  - ii. Written records or other relevant documents
  - iii. Physical or recorded evidence
- b. Carry out investigation meeting(s)
  - i. Determine which questions should be asked
  - ii. Agree who can accompany the witness

## 3. Reporting the investigation findings

- a. Write an investigation report
  - i. Decide on outcomes
  - ii. Recommend actions and learnings
  - iii. Anonymise the report
- b. Submit the investigation report to decision-makers
  - i. The Director and one other member of SLT who was not involved
  - ii. Depending on the scope and scale this may be taken to the Board
  - iii. Provide information to those affected on the outcome of the investigation. Ensuring this is done in a way that is sensitive to the culture of those affected.

The length of time the investigation process takes will depend on the context and severity of the incident and the accessibility of witnesses, evidence and information. An expected time frame should be agreed by the Safeguarding Incident Monitoring Group and communicated to key stakeholders including the person affected, if possible.

# Decisions and outcomes

Anonymised investigation reports are submitted to a Decision-Making Group - this is comprised of the Director and at least one other member of SLT who was not involved in the investigation process.

The decision-making group will review the investigation report, findings and recommendations and will make a decision regarding outcomes such as disciplinary action or referral to authorities.

The length of time it takes to make a decision will depend on the severity and scale of the incident but the decision-making group should aim to make a decision within two weeks of receiving the investigation report.

Any serious incidents will be reported to the [Charity Commission](#) in the UK

## Supporting survivors and people affected by incidents

Cool Earth strives to protect and support survivors of and people affected by safeguarding incidents.

It is important that any course of action following an investigation is not forced on a survivor. Reporting a safeguarding incident to the police could pose serious risk for a survivor and there could be enormous repercussions. Survivors can also experience emotional, financial and logistical challenges due to the reporting of a safeguarding incident.

Every effort will be made to facilitate access to services to support survivors, including:

- medical and psychological support
- transportation to appointments
- accompaniment to meetings
- translation or interpretation services
- childcare during appointments or meetings that have occurred as a result of a safeguarding incident

and signposting to local support mechanisms.

## Roles and responsibilities

While full compliance with the Safeguarding Policy is a fundamental requirement for all staff and individuals conducting work on behalf of Cool Earth, specific individuals or groups of individuals have been allocated additional responsibilities beyond simply adhering to the policy.

### **1. Safeguarding Trustee**

The Safeguarding Trustee is a volunteer from the Board of Trustees who has or is willing to learn skills, experience and confidence in the area of safeguarding. Their role is a strategic, advisory and governance role rather than operational. They must work with the Director and the Safeguarding Lead to ensure the Safeguarding Policy and Procedures

are being followed and what is put in place is creating a safer culture and keeping people safe.

The Safeguarding Trustee communicates regularly with the Safeguarding Lead and will work with the Chair, Director, designated Safeguarding Lead and communications team in order to manage all serious safeguarding cases.

The Safeguarding Trustee is: *Mark Ellingham, Trustee.*

## **2. Safeguarding Lead**

The Safeguarding Lead is a senior employee who is responsible for day-to-day operation of Safeguarding, ensuring policies and procedures are adhered to, and ensuring any safeguarding incidents that are reported are investigated appropriately. Their role includes:

- Oversight and management of the Safeguarding Incident Monitoring Group
- Managing the investigation of any safeguarding incidents that are reported
- Advising and updating the Safeguarding Trustee
- Regularly reviewing policies and procedures
- Working with Safeguarding Focal Points and the Operations team to ensure training is carried out

While they oversee and manage safeguarding, they rely on the advice and information given to them by the other Safeguarding Officers and Focal Points, the Safeguarding Incident Monitoring Group, and guidance from the Trustee Lead.

If the Safeguarding Lead is involved in a safeguarding incident that arises, the Director and/or another SLT member will take on the role of Safeguarding Lead.

The Safeguarding Lead is: *Sophie Kisnorbo, Head of Operations.*

## **3. Safeguarding Officers**

There are at least six Safeguarding Officers at Cool Earth who have received safeguarding training. Their representation includes managers from each country Cool Earth operates in and at least two Spanish speakers.

Safeguarding Officers are responsible for monitoring the safeguarding reporting mechanisms (such as [safeguarding@coolearth.org](mailto:safeguarding@coolearth.org) inbox, Whatsapp) and ensuring any safeguarding concerns are responded to and managed in line with the requirements of the Safeguarding Policy.

#### **4. Safeguarding Incident Monitoring Group**

In the event of a safeguarding incident, a Safeguarding Incident Monitoring Group will form within 48 hours to decide on next steps.

The Safeguarding Incident Monitoring Group is comprised of:

- Safeguarding Lead
- Safeguarding Officers from the relevant country
- Head of Programmes

The Safeguarding Incident Monitoring Group will manage the investigation of any confirmed safeguarding incidents.

The Safeguarding Officers may wish to include additional staff members if a safeguarding incident took place within their area of responsibility, or if they have played a key role in the reporting or communication surrounding the incident. This will be assessed on a case by case basis to ensure there is no risk of potential bias or perceived lack of objectivity.

#### **5. Safeguarding Focal Points**

Safeguarding Focal Points are key individuals across Cool Earth's Programmes team who are regularly present in the field, who would be recognisable to community partners, and who can communicate with the Safeguarding Lead and Safeguarding Officers.

Upon being informed of a safeguarding concern, a Safeguarding Focal Point must complete a Safeguarding Incident Report form and submit it accordingly.



## 6. Operations Team

Alongside the Safeguarding Lead, the Operations Team is responsible for ensuring:

- This policy is distributed to new staff during their induction and new staff sign a statement confirming their understanding of and compliance with the policy

- Annual refresher training sessions are conducted, with the help of the Programmes team where relevant, for all Cool Earth staff
- This policy is distributed to consultants, contractors, and other individuals carrying out work on behalf of Cool Earth

## **7. Head of Programmes**

The Head of Programmes is responsible for ensuring:

- Safeguarding is integrated into programme design and implementation
- Annual refresher training sessions are conducted, with the help of the Operations team where relevant, for all Cool Earth staff
- Programme Partners have their own Safeguarding Policy and processes (NGOs, government organisations, businesses) and/or are aligned with those of Cool Earth (Indigenous communities and associations)

## **8. All Team Members**

All team members must:

- Undertake Safeguarding training as directed by the Operations team
- Understand the concept of safeguarding, including resources available for identification and reporting
- Comprehend Cool Earth's zero-tolerance stance toward safeguarding incidents and the serious repercussions of involvement
- Report any potential incidents or concerns they witness, become aware of, or suspect within 24 hours
- Intentional failure to report such incidents is considered gross misconduct and will result in disciplinary action.

# Mandatory Obligations

## Obligation to Raise a Concern

All Cool Earth staff, consultants, contractors, partners and representatives are obligated to report any potential safeguarding concern they witness, suspect, or are made aware of as soon as possible. Failure of staff to do so will be considered gross misconduct and will result in disciplinary action. Failure of partners and other representatives to do so could result in the termination of their contract, partnership or affiliation with Cool Earth.

## Code of Conduct

The Code of Conduct is a key pillar of Cool Earth's safeguarding.

All staff, consultants, contractors, interns and volunteers are required to read and sign the Cool Earth Code of Conduct before commencing work with Cool Earth and annually thereafter. The Code of Conduct outlines the expected behaviours for all individuals associated with Cool Earth.

Breaches of the Code of Conduct may result in disciplinary action such as dismissal, termination of employment or referral to the authorities for legal action.

## Preventative Measures

There are various preventative measures Cool Earth takes to avoid safeguarding risks.

## Safe Recruitment and Onboarding Practices

Ensuring safe recruitment is one of the key areas of Safeguarding. Recruitment practices must aim to avoid hiring individuals who may pose a safeguarding risk.

Cool Earth is an implementing organisation of the Inter-Agency Misconduct Disclosure Scheme (MDS). The purpose of this scheme is to establish a minimum standard for humanitarian, development and other civil society organisations to share information as part of their recruitment process about people who have been found to have committed Misconduct.

A minimum of two references from previous employers and/or academic supervisors are obtained for a potential staff member. These reference checks include a set of safeguarding questions MDS members must use to conduct reference checks for all their new hires.

Criminal background checks are often unavailable, unreliable or of limited value in the countries we operate in, with the exception of the UK where Cool Earth does not operate programmes or work with at-risk groups. Additional references are therefore requested when appropriate.

Cool Earth's Safeguarding Policy is clearly communicated on the website where job advertisements are displayed. Additionally, interviewees for roles involving any contact with at-risk groups should be asked about their approach to safeguarding during the interview process.

Cool Earth's zero-tolerance stance on safeguarding incidents is incorporated into all contracts for staff, interns, consultants, and contractors. Our safeguarding expectations are also stipulated in all contracts with programme partners and other stakeholders.

As part of the onboarding process, all staff and consultants undergo a safeguarding induction and training. Additionally, individuals with safeguarding responsibilities are required to undertake more comprehensive safeguarding training. Annual refresher training will be provided to all team members.

## Ethical Collection and Use of Content

The portrayal of people in communication materials, including the gathering and use of images, can potentially cause harm or offence if they perpetuate negative stereotypes or fail to depict people with authenticity, dignity, and respect. Cool Earth prioritises safeguarding in its use of images, as per the [BOND Ethical Guidelines for the Collection and Use of Content](#).

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## Appendix 1: Associated Policies

The following policies are associated to or relevant to the Safeguarding Policy and can be found either on the Cool Earth website or, if an internal policy, in the Staff Handbook. This list is not exhaustive.

- Code of Conduct
- Prevention of Sexual Exploitation and Abuse Policy
- Whistleblowing Policy
- Complaints Policy
- Data Protection Policy

## Appendix 2: Definitions and terminology

There are terms used throughout this policy to describe or categorise individuals or organisations. They are defined as follows:



**Safeguarding:** Safeguarding means taking all reasonable and responsible steps to prevent the occurrence of harm that arises from coming into contact with our organisation; to protect people, especially children and at-risk adults, from that harm; and responding appropriately if and when harm does occur.

**Cool Earth:** Its staff and representatives, activities, programmes, publications, campaigns, operations and infrastructure.

**Community Partner** *[Can also be referred to as participant and/or beneficiary of assistance]:* Any individual or group of individuals who receive or benefit from (directly or otherwise) the activities and services managed by Cool Earth, or who comes into contact (directly or indirectly) with Cool Earth staff, representatives, affiliates or activities.

**Indigenous Peoples and Local Communities (IPLCs):** refer to distinct groups with deep historical connections to specific territories and ecosystems. These groups often possess unique cultural, social, economic, and political identities, shaped by their interactions with their environments over generations. IPLCs typically have traditional knowledge systems, customary practices, and governance structures that are integral to their ways of life and sustainable management of natural resources. They are often recognized for their contributions to biodiversity conservation, ecosystem resilience, and the maintenance of cultural diversity.

**LGBTQIA+:** is an inclusive term that includes people of all genders and sexualities, such as lesbian, gay, bisexual, transgender, questioning, queer, intersex, asexual, pansexual, and allies. While each letter in LGBTQIA+ stands for a specific group of people, the term encompasses the entire spectrum of gender fluidity and sexual identities.

**Harm:** Harm can include Sexual Exploitation, Sexual Abuse and Sexual Harassment (PSEA/SEAH) as well as any psychological and physical abuse, exploitation, neglect, coercion and any other infringement of an individual's rights.

**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.

**Sexual Exploitation:** The term sexual exploitation means any actual or attempted abuse of 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 includes activities like transactional sex, solicitation of such acts, and exploitative relationships.

Cool Earth regards any form of compensation (monetary or otherwise) in exchange for sexual services, including transactions with sex workers, as a form of sexual exploitation and a violation of this policy, irrespective of the legality of prostitution or payment for sex in the relevant context. Any staff member, partner, or supplier engaging in Cool Earth activities or representing the organisation, and paying for sex or sexual activities while they are engaged or representing the charity in any way, will be subject to investigative and disciplinary procedures.

**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. It covers acts such as sexual assault (attempted rape, unwanted kissing/touching, coercion into performing oral sex or touching) in addition to rape.

While the age of consent varies between countries that Cool Earth operates in, any sexual activity involving a child under 18 years of age is considered sexual abuse according to UN regulations. Our policy is to abide by the UN regulations, therefore any incidents of sexual abuse involving a person under 18 years of age will be subject to investigative and disciplinary procedures.

**Sexual Harassment:** The term sexual harassment means any unwelcome sexual behaviour that might offend, intimidate or humiliate another person, irrespective of their gender or sexual identity. This can include unwanted physical contact or touching, staring at someone or specific parts of their body, discussing one's own sex life, asking about someone else's sex life, making sexual jokes or advances, and sending sexually offensive messages through various communication channels (phone, text, Whatsapp, email, or social media).

It's important to note that sexual harassment need not be repetitive or continuous to be prohibited, and the recipient does not have to explicitly state that the behaviour is unwelcome for it to be considered harassment.

**Child:** A person below the age of 18.

**Young person:** We define young people as those aged 15-24, while acknowledging that definitions can change between countries and cultural contexts. This age category also sits in either 'child' or 'adult' depending on whether they are under or over 18 years.

**Adult:** A person age 18 or over.

**Partner:** Any institution or entity that enters into a formal cooperation arrangement with Cool Earth, and is provided with financial, advisory, material and/or capacity building

support (for example through a grant) to conduct pre-agreed activities with, or on behalf of, Cool Earth.

**Representatives:** Any individual who directly represents Cool Earth, including those who may not be employed by Cool Earth, including but not limited to trustees, ambassadors and volunteers.

**Staff:** Any individual who is under a contract of employment with Cool Earth.

**Supplier:** Any individual, group, firm or organisation contracted by Cool Earth to provide a service to Cool Earth including consultants.

**Survivor:** *[Can also be referred to as **victim** or **person affected**]* The person who has been abused or exploited. The term ‘person affected’ is preferential, followed by ‘survivor’, as it implies resilience and strength, but it is the individual’s choice how they wish to identify.

**At-risk adult or population:** *[Can also be referred to as **vulnerable adult** or **vulnerable population**.]* A person or group who has needs for care and support, who is experiencing, or at risk of, abuse or neglect and as a result of their care needs, is unable to protect themselves against harm or exploitation. For Cool Earth this includes many of the adults or people we work with, as IPLCs are often at risk due to the marginalisation they suffer and the lack of access they have to decision-making, grants and wider support.

**Charity Commission.** The [Charity Commission](#) is the regulator of charities in the UK. When there are incidents of serious malpractice or misconduct the Trustees have a duty to report them to the Charity Commission.