



Safeguarding Policy

April 2026



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Why we have a corporate policy on safeguarding of children and vulnerable adults

Windracers designs, builds and operates cargo drones.

Our work does not ordinarily entail working directly with children and vulnerable adults.

We may come into contact with children, vulnerable adults and/or situations where there's significant imbalance of power and/or economic situation, and therefore this policy exists to reinforce expectations of behaviour, irrespective of what local laws or customs may permit.

It sets out how colleagues will behave, and what they will look out for.

We are doing this as a matter of:

- proactively ensuring that our work should help not harm and should deliver for the poor and most vulnerable
- responding to the proper norms and expectations of the humanitarian, global development and security sectors
- responding to specific historic vulnerabilities of the aviation and humanitarian sectors

We treat safeguarding seriously; we take a zero-tolerance approach: see section below on how we use that approach to drive good conduct, and comprehensive reporting.

Definitions

In this policy, the following terms have the meanings set out below.

Child - Any person under the age of 18.

Vulnerable adult - Any person aged 18 or over who, by reason of mental or physical disability, age, illness, conflict, displacement, or economic circumstances, may be unable to protect themselves against abuse, harm, or exploitation. For the purposes of this policy,



context is relevant: individuals who would not ordinarily be considered vulnerable may be so in the humanitarian or conflict-affected contexts in which Windracers operate.

Humanitarian context operations - Windracers' operations conducted in fragile, conflict-affected, or humanitarian response context in which Windracers operates from time to time.

Safeguarding - The measures taken to protect the health, wellbeing, and human rights of individuals — particularly children and vulnerable adults — enabling them to live free from abuse, harm, and exploitation.

Beneficiaries - Individuals or communities who receive humanitarian or global development assistance in the context of operations in which Windracers participate.

Who this policy applies to, and when

This policy and its successors apply to all Windracers team members, whatever their employment status (permanent, contractor, etc), working for or representing Windracers on humanitarian context operations.

It applies to all circumstances in which colleagues could be reasonably perceived as representing the company: this can include both on- and off-duty time in countries in which we work.

Reporting concerns – expectation and reporting path

Windracers team members are expected to report any behaviour by Windracers team members which doesn't match this policy.

Safeguarding concerns can be reported to your line manager, who will pass them to the Safeguarding Focal Point, or direct to the Safeguarding Focal Point.

Windracers team members are **also** expected to report any safeguarding concerns they may encounter in the course of their work. Again, our work does not ordinarily entail working directly with children and vulnerable adults – but if, for example at a drop or delivery site, something doesn't seem right, team members should report it.

Team members who raise concerns in good faith will not suffer any detriment as a result. See Section 7 (Non-retaliation and whistleblower protection) for further detail.

The Safeguarding Focal Point will acknowledge receipt of any concern within five working days of receiving it and will provide an update on triage within 10 working days where practicable.

Safeguarding focal point and reporting chain

A safeguarding focal point will be appointed and receive proportionate training for that role. They will be expected to receive safeguarding concerns, and for basic triage of them. They will not be expected to conduct safeguarding investigations: if any are required, specialist consultancy will be bought in.

A safeguarding@windracers.com inbox, which will be publicised on the Windracers website, will feed to them, so that externals with concerns can report.

The current safeguarding focal point is Andrea Pouncefort, People Director (apouncefort@windracers.com).



The safeguarding focal point will have a direct line of reporting, in regard to safeguarding, to the CEO and/or Chair. They will make a summary report to each Board meeting of any safeguarding issues that have arisen in the proceeding period, how they were resolved, and of any outstanding issues.

Escalation where the focal point is implicated: If a concern relates to the Safeguarding Focal Point themselves, or to a person to whom the Safeguarding Focal Point reports, the concern must be raised directly with the CEO and/or Chair. Contact details for the CEO and Chair are available from Windracers' internal directory. In such cases, the CEO and/or Chair will assume the triage and oversight function for that concern and may engage external specialist support as appropriate.

Recruitment

Windracers is vetting all new starters to the BPSS standard, this includes Disclosure and Barring Service (DBS) checks. This standard is also being rolled out to all existing colleagues in two waves.

Non-retaliation and whistleblower protection

Windracer is committed to ensuring that team members who raise safeguarding concerns in good faith are not subjected to any detriment as a result. This applies whether the concern relates to the conduct of a colleague, a third party, or a situation encountered in the course of work.

Retaliation against any person who raises a safeguarding concern, makes a report, participates in a safeguarding process, or supports another person in doing so, is a serious disciplinary matter and may result in disciplinary action up to and including dismissal.

A concern raised in good faith will not lead to any disciplinary action against the person raising it, even if the concern is not upheld on investigation, provided the concern was raised honestly and not maliciously.

Team members who raise safeguarding concerns in good faith may be entitled to protection as whistleblowers under the Employment Rights Act 1996 (as amended). This policy does not limit or replace those statutory protections.

Any team member who believes they have suffered a detriment as a result of raising a safeguarding concern should report this to the People Director in the first instance, or, if the People Director is involved in the concern, directly to the CEO.

Team member responsibilities

As above, **even though** our work does not ordinarily entail working directly with children and vulnerable adults, we are setting out how colleagues will behave, and what they will look out for.

Colleagues involved in humanitarian context operations must not:

- Engage in sexual activity with anyone under the age of 18
- 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
- Sexually abuse or exploit vulnerable adults
- Subject a vulnerable adult to physical, emotional or psychological abuse, or neglect
- Exchange money, employment, goods or services for sexual activity. This includes any exchange of assistance that is due to beneficiaries of humanitarian or global development assistance
- Engage in any sexual relationships with beneficiaries of humanitarian or global development assistance, since they are based on inherently unequal power dynamics
- Develop inappropriate relationships with children, young people or vulnerable adults

While colleagues are not expected to have any expertise in identifying safeguarding concerns, they are expected, if they observe or have reason to suspect any of these behaviours in the course of their work at Windracers – whether by a Windracers team member or anyone else – to report them to the safeguarding focal point.

External access to report concerns

It is normative in humanitarian, global development and social sectors that people external to the organisation must be able to report concerns freely, confidentially, and with confidence about how they will be dealt with.

Contacts for the Safeguarding focal point and this Safeguarding policy will be advertised on the Windracers website.

Zero tolerance

It is normative in humanitarian, global development and social sectors that a zero tolerance approach is taken with regard to safeguarding and ethics and conduct. This is also consistent with the approach Windracers takes to safety through its Safety Management System.

The logic of a 'zero tolerance' approach is that:

- What gets measured, gets managed
- Prompt follow-up of any smaller incidents stops problematic behaviours or approaches before they become bigger
- An open and comprehensive approach creates better understanding of any problematic behaviours and approaches

An unintended consequence of zero tolerance approaches can be a reluctance to report. We therefore apply 'no blame' culture where reports are promptly, fully, and honestly made, for both incidents and near-misses.

The company seeks to provide a structured and comprehensive process to receive and follow up on reports to allow them to be handled fairly; this is intended to provide a positive incentive to report.

Response to concerns and investigations

On receipt of a safeguarding concern, the Safeguarding Focal Point will carry out an initial triage to assess whether:

- there is an immediate risk of harm requiring urgent action, including referral to local emergency services or law enforcement.
- the concern should be referred to authorities (such as police, local authority safeguarding teams, or relevant authorities in the country of operation); or
- an internal investigation is required.

Referral to authorities: Where there are reasonable grounds to believe that a criminal offence has been committed, or that a child or vulnerable adult is at immediate risk of harm, Windracers will make appropriate referrals to authorities without delay. Windracers will cooperate fully with any subsequent investigation.

Interim protective measures: Where a concern is raised against a Windracers team member, Windracers may, where appropriate and proportionate, take precautionary measures pending investigation, including suspension from relevant duties or redeployment away from the relevant context. Any such measures are precautionary, not disciplinary, and do not constitute an assumption of guilt.

Investigation process: Where an internal investigation is required, specialist consultancy will be engaged (if required). Any investigation will be conducted fairly and in accordance with Windracers's disciplinary policy. The subject of any allegation will be informed of the concern at an appropriate stage in the process and will have a reasonable opportunity to respond. A specialist consultancy will be engaged where appropriate.

Support for those who have experienced harm: Windracers will, where possible, take reasonable steps to ensure that anyone who has experienced harm is treated with dignity and sensitivity, and is signposted towards appropriate support services.

Data protection

Safeguarding concerns and related information constitute sensitive personal data (special category data) for the purposes of the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. Such information will be:

- held securely and accessed only by those with a legitimate need to know in connection with the safeguarding process.

processed only for the purposes of safeguarding, related investigations, and associated reporting obligations; A safeguarding@windracers.com inbox, which will be publicised on the Windracers website, will feed to them, so that externals with concerns can report.



- retained only for as long as is necessary for those purposes, in accordance with Windracers’s data retention policies; and
- handled in accordance with Windracers’s data protection policy.

Where safeguarding concerns involve the personal data of individuals in third countries, Windracers will comply with applicable requirements regarding international data transfers under UK GDPR.

Where a safeguarding concern leads to a referral to authorities or other third parties, only information strictly necessary for that purpose will be shared.

Policy governance and review

This policy will be reviewed at least annually from the date of approval, and in any event following any significant safeguarding incident or material change in Windracers’s operations or the contexts in which it works.

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