



SAFEGUARDING POLICY

Context

Compassion UK (CUK) believes that everyone who comes into contact with the organisation has the right to be protected from all forms of harm, abuse, neglect and exploitation. CUK is committed to:

- protecting people, particularly children, at risk adults and beneficiaries of Compassion's programme, from any harm, including harm arising from the conduct of employees or associated personnel.
- upholding high standards of accountability and transparency to ensure slavery and human trafficking is not taking place within our organisation or our supply chains.

Purpose

This policy sets out the commitments made by CUK and informs employees and associated personnel of their responsibilities in relation to safeguarding. It aims to address child safeguarding, adult safeguarding, protection from sexual exploitation, abuse, slavery and human trafficking. These key areas of safeguarding may have different policies and procedures associated with them (*see Associated Policies table below*).

This policy does not cover the other safeguarding issues which include:

- Sexual harassment in the workplace, which is dealt with under CUK's '**Anti-Harassment & Anti-Bullying and Policy**'.
- Child protection in terms of Compassion's beneficiaries, which is covered by CUK's '**Child Protection Management Policy**'.
- The design and implementation of Compassion's programme and activities which is covered by Compassion International's Global Programme.
- Safeguarding concerns in the wider community not perpetrated by CUK or its employees and associated personnel.

Scope

This policy applies to all CUK employees and associated personnel, i.e. volunteers, trustees, ambassadors, independent contractors, and to third party organisations and suppliers working on its behalf. To facilitate the reading of this policy, the term 'employees' has been used with the intention of covering all the individuals mentioned.

Definitions

At risk adult	A person who is or may be in need of care by reason of mental or other disability, age, illness or in vulnerable circumstances; and who is or may be unable to take care of him or herself, or unable to protect him/herself against significant harm or exploitation.
Beneficiary	Someone who directly benefits from Compassion's programme.

Child	A person below the age of 18.
Harm	Psychological*, physical and any other infringement of an individual's rights. <i>*Emotional or psychological abuse, including (but not limited to) humiliating and degrading treatment such as bad name calling, constant criticism, belittling and persistent shaming</i>
Human Trafficking	The process of trapping people through the use of violence, deception or coercion and exploiting them for financial or personal gain.
Modern Slavery	The recruitment, movement, harbouring or receiving of children, women or men through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation. It is a crime under the Modern Slavery Act 2015 and includes holding a person in a position of slavery, servitude forced or compulsory labour, or facilitating their travel with the intention of exploiting them soon after
Protection from Sexual Exploitation and Abuse (PSEA)	The term derives from the United Nations Secretary General's Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse (ST/SGB/2003/13). It is used by the humanitarian and development community to refer to the prevention of sexual exploitation and abuse of affected populations by employees or associated personnel.
Safeguarding	Taking all reasonable steps to prevent harm, particularly sexual exploitation, abuse and harassment from occurring; to protect people, especially vulnerable adults and children, from that harm; and to respond appropriately when harm does occur.
Sexual abuse	The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.
Sexual exploitation	Any actual or attempted abuse of a 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 definition includes human trafficking and modern slavery.
Survivor	The person who has been abused or exploited. The term 'survivor' is often used in preference to 'victim' as it implies strength, resilience and the capacity to survive.

Risk Assessment

CUK's workforce consists of employees, casual workers, apprentices, volunteers and independent contractors who are responsible for upholding safeguarding measures. CUK employees and associated personnel come into contact with children, young people and vulnerable adults through:

- Engaging in the advancement of the Christian faith to congregations which have children and vulnerable persons present at the church services and Christian events
- Communication and interactions through our Engagement Centre
- Access to beneficiary personal data.
- Correspondence with children through the child sponsorship programme.
- Visits to Compassion's projects overseas.

CUK conducts business with a range of partners, suppliers and contractors including in some of the neediest countries in the work with increased risk of labour exploitation and child protection issues.

Guiding Principles for Safeguarding

CUK will not tolerate abuse and exploitation by its employees or associated personnel. It commits to addressing safeguarding throughout its work, through the three pillars of **prevention, reporting and response**.

Prevention

CUK's responsibilities:

CUK will:

- Ensure all employees have access to, are familiar with, and know their responsibilities within this policy;
- Design and undertake all its activities in a way that protects people from any risk of harm that may arise from their coming into contact with the organization;
- Implement stringent safeguarding procedures when recruiting, managing and deploying employees and associated personnel. The safer recruitment, selection and vetting procedures are outlined in CUK's '**Recruitment and Selection Policy**', '**Policy on Engaging People with a Criminal Record**' and '**Child Protection Strategy**;
- Ensure employees receive training on safeguarding at a level commensurate with their role in the organization;
- Follow up on reports of safeguarding concerns promptly and according to due process.
- Maintain full control over recruitment processes of its employees.
- Maintain a work environment that is safe, healthy and free from unlawful discrimination.
- Pay its employees at or above the living wage and conduct annual review of pay scales.
- Comply with minimum age laws.
- Ensure working hours are not excessive
- Take a risk-based approach to conducting proportional due diligence checks in the contract management processes and keeping these under review.

Employee and associated personnel responsibilities:

Child safeguarding

CUK employees and associated personnel must commit to fully abide by all elements of Compassion International's '**Code of Conduct on Child Protection**' which includes the commitment not to:

- Engage in sexual/sexually suggestive behaviour with any child under age 18, regardless of the legal age of consent;
- Condone or participate in illegal, unsafe or abusive behaviour of any child, including exploitation, trafficking, harmful traditional practices, and spiritual or ritualistic abuse;

Adult safeguarding

CUK employees and associated personnel must not:

- Sexually abuse or exploit at risk adults;
- Subject an at-risk adult to physical, emotional or psychological abuse, or neglect.

Protection from sexual exploitation and abuse

CUK employees and associated personnel must not:

- Engage in transactional sex which includes exchange of money, employment, goods and services for sex or sexual favours
- Solicit a romantic/dating relationship and will never engage in sexual/sexually suggestive behaviour with any beneficiary, regardless of age.

Additionally, CUK employees 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 CUK employee or associated personnel in accordance with CUK's '**Whistleblowing Policy & Procedure**'.

Protection from modern slavery and human trafficking

CUK employees and associated personnel are obliged to:

- Submit evidence of 'Right to Work' under the requirements of the Immigration, Asylum and Nationality Act 2006
- Know and understand organisational procedures to prevent modern slavery and human trafficking.
- Report any risks, concerns or suspicions regarding modern slavery and human trafficking violations by a CUK employee or associated personnel in accordance with CUK's '**Whistleblowing Policy & Procedure**'

Reporting

CUK will ensure that safe, appropriate, accessible means of reporting safeguarding concerns are made available to all, including members of the public. Clear procedures are also implemented for reporting concerns to statutory agencies that need to know.

CUK employees receive training on the definition of abuse and maltreatment, and the different categories of abuse which constitute all forms of physical and/or emotional ill treatment, sexual abuse, neglect, negligent treatment, commercial or other exploitation that result in actual or potential harm of children and vulnerable adults. This is outlined in more detail in **Compassion International's Guide to Protecting Children from Abuse**.

Safeguarding Policy

Any employee reporting concerns or complaints through formal whistleblowing channels will be protected by CUK's **'Whistleblowing Policy & Procedure'**.

CUK will also accept complaints from external sources such as members of the public, partners and official bodies.

How to report a safeguarding concern

Employees who have a complaint or concern relating to safeguarding should report it to the Child Protection Officer at childprotection@compassionuk.org if the issues involves children or via the **'Feedback or Raise a Concern'** online form.

Response

CUK will follow up safeguarding reports and concerns according to the CUK's **'Whistleblowing Policy & Procedure'**, and any applicable legal and statutory obligations.

If the concern is deemed a criminal offence it may also be reported to the police.

Appropriate disciplinary measures will be applied to employees found in breach of this policy according to CUK's **'Disciplinary Procedure'**. The investigation into a breach of this policy will not end in the event that an employee resigns during disciplinary processes.

CUK will offer support to survivors of harm caused by employees or associated personnel, regardless of whether a formal internal response is carried out (such as an internal investigation). Decisions regarding support will be led by the survivor.

Confidentiality

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 be kept secure at all times.

Designated Safeguarding Roles

Child Protection Officer: A person appointed by the Board to ensure that child safeguarding policies and procedures are implemented consistently with best practice. The Child Protection Officer is also responsible for receiving and reporting child protection concerns.

Adam Tankard | Email: childprotection@compassionuk.org | Telephone: +44 7841 014743

Designated Safeguarding Trustee Lead: A trustee appointed by the Board to lead and oversee the development and implementation of guiding principles and safeguarding procedures.

Delfin Posada | Use this link and when prompted select 'Designated Trustee': **Feedback or Raise a Concern**

Designate Officer: The Human Resources Director who is the main point of contact for concerns raised about misconduct, alleged dishonest or illegal activity as outlined in the **'Whistleblowing Policy & Procedure'**.

Jackie Traut | Email: blowingthewhistle@compassionuk.org

Associated Policies:

Access documents using CASCADE's Company Document Feature	
Code of Conduct	Keyword search 'Conduct'
Anti-Harassment & Anti-Bullying Policy	Keyword search 'Harassment & Bullying'
Whistleblowing Policy & Procedure	Keyword search 'Whistleblowing'
Child Protection Management Policy	Keyword search 'Child Protection'
Disciplinary Procedure	Keyword search 'Disciplinary'
Modern Slavery and Human Trafficking Statements	Available at: https://www.compassionuk.org/modern-slavery-and-human-trafficking-statement/

This policy will be reviewed every THREE years. Review history:

Version	Approval date	Approved by	Details
One	30/11/2018	Board of Trustees	Superseded by version 2
Two	18/10/2019	Board of Trustees	Superseded by version 3
Three	26/06/2020	Board of Trustees	Included protection from modern slavery and human trafficking