



SAFEGUARDING POLICY

Context

Compassion UK 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. Compassion UK 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.
- implementing reasonable and proportionate risk management strategies which protect people from becoming exposed to, used, or abused for extremism, radicalisation, and terrorism.
- upholding high standards of accountability and transparency to ensure slavery and human trafficking is not taking place within our organisation or our supply chains.
- Protecting staff, volunteers and those connected with Compassion UK from any form of bullying, harassment or intimidation.

Purpose

This policy sets out the commitments made by Compassion UK 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, human trafficking, and extremism. 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 Compassion UK's '**Anti-Harassment & Anti-Bullying and Policy**'.
- Child protection in terms of Compassion's beneficiaries, which is covered by Compassion UK'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 affecting beneficiaries in their own local contexts and their wider community which are not perpetrated by Compassion UK or its employees and associated personnel.

Scope

This policy applies to all Compassion UK 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.

Risk Assessment

Compassion UK's workforce consists of employees, casual workers, apprentices, volunteers, and independent contractors who are responsible for upholding safeguarding measures. Compassion UK 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.

Compassion UK 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

Compassion UK 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

Compassion UK's responsibilities:

Compassion UK will:

- Ensure all employees and associated personnel have access to, are familiar with, and know their responsibilities within this policy and any behaviour protocols.
- 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 organisation.
- Implement stringent safeguarding procedures when recruiting, managing, and deploying employees and associated personnel. The safer recruitment, selection and vetting procedures are outlined in Compassion UK's '**Recruitment and Selection Policy**', '**Policy on Engaging People with a Criminal Record**' and '**Child Protection Strategy**'.
- Ensure employees and associated personnel receive mandatory training and awareness (including periodic refresher training) on safeguarding at a level commensurate with their role in the organisation.
- Follow up on reports of safeguarding concerns promptly and according to due process.
- Maintain full control over recruitment processes of its employees and associated personnel.
- 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. This includes ensuring there are no links with or connection to proscribed organisations, designated persons, groups, or entities,
- Ensure its platforms (including social media digital technology), communication networks, funds, assets, and people are not exploited or used for the expression and promotion of extremism or terrorist ideology.

Employee and associated personnel responsibilities:

Child safeguarding

Compassion UK employees and associated personnel **must** commit to fully abide by all elements of Compassion International's '**Statement of Commitment to Child Protection and Code of Conduct**', **Code of Conduct for Virtual Events** and '**Compassion UK's Code of Conduct**'

Adult safeguarding

Compassion UK employees and associated personnel **must not**:

- Sexually abuse or exploit any adult;
- Subject any adult to physical, emotional, or psychological abuse, or neglect.

Protection from sexual exploitation and abuse

Compassion UK 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, Compassion UK 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 Compassion UK employee or associated personnel in accordance with Compassion UK's '**Whistleblowing Policy & Procedure**'.

Protection from modern slavery and human trafficking

Compassion UK 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 Compassion UK employee or associated personnel in accordance with Compassion UK's '**Whistleblowing Policy & Procedure**'

Protection from extremism

Compassion UK employees and associated personnel **must not**:

- Promote extremist ideology or make extremist comments. This includes but is not limited to:
 - encouraging, glorifying, or promoting any acts of terrorism, including any individuals, groups and organisations that support such actions; or,
 - inciting or spreading hatred, violence, intolerance in the community and denigrating other faiths.

Reporting

Compassion UK 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.

Compassion UK employees receive training on the definition of abuse and maltreatment, and the various 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**.

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

Compassion UK 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 involve children or via the **'Feedback or Raise a Concern'** Online form.

Response

Compassion UK will follow up safeguarding reports and concerns according to the Compassion UK'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 Compassion UK's **'Disciplinary Procedure'**. The investigation into a breach of this policy will not end if an employee resigns during disciplinary processes.

Compassion UK 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

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](#)

Designated 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

Definitions

Associated Personnel	Refers to volunteers, trustees, ambassadors, independent contractors, third party organisations, suppliers working on Compassion UK behalf and members of the public.
Beneficiary	Any child, youth, Mother Child Unit (MCU) individual or group that receives the benefit of Compassion assistance or programme
Child or Youth	Child – A human being from birth to the age of 11. At the age of 12 the term Youth is applied. Youth – A human being from 12 to 22 (22 is the maximum age for Compassion beneficiaries)
Designated Persons (Financial Sanctions)	Individuals or groups which face financial restrictions in the UK. The Office for Financial Sanctions Implementation (OFSI), part of HM Treasury, maintains the consolidated list of these individuals and entities on its website: (www.gov.uk/government/publications/financial-sanctions-consolidated-list-of-targets) * Note: The interpretation of the term 'designated' as used in this definition of 'Designated Persons (Financial Sanctions)' does not include and shall not be construed as having a similar meaning to any 'Designated Safeguarding Role' including 'Designated Safeguarding Trustee Lead' and 'Designated Officer'.
Extremism	A vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths

and beliefs. Also included in extremism are calls for the death of members of our armed forces, whether in the UK or overseas

Harm	Psychological*, physical, sexual 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 using 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 using 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
Proscribed Organisations	An organisation which the Home Secretary believes to be concerned in terrorism as defined by the Terrorism Act 2000. The Home Office maintains a list of terrorist groups or organisations banned under UK law on its website: www.gov.uk/government/publications/proscribed-terror-groups-or-organisations--2 .
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.
Radicalisation	The process by which a person comes to support terrorism and forms of extremism leading to terrorism
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 ability to survive.
Terrorism	An action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the

public and is made for the purpose of advancing a political, religious, or ideological cause.

Vulnerable Person

A person, other than a child, who:

- a) is suffering from a disorder of the mind, whether because of mental illness or dementia,
- b) has an intellectual disability,
- c) is suffering from a physical impairment, whether because of injury, illness, or age, or
- d) has a physical disability, which is of such a nature or degree:
 - i. as to restrict the capacity of the person to guard himself or herself against harm by another person, or

that results in the person requiring assistance with the activities of daily living including dressing, eating, walking, washing, and bathing.

Associated Policies and Procedures:

- Anti-Harassment & Anti-Bullying Policy
- Child Protection Management Policy
- Child Protection Strategy
- Code of Conduct
- Code of Conduct
- Disciplinary Procedure
- Modern Slavery and Human Trafficking Statements Available at: <https://www.compassionuk.org/modern-slavery-and-human-trafficking-statement/>
- Policy on Engaging People with a Criminal Record
- Recruitment and Selection Policy
- Whistleblowing Policy & Procedure

This policy will be reviewed annually, where there is a change in legislation, or a serious incident.

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
Four	29/10/2021	Board of Trustees	Included protection from extremism