

SAFEGUARDING POLICY

Version Number:	V6.0
Policy Category:	B-Operational B-11. Safeguarding
Approval Authority:	Board of Trustees
Policy Owner:	Head of Safeguarding
Distribution:	Internal and External
Last Approval Date:	8 March 2024
Next Review:	March 2025

REPORTING A CONCERN?

If you need to report any safeguarding concern or incident, please contact:

Compassion UK - childprotection@compassionuk.org

Compassion Ireland - childprotection@compassion.ie

Or see section 4.3 for further guidance.

Compassion UK and Compassion Ireland (“Compassion”) reserve the right to review, amend, modify, and update its policies and procedures at any time and without prior notice to adapt to changing business needs, legal requirements, and best practice.

Please Note: Printing this document may make it obsolete.

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1. INTRODUCTION

Compassion UK and Compassion Ireland (“Compassion”) is committed to ensure that everyone who is involved in or connected to our work is protected from all forms of harm, abuse, neglect, and exploitation. Specifically, Compassion is committed to:

- Protecting people, particularly children, at risk adults and participants 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 from any form of bullying, harassment or intimidation.

2. PURPOSE

The purpose of this policy is to set out the safeguarding commitments made by Compassion and outlines the effective framework under the three pillars to prevent, report and respond to any form of abuse, neglect, or harm, promoting the highest standards in safeguarding and child protection.

3. SCOPE

This policy applies to all Compassion employees and associated personnel and is intended to address child safeguarding, adult safeguarding, protection from sexual exploitation, abuse, slavery, human trafficking, and extremism.

Compassion has separate policies which cover:

- Sexual harassment in the workplace including any harassment, bullying victimisation (‘Dignity at Work Policy’), (‘Disciplinary Policy and Procedure’) and (‘Resolution Policy and Procedure’)
- Safeguarding and Child protection in terms of Compassion’s participants, (‘Child Protection Management Policy’)
- The design and implementation of Compassion’s programme and activities (‘Compassion International’s Global Programme.’)
- The safeguarding and child protection standards and expectations which are embedded within Compassion International’s programming and work with participants and the wider communities in which Compassion International operates, as these are included in other global policies and procedures.
- Behaviour or conduct of an employee or associated personnel including occasions where unacceptable behaviours which take place outside the course of employment or engagement with Compassion (‘Code of Conduct’)
- Protection of supporters in potentially vulnerable circumstances (‘Policy on Supporters in Vulnerable Circumstances’)
- The safer recruitment, selection and vetting procedures (‘Recruitment and Selection Policy’, ‘Policy on Engaging People with a Criminal Record’, and ‘Background Screening Policy’).
- Clear procedures for reporting concerns to statutory agencies (‘Serious Incidents Reporting Policy and Procedure’).

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Compassion UK and Compassion Ireland do not work directly with programme participants or Frontline Church Partners and are independent but within the partnership-based structure of Compassion International.

This is a shared policy that covers Compassion UK and Compassion Ireland under the same policy. Where relevant and applicable, some aspects of the policy may be customised to ensure compliance with relevant laws and regulations for each entity.

In the event of any conflict or inconsistencies between the policy and applicable legislation for each entity, the legislation will always take precedence.

4. STANDARDS

Foundations:

- 4.1. Safeguarding everyone involved in or connected with the work of Compassion is our highest priority. As a child-focused ministry working with the vulnerable, the protection of children and vulnerable adults is fundamental to Compassion's mission and foundational to every aspect of the ministry.
- 4.2. Compassion expects all employees and associated personnel to work in a way which is aligned to our commitment that safeguarding is our highest priority. This includes the responsibility to create a safe environment at Compassion and enabling people to participate in our work free from the risk of abuse or maltreatment.
- 4.3. Compassion holds itself and others accountable to the highest standards of safeguarding, with clear reporting mechanisms and a robust approach to addressing safeguarding concerns. Whilst it is expected that all employees and associated personnel will abide by their responsibility to report incidents or concerns; nothing in this policy should be read as requiring a survivor of abuse to report their own experiences against their wishes.
- 4.4. Compassion's safeguarding responsibilities extend to any concerns which may:
 - 4.4.1. have taken place some time ago. Compassion does not consider there to be any time limit on our responsibility to respond to concerns or allegations of abuse.
 - 4.4.2. occur outside the course of employment or engagement with Compassion. Compassion will not disregard safeguarding concerns simply because they did not occur in the course of employment or engagement.
- 4.5. Compassion is aware that all children are at risk of being vulnerable by virtue of their age and power imbalances and will strive to implement robust safeguarding procedures which ensure their protection.
- 4.6. Compassion will always be mindful of and respond appropriately to circumstances where people who are over the age of 18 (including employees, associated personnel, volunteers and supporters) who may be or become vulnerable and require additional support.
- 4.7. Compassion will not tolerate abuse or exploitation (including child abuse and child exploitation) by or of its employees or associated personnel.

Prevention:

- 4.8. Compassion takes the responsibility to prevent or mitigate against the risk of abuse occurring very seriously. To that end, Compassion will:
 - 4.8.1. Ensure all employees and associated personnel have access to, are familiar with, and know their responsibilities within this policy and any behaviour protocols.
 - 4.8.2. Design and undertake all its activities in a way that protects people from any risk of harm that may arise from coming into contact with the organisation.

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- 4.8.3. Implement its stringent safeguarding procedures when recruiting, managing, and deploying employees and associated personnel. Compassion is a participating organisation of the [Misconduct Disclosure Scheme](#). Any behaviour which meets the threshold for misconduct involving sexual exploitation, sexual abuse or sexual harassment as defined by the United Nations, will be requested by Compassion or disclosed to any organisation requesting such information, including whether such disciplinary matters are under investigation, unless Compassion is legally prohibited from doing so.
 - 4.8.4. Ensure employees and associated personnel receive mandatory training and awareness (including regular refresher training) on safeguarding at a level commensurate with their role in the organisation.
 - 4.8.5. Follow up on reports of safeguarding concerns promptly and according to due process.
 - 4.8.6. Maintain a work environment that is safe, healthy, and free from unlawful discrimination.
 - 4.8.7. Pay its employees at or above the living wage and conduct annual review of pay scales.
 - 4.8.8. Comply with minimum age laws.
 - 4.8.9. Ensure working hours are not excessive.
 - 4.8.10. Take a risk-based approach to conducting proportional due diligence checks in the contract management processes and keeping these under review to ensure there are no links with or connection to proscribed organisations, designated persons, groups, or entities.
 - 4.8.11. 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. Compassion will fulfil any required reporting requirements to the proper authorities as set out under the duties in counter-terrorism legislation ('Prevent duty').
 - 4.8.12. Provide specialist support and assistance through the Safeguarding Team.
- 4.9. In order to fulfil these standards, Compassion expects its employees and associated personnel to:
- 4.9.1. Fully abide by all the expectations and requirements under this policy and all other associated policies and procedures.
 - 4.9.2. Adhere to all applicable elements of Compassion's 'Code of Conduct', reviewing and re-signing annually noting any changes.
 - 4.9.3. Contribute to creating and maintaining an environment that prevents safeguarding violations, modern slavery and human trafficking, extremism and promotes the implementation of the Safeguarding Policy.
 - 4.9.4. Complete mandatory safeguarding training within the first 5 days of being employed by Compassion and participate in refresher training.
 - 4.9.5. Refrain from behaving or acting in any way which undermines Compassion's ability to fulfil the commitments made under this policy or the associated policies.
 - 4.9.6. Ensure that all their interactions with people with whom Compassion works or comes into contact with (including Participants, caregivers, other employees or donors and supporters) is appropriate, not exploitative or abusive, and does not take advantage of any imbalances of power that may exist.
 - 4.9.7. Be mindful of the position of trust they occupy by being employed by Compassion and refrain from any behaviour (including behaviour outside of their work) which undermines this position of trust or their ability to work in a child-focused ministry.
 - 4.9.8. At all times to refrain from any behaviour which could constitute or contribute to child abuse or child exploitation. This includes never engaging or attempting to engage in any sexual activity (including digital interactions) with any child. Nor supporting, condoning or taking part in any sexual or other

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exploitation of children (which includes viewing indecent images or paying towards pornographic content which depicts a child). Mistaken belief the child is aged over 18 is no excuse.

Reporting:

- 4.10. Compassion will ensure that safe, appropriate, accessible means of reporting safeguarding concerns are made available to all, including members of the public. All concerns reported to Compassion about the welfare of children and vulnerable people will be reported as applicable to the relevant statutory agencies or authorities in accordance with statutory guidance including reporting any concerns of criminal behaviour.
- 4.11. Any employee or associated personnel reporting concerns or complaints through formal whistleblowing channels will be protected by Compassion's 'Whistleblowing Policy & Procedure'
- 4.12. Compassion will also accept complaints from external sources such as members of the public, partners, and official bodies.
- 4.13. Compassion understands that reporting issues can be difficult. Any harassment, bullying or victimisation of staff for doing so will not be tolerated, regardless of whether the concern is upheld.

Response:

- 4.14. Compassion will follow up safeguarding reports and concerns according to the Compassion's 'Whistleblowing and Protected Disclosures Policy and Procedure', and any applicable legal and statutory obligations.
- 4.15. Compassion will investigate any suspected or alleged breaches of this policy, associated policies or the Code of Conduct.
- 4.16. Appropriate disciplinary measures will be applied to employees found in breach of this policy according to Compassion 'Disciplinary Policy and Procedure'. The investigation into a breach of this policy will not end if an employee resigns during the disciplinary processes. All investigations will be conducted with a survivor centred approach. Compassion recognises that survivors have the right whether to be involved in any investigation or not. However, an investigation can continue in the absence of survivor participation.
- 4.17. Compassion 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.
- 4.18. Compassion will ensure that a proper risk assessment has been completed and regularly updated in respect of any individual found to have perpetrated abuse. Compassion will take steps to ensure that no person who has been dismissed from any role at Compassion for perpetrating abuse is re-engaged by Compassion.
- 4.19. Where Compassion has concerns about the behaviour or conduct of a sponsor, a risk assessment will be completed to determine what safeguards shall be put in place to mitigate any risks to Participants or their caregivers or Compassion employees and associated personnel. If necessary, a sponsorship can be terminated for safeguarding and child protection reasons under the 'Policy on Acceptance and Refusal and Return of Donations.

Confidentiality:

- 4.20. All reports on safeguarding concerns should be kept confidential due to the sensitive nature of the information in the reports. To the greatest extent possible, any personal data should be anonymised before reporting externally. Information relating to serious incidents and subsequent case management of safeguarding concerns should be shared internally strictly on a need-to-know basis only and should be kept secure at all times in accordance with relevant procedures for data protection.

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5. RESPONSIBILITIES

<p>All employees and associated personnel</p>	<p>Responsible for upholding safeguarding measures when they come into contact with children, young people, and vulnerable adults in activities including:</p> <ul style="list-style-type: none"> • 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 participant personal data. • Correspondence with children through the child sponsorship programme. • Visits to Compassion’s projects overseas. • Virtual visits and trips with programme participants.
<p>Head of Safeguarding and designated Child Protection Officer</p>	<p>A person appointed by the Board to ensure that child and adult safeguarding policies and procedures are implemented consistently with best practice. The Head of Safeguarding is also responsible for receiving and reporting child protection concerns.</p> <p><i>Contact:</i></p> <p>Compassion UK - childprotection@compassionuk.org</p> <p>Compassion Ireland - childprotection@compassionie.org</p>
<p>Designated Safeguarding Trustee Lead</p>	<p>A trustee appointed by the Board to lead and oversee the development and implementation of guiding principles and safeguarding procedures.</p> <p><i>Contact:</i></p> <p>Compassion UK: Use this link and when prompted select ‘Designated Trustee’: Feedback or Raise a Concern</p> <p>Compassion Ireland: Use this link and when prompted select ‘Designated Trustee’: Feedback or Raise a Concern</p>
<p>Whistleblowing Designated Officer</p>	<p>The Director of People and Culture is the primary point of contact for concerns raised about misconduct, alleged dishonest or illegal activity as outlined in the ‘Whistleblowing and Protected Disclosures Policy & Procedure’.</p> <p><i>Contact:</i></p> <p>Compassion UK - blowingthewhistle@compassionuk.org</p> <p>Compassion Ireland - blowingthewhistle@compassionie.ie</p>

6. ASSOCIATED POLICIES AND PROCEDURES

The following policies are linked, connected, co-related or relevant to this policy. The implementing procedures are subset of this policy and provide detailed guidance on how to implement the standards set out in this policy.

<ul style="list-style-type: none"> • Dignity at Work Policy and Procedure 	<ul style="list-style-type: none"> • Policy on Supporters in Vulnerable Circumstance
<ul style="list-style-type: none"> • Child Protection Management Policy 	<ul style="list-style-type: none"> • Code of Conduct
<ul style="list-style-type: none"> • Disciplinary Policy and Procedure 	<ul style="list-style-type: none"> • Resolution Policy and Procedure
<ul style="list-style-type: none"> • Policy on Engaging People with a Criminal Record 	<ul style="list-style-type: none"> • Recruitment and Selection Policy and Procedure

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• Background Screening Policy and Procedure	• Policy on Acceptance Refusal and Return of Donations Policy
• Whistleblowing and Protected Disclosures Policy and Procedure	• Serious Incident Reporting Policy
• Equality, Equity, Diversity and Inclusion Policy	• Anti-Financial Crime Policy

7. DEFINITIONS

Associated Personnel

Refers to casual workers, apprentices, volunteers, trustees, ambassadors, independent contractors, third party organisations, suppliers working on Compassion’s behalf, programme visitors including supporters, journalists, celebrities, and politicians, and members of the public and visitors to Compassion House.

Child

Every person below the age of 18 irrespective of the age of the majority.

Child Abuse

Child abuse or maltreatment constitutes all forms of physical and/or emotional ill treatment, sexual abuse (all sexual activity with a child is considered child abuse), neglect, or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the child’s health, survival, development or dignity in the context of a relationship of responsibility, trust or power.

Child abuse can also occur online.

Child Exploitation

Child exploitation refers to the use of children for someone else’s advantage, gratification or profit often resulting in unjust, cruel and harmful treatment of the child. These activities are to the detriment of the child’s physical or mental health, education, moral or social-emotional development...it covers situations of manipulation, misuse, abuse, victimization, oppression or ill-treatment.

Youth

A person aged from 12 to 22 (22 is the maximum age for Compassion participants).

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)

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, financial and any other infringement of an individual’s rights.

**Emotional or psychological abuse, including (but not limited to) humiliating and degrading treatment such as bad name calling, constant criticism, belittling and persistent shaming*

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

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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.

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 children and youth, vulnerable adults, employees and associated personnel) 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' has been used throughout this policy for consistency, but Compassion recognises the right of an individual to use the term of their own preference.

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

The definition is wide, however may be regarded to include anyone over the age of 18 years who may be unable to protect themselves from abuse, harm or exploitation. Vulnerability may be by reason of illness, age, mental illness, disability or other types of physical or mental impairment. Those suffering from trauma, addiction, or their immigration status. Vulnerability may be temporary or permanent.

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8. POLICY APPROVAL AND REVISION HISTORY

Review Frequency: This policy will be reviewed and approved every year.

Version Number	Approval Date	Changes Made
V1.0	30-Nov-2018	Superseded by version 2
V2.0	18-Oct-2019	Superseded by version 3
V3.0	26-Jun-2020	Included protection from modern slavery and human trafficking
V4.0	29-Oct-2021	Included protection from extremism
V5.0	03-Mar-2023	Changes to reflect new Compassion terminology and updated Code of Conduct
V6.0	08-Mar-2024	New single policy document that covers Compassion UK and Compassion Ireland under the same policy Some additional requirements both of Compassion and employees and associated personnel, minor changes to scope and changes to language.