Safeguarding Policy

Policy Classification:	B-Operational | B-11. Safeguarding
Policy Approver:	Board of Trustees
Policy Owner:	Head of Safeguarding
Distribution:	Internal and External
Effective Date:	13 March 2026
Review Date:	March 2027
Policy Version Number:	V8.0

REPORTING A CONCERN?

If you need to report any safeguarding concern or incident, please contact us by email or online:

Email:

- Compassion UK - childprotection@compassionuk.org
- Compassion Ireland - childprotection@compassion.ie

Online:

Use the "Raise a concern" option on the our websites:

- Compassion UK: www.compassionuk.org/contact/
- Compassion Ireland: www.compassion.ie/about-us/contact/

For further guidance, see section 4.3, 4.11, 4.12 & 4.13.

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

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. Our safeguarding approach includes:

- Protecting people, especially children, vulnerable people 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 being exposed to, or abused by 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.
- Safeguarding staff, volunteers and those connected with Compassion from bullying, harassment or intimidation.

2. Purpose

The purpose of this policy is to set out Compassion's safeguarding commitments based on the three pillars of prevent, report and respond in order to address any form of abuse, neglect, or harm. This policy promotes the highest standards of safeguarding and child protection.

3. Scope

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

Compassion has separate policies which cover:

- Harassment, sexual harassment, bullying, and victimisation in the workplace: Dignity at Work Policy, Disciplinary Policy and Procedure, and Resolution Policy and Procedure.
- Safeguarding and child protection for Compassion's programme participants: 'Global Child and Youth Protection and Safeguarding Policy'
- Safeguarding and child protection standards embedded in global programming and community engagement as outlined in associated global policies and procedures.
- Behaviour or conduct of an employee or associated personnel including relevant conduct outside the course of employment or engagement: 'Code of Conduct'
- Protection of supporters in potentially vulnerable circumstances: 'Policy on Supporters in Vulnerable Circumstances'
- Safer recruitment, selection and vetting procedures: 'Recruitment and Selection Policy', 'Background Screening Policy'.
- Procedures for reporting concerns to statutory agencies: 'Serious Incidents Reporting Policy and Procedure'.
- Maintaining a safe, healthy, and inclusive work environment, free from unlawful discrimination: 'Health and Safety Policy and Equality, Equity, Diversity and Inclusion Policy.'

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 people is central to Compassion's mission and underpins every aspect of our work.

4.2. Compassion expects all employees and associated personnel to uphold this commitment by creating, maintaining and respecting safe environments and enabling participation 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. While all employees and associated personnel are expected to report incidents or concerns, nothing in this policy would require a survivor of abuse to disclose their own experiences against their wishes.

4.4. Compassion's safeguarding decisions consider all relevant information, including any concerns that occurred:

a) some time ago as there is no time limit on our responsibility to respond to concerns or allegations of abuse.

b) outside employment or engagement with Compassion, including all previous employment or engagement. Compassion will not disregard safeguarding concerns because they did not occur during employment or engagement at Compassion.

4.5. Compassion recognises that children experience an elevated vulnerability to the risk of abuse, exploitation, and violence throughout childhood, due to their age and power imbalances. Accordingly, Compassion will implement robust procedures to ensure their protection.

4.6. Compassion will respond appropriately to circumstances where adults (including employees, associated personnel, volunteers and supporters) may be or become vulnerable and require additional support.

4.7. Compassion recognises the benefits of emerging technologies, including artificial intelligence (AI), but our zero-tolerance approach to harm applies equally to all technology-assisted activity. Any use of AI must comply with safeguarding principles and with Compassion's Policy on Use of Artificial Intelligence (AI) in the Workplace, which sets out standards of behaviour such as:

a) always ensuring appropriate human oversight;

b) never generating or using content involving children or vulnerable adults in inappropriate or exploitative ways;

c) never compromising the privacy, dignity or safety of children, vulnerable adults, employees, or supporters.

Any safeguarding breach involving technologies will be treated with the same seriousness as all other safeguarding violations and may result in disciplinary action in line with Compassion's Disciplinary Policy and Procedure.

4.8. Compassion will not tolerate abuse or exploitation (including child abuse and child exploitation) by or of its employees or associated personnel.

Prevention

4.9. Compassion takes the responsibility to prevent or mitigate against the risk of abuse occurring very seriously. To that end, Compassion will:

(a) Ensure all employees and associated personnel have access to this policy, understand their responsibilities and are familiar with expected behaviour protocols.

(b) Design and deliver activities in ways that protect people from harm arising from engagement with Compassion.

(c) Implement stringent safeguarding procedures when recruiting, managing, and deploying employees and associated personnel. Compassion participates in the Misconduct Disclosure Scheme and adheres to its standards.

(d) Provide mandatory safeguarding (including refresher) training at a level appropriate to each role.

(e) Follow up on reports of safeguarding concerns promptly and according to due process.

(f) Protect employees and associated personnel from modern slavery and human trafficking by paying at or above the living wage, reviewing salary scales annually, complying with minimum age laws and ensuring that working hours are not excessive.

(g) Apply a risk-based approach to due diligence in contract management, reviewing regularly to ensure there are no links with or connection to proscribed organisations, designated persons, groups, or entities.

(h) Ensure its platforms (including social media and 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 meet all reporting requirements under counter-terrorism legislation ('Prevent duty').

(i) Provide specialist support and assistance through the Safeguarding Team.

4.10. To fulfil these standards, Compassion expects its employees and associated personnel to:

(a) Fully comply with this policy and all related policies and procedures.

(b) Adhere to all elements of Compassion's 'Code of Conduct', reviewing and re-signing annually.

(c) Contribute to creating and maintaining an environment that prevents safeguarding violations, modern slavery and human trafficking and extremism.

(d) Complete mandatory safeguarding training within the first five days of being employed by Compassion and participate in refresher training.

(e) Avoid any behaviour which undermines Compassion's ability to fulfil the commitments made under this policy or the associated policies.

(f) Ensure all interactions with people with whom Compassion works or comes into contact with (including Participants, caregivers, other employees or donors and supporters) are appropriate, non- exploitative or abusive, and do not take advantage of any imbalances of power.

(g) Recognise the position of trust they hold and refrain from any behaviour (inside or outside work) that undermines this trust to work in a child-focused ministry.

(h) Never engage in or attempt any behaviour, whether in person or digitally, that constitutes or contributes to sexual abuse, attempted sexual abuse or sexually motivated behaviour towards a child. This includes

i. Engaging or attempting to engage in sexual activity with a child (including online interactions)

ii. Supporting, condoning or participating in any sexual or other exploitation of children. This includes viewing or making indecent images or paying for or otherwise funding pornographic content involving a child.

iii. A mistaken belief that a child is over 18 will never be accepted as an excuse under this policy.

Reporting

4.11. Compassion will ensure safe, appropriate, accessible and confidential ways to report safeguarding concerns that are available to everyone, including members of the public. All concerns about the welfare of children and vulnerable people will be referred, as appropriate to relevant statutory agencies or authorities in line with statutory guidance, including reporting concerns of criminal behaviour.

4.12. Any employee or associated personnel who reports concerns or complaints through formal whistleblowing channels will be protected by Compassion's 'Whistleblowing and Protected Disclosures Policy & Procedure'

4.13. Compassion will accept and take seriously complaints from external sources, including members of the public, partners, and official bodies.

4.14. Compassion recognises that reporting concerns can be difficult. Any harassment, bullying or victimisation for doing so will not be tolerated, regardless of whether the concern is upheld.

Response

4.15. Compassion will follow up safeguarding reports and concerns in accordance with the 'Whistleblowing and Protected Disclosures Policy and Procedure', and all applicable legal and statutory obligations.

4.16. Compassion will investigate any suspected or alleged breaches of this policy, associated policies or the Code of Conduct.

4.17. Appropriate disciplinary measures will be applied to employees found in breach of this policy, in line with Compassion's 'Disciplinary Policy and Procedure'. Investigations will continue even 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 to choose whether they participate in an investigation. However, an investigation may proceed without survivor involvement.

4.18. Compassion will offer support to survivors of harm caused by employees or associated personnel, whether or not a formal internal investigation takes place. Decisions regarding support will be guided by the survivor.

4.19. Compassion will complete and regularly update a risk assessment for individuals found to have perpetrated abuse. Compassion will ensure that anyone dismissed for perpetrating abuse is not re-engaged in any capacity by Compassion.

4.20. Where concerns arise about the behaviour of a supporter (or potential supporter), Compassion will complete a risk assessment to determine what safeguards are required to protect Participants or their caregivers or Compassion employees and associated personnel. Compassion reserves the right to refuse or terminate existing child sponsorships and/or any other recurring donations for safeguarding and child protection reasons, in line with the 'Policy on Acceptance and Refusal and Return of Donations'.

Confidentiality

4.21. All safeguarding reports and concerns must be treated as confidential due to the sensitive information they contain. Wherever possible, personal data should be anonymised before any external reporting takes place. Information relating to serious incidents and the case management of safeguarding concerns should be shared

internally strictly on a need-to-know basis only and must be stored securely at all times, in accordance with relevant data protection procedures.

5. Associated Policies and Procedures

The following policies and procedures are linked, connected, co-related or relevant to this policy.

• Anti-Financial Crime Policy	• Background Screening Policy and Procedure
• Code of Conduct	• Dignity at Work Policy and Procedure
• Disciplinary Policy and Procedure	• Equality, Equity, Diversity and Inclusion Policy
• Global Child and Youth Protection and Safeguarding Policy	• Health and Safety Policy
• Policy on Supporters in a Vulnerable Circumstance	• Policy on use of Artificial Intelligence (AI) in the Workplace
• Recruitment and Selection Policy and Procedure	• Resolution Policy and Procedure
• Serious Incident Reporting Policy	• Supporter Charter and Complaints Policy

6. Definitions

Term	Definition
Associated Personnel	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	All forms of physical and/or emotional ill treatment, sexual abuse (all sexual activity with a child is child abuse), neglect, or 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	The use of children for another person's advantage, gratification or profit often involving unjust, cruel and harmful treatment. It includes manipulation, misuse, abuse, victimisation, oppression or ill treatment and harms a child's physical, mental, educational, moral or social-emotional development.
Designated Persons (Financial Sanctions)	Individuals or groups subject to UK government financial restrictions. The Office for Financial Sanctions Implementation (OFSI), part of HM Treasury, maintains the consolidated list of sanctioned individuals and entities on its website: (www.gov.uk/government/publications/financial-sanctions-consolidated-list-of-targets)
Extremism (UK)	The promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to: 1. negate or destroy the fundamental rights and freedoms of others; or 2. undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or

	intentionally create a permissive environment for others to achieve the results in (1) or (2).
Extremism (Ireland)	The promotion, encouragement, or advocacy of the commission of terrorist activities. This includes engaging in, promoting, encouraging, or advocating for terrorist activities both within and outside the state (Offences against the State Acts 1939-1998 and the Criminal Justice (Terrorist Offences) Act 2005)
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 name-calling, constant criticism, belittling and persistent shaming*
Human Trafficking	Trapping, transporting or harbouring people through force, violence, deception or coercion and exploiting them for financial or personal gain.
Misconduct Disclosure Scheme	A scheme enabling participating organisations to share information during reference checks to prevent individuals who pose a safeguarding risk from moving between organisations. Behaviour meeting the threshold for sexual exploitation, sexual abuse, or sexual harassment (as defined by the UN) will be requested from or disclosed to participating organisations unless legally prohibited.
Modern Slavery	The recruitment, movement, harbouring or receiving of people through force, coercion, abuse of vulnerability, deception, or other means for 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.
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	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 incudes human trafficking and modern slavery.
Survivor	A person who has been abused or exploited. The term 'survivor' has been used throughout this policy, though individuals may choose 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.
Youth	A person aged from 12 to 22 (22 is the maximum age for Compassion participants).

7. Policy Approval and Revision History

This policy will be reviewed and approved every three years or where necessary upon any significant change to legislation or current practice (whichever happens first).

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	05-Mar-2024	Substantial Review: 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.
V7.0	09-May-2025	Annual Review: Minor changes to incorporate lessons learnt and reflect changes to associated policies and definitions.
V8.0	13-Mar-2026	Annual Review: Moderate changes to remove unnecessary content, whilst retaining all clauses and incorporate policy relating to Artificial Intelligence.