



SAFEGUARDING

POLICY

Passed by the Trustees on 24 January 2022
Reviewed January 2024



Congo Church Association (“CCA”) Safeguarding Policy

Overview

CCA is an unincorporated association regulated by its constitution and by the Charity Commission in England (No. 285760). Its primary objective is to support the Anglican church in DR Congo. Specifically, its objects are:

- a. to advance the Christian Religion in the Democratic Republic of the Congo
- b. in partnership with the Anglican Church in the Democratic Republic of Congo to relieve poverty and to provide for the needs of refugees and the displaced.
- c. in partnership with the Anglican Church in the DRC and civil society there to promote and sustain schemes for peace and reconciliation, health, education and community development for the welfare and benefit of the population.
- d. to relieve poverty among the clergy and former clergy of the Anglican Church and the widows and dependants of any such persons.

Further to those objects, CCA receives donations, principally from individuals and churches in the UK, who have a personal interest in the Anglican church in DR Congo. Many individuals have served as mission partners there or in other capacities. Churches often have links with Dioceses or other institutions in DR Congo. CCA receives these donations either as contributions to its General Funds or as restricted funds. Restricted funds are then passed on to the beneficiaries of the trust declared by the donors and General Funds are applied to the objects of the charity in accordance with decisions made by the Members at each Annual General Meeting.

CCA has no employees. The work of the association is carried out by volunteers. CCA could not function without the voluntary work undertaken by its committee members, unless it substantially increased its administration costs to the detriment of its beneficiaries.

CCA is wholly committed to the safeguarding of children and adults at risk and ensuring their well-being.

CCA believes that every child and adult has the right to protection and to live in ‘safe environments’, regardless of gender, ethnicity, political association, religion, sexual orientation and whether or not they have a disability.

It is CCA’s responsibility to make sure that all children and vulnerable adults, who come into contact with CCA’s activities and those of our Partners, are safeguarded to the greatest extent possible.

Purpose of policy

The purpose of this safeguarding policy and procedures is to regulate how CCA’s Representatives and Partners work so that the children and adults they come into contact with are not abused, neglected or Harmed in any way.

Who this policy applies to

This safeguarding policy is a mandatory policy that applies to all CCA Representatives.

1. Definitions

- 1.1 **Safeguarding** means protecting peoples’ health, wellbeing and human rights and enabling them to live free from Harm; it also means protecting people, especially children and vulnerable adults, from Harm that arises from contact with CCA’s Representatives and Partners and their Programmes.



- 1.2 **Harm** means any form of physical, psychological or other mental injury and includes all forms of abuse, including Physical, Sexual and Emotional Abuse, Neglect, Sexual Exploitation and Trafficking and Commercial Exploitation and Harmed shall be construed accordingly.
- 1.3 **CCA Representative** means members of CCA's committee, its President and Patron, and anyone else (including volunteers, contractors and consultants) acting on behalf of CCA or with its authority.
- 1.4 **CCA Partner** means any organisation or individual (not being a CCA Representative) assisting CCA in the realisation of its objectives, including any diocese, provincial department or any other organisation or individual acting with the authority of Province de L'Eglise Anglicane Du Congo ("PEAC"), save that a Beneficiary of Assistance is not a CCA Partner.
- 1.5 **Physical Abuse** means actual or threatened physical harm perpetrated by another person, adult or child including but not limited to hitting, shaking, poisoning, drowning, burning, and unlawful or inappropriate physical sanctions
- 1.6 **Sexual Abuse** means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions; it includes, but is not limited to:
 - 1.6.1 forcing or enticing a person to take part in sexual activities that he or she does not fully understand and has little choice in consenting to;
 - 1.6.2 rape, oral sex, penetration, or non-penetrative acts such as masturbation, kissing, rubbing, and touching;
 - 1.6.3 looking at, producing or watching sexual images or sexual activities;
 - 1.6.4 encouraging people to behave in sexually inappropriate ways and
 - 1.6.5 Sexual Exploitation and Trafficking
- 1.7 **Emotional Abuse** means persistent emotional maltreatment which impacts on a person's mental health and development. Emotionally abusive acts include restriction of movement, degrading, humiliating, bullying (including cyber bullying), threatening, scaring, discriminating, ridiculing or other non-physical forms of hostile or rejection treatment.
- 1.8 **Neglect** means a persistent failure to meet (a) a Child's or (b) a Vulnerable Adult's or (c) where there is a duty of care, any other person's basic physical, psychological and/or mental needs, which is likely to result in serious impairment. It includes the failure to properly supervise and protect Children or Vulnerable Adults from Harm and provide for nutrition, shelter and safe living/working conditions.
- 1.9 **Sexual Exploitation and Trafficking** means engagement in any sexual activity in exchange for money, gifts, food, accommodation, affection, status, or anything else to meet family or personal needs. It usually involves manipulation or coercion. An abusive relationship between victim and perpetrator involves an imbalance of power where the victim's options are limited. Sexual exploitation manifests in different ways. It can involve a perpetrator with some power exercising financial, emotional or physical control over a person. It can involve peers manipulating or forcing victims into sexual activity, sometimes within gangs and in gang-affected neighbourhoods. It may also involve opportunistic or organised networks of perpetrators who profit financially from trafficking victims between different locations to engage in sexual activity with multiple men or women.
- 1.10 **Commercial Exploitation** means exploiting a Child or Vulnerable Adult in work or other activities for the benefit of others and to the detriment of their physical or mental health, education, moral or social-emotional development. It includes, but is not limited to, child labour.



- 1.11 **Concern/Complaint** means a suspicion, allegation or disclosure that a person is or might be a Survivor/Victim
- 1.12 **Survivor/Victim** is a person who has or might have suffered, is or might be suffering or is or might be at risk of suffering Harm.
- 1.13 **Child** means a person under 18 or if the child is located in a country where the age of consent is higher, under that higher age
- 1.14 **Vulnerable Adult** means a person aged 18 or over who could be particularly subject to Harm because of personal characteristics which may include, but are not limited to, age, disability, special educational needs, illness, mental or physical frailty or impairment. Adults can also be at risk of Harm due to life circumstances which may include but are not limited to isolation, socio-economic factors and environmental conditions. A person is also considered vulnerable if they are unable to look after themselves, protect themselves from Harm or are unable to report Harm.
- 1.15 **Beneficiary of Assistance** means an individual(s) (not an organisation) intended by CCA to be the person(s) deriving benefit from money, goods or services originating with CCA – i.e. the end-user.
- 1.16 Plurals are defined accordingly.

2. What we believe

- 2.1 We recognise our responsibilities for Safeguarding the wellbeing of everyone we come into contact with and our Beneficiaries of Assistance and protecting them from Harm.
- 2.2 We seek to recognise the inherent dignity and worth of all people. We believe that everyone we work with in any capacity (regardless of age, gender identity, disability, sexual orientation, ethnic identity or any other protected characteristic under the Equality Act 2010) has the right to be protected from Harm. We will not tolerate the inflicting of Harm on anyone. We are committed to communicating this ethos to our Partners.
- 2.3 We believe that Safeguarding is both an individual and a corporate responsibility; that all people have equal rights to protection from Harm and that inequalities should be challenged; that openness must be encouraged and Concerns/Complaints about Safeguarding investigated and disclosed promptly and appropriately.
- 2.4 Safeguarding should apply consistently and without exception to all our Representatives and Partners. It requires identifying, preventing and safeguarding against all risks of Harm and having accountable and transparent systems for response, reporting and learning when risks materialise.
- 2.5 Our Representatives have a responsibility to safeguard children, vulnerable adults, those we come into contact with and our Beneficiaries of Assistance. Safeguarding puts those we work with and for at the centre of all we do.
- 2.6 CCA Partners have a responsibility to meet the Safeguarding standards set out in this document and we are committed to support Partners to meet these standards.
- 2.7 We are committed to:



- 2.7.1 a culture of transparency and “zero tolerance to abuse” where Safeguarding Concerns/Complaints can be made and responded to;
- 2.7.2 a culture where issues about Safeguarding are raised and discussed;
- 2.7.3 investigating and where appropriate reporting any Concerns/Complaints or breaches of our Code of Behaviour.
- 2.8 Our projects and actions will take into account “do no harm” principles, seeking the best interest of those we work with and our Beneficiaries of Assistance.
- 2.9 Our approach is “survivor- centred” whilst respecting the rights of those accused until proven guilty.
- 2.10 The key strands of our safeguarding policy are prevention, reporting and response.

3. How we will act - our Code of Conduct

- 3.1 We will at all times act in accordance with what we believe (as set out in section 2 above).
- 3.2 We are committed to communicating what we believe about Safeguarding to our Partners and working with them, where needed, to encourage similar beliefs.
- 3.3 We will proactively encourage a culture of “zero tolerance” towards Harm, and seek to ensure that CCA Representatives “Do No Harm” while working for or with us.
- 3.4 All CCA Representatives must ensure that their behaviour is aligned with our mission and vision, that they comply with this Code of Behaviour and that they do not bring CCA into disrepute.
- 3.5 We will take action to prevent Harm to those with whom we work.
- 3.6 We will contribute to creating and maintaining an environment that prevents Safeguarding violations and promotes the implementation of this policy.
- 3.7 All CCA Representatives will immediately report any concerns or allegations of the infliction of Harm or non-compliance with this policy by any CCA committee member to the Safeguarding Officer (or, in the case of allegations against the Safeguarding Officer, to two other committee members).
- 3.8 All CCA Representatives will immediately disclose all charges, convictions, and other outcomes of an offence against them which occurred prior to or which occur during their association with CCA and which relate to the infliction of Harm or dishonesty.
- 3.9 CCA Representatives will not:
 - 3.9.1 exchange money, employment, goods or services for sexual activity - this includes any exchange of assistance intended for Beneficiaries of Assistance;
 - 3.9.2 engage in any sexual relationships with Beneficiaries of Assistance (they are based on inherently unequal power relationships);
 - 3.9.3 engage in sexual activity with a Child;
 - 3.9.4 sexually abuse or exploit Children, including touching a Child in a manner which is insensitive or inappropriate;



- 3.9.5 subject a Child to physical, emotional or psychological abuse or neglect in its many forms, or engage into abusive contact with Children;
- 3.9.6 engage in any commercially exploitative activities with Children including child labour or trafficking;
- 3.9.7 seek to make contact or spend time with any Child with whom they come into contact as a part of their work with CCA or CCA Partners except as part of the designated activities set out in the role;
- 3.9.8 degrade, discriminate, belittle or shame a Child, or show favouring behaviours;
- 3.9.9 seek lone contact with a Child or visit Children unaccompanied in their home or other accommodation;
- 3.9.10 sexually abuse or exploit a Vulnerable Adult;
- 3.9.11 subject a Vulnerable Adult to Physical, Emotional or psychological abuse or Neglect or behave in a way that may reasonably be considered abusive;
- 3.9.12 otherwise inflict Harm on a Vulnerable Adult;
- 3.9.13 seek lone contact with a Vulnerable Adult or visit a Vulnerable Adult unaccompanied in their home or other accommodation;
- 3.9.13 use a position of power for the purpose of personal gain including accepting favours, bribes, gifts;
- 3.10.14 attempt to do any of the actions referred to in 3.9.1 to 3.9.13 above.

Photography (including video)

- 3.10 When photographing or filming a Child or Vulnerable Adult for our communications or for any other purpose, CCA's Representatives must:
 - 3.10.1 assess and endeavour to comply with local traditions or restrictions for reproducing personal images before photographing or filming;
 - 3.10.2 obtain a completed consent form (Annexe 1) before photographing or filming a Child or Vulnerable Adult, explain honestly how the photograph or film will be used and ensure that the person signing the consent form has a copy;
 - 3.10.3 ensure photographs, films, videos and DVDs present people, particularly Children and Vulnerable Adults in a dignified and respectful manner and not in a submissive or shameful manner - for example, children should be clothed;
 - 3.10.4 ensure images are honest representations of the context and the facts;
 - 3.0.5 ensure file labels, meta data or text descriptions do not reveal identifying information about a Child when sending images electronically or publishing images in any form.

4. What we will do and not do to prevent Harm

- 4.1 We will at all times have a Safeguarding Officer in post and keep in use a dedicated email address for that person (safeguarding@congochurchasn.org.uk). We will also ensure that the Safeguarding Officer is properly trained, including top-up training.
- 4.2 We will not transfer funds to any CCA Partner unless that Partner either:



- 4.2.1 has and is committed to implementing its own Safeguarding policy which, in CCA's opinion, meets the standards set out in this policy or
- 4.2.2 is, in CCA's opinion, committed to adopting its own Safeguarding policy which will, in CCA's opinion, meet the standards set out in this policy and in the meantime, having been sent a copy of this policy in French or other relevant language, has stated in writing that it will at all times observe the Safeguarding standards set out in this policy.

Prevention

- 4.3 We will take the following steps to minimise risk:
 - 4.3.1 Assess the potential risk of Harm in all our activities and design and implement those activities in such a way as to minimise that risk as much as reasonably possible. Risk assessment guidance is contained in Annexe 2
 - 4.3.2 Conduct where possible safe recruitment of CCA Representatives if they might be in contact with Vulnerable Adults or Children through activities in the UK, virtually or overseas. This may include DBS or similar checks where appropriate and requesting that previous convictions be disclosed prior to engagement.
 - 4.3.3 Conduct where possible and where appropriate risk assessments, identifying possible risks for Children and Vulnerable Adults and putting mitigation measures in place.
 - 4.3.4 Ensure CCA Representatives receive appropriate Safeguarding training to understand their responsibilities and roles under this policy.
 - 4.3.5 Communicate the content of this policy to all CCA Representatives and CCA Partners.
 - 4.3.6 Follow up on reports of Safeguarding Concerns/Complaints promptly and appropriately including where appropriate immediate notification to CCA Partners and referral to statutory and professional bodies to ensure further Harm is prevented.

Reporting Concerns/Complaints

- 4.4 Our Safeguarding Officer will ensure that all CCA Representatives and CCA Partners are made aware of how to report a Safeguarding Concern/Complaint in a safe and accessible way.
- 4.5 Reporting Concerns/Complaints where the Survivor/Victim is a Child or Vulnerable Adult is mandatory. These Concerns/Complaints can arise where the person reporting:
 - 4.5.1 experiences the abusive behaviour;
 - 4.5.2 witnesses the abusive behaviour or
 - 4.5.3 suspects the abusive behaviour (for example where there are signs of abuse on the Survivor/Victim or when an allegation is disclosed by a third party).
- 4.6 There are three types of Concerns/Complaints that can be reported:
 - 4.6.1 **Category 1** – breaches of this policy or the Code of Conduct by CCA Representatives. We have a duty of care and will respond by reporting, where appropriate, and initiating an investigation.
 - 4.6.2 **Category 2** – breaches of this policy or the Code of Conduct by a CCA Partner staff member or volunteer. We will require the CCA Partner to initiate an investigation, if appropriate, in line with their Safeguarding policy. We would expect the CCA Partner to share the final report with CCA.



- 4.6.3 **Category 3** – where there is a report of Harm in a community in which we and/or any CCA Partner is working. While neither we nor the Partner will have a formal responsibility to investigate, we and the Partner may have some influence in the community and will pass on information to the relevant local authorities. In each case an assessment should be made of what is in the best interest of the child or adult at risk in relation to reporting the allegation to the authorities. Local laws will be observed.
- 4.7 CCA Representatives will report all instances of Harm either witnessed by or disclosed to them to the CCA Safeguarding Officer. If a person wishes to make a confidential disclosure to a CCA Representative, that person should be informed that some disclosures must be reported to the CCA Safeguarding Officer and cannot be made in confidence. If the person then refuses to make a disclosure or part of a disclosure the conversation should be reported to the CCA Safeguarding Officer.
- 4.8 CCA will accept disclosures about Concerns/Complaints from external sources such as members of the public, partners and official bodies.

Responding

- 4.9 All Concerns/Complaints should be **recorded immediately** on the Safeguarding Incident Reporting form (Annexe 3) and emailed directly to safeguarding@congochurchasn.org.uk. The Safeguarding Officer will follow the procedure set out in Annexe 4 and will inform the committee members, as appropriate. We will follow up Safeguarding Concerns/Complaints according to this policy and legal and statutory obligations.
- 4.10 CCA Representatives are encouraged to speak out about any Concerns/Complaints and report any disclosed Concerns/Complaints to the Safeguarding Officer as soon as reasonably possible.
- 4.11 WE acknowledge that the safety and care of the Survivors/Victims is critical within the first few hours immediately following an incident. We are committed to take action as soon as possible.
- 4.12 Confidentiality is essential to a fair and effective process and must be maintained at all stages of the process when dealing with Safeguarding matters. Information will be disseminated only to those who need to know and will be kept secure.
- 4.13 We will have available at all times a list of professionals or referral services to enable us to respond effectively to Concerns/Complaints. We will conduct investigations on serious allegations and engage qualified professionals to do so when required. If an allegation concerns an immediate risk to a person at risk or is a criminal offence it must be reported to the appropriate authorities, unless doing so would be likely to cause further Harm to the Survivor/Victim. CCA Representatives must cooperate with the authorities and avoid interfering with the course of justice.
- 4.14 The CCA Safeguarding Officer will encourage feedback and make available complaints mechanisms for its Safeguarding activities. All CCA Representatives will be informed that deliberately false allegations will be the subject of disciplinary action.
- 4.15 We will follow and regularly update the flowchart “Procedure for Responding to Safeguarding concerns.”
- 4.16 When the Concern/Complaint is of inappropriate behaviour not amounting to a criminal offence, the Safeguarding Officer and CCA committee members are at liberty to decide the most appropriate course of action.
- 4.17 But when the Concern/Complaint is of a serious or sensitive nature, including but not limited to sexual abuse or serious physical abuse, we will instigate an investigation. That investigation will be postponed until after the conclusion of any criminal proceedings if there is any risk of



interfering with the course of justice. In most cases that investigation will be conducted by one or more of our committee members, in addition to those responsible for safeguarding. It may include additional individuals with relevant experience or expertise. If the Concern/Complaint involves a Committee Member:

- 4.17.1 the investigatory panel will have one CCA committee member and two independent, trained professional and
- 4.17 unless there is good reason otherwise, the member will be suspended from his/her responsibilities .
- 4.18 If the Concern/Complaint involves a CCA Partner or staff member or volunteers of a CCA Partner, funding to that Partner will be suspended immediately and only resumed following a satisfactory risk assessment undertaken by us.
- 4.19 Appropriate disciplinary measures should be taken in the event that a Concern/Complaint is found to be true. If the allegation is found to be without base, appropriate steps should be taken to minimise damage to the reputation of the individual accused.
- 4.20 All Safeguarding Concerns/Complaints are recorded by the CCA Safeguarding Officer in a Safeguarding Incident Tracker which is reviewed by the CCA Committee. Any key Safeguarding risks are also shared with CCA Representatives and Partners. This is to ensure that Safeguarding measures and processes are reviewed and effective.
- 4.21 We will report any Concerns/Complaints to the appropriate regulatory bodies (including the Charity Commission) and government departments, as required by law. Where there is evidence that criminal activity may have taken place we will report to the relevant police and/or child protection authorities of the country where the incident occurred and/or country of origin of the Survivor/Victim as appropriate. We will do this where required by law but where not so required only if it is in the best interests of the Survivor/Victim to do so.
- 4.22 We will review this policy every year.



Annexe 1

CONSENT FORM

I and my Parent or Guardian where appropriate, give CCA, its Representatives and Partners, the absolute right and permission, as described below, to use information and other materials - my first name, country, age, my statements, a personal interview, my image, and any voice recording, including excerpts of such information (“my Materials”) as follows:.

My Materials may be used, including editing, by CCA and, with CCA’s permission, other organisations, persons or groups that partner with CCA to promote CCA’s mission.

I understand that my Materials may be used in printed materials, on the internet and other electronic media, video and audio recordings and other media, for any period of time and anywhere in the world.

I understand that my consent can be cancelled or changed at any time by giving notice to CCA.

I understand that I will not have the right to review or approve the draft or final product resulting from the use of my Materials.

I am of adult age and have every right to provide consent to CCA.

I have read this consent (or had it read to me) before signing it, and I understand this consent.

Signature of Parent/Guardian: _____

Name of Parent/Guardian: _____

Relationship to child/adult as risk:

Name of child/adult at risk: _____ Age: _____



Annexe 2

SAFEGUARDING RISK ASSESSMENT TABLE EXAMPLE

Activity (Risk event)	Physiotherapy for children that is administered by briefly trained caretakers
Effect on objectives <i>How would the risk impact project people and objectives?</i>	Children may injured (e.g limbs break) if the therapy techniques were not well understood or implemented
Impact	High
Likelihood	Low
Risk Rating <i>Impact x likelihood</i>	Medium
Mitigation Strategies <i>List the measures already in place (p) And that you are developing (d) that would prevent or reduce this risk from occurring</i>	Increase the frequency of therapy trainings for the caretakers. Encourage caretakers to perform only simple techniques and monitor their performance before introducing them to the more complex ones.
Acceptable risk? <i>Yes / No</i>	Yes
Risk Owner <i>Individual responsible for the risk event</i>	Project Manager at implementing partner
Timeline <i>Expected completion date for item</i>	Ongoing
Monitoring / Reporting <i>Reporting timeframes and method</i>	Bi-annual feedback meetings with caretakers and persons receiving physiotherapy. Inclusion in reports to CCA and other donors.

		Impact		
		Low	Medium	High
Likelihood	High	Medium	High	High
	Medium	Low	Medium	High
	Low	Low	Low	Medium



Annexe 3

SAFEGUARDING INCIDENT REPORTING FORM

Your Information			
Name			
Address			
Contact number(s)			
E-mail			
Name of organisation		Your role	

Personal information – child / young person / adult at risk					
Name				Date of birth	
Gender	Male <input type="checkbox"/>	Female <input type="checkbox"/>	Non-binary <input type="checkbox"/>	Another description (please state) <input type="checkbox"/>	
Is there any information about the child / young person / adult that would be useful to consider?					

Contact information – parent / carer		
Name(s)		
Address		
Contact number(s)		
E-mail		
Have they been notified of this incident?	No <input type="checkbox"/>	Please explain why this decision has been taken
	Yes <input type="checkbox"/>	Please give details of what was said / actions agreed



Incident details*			
Date and time of incident			
Please tick one:	<input type="checkbox"/> I am reporting my own concerns	<input type="checkbox"/> I am responding to concerns raised by someone else – please fill in their details:	
Name of person raising concern		Role within the organisation or relationship to the child	
Contact number(s)			
E-mail			
<p>Details of the incident or concerns (what, where, when, who, how etc; please include other relevant information, such as description of any injuries and whether you are recording this incident as fact, opinion, or hearsay)</p>			

* Attach a separate sheet if more space is required (eg multiple witnesses)

Incident details (continued)			
Child / Young Person / Adult at Risk's account of the incident			
Please provide any witness accounts of the incident			
Name of witness (and date of birth, if a child)		Role with the org. or relationship to the child	
Address			
Contact number(s)			
E-mail			
Details of any person involved in this incident or alleged to have caused the incident / injury			
Name (and date of birth if a child)		Role with the org. or relationship to the child	
Address			
Contact number(s)			
E-mail			
Please provide details of action taken to date:			



Has the incident been reported to any external agencies?	<input type="checkbox"/> No	<input type="checkbox"/> Yes – please provide further details:
Name of organisation / agency		
Contact person		
Contact number(s)		
E-mail		
Agreed action or advice given		

Declaration	
Your signature	
Print name	
Today's date	

Contact your organisation's Designated Safeguarding Officer in line with CCA's reporting procedures	
Safeguarding Officer's name	
Date reported	
Action	
Send to safeguarding@congochurchassn.org.uk or post to CCA, Hockliffe Grange, Hockliffe LU7 9NL	



Annexe 4

