

Common Purpose Charitable Trust Safeguarding Policy



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SMT Sponsor:	Adirupa Sengupta (Group Chief Executive of Common Purpose Charitable Trust)
Area of Governance:	Board of Trustees
Date for Renewal:	May 2026
Approved by:	Common Purpose Board of Trustees
Geographical Scope:	For all Common Purpose employees, volunteers and representatives worldwide, except in countries where the following policy contravenes local legislation. In these cases, local legislation must be followed with guidance from the Director, Learning and Innovation. This document will apply if Common Purpose policy is more stringent than local legislation.
Confidentiality:	Public, additional guidelines and materials are available internally

Policy Statement

Common Purpose, for the purposes of this policy and procedures document, considers a *vulnerable person* as a minor (under 18) or adult who may be restricted in capacity to guard himself / herself against harm or exploitation or to report such harm or exploitation. Restriction of capacity may arise as a result of physical or intellectual impairment. Vulnerability to abuse is influenced by both context and individual circumstances.

Common Purpose, for the purposes of this policy and procedures document, considers a minor in line with the United Nations Convention on the Rights of the Child (UNCRC), 1989, under the Policy a minor is defined as anyone who has not reached their 18th birthday. Although the national laws in countries that we work in may have different ages at which a child is considered an adult, or at which a child can give consent or is responsible, we use the definition of a child according to international law as set out in the Convention on the Rights of the Child.

Common Purpose is committed to the safeguarding of vulnerable persons and minors from abuse. The definitions of safeguarding that guide our work in Common Purpose, are taken from the statutory guidance below:

- Safeguarding children as defined in *Working Together to Safeguard Children 2018*
- Safeguarding adults at risk as defined in the *Care and Support Statutory Guidance* issued in the Care Act 2014

Safeguarding means protecting peoples' health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect. It acknowledges that all minors and adults have the right to be safe and to live a life free from abuse. All persons are entitled to this right, regardless of their circumstances.

All Common Purpose activities have a publicly declared 'No Tolerance' approach to any form of abuse and promotes a culture which supports this ethos. Common Purpose believes that everyone we come into contact with, regardless of age, gender identity, disability, sexual orientation or ethnic origin has the right to be protected from all forms of harm, abuse, neglect and exploitation. Common Purpose will not tolerate abuse and exploitation by staff or associated personnel.

Common Purpose commits to addressing safeguarding throughout its work, through the three pillars of prevention, reporting and response.

This policy is mandatory and must be applied in all situations where Common Purpose, or our partners, work.

This policy forms part of an employees' terms and conditions of employment and may be subject to change at the discretion of management. It is therefore the responsibility of all staff of Common Purpose to raise any concerns they have or any concerns which are reported to them according to this policy.

A core governance responsibility is to ensure that safeguarding policies and procedures and associated practices are in place and appropriate to the activities provided.

Purpose

The purpose of this policy is to ensure that Common Purpose exercises its duty of care to safeguard minors (under 18s) and vulnerable adults.

We also have a duty to protect our trustees, staff, volunteers and programme participants (including minors and vulnerable adults) from any harm that may be caused due to their coming into contact with Common Purpose. This includes harm arising from:

- The conduct of trustees, staff or personnel associated with Common Purpose
- The design and implementation of Common Purpose's programmes and activities

The policy lays out the commitments made by Common Purpose, and informs trustees, staff and associated personnel of their responsibilities in relation to safeguarding.

This policy does not cover:

- Sexual harassment in the workplace – this is dealt with under Common Purpose's Human Resources Policies and Procedures
- Safeguarding concerns in the wider community not perpetrated by Common Purpose or associated personnel

Scope

This Policy and Procedure applies to:

- All staff employed by or contracted to Common Purpose globally
- Trustees and directors of The Common Purpose Charitable Trust and all subsidiaries
- The licensees of Common Purpose, including their directors, staff, and associated personnel
- Associated personnel whilst engaged with work or visits related to Common Purpose, including but not limited to the following: consultants, volunteers, contractors, programme visitors and guest contributors
- Partners, contractors and suppliers, and is also relevant for those with whom we engage for example minors, parents and communities, to act in accordance with this policy

In cases where we are not the lead partner, then it is expected that we will encourage and advocate for our partners to either follow the Common Purpose Safeguarding Policy or develop their own.

Programme participants and members of the public are not within the scope of the policy. Programme participant behaviour is addressed through the Common Purpose Conventions and the terms of conditions of their specific programme.

Principles

All our policies and procedures promote welfare, reflect inclusion and transparency in the provision of activities, and promote a culture of safeguarding.

The practices and procedures within this policy are based on the principles contained in UK legislation and guidelines from the Charity Commission for England. They take the following into consideration:

- The Children Act 1989
- United Nations Convention on the Rights of the Child 1989
- The Children Act 2004 & 2007
- Working Together 2018
- The Care Act 2014
- Human Rights Act 1998
- Keeping Children Safe in Education 2020

Implementation

Responsibility for leading implementation of this policy and procedure rests with the Common Purpose Operations Team, namely the Director, Learning and Innovation.

The Director, Learning and Innovation will have overall responsibility for implementation of this policy and procedure within their administrative area, and, will ensure that each manager of relevant Common Purpose activities will undertake the following:

- Communicate this policy to all staff and volunteers
- Appropriate training is provided
- Ensure that service specific procedures are developed, implemented and reviewed in compliance with this policy

Definitions of Abuse

Abuse may be defined as *"any act, or failure to act, which results in a breach of a minor or vulnerable person's human rights, civil liberties, physical and mental integrity, dignity or general wellbeing, whether intended or through negligence, including sexual relationships or financial transactions to which the person does not or cannot validly consent, or which are deliberately exploitative. Abuse may take a variety of forms."*

Although this abuse definition focuses on acts of abuse by individuals, abuse can also arise from inappropriate or inadequacy of care or programmes of care.

There are several forms of abuse, any or all of which may be perpetrated as the result of deliberate intent, negligence or lack of insight and ignorance. A person may experience more than one form of abuse at any one time. The following are the main categories/types of abuse.

Types of Abuse

- Physical abuse includes hitting, slapping, pushing, kicking, misuse of medication, restraint or inappropriate sanctions.
- Sexual abuse includes rape and sexual assault, or sexual acts to which the vulnerable person has not consented, or could not consent, or into which he, she or they were compelled to consent

- Psychological abuse includes emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks
- Financial or material abuse includes theft, fraud, exploitation, pressure in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits
- Neglect and acts of omission includes ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services, the withholding of the necessities of life such as medication, adequate nutrition and heating
- Discriminatory abuse includes ageism, racism, sexism, that based on a person's disability, and other forms of harassment, slurs or similar treatment
- Institutional abuse may occur within residential care and acute settings including nursing homes, acute hospitals and any other in-patient settings, and may involve poor standards of care, rigid routines and inadequate responses to complex needs

Related areas to safeguarding

- Forced marriage
- Child sexual exploitation
- Female genital mutilation
- Modern slavery
- Honour based violence
- Domestic abuse
- Stalking
- Hate crime
- Extremism and radicalization
- Cyber abuse / stalking
- Gangs
- Bullying
- Mate crime

Prevention

Common Purpose responsibilities

The key to safeguarding is abuse prevention. It is widely recognized that organizational awareness and good practice can promote positive staff actions, reduce opportunities for offending and enable earlier detection and response to safeguarding concerns.

In this regard Common Purpose will:

- Make this policy available to all staff, and provide appropriate means for staff to become familiar with, and know their responsibilities within this policy
- Design and undertake all its programmes and activities in a way that protects people from any risk of harm that may arise from their coming into contact with Common Purpose. This includes the way in which information about individuals in our programmes is gathered and communicated
- Implement stringent safeguarding procedures when recruiting, managing and deploying staff and associated personnel
- Adopt safeguarding practices through procedures and a code of conduct for staff and volunteers
- Develop and implement an effective e-safety policy and related procedures
- Make training available on safeguarding for staff as required
- Follow up on reports of safeguarding concerns promptly and according to the agreed procedures as set out in the Safeguarding Reporting Procedures
- Appoint a lead trustee with responsibility for safeguarding
- Review this policy annually and have it approved by the CPCT board.
- Record and store information professionally and securely, and share information about safeguarding and good practice with staff and volunteers via the staff handbook and other communication
- Access to the data will be restricted to authorized personnel only, including members of the programme delivery team, relevant administrative staff, and approved data analysts or researchers working under strict confidentiality agreements
- Minor and vulnerable adult information will be anonymised wherever possible to protect individual privacy and ensure confidentiality
- Use its safeguarding procedures to share concerns with agencies who need to know
- Use its procedures to manage and allegations against staff and volunteers appropriately
- Create and maintain an anti-bullying environment and include appropriate policy and procedure to help it deal effectively with any bullying that does arise
- Establish effective complaints and whistleblowing measures
- Provide a safe physical environment for staff, volunteers, and programme participants by applying health and safety measures in accordance with the law and regulatory guidance.

Staff responsibilities

Common Purpose staff and associated personnel must not:

- Sexually abuse or exploit anyone
- Subject anyone to physical, emotional or psychological abuse, or neglect
- Exchange money, employment, goods or services for sexual activity.

Additionally, Common Purpose staff 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

- Value, listen to and respect all people whom they come into contact with
- Report any concerns or suspicions regarding safeguarding violations by a Common Purpose staff member or associated personnel to the appropriate staff member

Enabling reports

Common Purpose has a duty of care to ensure we respond appropriately to concerns of actual or suspected abuse / harm both internally and externally.

Irrespective of role all Common Purpose staff have a responsibility and mandatory duty to report any allegations or concerns in a confidential manner. It is not for staff to decide whether abuse has taken place. No staff member can agree to keeping information relating to safeguarding in personal confidence.

As a result, Common Purpose has established a safe, appropriate and accessible means of reporting safeguarding concerns for staff and the programme participants we work with.

Any staff reporting concerns or complaints through formal whistleblowing channels (or if they request it) will be protected by Common Purpose's Whistleblowing Policy.

Common Purpose will also accept complaints from people other than staff, such as programme participants and members of the public.

Below you will find the appropriate channel to raise an allegation or concern.

How to report a safeguarding concern – staff

Staff members who have a complaint or concern relating to safeguarding should report it immediately to [David O'Connor](#), Director, Learning and Innovation Common Purpose Charitable Trust or T: +44 (0)7774 682485

If the staff member does not feel comfortable reporting to the Learning and Innovation Director for example if they feel that the report will not be taken seriously, or if that person is implicated in the concern) they may report to the designated nominated Trustee responsible for Safeguarding, [Jan Sanders](#).

How to report a safeguarding concern – people other than staff (programme participants etc.)

Programme participants and members of the public who have a complaint or concern relating to safeguarding should contact [David O'Connor](#), Director, Learning and Innovation Common Purpose Charitable Trust or T: +44 (0)7774 682485 in the first instance.

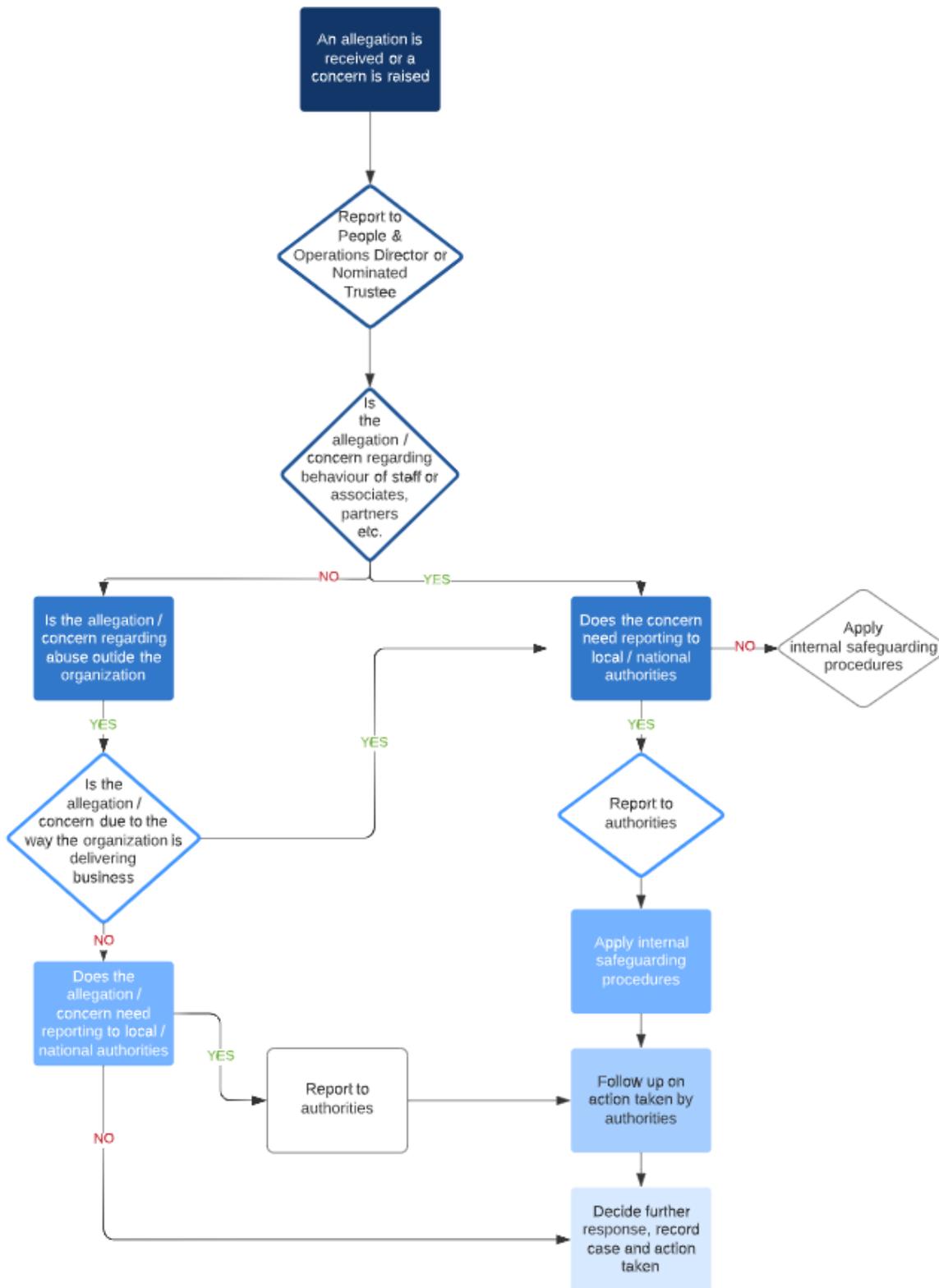
Response

Common Purpose will follow up safeguarding allegations and concerns according to the transparent processes set out in the following Safeguarding Reporting Procedures, and legal and statutory obligations. Common Purpose is not an investigative authority, and therefore where appropriate referrals will be made to the relevant social or law enforcement agencies.

Common Purpose will apply appropriate disciplinary measures to staff found in breach of policy. Where staff or associated personnel have caused harm to a person, regardless of whether or not a formal internal response is initiated (such as an internal investigation), Common Purpose will offer appropriate support to that person.

Safeguarding Decision Tree

The following flow chart highlights the consideration stages we follow when an allegation or complaint is received.



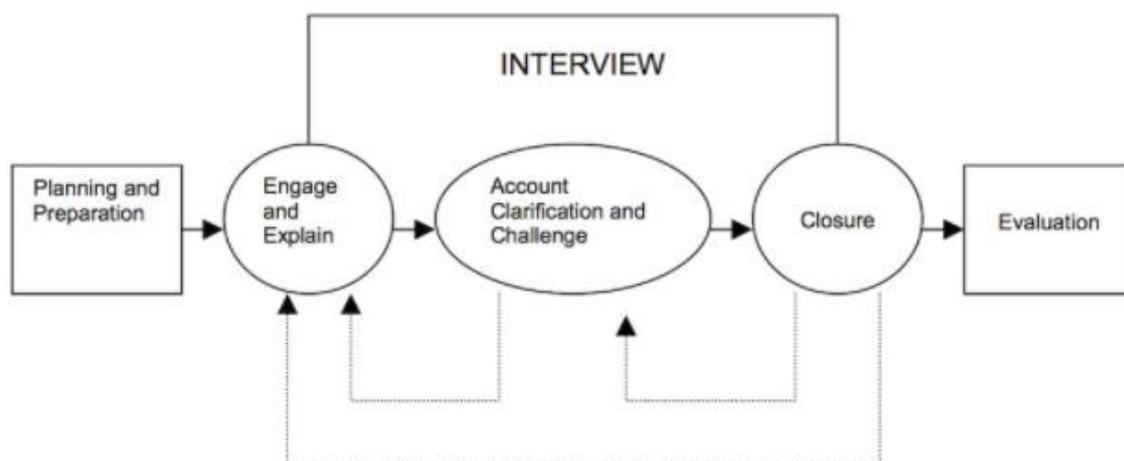
Investigation Procedure

Our investigation procedure is based around the following key steps. The steps will be climbed up and down at different stages of the process and may need to be revisited as the investigation progresses.



Investigation Process

To ensure complete transparency, during the investigation stage we use the PEACE model to ensure that we are gathering all pertinent information without bias. Our findings and final reports will outline the information found at each stage of this process.



Confidentiality

Staff and associated personnel will maintain confidentiality at all stages of the process when dealing with safeguarding concerns. Information relating to the concern and subsequent case management will be shared strictly on a need to know basis and will be kept secure at all times.

Recording and Information Sharing

All safeguarding concerns, decisions and actions will be recorded promptly and saved securely. This includes retaining a copy of a referral and evidence of prompt completion of any agreed actions to protect a minor (under 18s) or vulnerable adult.

Information sharing decisions will be recorded whether or not the decision is taken to share. Reasons to share should also include what information has been shared and to whom.

Consideration must be given about what information to share and the impact of disclosing information on the individual or any third party. Any information shared must be proportionate to the need and level of risk. It must also be accurate, relevant, and adequate to the purpose of sharing the information.

From the outset of identifying safeguarding concerns we will be open and transparent with the individual about why, what, how and with whom information will, or could be shared. We will also seek their agreement to share information, unless it is unsafe or inappropriate to do so.

All information should be shared in a timely manner to reduce the risk of harm, and in an appropriate and secure way.

Associated policies

1. Safeguarding Reporting Procedures

2. Common Purpose Staff Handbook
3. Human Resources Policies and Procedures
4. Staff Data Privacy Policy
5. Ethical Standards Policy
6. Common Purpose Conventions
7. Complaints Policy
8. Risk Management Policy & Procedures
9. GDPR Policy

Review

Responsibility for reviewing and updating the Safeguarding Policy lies with the Director, Learning and Innovation and nominated Trustee. This document will be reviewed and updated every 12 months.

Last reviewed: May 2025

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Next scheduled review: May 2026