

SAFEGUARDING POLICY

1. Introduction/background

1.1 The Glynn Vivian Miners Mission Incorporated 1906, hereafter referred to as the International Miners' Mission (IMM), is committed to proactively safeguarding and promoting the welfare of its beneficiaries and to taking all necessary steps to ensure those who come into contact with IMM or its associated programmes do not, as a result, come to any harm.

1.2 This policy relates to IMM's commitment to safeguarding (as defined by the Charity Commission) through its trustees, staff, and employees and protecting its beneficiaries.¹ The policy applies to all personnel: directors, partners, representatives, board members, trustees, consultants, volunteers, and anyone else ("personnel") associated with the delivery of IMM's objectives. This policy always applies to these personnel, including when they are on duty, off duty, or on leave.

1.3 The IMM believes all people are made in the image of God and should be treated with respect, honoured for their intrinsic value, and cared for in ways that glorify God. Over recent years there has been increasing recognition of the way in which people can be at risk of harm from individuals, organisations, and institutions that are supposed to help them.

1.4 As a consequence, there has been a significant increase in the efforts made by charities to ensure that no harm comes to beneficiaries or target communities from contact with their trustees and associates or because of any of the organisation's activities. This policy addresses abuse and exploitation by individuals in positions of trust.

1.5 This duty of care extends beyond statutory safeguarding requirements. IMM takes seriously its obligations to operate in a way that ensures, so far as is possible, that its work does no harm to anyone with whom it engages.

1.6 Given these values and considering widely recognised risks, IMM has developed this policy to promote protection for all those people it encounters, as well as trustees, staff, employees, and volunteers within IMM itself.

1.7 Should it encounter vulnerable groups (including children), IMM takes responsibility to ensure it is doing all it can to protect such groups from all forms of harm, including abuse, neglect and exploitation and to ensure appropriate action is taken if such harm occurs.

1.8 Key Terms:

(a) Safeguarding.

- i. The process of protecting beneficiaries, including children and vulnerable populations, from abuse or neglect, preventing impairment of their health and development, and ensuring they are safe and have effective care that enables them to flourish.

¹ The Charity Commission has published guidance, "Safeguarding and protecting people for charities and trustees", which is updated from time to time and available at: <https://www.gov.uk/guidance/safeguarding-duties-for-charity-trustees>

ii. IMM is responsible to ensure that personnel, operations, and programs do no harm. This includes protecting children and vulnerable populations from the risk of harm and abuse.

(b) Child(ren). A child is an individual under the age of 18, irrespective of local country definitions of when a child reaches adulthood.

(c) Child Abuse. The infliction of physical or emotional injury on a person under the age of 18 years old. There are four categories of child abuse:

i. Sexual Abuse: Includes any actual or threatened sexual contact, prostitution, or pornography involving a child. A child is incapable of “consenting” to sexual activity with an adult. The mistaken belief that the person is 18 or older, cannot be used as a defence.

ii. Physical Abuse: Includes the actual or threatened physical injury of a child. Child physical abuse can include deliberately hitting, beating, shaking, and/or throwing a child.

iii. Emotional Abuse: Includes severe or persistent mistreatment, or rejection of a child that may impair emotional or behavioural development. Emotional abuse can include telling the child they are worthless, unloved, or inadequate; inappropriate use of spiritual authority (for example, the Bible, church tradition, church authority, etc.); or forcing a child to act in any unhealthy way.

iv. Neglect: Includes the persistent or severe failure to care for and/or protect a child from exposure to danger that results in the impairment of health or development. Neglect can include educational, physical, or emotional elements.

d. Beneficiary. A resident of a community that may be a recipient of services, and/or participate actively as a contributor of project service activities sponsored by IMM and IMM partners.

e. Vulnerable populations. Adults and children who are unable to protect themselves from harm or exploitation; or who for any reason including gender, mental health, physical health, disability, ethnicity, religious identity, economic, social status, and/or as a result of disasters and conflicts, are deemed to be at risk.

f. Sexual exploitation. Sexual exploitation occurs when someone uses, or tries to use, a differential power relationship or a person’s vulnerable position or trust for sexual purposes. This can include coercing or engaging a person into a sexual act, prostitution, or pornography, with or without the person’s consent, in exchange for goods and services, money, drugs, shelter, food, protection or other benefits.²

g. Sexual abuse. Actual or threatened physical sexual contact, whether by force or under unequal or coercive conditions. Aid beneficiaries or other community members may be at particular risk of sexual exploitation or abuse. It is the responsibility of all IMM personnel to create and maintain an environment that prevents sexual exploitation and abuse.

1.9 The IMM Board of Trustees will nominate a Safeguarding Lead Trustee, who will have oversight of safeguarding and welfare arrangements and will receive reports of any safeguarding and welfare

² UN Secretary General Bulletin: <http://www.pseataforce.org/uploads/tools/1327932869.pdf>

incidents that arise. The Safeguarding Lead Trustee will have a regular opportunity at meetings of the Board of Trustees to ensure that they are appropriately apprised of matters that arise.

2. Understanding Risks

2.1 Vulnerable persons can be harmed, or put at risk of harm, by organisations and institutions, and that abuse of vulnerable groups (including children) can happen in all types of organisations. Such harm may result from unintentional acts or deliberate actions.

2.2 Unintentional acts may lead to harm due to a lack of 'due diligence' or competence or through organisational negligence, such as inadequate care and supervision, lack of policies, procedures and guidance to inform programming and practice, or lack of trustee compliance with legal requirements.

2.3 Deliberate actions may be taken by people with intent to abuse vulnerable people and the following are prohibited activities when interacting with beneficiaries, children, and vulnerable populations. Personnel are prohibited from engaging in any of the following actions (this list is not all inclusive):

(a) Sexual Misconduct

- i. Spending time with a child where they are outside the view of others.
- ii. Not using the "different gender two adult" rule when possible.
- iii. Behaving with beneficiaries, children, and vulnerable populations in a manner that is sexually provocative.
- iv. Exposing beneficiaries, children, and vulnerable populations to pornography or other sexually explicit images or media.
- v. Sleeping in the same bed with a child (that is not your own) or vulnerable populations.
- vi. Suggesting that an alleged survivor of sexual abuse has any responsibility for the abuse or that they behaved in a "seductive" manner.
- vii. Unwanted touching, molesting, oral sex and/or sexual intercourse with any beneficiaries, children, and vulnerable populations.
- viii. Engaging in prostitution.

(b) Physical Misconduct. Hitting or physically assaulting beneficiaries, children, and vulnerable populations, even if acceptable in local culture.

(c) Emotional Misconduct

- i. Acting in ways that shame, humiliate, belittle, or degrade beneficiaries, children, and vulnerable populations, or otherwise perpetrate any form of abuse.
- ii. Participating in harmful traditional practices or spiritual or ritualistic abuse.

(d) Inappropriate Images. Taking, producing, or creating images of beneficiaries, children, and vulnerable populations that are humiliating, degrading, shameful, or otherwise offensive. All beneficiaries should be adequately clothed and not in poses that could be perceived as sexually suggestive.

(e) Other.

- i. Enlisting or engaging a child or vulnerable populations in IMM activities without parental or guardian consent.
- ii. Driving a child without parental consent or vulnerable populations without proper consent; at least one other adult must be present in the car or on a motorcycle.
- iii. Never include in media publications the full name or location of the beneficiary, child, or vulnerable populations or provide this information to unauthorized people.
- iv. Taking beneficiaries, children, and vulnerable populations to the home of personnel.
- v. Being intoxicated or consuming alcohol or drugs before or during encounters with beneficiaries, children, and vulnerable populations.
- vi. Using offensive language, suggestions, or advice.
- vii. Exposing beneficiaries, children, and vulnerable populations to situations that are unsafe, abusive, or illegal.
- viii. Dressing in a culturally inappropriate way where bodies are exposed to beneficiaries, children, and vulnerable populations.
- ix. Blaming the survivor for abuse, as they cannot be blamed for the actions of others.
- x. Leaving non-IMM personnel unsupervised during visits to IMM project areas.
- xi. Hiring vulnerable populations to do any work that exploits them.

3. Scope of this policy

3.1 Board members and trustees must always comply with this policy, and they are expected to act in the best interests of IMM's ultimate beneficiaries.

3.2 This policy also applies in respect of partnership organisations who are delivering a programme or service on behalf of IMM. For the avoidance of doubt, this policy (where necessary changes have been made) also applies to partners whose relationship with IMM is governed by a Memorandum of Understanding (see paragraph 7),

3.3 In respect of partnership organisations who deliver a programme or service on behalf of IMM only, IMM expects that the principles and approaches already shared with partnership organisations mean that they will fully support the values and commitments set out in this policy. IMM recognises that some will already have protection policies and associated measures in place. Where this is the case, the highest standard should prevail.

3.4 IMM will ensure that each partner has appointed a member of staff who will be responsible for promptly reporting to the relevant IMM Designated Safeguarding Officer (or other appropriate person) any safeguarding concerns that arise in or are relevant to the context of the partnership.

4. Statement of Commitments

4.1 IMM commits to taking all practical measures to ensure vulnerable groups (including children) impacted by projects and programmes delivered and/or supported by IMM are protected as far as possible from harm, including exploitation, neglect, and abuse of all kinds.

4.2 In order to protect the most vulnerable populations, particularly children, from sexual exploitation, abuse, and harassment (SEAH), and to ensure the integrity of IMM activities, the following core principles must be followed:

- (a) SEAH constitutes acts of gross misconduct and are grounds for termination of employment.
- (b) Sexual activity with children is prohibited. Mistaken belief in the age of the child is not a defence.
- (c) Exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliation, degrading or exploitative behaviour, is prohibited. This includes the exchange of assistance that is due to program beneficiaries.
- (d) Sexual relationships between personnel and beneficiaries are strongly discouraged. Such relationships, as they are based on inherently unequal power dynamics, undermine the credibility and integrity of IMM's evangelistic, pastoral and development work.
- (e) When personnel develop concerns or suspicions regarding SEAH by a fellow worker, whether in IMM or not, he or she must immediately report such concerns via established reporting mechanisms.
- (f) Personnel are required to create and maintain a safe environment that prevents SEAH and promotes the implementation of this Policy. Supervisors at all levels have responsibilities to support and develop systems which maintain this environment.

5. IMM commits to:

5.1 Ensuring IMM staff, employees, partners, and trustees are fully cognisant of protection issues.

5.2 Increasing understanding and raising the awareness of trustees, staff, and employees of risks relating to safeguarding within IMM and in connection with its activities.

5.3 Taking appropriate and proportionate action if this policy is not complied with.

5.4 Carrying out appropriate and relevant due diligence on partners who are delivering a programme or service on behalf of IMM only, which will include ensuring they have appropriate controls and safeguarding measures in place; meet any applicable international standards in carrying out their activities; and integrating safeguarding and onward reporting requirements in IMM's partnership or funding-related agreements, taking account of the Charity Commission's relevant guidance.³

5.5 Making sure protection considerations are integrated into all aspects of the organisation.

5.6 Ensuring all trustees, staff, and employees are aware of their responsibilities to report concerns and of steps to take/who to go to when reporting such concerns.

5.7 Ensuring that safeguarding concerns are addressed promptly and through the appropriate channels.

5.8 Reporting safeguarding incidents, allegations or concerns to external authorities and regulators, as appropriate, and in accordance with best practice. IMM will fully risk assess such reporting to

³ <https://www.gov.uk/government/publications/charities-due-diligence-checks-and-monitoringend-use-of-funds>

ensure that making a report is not likely to cause further harm to the individual(s) to whom harm has (actually, allegedly, or potentially) already been caused.

5.9 Ensuring that its privacy policy (see 11.1) remains suitably updated so that while it will report wrongdoing, fairly and accurately, on the part of its trustees, staff, employees, and partners to appropriate authorities; it will share such information in such a way to protect individuals from further harm.

6. Embedding organisational commitment

6.1 In order to make its policy commitments a practical reality, IMM will instigate or strengthen a range of measures that focus on making sure this policy and associated procedures are in place, that people are supported to understand and work within the provisions of the policy, that it is fully and effectively integrated into all our activities, and that it is subject to monitoring and review.

6.2 IMM trustees, staff, and employees will receive training/briefing on their responsibilities and obligations under this policy at least once per year, and it will form part of the induction for new trustees, staff, and employees.

6.3 Trustees, staff, and employees will be expected to acknowledge and accept their responsibilities under this policy.

6.4 Breaches by trustees, staff, and employees may result in the termination of their trusteeship or employment.

7. Partners of IMM

7.1 IMM may enter relationships with partners which are governed by a Memorandum of Understanding. IMM requires that such partners will take all steps necessary in the cultural context to promote safety, and to alert IMM should any issues or allegations be raised about an individual who has a relationship with IMM and who has fallen short of this expectation.

7.2 While any individuals from these partners are involved with us, they will individually be subject to any IMM checks, policies and procedures which may apply. This includes an appropriate safeguarding orientation when they start and during due diligence auditing.

7.3 In respect of any other ways in which IMM might engage with these partners, IMM will take all practical steps, which are documented within the Memorandum of Understanding, to ensure those who come into contact with IMM, or associated programmes do not, as a result, come to any harm.

8. Reporting concerns

8.1 A safeguarding concern may arise in several ways. For example:

- (a) You may witness abuse taking place.
- (b) An individual may tell you that they or someone they know has suffered harm.
- (c) You may notice behaviour which gives rise to a suspicion or concern that an individual has been harmed or is at risk of harm or that an individual has acted inappropriately or in breach of this policy.
- (d) You may hear a rumour or be part of an informal discussion about a suspicion, concern or allegation.
- (e) You may receive a letter, e-mail, text, or message on social media.

8.2 IMM trustees, staff, and employees are required to immediately report, to the Safeguarding Lead Trustee, any concerns, or suspicions of possible/actual harm to a beneficiary (or other person connected to the charity), including abuse, exploitation and neglect, including any suspected, alleged, or actual historical abuse.

8.3 The person making the report should otherwise keep the matter strictly confidential and not seek to investigate the incident or suspicion. If you do not have all the information available to make a complete report, you should not delay in raising the concern and must not investigate further to obtain additional information. Suspicions must not be discussed with anyone other than the Safeguarding Lead Trustee.

8.4 Any materials in writing concerning a report of concerns will be kept securely if in hard copy or password protected if stored electronically, with appropriate access restrictions.

8.5 The name of the Safeguarding Lead Trustee can be found in the 'Contact Information' section at the end of this policy.

9. Responding to concerns

9.1 We are committed to reporting all relevant incidents to the Charity Commission for England and Wales via a serious incident report.⁴ We will also report incidents to other regulatory bodies and government departments or funding bodies, where appropriate. Where there is evidence that criminal activity may have taken place, or concerns have been raised in relation to a child or vulnerable adult, we will report to the relevant police and/or safeguarding authorities as appropriate (for example to the relevant Local Authority Designated Officer (LADO) or Adult Safeguarding Board), taking appropriate account of the Charity Commission's guidance in this respect.⁵

9.2 Decisions to report to external authorities will be fully risk assessed and anonymisation/pseudonymisation considered when necessary. Reporting will not be avoided on the basis that it may harm IMM's reputation or give rise to litigation. Any concerns in relation to data protection will not act as a barrier to reporting, although they will be carefully considered to ensure that the disclosure is made within the legal framework for so doing.

9.3 On a case-by-case basis, the Safeguarding Lead Trustee will consider what steps are necessary and appropriate. In addition to potential external reporting discussed above, in summary the steps which may be taken include:

(a) If necessary, IMM will arrange appropriate external support. All decision making on what support is provided should be informed by the survivor's wishes.

(b) Clarify what, how and with whom information will be shared relating to this concern. Information must be shared on a need-to-know basis only, with appropriate consideration of the need to ensure that sharing the information is necessary for the purposes for which it is shared, the information is accurate and up to date, the information sharing is timely and the information is secure in how it is shared and stored.

⁴ The Charity Commission has published guidance as to what constitutes a serious incident and how to make a report, which is updated from time to time and available at:

<https://www.gov.uk/guidance/how-to-report-a-serious-incident-in-your-charity>

⁵ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/780835/Criminal_reporting_of_safeguarding_offences_including_overseas_v3.pdf

(c) Consider whether the Board of Trustees need to be informed straight away or whether it can be reported at the next board meeting.

(d) Consider what next steps are appropriate. These could be (but are not limited to):

- i. No further action (for example if there is insufficient information to follow up, or the report refers to incidents outside the organisation's remit and there are no steps that IMM may take practically.
- ii. Investigation is required to gather further information.
- iii. Immediate disciplinary action if no further information needed.
- iv. Review, and possible termination, of agreement or relationship with the partnership organisation.
- v. Referral to relevant authorities

(e) Action any other reporting obligations. These may include:

- i. Partner organisations in accordance with an obligation in a Memorandum of Understanding.
- ii. Statutory or regulatory bodies (such as the Charity Commission or the Information Commissioner's Office.

(f) Document all steps and decision made clearly, with access appropriately restricted.

9.4 The IMM prohibits retaliation against anyone who:

- (a) Opposes any act of abuse.
- (b) Reports in good faith any suspected or alleged child and vulnerable populations.
- (c) Participates in the investigation of any alleged incident of child and vulnerable populations.
- (d) Retaliation is grounds for discipline of personnel, including termination. Anyone who believes that he/she has been retaliated against should promptly inform IMM using the reporting options listed previously.

10. Policy Review

10.1 We are committed to reviewing our policy and good practice regularly. This policy will be reviewed by the board of trustees at least annually, when there is a change in UK law and/or best practice or when an incident occurs that highlights a need for change – whichever occurs first.

11. Other relevant policies

11.1 The following policies of IMM may also be relevant to safeguarding matters:

- (a) Data protection policy
- (b) Privacy Policy
- (c) Website terms and conditions

12. Contact information

12.1 IMM's Safeguarding Lead Trustee is Terry Garde

12.2 This individual can be reached by email through immsafeguarding@gmail.com

12.4 If you are not comfortable with submitting your full report via email to that address, please initially send an email and ask our trustee to contact you forthwith.

13. Publishing this policy

13.1 IMM will ensure that this policy is always publicly accessible on its website.

Date of initial policy: 18 November 2020

Date of this version: 06 March 2026

Date of next review of the policy: March 2027