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COMFORT INTERNATIONAL SAFEGUARDING POLICY

SECTION 1

Details of the organisation

Name of Organisation: **Comfort International**

Main Office

14-15 Carron House, Cumbernauld

G67 1ER, Scotland, UK

Tel +44 (0)1236 598274

Registered Office

23 Lochty Street, Carnoustie, Angus

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Tel +44 (0)7542 731983

Email address: enquiry@comfortinternational.org

Charity Number: SC030369

Company Number: Not applicable

Comfort International is a Scottish Charitable Incorporated Organisation and is legally required to report to The Scottish Charity Regulator (OSCR) on an annual basis

Regulators details: OSCR

The following is a brief description of our organisation and the type of work / activities we undertake with children and adults who have care and support needs:



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For many years after the 1994 genocide, individuals and communities in Rwanda struggled to survive and indigenous charities and churches had very few resources with which to help.

Comfort International, which was initially set up in 1999 as Comfort Rwanda, continues to work Rwanda as well as the Democratic Republic of Congo and (more recently) Burundi by partnering with some of their local Christian organisations helping them to support those most in need with the aim of bringing them from a position of requiring care and relief. We typically work with a wide range of people, ranging from the very young, including babies, to the elderly. We do this through a variety of ways:

- **Providing Care and Relief**
- **Supporting Education**
- **Training, Employment and Income Generation**
- **Building Sustainable Communities**
- **Partnering the Church**
- **Promoting Relationships**

Comfort International encourages individuals, groups (including groups of pupils from Secondary schools who are accompanied by teaching staff, as well as groups from churches from across the UK, most of who have had a history of supporting the charity. These trips are typically led by those who have been involved with the charity for a number of years and who are familiar with the areas that will be visited.

As well as undertaking regular trips to our partners in Africa, we have a few paid staff and a large number of volunteers who take an active role in the day to day administration work of Comfort International. The paid staff and volunteers are either based in our main office located in Cumbernauld, or else they may work from home.



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Our commitment

As Trustees of Comfort International, we recognise the need to provide a safe and caring environment for children, young people and adults. We acknowledge that children, young people and adults can be the victims of physical, sexual and emotional abuse, and neglect. We accept the UN Universal Declaration of Human Rights and the International Covenant of Human Rights, which states that everyone is entitled to “all the rights and freedoms set forth therein, without distinction of any kind, such as race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth or other status”. We also concur with the Convention on the Rights of the Child which states that children should be able to develop their full potential, free from hunger and want, neglect and abuse. They have a right to be protected from “all forms of physical or mental violence, injury or abuse, neglect or negligent treatment or exploitation, including sexual abuse, while in the care of parent(s), legal guardian(s), or any other person who has care of the child.” As a Leadership we have therefore adopted the procedures set out in this safeguarding policy in accordance with statutory guidance. We are committed to build constructive links with statutory and voluntary agencies involved in safeguarding.

The policy and attached practice guidelines are based on the ten **Safe and Secure** safeguarding standards published by the Churches’ Child Protection Advisory Service (CCPAS)

The Trustees undertake to:

- endorse and follow all national and local safeguarding legislation and procedures, in addition to the international conventions outlined above.
- provide on-going safeguarding training for all its workers and will regularly review the operational guidelines attached.



- ensure that the premises meet the requirements of the Equality Act 2010 and all other relevant legislation, and that it is welcoming and inclusive.
- support the Safeguarding Coordinator(s) in their work and in any action they may need to take in order to protect children and adults with care and support needs.
- the Trustees agree not to allow the document to be copied by other organisations.

SECTION 2

Recognising and responding appropriately to an allegation or suspicion of abuse

Understanding abuse and neglect

Defining child abuse or abuse against an adult is a difficult and complex issue. A person may abuse by inflicting harm, or failing to prevent harm. Children and adults in need of protection may be abused within a family, an institution or a community setting. Very often the abuser is known or in a trusted relationship with the child or adult.

In order to safeguard those in our organisation we adhere to the UN Convention on the Rights of the Child and have as our starting point as a definition of abuse, Article 19 which states:

1. States Parties shall take all appropriate legislative, administrative, social and educational measures to protect the child from all forms of physical or mental violence, injury or abuse, neglect or negligent treatment, maltreatment or exploitation, including sexual abuse, while in the care of parent(s), legal guardian(s) or any other person who has the care of the child.

2. Such protective measures should, as appropriate, include effective procedures for the establishment of social programmes to provide necessary support for the child and for those who have the care of the child, as well as for other forms of prevention and for



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identification, reporting, referral, investigation, treatment and follow-up of instances of child maltreatment described heretofore, and, as appropriate, for judicial involvement.

Also for adults the UN Universal Declaration of Human Rights with particular reference to Article 5 which states:

No one shall be subjected to torture or to cruel, inhuman or degrading treatment or punishment.

Detailed definitions, and signs and indicators of abuse, as well as how to respond to a disclosure of abuse, are included here in our policy:

Categories of Abuse For recording all cases, the following are standard categories of abuse. Although these are represented as discrete definitions, in practice there may be overlap between categories. In such cases local authorities should enter the name on the Child Protection Register under one main category of abuse although for the purposes of individual case management, the case conference may identify combinations of abuse which the child protection plan will need to address. It may also become necessary to change the category of abuse under which a child is registered as the case progresses.

Physical Injury Actual or attempted physical injury to a child, including the administration of toxic substances, where there is knowledge, or reasonable suspicion that the injury was inflicted or knowingly not prevented.

Sexual Abuse Any child may be deemed to have been sexually abused when any person(s) by design or neglect exploits the child, directly or indirectly, in any activity intended to lead to the sexual arousal or other forms of gratification of that person or any other person(s) including organised networks. This definition holds whether or not



there has been genital contact and whether or n the child is said to have initiated, or consented, to the behaviour.

Non Organic Failure to Thrive Children who significantly fail to reach normal growth and developmental milestones (i.e. physical growth, weight, motor, social and intellectual development) where physical and genetic reasons have been medically eliminated and a diagnosis of non-organic failure to thrive has been established.

Emotional Abuse Failure to provide for the child's basic emotional needs such as to have a severe effect on the behaviour and development of the child.

Physical Neglect This occurs when a child's essential needs are not met and this is likely to cause impairment to physical health and development. Such needs include food, clothing cleanliness, shelter and warmth. A lack of appropriate care, including deprivation of access to health care, may result in persistent or severe exposure, through negligence, to circumstances which will endanger the child.

Abuse against an adult:

This considers the different types and patterns of abuse and neglect and the different circumstances in which they may take place. This is not intended to be an exhaustive list but an illustrative guide as to the sort of behaviour which could give rise to a safeguarding concern.

- **Physical abuse** – including assault, hitting, slapping, pushing, misuse of medication, restraint or inappropriate physical sanctions.
- **Domestic violence** – including psychological, physical, sexual, financial, emotional abuse; so called 'honour' based violence.



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- **Sexual abuse** – including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.

- **Psychological abuse** – including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion,

harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks.

- **Financial or material abuse** – including theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

- **Modern slavery** – encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

- **Discriminatory abuse** – including forms of harassment, slurs or similar treatment; because of race, gender and gender identity, age, disability, sexual orientation or religion.

- **Organisational abuse** – including neglect and poor care practice within an Institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home. This may range from one off incidents to on-going



ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.

- **Neglect and acts of omission** – including ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.
- **Self-neglect** – this covers a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.

Incidents of abuse may be one-off or multiple, and affect one person or more.

Signs and indicators of abuse in adults:

Physical abuse

- History of unexplained falls, fractures, bruises, burns, minor injuries.
- Signs of under or over use of medication and/or medical problems left unattended.

Domestic violence

- Unexplained injuries or 'excuses' for marks or scars
- Controlling and/or threatening relationship including psychological, physical, sexual, financial, emotional abuse; so called 'honour' based violence and Female Genital Mutilation.
- Age range extended to 16yrs.

Sexual abuse

- Pregnancy in a woman who is unable to consent to sexual intercourse
- Unexplained change in behaviour or sexually explicit behaviour



- Torn, stained or bloody underwear and/or unusual difficulty in walking or sitting
- Infections or sexually transmitted diseases
- Full or partial disclosures or hints of sexual abuse
- Self harming

Psychological abuse

- Alteration in psychological state eg. Withdrawn, agitated, anxious, tearful
- Intimidated or subdued in the presence of a carer
- Fearful, flinching or frightened of making choices or expressing wishes
- Unexplained paranoia

Financial or material abuse

- Disparity between assets and living conditions
- Unexplained withdrawals from accounts or disappearance of financial documents
- Sudden inability to pay bills
- Carers or professionals fail to account for expenses incurred on a person's behalf
- Recent changes of deeds or title to property

Modern slavery

- Physical appearance; unkempt, inappropriate clothing, malnourished
- Movement monitored, rarely alone, travel early or late at night to facilitate working hours.
- Few personal possessions or ID documents.
- Fear of seeking help or trusting people.

Discriminatory abuse

- Inappropriate remarks, comments or lack of respect
- Poor quality or avoidance care



Organisational abuse

- No confidence in complaints procedures for staff or service users.
- Neglectful or poor professional practice.

Neglect and acts of omission

- Deteriorating despite apparent care
- Poor home conditions, clothing or care and support.
- Lack of medication or medical intervention

Self-neglect

- Hoarding inside or outside a property
- Neglecting personal hygiene or medical needs

How to respond to a child/vulnerable adult wishing to disclose abuse:

Ensure the physical environment is welcoming, giving opportunity for the child or vulnerable adult to talk in private but making sure others are aware the conversation is taking place.

- It is especially important to allow time and space for the person to talk
- Above everything else listen without interrupting
- Be attentive and look at them whilst they are speaking
- Show acceptance of what they say (however unlikely the story may sound) by reflecting back words or short phrases they have used
- Try to remain calm, even if on the inside you are feeling something different
- Be honest and don't make promises you can't keep regarding confidentiality
- If they decide not to tell you after all, accept their decision but let them know that you are always ready to listen.
- Use language that is age appropriate and, for those with disabilities, ensure there is someone available who understands sign language, Braille etc.



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HELPFUL RESPONSES

- You have done the right thing in telling
- I am glad you have told me
- I will try to help you.

DON'T SAY

- Why didn't you tell anyone before?
- I can't believe it!
- Are you sure this is true?
- Why? How? When? Who? Where?
- I am shocked, don't tell anyone else

Safeguarding awareness

The Trustees are committed to on-going safeguarding training and development opportunities for all workers, developing a culture of awareness of safeguarding issues to help protect everyone. All our workers will receive induction training and undertake recognised safeguarding training on a regular basis as recommended by CPAS. (E.G. Induction to Introduction to Safeguarding – Children and Adult, followed by Facing the Unthinkable Course)

The Trustees will also ensure that children and adults with care and support needs are provided with information on where to get help and advice in relation to abuse, discrimination, bullying or any other matter where they have a concern.

RESPONDING TO ALLEGATIONS OF ABUSE

Under no circumstances should a worker carry out their own investigation into an allegation or suspicion of abuse. Following procedures as below:



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- The person in receipt of allegations or suspicions of abuse should report concerns as soon as possible to (Name) Fiona McClung (hereafter the “Safeguarding Co-ordinator”) **Email: fiona@comfortinternational.org** who is nominated by the Trustees to act on their behalf in dealing with the allegation or suspicion of neglect or abuse, including referring the matter on to the statutory authorities.
- In the absence of the Safeguarding Co-ordinator or, if the suspicions in any way involve the Safeguarding Co-ordinator, then the report should be made to (Name) Izzy Henderson (hereafter the “Trustee responsible for Safeguarding”) **Email: izzy@comfortinternational.org**.

If the suspicions implicate both the Safeguarding Co-ordinator and the Trustee responsible for Safeguarding, then the report should be made in the first instance to the Churches’ Child Protection Advisory Service (CCPAS) PO Box 133, Swanley, Kent, BR8 7UQ. Telephone 0845 120 4550. Alternatively contact Social Services or the police.

- Where the concern is about a child the Safeguarding Co-ordinator should contact Children’s Social Services. Where the concern is regarding an adult in need of protection contact Adult Social Services or take advice from CCPAS as above.

The local Children’s Social Services office telephone number (office hours) is 01698 332599. The out of hours emergency number is 0800 121 4114.

The local Adult Social Services office telephone number (office hours) is 01236 638700. The out of hours emergency number is 0800 121 4114

The Police telephone number is 101.

Child Protection Number is 0808 800 5000



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If the suspected abuse takes place in a country other than the UK, local authorities will also be informed in addition to UK authorities

- The Safeguarding Co-ordinator **may** need to inform others depending on the circumstances and/or nature of the concern (for example the Chair of Trustees to log that a safeguarding concern is being dealt with, Insurance company to log that there is a possibility of a serious incident concerning safeguarding or a Designated Officer (formerly LADO) if allegations have been made about a person who has a role with under 18's elsewhere or another denominational officer e.g. Diocesan Safeguarding Adviser or similar).
- Suspicions must not be discussed with anyone other than those nominated above. A written record of the concerns should be made in accordance with these procedures and kept in a secure place.
- Whilst allegations or suspicions of abuse will normally be reported to the Safeguarding Co-ordinator, the absence of the Safeguarding Co-ordinator or Deputy should not delay referral to Social Services, the Police or taking advice from CCPAS.
- The Leadership will support the Safeguarding Co-ordinator/Deputy in their role, and accept that any information they may have in their possession will be shared in a strictly limited way on a need to know basis.
- It is, of course, the right of any individual as a citizen to make a direct referral to the safeguarding agencies or seek advice from CCPAS, although the Leadership hope



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- that members of the organisation will use this procedure. If, however, the individual with the concern feels that the Safeguarding Co-ordinator/Deputy has not responded appropriately, or where they have a disagreement with the Safeguarding Co-ordinator(s) as to the appropriateness of a referral they are free to contact an outside agency direct. We hope by making this statement that the Leadership demonstrate its commitment to effective safeguarding and the protection of all those who are vulnerable.

The role of the safeguarding co-ordinator/ deputy is to collate and clarify the precise details of the allegation or suspicion and pass this information on to statutory agencies who have a legal duty to investigate.

Detailed procedures where there is a concern about a child:

Allegations of physical injury, neglect or emotional abuse.

If a child has a physical injury, a symptom of neglect or where there are concerns about emotional abuse, the Safeguarding Co-ordinator/Deputy will:

- Contact Children's Social Services (or CCPAS) for advice in cases of deliberate injury, if concerned about a child's safety or if a child is afraid to return home.
- Not tell the parents or carers unless advised to do so, having contacted Children's Social Services.
- Seek medical help if needed urgently, informing the doctor of any suspicions.



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- For lesser concerns, (e.g. poor parenting), encourage parent/carer to seek help, but not if this places the child at risk of significant harm.
- Where the parent/carer is unwilling to seek help, offer to accompany them. In cases of real concern, if they still fail to act, contact Children's Social Services direct for advice.
- Seek and follow advice given by CCPAS (who will confirm their advice in writing) if unsure whether or not to refer a case to Children's Social Services.

Allegations of sexual abuse

In the event of allegations or suspicions of sexual abuse, the Safeguarding Co-ordinator/Deputy will:

- Contact the Children's Social Services Department Duty Social Worker for children and families or Police Child Protection Team direct. They will NOT speak to the parent/carer or anyone else.
- Seek and follow the advice given by CCPAS if, for any reason they are unsure whether or not to contact Children's Social Services/Police. CCPAS will confirm its advice in writing for future reference.

Detailed procedures where there is a concern that an adult is in need of protection:

Suspensions or allegations of abuse or harm including; physical, sexual, organisational, financial, discriminatory, neglect, self-neglect, forced marriage, modern slavery, domestic abuse

If there is concern about any of the above, Safeguarding Co-ordinator/Deputy will:



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- contact the Adult Social Care Team who have responsibility under the Care Act 2014 to investigate allegations of abuse. Alternatively, CCPAS can be contacted for advice.
- If the adult is in immediate danger or has sustained a serious injury contact the Emergency Services, informing them of any suspicions.

If there is a concern regarding spiritual abuse, Safeguarding Co-ordinator will:

- Identify support services for the victim i.e. counselling or other pastoral support
- Contact CCPAS and in discussion with them will consider appropriate action with regards to the scale of the concern.

Allegations of abuse against a person who works with children/young people

If an accusation is made against a worker (whether a volunteer or paid member of staff) whilst following the procedure outlined above, the Safeguarding Co-ordinator, in accordance with Local Safeguarding Children Board (LSCB) procedures will need to liaise with Children's Social Services in regards to the suspension of the worker, also making a referral to a designated officer formerly called a Local Authority Designated Officer (LADO).

Allegations of abuse against a person who works with adults with care and support needs.

The Care Act places the duty upon **Adult Services** to investigate situations of harm to adults with care and support needs. This may result in a range of options including action against the person or organisation causing the harm, increasing the support for the carers or no further action if the 'victim' chooses for no further action and they have the capacity to communicate their decision. However, this is a decision for Adult Services to decide not the church.



SECTION 3

Prevention

Safer recruitment

The Trustees will ensure all workers will be appointed, trained, supported and supervised in accordance with government guidance on safe recruitment. This includes ensuring that:

- There is a written job description / person specification for the post
- Those applying have completed an application form and a self-declaration form
- Those short listed have been interviewed
- Safeguarding has been discussed at interview
- Written references have been obtained, and followed up where appropriate
- A disclosure and barring check has been completed where necessary (we will comply with Code of Practice requirements concerning the fair treatment of applicants and the handling of information – we should state here what we have decided).
- Qualifications where relevant have been verified
- A suitable training programme is provided for the successful applicant
- The applicant has completed a probationary period
- The applicant has been given a copy of the organisation's safeguarding policy and knows how to report concerns.

Management of Workers – Codes of Conduct

As Trustees, we are committed to supporting all workers and ensuring they receive support and supervision. All workers have been issued with a code of conduct towards children, young people and adults with care and support needs.



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SECTION 4

Pastoral Care

Supporting those affected by abuse

The Trustees are committed to offering pastoral care, working with statutory agencies as appropriate, and support to all those who have been affected by abuse who have contact with or are part of the place of worship/organisation.

Working with offenders

When someone attending the organisation is known to have abused children or is known to be a risk to adults with care and support needs the Trustees will supervise the individual concerned and offer pastoral care, but in its safeguarding commitment to the protection of children and adults with care and support needs, set boundaries for that person, which they will be expected to keep.

SECTION 5

Practice Guidelines

As an organisation working with children, young people and adults with care and support needs we wish to operate and promote good working practice. This will enable workers to run activities safely, develop good relationships and minimise the risk of false or unfounded accusation.

As well as a general code of conduct for workers we also have specific good practice guidelines for every activity we are involved in and these are attached/will be developed.



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Working in Partnership

The diversity of organisations and settings means there can be great variation in practice when it comes to safeguarding children, young people and adults. This can be because of cultural tradition, belief and religious practice or understanding, for example, of what constitutes abuse.

We therefore have clear guidelines in regard to our expectations of those with whom we work in partnership, whether in the UK or not. We will discuss with all partners our safeguarding expectations and have a partnership agreement for safeguarding. It is also our expectation that any organisation using our premises, as part of the letting agreement will have their own policy that meets CCPAS' safeguarding standards.

Good communication is essential in promoting safeguarding, both to those we wish to protect, to everyone involved in working with children and adults and to all those with whom we work in partnership. This safeguarding policy is just one means of promoting safeguarding.

Where a place of worship or organisation is working with partners it is important to have clear guidance on safeguarding expectations. This is particularly important where working with partners who are based in other countries.

You could add here other ways in which you have communicated the safeguarding message e.g. through displaying CCPAS helpline number, Childline telephone number of notice boards, use of KASH video etc.



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APPENDIX - 1

Leadership Safeguarding Statement

The Trustees of Comfort International recognises the importance of its ministry /work with children and young people and adults in need of protection and its responsibility to protect everyone entrusted to our care.

We are committed to creating and enabling a healthy culture in order to minimise any coercion and control within our church.

The following statement was agreed by the leadership/organisation on 24/04/2018

This organisation is committed to the safeguarding of children and adults with care and support needs and ensuring their well-being.

Specifically:

- We recognise that we all have a responsibility to help prevent the physical, sexual, emotional abuse and neglect of children and young people (those under 18 years of age) and to report any such abuse that we discover or suspect.
- We believe every child should be valued, safe and happy. We want to make sure that children we have contact with know this and are empowered to tell us if they are suffering harm.
- All children and young people have the right to be treated with respect, to be listened to and to be protected from all forms of abuse.
- We recognise that we all have a responsibility to help prevent the physical, sexual, psychological, financial and discriminatory abuse and neglect of adults who have care and support needs and to report any such abuse that we discover or suspect.
- We recognise the personal dignity and rights of adults who find themselves victims of forced marriage or modern slavery and will ensure all our policies and procedures reflect this.



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- We believe all adults should enjoy and have access to every aspect of the life of the place of worship/organisation unless they pose a risk to the safety of those we serve.
- We undertake to exercise proper care in the appointment and selection of all those who will work with children and adults with care and support needs.
- We believe in the necessity of creating a healthy culture in our organisation where the value of all people is recognised and challenges are responded to appropriately.

We are committed to:

- Following the requirements for UK legislation in relation to safeguarding children and adults and good practice recommendations.
- Respecting the rights of children as described in the UN Convention on the Rights of the Child.
- Implementing the requirements of legislation in regard to people with disabilities.
- Ensuring that workers adhere to the agreed procedures of our safeguarding policy.
- Keeping up to date with national and local developments relating to safeguarding.
- Following any denominational or organisational guidelines in relation to safeguarding children and adults in need of protection.
- Supporting the safeguarding co-ordinator/s in their work and in any action they may need to take in order to protect children/adults with care and support needs.
- Ensuring that everyone agrees to abide by these recommendations and the guidelines established by this place of worship/organisation.
- Supporting parents and families
- Nurturing, protecting and safeguarding of children and young people



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- Supporting, resourcing, training, monitoring and providing supervision to all those who undertake this work.
- Supporting all in the place of worship/organisation affected by abuse.
- Adopting and following the 'Safe and Secure' safeguarding standards developed by the Churches' Child Protection Advisory Service.

We recognise:

- Children's Social Services (or equivalent) has lead responsibility for investigating all allegations or suspicions of abuse where there are concerns about a child. Adult Social Care (or equivalent) has lead responsibility for investigating all allegations or suspicions of abuse where there are concerns about an adult with care and support needs.
- Where an allegation suggests that a criminal offence may have been committed then the police should be contacted as a matter of urgency.
- Where working outside of the UK, concerns will be reported to the appropriate agencies in the country in which we operate, and their procedures followed, and in addition we will report concerns to our agency's headquarters.
- Safeguarding is everyone's responsibility.

We will review this statement and our policy and procedures annually.

If you have any concerns for a child or adult with care and support needs then speak to one of the following who have been approved as safeguarding co-ordinators for this place of organisation.

Fiona McClung Email: fiona@comfortinternational.org Safeguarding Coordinator

A copy of the full policy and procedures is available from the office at 14/15 Carron House. Cumbernauld. Tel 01236 598274



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