

## Catholic Union Charitable Trust Safeguarding Policy and Procedures

Policy	Date of approval by board of Trustees	Date of policy review
Safeguarding Policy	14.10.25	01.10.26
Name and contact details for Safeguarding Operational Lead	Director	
Name and contact details Safeguarding Lead Trustee	Andrea Speranza: safeguarding@catholicunion.org.uk	

## 1. Introduction

The Catholic Union Charitable Trust, referred to as CUCT in this policy, exists to address the pressing social challenges of the day and equip and protect the ability of Catholics to contribute to those debates and in wider public affairs.

We work in a spirit of solidarity with our members, other organisations and other stakeholders without compromising the need for safety and protection. We seek to protect the rights and uphold the human dignity of all.

We do everything we can to ensure that safeguarding risks are identified and regularly reviewed and strategies to mitigate these are in place.

## 2. CUCT Safeguarding policy statement

CUCT believes that everyone we encounter through our work, regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation<sup>1</sup> has the right to be protected from all forms of harm, abuse, neglect, and exploitation.

CUCT believes the safety and welfare of children and vulnerable adults is paramount in our decision-making processes.

CUCT will not tolerate any form of abuse, neglect and exploitation of and by staff or associated personnel.

## 3. Safeguarding definition

CUCT works to the Charity Commission's definition of safeguarding. In its guidance, the Charity Commission describes safeguarding as ***“taking reasonable steps to protect from harm people who come into contact with your charity. This includes people who benefit from your charity's work, staff, volunteers, other people who come into contact with your charity through its work”***<sup>2</sup>

## 4. The scope of this policy

CUCT Safeguarding Policy applies to trustees, council members, staff and visitors, including all those who represent or are validated by us, such as interns, volunteers, consultants, contractors and journalists.

## 5. Legal Framework

This policy has been drawn up on the basis of legislation, policy and guidance that seeks to protect children and adults at risk in the UK, including the Children Act 1989 and 2004 and Safeguarding Vulnerable Groups Act 2006, Care Act 2014 in England, and United Kingdom Charity Commission guidance.

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<sup>1</sup> Equality Act 2010 ([legislation.gov.uk](http://legislation.gov.uk))

<sup>2</sup> [Safeguarding and protecting people for charities and trustees - GOV.UK \(www.gov.uk\)](http://www.gov.uk) [Safeguarding and protecting people for charities and trustees - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

## 6. Definitions

See Annex 1 of this policy for definitions and information on categories of abuse.

## 7. CUCT Safeguarding Framework

CUCT safeguarding framework is supported by four key pillars – **Prevention, Protection, Reporting and Responding**. These are sustained by embedding a strong safeguarding culture throughout the organisation.

## 8. Prevention

CUCT believes that having robust safeguarding arrangements in place to reduce the risk of harm is beneficial to the organisation, staff, and people we encounter, in the course of our projects, research, campaigning and awareness raising work. CUCT has arrangements in place for safer work practices, safer recruitment, a code of code, and a training programme as part of our prevention strategy.

### 8.1. Safer Recruitment

Safer recruitment is an integral part of CUCT's commitment to build an organisational culture wherein the safety and wellbeing of everyone involved is paramount. CUCT is fully committed to safer recruitment principles in the selection and vetting of potential new staff.

The overall purpose of safer recruitment is to help identify and deter or reject individuals who are deemed to pose a danger to children and vulnerable adults. CUCT has appropriate arrangements in place to reduce the risk of unsuitable people entering the organisation.

[CUCT Safer Recruitment Policy](#) (*pending*) includes making all prudent and necessary checks when recruiting staff and volunteers and ensuring that they understand their responsibilities as well as the mechanisms to report concerns. Relevant posts with potential contact with vulnerable groups will be risk assessed, and the level of DBS checks will be decided accordingly as part of our commitment to safer recruitment and safeguarding.

No member of staff or other representative may undertake activities in relation to CUCT that involve access to children or adults at risk without supervision unless and until an appropriate background check (which may include a criminal record check, as appropriate) has been completed with satisfactory results.

Recruitment of trustees will be undertaken in accordance with applicable guidance from relevant local regulators. In England and Wales, this includes guidance issued by the Charity Commission for England and Wales<sup>3</sup> to ensure best practice in respect of trustee recruitment.

Where we become aware that any current staff member/volunteer or anyone associated with our work may pose a risk to children and/or adults at risk we will comply with the legislation and relevant guidance in respect of referring that representative to the relevant authorities if appropriate<sup>4</sup>.

The protection from harm of our personnel and management of reports is addressed through

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<sup>3</sup> For example, see Charity Commission guidance CC30 *Finding new trustees*: <https://www.gov.uk/government/publications/finding-new-trustees-cc30>

<sup>4</sup> For example, for more information about making a referral to the DBS please see: <https://www.gov.uk/guidance/making-barring-referrals-to-the-dbs>

HR policies.

## **8.2. Codes of Conduct**

CUCT Codes of Conduct describe the ethics and behaviour required of all stakeholders to ensure a robust safeguarding environment. They are designed to create a culture of best practice in keeping beneficiaries and everyone associated with our work safe. All staff members, and all those who act on our behalf, trustees, consultants, journalists, as well as visitors will read and sign a Code of Conduct and are expected to adhere to its values and minimum standards. Breaches of the Code of Conduct are grounds for disciplinary action, up to and including dismissal. CUCT staff/contractors' Code of Conduct and the Trusteel Code of Conduct can be accessed separately.

## **8.3. Whistleblowing**

[CUCT Whistleblowing Policy](#) provides a process whereby the concerns of staff can be raised and resolved at the appropriate level. The policy includes a clear process for dealing with concerns and a handling framework with identified owners of each step. The policy is explicit that there can be no reprisals for the whistleblower where concerns are reported in good faith and without malice. It identifies a clear process to follow if the concern is being raised against an individual in the organisation who manages internal complaints or concerns.

## **8.4. Embedding a strong safeguarding culture through capacity building**

A strong safeguarding culture requires an informed and trained staff team and a clear action plan for commitments made. CUCT board members, staff, contractors, and volunteers will receive a thorough induction covering all aspects of our safeguarding framework and implementation plan, and they will be introduced to the Safeguarding Leads at operational and governance levels.

Everyone associated with CUCT is obliged to create and maintain an environment that prevents exploitation and abuse. However, the trustees and director have a particular responsibility to support and develop a culture and system that maintains this environment.

All staff will be supported through ongoing supervision and training. Staff with specific safeguarding responsibilities will be trained to implement safeguarding in their specific context and encouraged to be approachable and will respond to issues in a professional and timely manner.

CUCT's Safeguarding Policy will be reviewed at least annually and approved by the council/board of trustees.

## **9. Protection**

Protection is the action that CUCT will take and or facilitate to ensure the safety and protection of a survivor of harm. CUCT will facilitate a referral to appropriate protection agencies within the UK.

## **10. Reporting**

CUCT will ensure that safe, appropriate, accessible means of reporting safeguarding concerns are made available to staff, volunteers and all to whom this policy applies.

CUCT will also accept complaints from external sources such as members of the public, partners, and official bodies. Reporting is supported by our Whistleblowing policy and procedures for internal and external (from partners) safeguarding concerns. Where concerns relate to anyone associated with our work, we take all the necessary steps to ensure the safety and protection of individuals making a report.

Safeguarding concerns may arise from recognition of potential signs of abuse, suspicion of harmful behaviours, and direct disclosure by a survivor.

The reporting of suspected or actual abuse is a professional obligation for CUCT personnel. Failure to report information can lead to disciplinary action or dismissal. In any cases of suspicion of a safeguarding issue the person to whom it has been reported must immediately inform the Safeguarding Lead.

CUCT believes that no concern is too small. If you are unsure whether a situation constitutes a safeguarding concern you are encouraged to contact the Safeguarding Lead as soon as possible at [director@catholicunion.org.uk](mailto:director@catholicunion.org.uk) as soon as possible. Your concern will be treated with respect and dealt with professionally and confidentially. You can speak to the Safeguarding Lead via email or telephone. If the Safeguarding Lead is unavailable or your concern relates to the Safeguarding Lead, you can report your concern to the Safeguarding Lead trustee via ([asperanza@cafod.org.uk](mailto:asperanza@cafod.org.uk))

CUCT Contact details for the Safeguarding Lead and Safeguarding Lead Trustee can be found on the first page of this policy document. The Safeguarding Lead or the Safeguarding Lead Trustee (as applicable) ensures that all discussions and actions are documented.

All staff are responsible for maintaining confidentiality of records and cases of allegations or suspicions. This information shall only be made available to the relevant parties.

## **11. What to report**

The Charity Commission requires CUCT to ensure that safeguarding incidents are handled sensitively and appropriately within the organisation. All serious incidents must be reported to CUCT Safeguarding Lead using agreed reporting pathways and within agreed timeframes.

Below is a non-exhaustive list of examples of incidents that should be reported to CUCT by our own staff, volunteers and others to whom this policy applies:

- Allegations of criminal activity committed by a staff member or their partner.
- A romantic or sexual relationship formed between a staff member and a beneficiary/volunteer where there is a power imbalance.
- A disclosure of sexual abuse or harassment between two staff members/volunteers or between a staff member/volunteer and a beneficiary.

## **12. Responding**

CUCT is committed to responding effectively, sensitively and swiftly to all allegations and suspicions of any type of harm, violence and harassment. CUCT will follow up all safeguarding reports and concerns according to policy and procedure.

The safety and wellbeing of the individual(s) affected is the paramount consideration and immediate steps will be taken by the Safeguarding Lead in collaboration with other CUCT personnel as necessary to protect the individual(s) affected and to address any possible urgent medical needs.

We take all reports of safeguarding concerns seriously and will treat them confidentially. CUCT aims to acknowledge a safeguarding report within **48 hours** and aims to respond with 5 working days of the concern being filed.

A virtual or in person case discussion involving relevant members of the CUCT leadership will be held within 24 hours to discuss the nature of the case and to take decisions on next steps. Any investigation involving council/board members, directors, staff (**full time or part time**), consultants and contractors will be handled fairly with the full support of the CUCT council/board. Investigations will be objective, transparent, and will be guided by professional expertise and support when required.

Where it appears that a criminal offence may have taken place, the matter will be referred to the appropriate national authorities in line with local reporting/referral systems.

The complaint will be investigated following principles of best practice in investigating safeguarding allegations, reflecting survivor centred approaches, including a report to the statutory authorities where relevant and with survivor consent. Investigation findings will be analysed, remedial steps will be taken, and any learning will feed back into further strengthening of our Safeguarding measures.

### **13. Implementation**

Safeguarding will be integrated in all our functions and activities. The CUCT safeguarding policy will be available to all team members (full time or part time), council members, interns, consultants and contracted individuals for specific projects.

Everyone will sign the code of conduct as part of the induction process; the Safeguarding Lead will ensure this arrangement is in place and access to safeguarding training will be facilitated for staff and trustees.

CUCT team members with specific safeguarding responsibilities will be signposted to training to support their role to receive and respond professionally to safeguarding concerns and allegations.

CUCT will continually evaluate its safeguarding practice and update its policy following a review annually by the Safeguarding Lead.

## **Annex 1: Definitions**

**Beneficiaries** - Any person whom we and our partners' support. For the purpose of this policy, and, again in line with Charity Commission guidance, we define a beneficiary as *"a person or group of people eligible to benefit from a charity."*

**Adult at risk** - Any person aged 18 or over who is or may need care and support, (e.g., health, personal or social care), is experiencing or is at risk of abuse or neglect and as a result of this is unable to protect themselves from either the risk or experience of neglect or abuse.

**Child** - any person under the age of 18 (United Nations Convention on the Rights of the Child). This may not always be possible to verify. It is often difficult to know the true age of a person within the context in which we work. There are times when adults can present themselves as a minor and instances when minors present as adults. People who present as minors will be accepted as such until information about their true age is established.

**Child Abuse** - A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place online, either wholly, or by its use to facilitate offline abuse. Children may be abused by an adult or adults, or another child or children - Working Together to Safeguard Children, 2018.

Modern slavery - when an individual is exploited by others, for personal or commercial gain. Whether tricked, coerced, or forced, they lose their freedom. This includes but is not limited to human trafficking, forced labour and debt bondage.

**Partner:** an organisation which receives funding from CUCT or one with which CUCT collaborates to deliver its programmes or which is otherwise associated with the CUCT name and brand.

**Partner staff** means employees and directors/board members of a partner, freelance workers (self-employed or agency staff), and volunteers, interns and secondees of a partner.

**Safeguarding Adults** – Safeguarding means protecting an adult's right to live in safety, free from abuse and neglect. It is about people and organisations working together to prevent and stop both the risks and experience of abuse or neglect, while at the same time making sure that the adult's wellbeing is promoted including, where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action. This must recognise that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear, or unrealistic about their personal circumstances. There may be instances whereby the risk is so high that referrals for support need to be made without an adult's consent. - Care and Support Statutory Guidance, March 2020.

**Safeguarding Children** - means protecting children from maltreatment, preventing impairment of children's health or development, ensuring that children are growing up in circumstances consistent with the provision of safe and effective care, and taking action to enable all children to have the best outcomes. Working Together Safeguard, Children 2018.

**Staff** means CUCT employees and directors, freelance workers (self-employed or agency staff), and volunteers, interns and secondees.

**Survivor-centred Approach** - The principle of a survivor-centred approach is to view the person who has been on the receiving end of harm, abuse, or exploitation as a survivor, rather than victim. Using the language of victim when talking about sex and gender-based violence (SGBV) can result in presenting the person as not having agency or the power to defend themselves. When we shift to acknowledge this person as a survivor, we see that their identity is not shaped by the violence or harassment that has happened and see that they have survived the incident. A survivor-centred approach means that we prioritise the rights, needs and wishes of the survivor. We aim to create a supportive environment in which the survivor's rights are respected and in which they are treated with dignity and respect.

**Unaccompanied Child (UAC)** - An unaccompanied child is a person who is under the age of eighteen, unless, under the law applicable to the child, majority is, attained earlier and who is "separated from both parents and is not being cared for by an adult who by law or custom has responsibility to do so."<sup>5</sup>

**Vulnerable Adult** - Vulnerable adults are defined as people who are unable to take care of protecting themselves against harm or exploitation for any reason. When safeguarding adults, this involves reducing and preventing the risk of harm, neglect, or abuse alongside supporting them to maintain their own lives. While most would consider vulnerable adults to be those who lack capacity, adults with full capacity can also be considered as vulnerable as well. This is when they are unable to take care or protect themselves from harm<sup>6</sup>.

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<sup>5</sup> <https://www.unhcr.org/3d4f91cf4.pdf>

<sup>6</sup> <https://www.carecheck.co.uk/importance-of-safeguarding/>