



Code of Conduct to Prevent, Investigate and Respond to Sexual Exploitation and Sexual Abuse / Harassment

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Section I: Introduction and Purpose

In accordance with guidance from the Canadian government and Compassion Canada's commitment to its core values, there is an awareness that sexual exploitation and abuse violate universally recognized international legal norms and standards. Compassion Canada has instituted this publicly available code of conduct to prevent, investigate and respond to sexual exploitation and abuse consistent with the core principles identified in the Inter-Agency Standing Committee Plan of Action on Protection from Sexual Exploitation and Abuse / Harassment in Humanitarian Crises.

Per the master agency agreement between Compassion Canada and Compassion International, Compassion Canada as principal engages Compassion International as its agent to provide charitable programs through its national offices and Frontline Church Partners (FCPs). Per the Compassion Global Partner Alliance Covenant Charter, the name "Compassion" represents the worldwide organization as described by the mission, purpose and values of Compassion International.

Compassion is opposed to all forms of maltreatment. Compassion neither tolerates nor condones the abuse or maltreatment of children, youth, or program participants of any age. All engaged in programming supported by Compassion have the right to expect a safe environment that is free from all forms of abusive behavior. Any behavior which creates a climate of violence, hostility, intimidation, or abuse in a Compassion-funded program will not be tolerated. Compassion has established policies and standards to prevent abuse and appropriately respond when abuse occurs. Agreements with partners include provisions that ensure all project staff and those in direct contact with the project beneficiaries comply with the standards in this code of conduct.

This code of conduct is integrated across the Compassion's operations and includes the following provisions:

- Accountability processes integrated throughout Compassion, including roles and responsibilities to ensure monitoring of, and compliance with, the code of conduct;
- A mechanism for anonymous and confidential reporting and, fair and confidential investigative procedures to respond to all allegations of sexual exploitation and abuse;
- Training on prevention of sexual exploitation and abuse and remedial measures when misconduct is

found;

- Measures including disciplinary action in cases of serious misconduct.

Compassion is committed to ensure that everyone who is involved in or connected to our work is protected from all forms of harm, abuse, neglect, and exploitation. Specifically, Compassion is committed to:

- Protecting people, particularly children, at risk adults and participants of Compassion's program, from any harm, including harm arising from the conduct of employees or associated personnel.
- Protecting staff, volunteers and those connected with Compassion from any form of bullying, harassment or intimidation.

Section II: Definitions

Associated Personnel – Refers to casual workers, apprentices, volunteers, trustees, ambassadors, independent contractors, third party organizations, suppliers working on Compassion's behalf, program visitors including supporters, journalists, celebrities, and politicians, and members of the public and visitors to Compassion.

Child – Every person below the age of 18 irrespective of the age of the majority.

Child Abuse – Child abuse or maltreatment constitutes all forms of physical and/ or emotional ill treatment, sexual abuse (all sexual activity with a child is considered child abuse), neglect, or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the child's health, survival, development or dignity in the context of a relationship of responsibility, trust or power.

Child Exploitation – Child exploitation refers to the use of children for someone else's advantage, gratification or profit often resulting in unjust, cruel and harmful treatment of the child. These activities are to the detriment of the child's physical or mental health, education, moral or social-emotional development. It covers situations of manipulation, misuse, abuse, victimization.

Participants – Participants are children and youth enrolled in Compassion-supported church-based programs, receiving holistic development support in the areas of health, education, livelihood, protection, and spiritual care.

Safeguarding – Taking all reasonable steps to prevent harm, particularly sexual exploitation, abuse, and harassment from occurring; to protect people (especially children and youth, vulnerable adults, employees and associated personnel) from that harm and to respond appropriately when harm does occur.

Sexual Exploitation – Refers to any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.

Sexual Abuse – Refers to an actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

Survivor – The person who has been abused or exploited. The term 'survivor' has been used throughout policies for consistency, but Compassion recognises the right of an individual to use the term of their own preference.

Volunteers – Individuals who freely offer their time, skills, and energy to support Compassion Canada's mission of releasing children from poverty in Jesus' name without financial compensation. Compassion Canada volunteers serve in various capacities including fundraising, advocacy, event support, writing, administrative help and prayer ministry. Compassion International volunteers serve at frontline community partners alongside program staff and participants and other community members.

Youth – A person aged from 12 to 22 (22 is the maximum age for Compassion Participants).

Section III: SCOPE

This policy applies to all Compassion employees and associated personnel. Compassion has separate policies which cover:

- Violence and harassment, including how incidents of violence and harassment will be handled and investigated for employees ([Compassion Canada Workplace Violence and Harassment Policy](#))
- Safeguarding and Child protection in terms of Compassion's participants, ([Child protection policy - Compassion Canada](#))
- The safeguarding and child protection standards and expectations which are embedded within Compassion International's programming and work with participants and the wider communities in which Compassion International operates, as these are included in other global policies and procedures.
- Behaviour or conduct of an employee or associated personnel including occasions where unacceptable behaviours which take place outside the course of employment or engagement with Compassion ([Code of Conduct for Child and Youth Protection and Safeguarding](#))
- Recruitment, selection and hiring procedures which designed to vet potential employees and protect the safety of our current employees, children, volunteers, and other stakeholders. Compassion Canada conducts background checks in compliance with applicable laws and regulations for potential employees as well as annually for current employees (Talent Acquisition Policy). This may include but is not limited to criminal record and vulnerable sector checks ([Criminal Record Check Policy](#)), Compassion Canada's commitments to preventing the financing of terrorism and ensuring compliance with all applicable laws and regulations related to counterterrorism financing efforts ([Anti-Terrorism Policy](#)).

Section IV: Prevention / Accountability Processes

1. Compassion Canada's prevention and accountability processes include the following:
 - a. Requiring annual signing of the Compassion Canada Code of Conduct for Child and Youth Protection and Safeguarding for all staff members, volunteers/contractors with access to child data and board members (along with pre-trip signing of this commitment for all visitors to the field).
 - b. Recruitment: Conducting the appropriate screening/background checks of staff, volunteers with access to child data, board members, independent contractors representing Compassion and all visitors to the field prior to face-to-face contact with children and youth.
 - c. Removing personal information that could be used to identify and locate Compassion-assisted children in printed materials, online, or in sponsorship correspondence.
 - d. Implementing a Canada-specific strategy for child protection.
 - e. All Sponsor and Participant Communications refer to both the sponsor and the participant using only the sponsor or participant's "preferred name". Sponsor's or participant's "preferred name" does not include both the person's first/given name and their family or "last" name. In all sponsor- and public-facing communications, only the "preferred name" may be used to identify the participant and/or any member of their family.
 - f. Employing a Child Protection Specialist on staff to:
 - i. Serve as Compassion Canada's appointed liaison and primary advocate for Participant Protection portfolio:
 1. Track and report Participant Protection training compliance,
 2. Participant Protection case management and reporting,
 3. Compassion Canada point of contact for participant protection questions or concerns,
 4. Content curation and Pulse Page management for Participant Protection.
 - ii. In collaboration with stakeholders, create, maintain, and update the Participant Protection Strategy.
 - iii. Participate in a Global Partner Alliance community of practice regarding participant

- protection.
 - iv. Foster and encourage a strong culture of safeguarding at Compassion, ensuring staff are confident to share concerns, aware of how to share concerns, have the resources, and support they need to provide sector leading safeguarding work.
 - v. Liaise directly with Compassion International's Participant Protection Team on the case management of all participant safeguarding incidents and provide relevant information and reporting.
 - vi. Promptly assess, evaluate and report safeguarding cases to relevant internal and external stakeholders (on a strictly need-to-know basis) and in accordance with internal procedures including data protection and confidentiality.
2. Compassion International's prevention and accountability processes include the following:
- a. Ensure all employees have access to, are familiar with, and know their responsibilities within this policy and any behaviour protocols including the Compassion Code of Conduct for Child and Youth Protection and Safeguarding which each volunteer, intern, staff person, manager, board member, subcontractor and partner is required to sign.
 - b. Design and undertake all its activities in a way that protects people from any risk of harm that may arise from coming into contact with the organisation.
 - c. Implement its stringent safeguarding procedures when recruiting, managing, and deploying employees and associated personnel.
 - d. Maintain a work environment that is safe, healthy, and free from unlawful discrimination.
 - e. Provide specialist support and assistance through the Child Protection Officers/Specialists.
3. Compassion National offices' prevention and accountability processes include the following:
- a. Compassion National office employees annually sign and abide by Compassion's Statement of Commitment to Participant Protection & Safeguarding and Code of Conduct to ensure that there is a common set of expectations for and commitment to the protection of children and youth across the ministry.
 - b. Recruitment:
 - i. Appropriate background and/or character reference checks for all staff. Background and/or character reference checks apply to contractors and volunteers with direct participant interaction, who work with child data or whose nature of work involves a high level of risk to participants. The level of risk is determined by each National Office, and appropriate action is taken in recognition of relevant local laws.
 - ii. For potential employees to complete the appropriate background check, obtain the appropriate information for character reference checks, and provide this documentation to the National Office. People and Culture in the National Office ensures the completion of background checks and character reference checks. Documentation of the completion of all procedures is kept in the employee's personnel file by People and Culture.
 - c. Develop and implement a Child Protection strategy and action plan. Strategies are reviewed and approved by the Global Program Protection and Safeguarding team.
 - d. At least one full-time Child Protection Specialist providing consultation to national office staff and church partners, engaging in networking to advance child protection efforts, and leading prevention and response efforts for the national office.
 - e. Documented guidelines to direct culturally appropriate conduct and ensure safety during any visit to the field that includes interaction with children. This includes an intentional orientation session on child protection for all visitors to the field, regardless of trip type (individual visit, group trip, etc.).
4. Compassion FCPs' prevention and accountability processes include the following:
- a. FCP employees annually sign and abide by Compassion's Statement of Commitment to Participant Protection & Safeguarding and Code of Conduct to ensure that there is a common set of expectations for and commitment to the protection of children and youth across the ministry.
 - b. Annually, all FCP leaders, volunteers, and contractors re-sign the Statement of Commitment to Child Protection and Code of Conduct.

- c. Recruitment:
 - i. Maintain documentation of up-to-date procedures throughout the partnership with Compassion International.
 - ii. Written documentation of procedures stored at the Child and Youth Development Center and be available for review if requested (including, but not limited to, as a part of Compassion's partnership audit process, by any government organization, or as a part of any criminal or civil investigation or procedure).
 - iii. These procedures include all of the following and to be used in decision-making related to the candidate's service at the FCP:
 - 1. The most rigorous and complete background check available.
 - 2. Character reference checks.
 - 3. Personal interview with candidates.
 - iv. These procedures apply to employees, leaders, volunteers, or contactors with any participant interaction or who are working with child data (either condition could create potential risk for harm to a child or violation of privacy should these positions be abused).
- d. Personnel files: All FCPs maintain a personnel file for each employee, leader, contractor, or volunteer. Files are created during recruitment of a candidate, maintained through the employee, leader, contractor, or volunteer's tenure with the FCP; and held for at least five (5) years after the employee, contractor, or volunteer has ended their involvement with the child and youth development center. At minimum, these files include:
 - i. Documentation of the completion of all required pre-employment procedures
 - ii. Record of code of conduct signatures, including date of signature
 - iii. Record of any child protection training completed, including date of completion
 - iv. Record of any disciplinary action or termination related to child protection violations or concerns
- e. Develop and implement a Child Protection strategy and action plan. Strategies are reviewed and approved by the Global Program Protection and Safeguarding team.
- f. Have one staff member designated as having specific child protection activities within his/her role. This individual will oversee child protection, prevention of harm (e.g., advocacy and training), and response (case reporting, investigation, and follow-up). While one person is designated as the child protection officer or contact at the FCP, everyone has the responsibility for protecting children from harm and reporting suspected or known incidents of child maltreatment or abuse. Not being designated as the Child Protection Officer is not a valid excuse for failing to protect children or report known or suspected incidents of child abuse, neglect, or exploitation.
- g. Compassion and Frontline Church Partners have a mutual responsibility to understand who is working or volunteering with program participants. This is in order to have confidence that every person that is intentionally introduced to program participants is as appropriate as can be determined and follows our shared commitments to the protection of program participants. Frontline Church Partners update their staff, volunteer, and contractor records whenever a change in staff/volunteer/contractor status is made.
 - i. FCPs review their staff list at least quarterly, ensuring that all active staff/volunteers/contractors are listed, and any staff/volunteers/contractors who have departed are marked as "inactive."

Section V: Reporting and Investigative Procedures

1. Any behaviour which creates a climate of violence, hostility, intimidation, or abuse in a Compassion-funded program will not be tolerated and all reported allegations of abuse involving participants, including exploitation, sexual abuse, and harassment, will be responded to promptly, respectfully, and in accordance with established safeguarding process which prioritize the well-being of survivors.

2. Reporting:
 - a. All Compassion staff are expected to report participant protection and safeguarding concerns to Resolver, Compassion's participant protection reporting and incident management system.
 - b. Anonymous reporting is available and two-way anonymous communication is available through the Resolver system in twenty (26) languages and readily available on a computer or smart phone: <https://cintl.us/reportabuse>
 - c. Participants and caregivers also have access to report via email or telephone in each country: <https://abusehotline.ci.org/>
 - d. Compassion accepts complaints from external sources such as members of the public, partners, and official bodies.
 - e. Compassion International's global Protection and Safeguarding team at prosafeteam@us.ci.org are available for additional policy, guidelines, and standards related inquiries.
 - f. Canadian sponsors that hear from their sponsored child something in a letter that makes them feel abuse is happening or likely to happen, are requested to call +1-800-563-5437 or contact Compassion Canada via email: info@compassion.ca
3. All abuse complaints are logged in the Compassion Child Protection Incident Management web-based tool Resolver using the following criteria:
 - a. Category 1 Incident: A Compassion-related relationship is accused of abuse
 - i. The incident must be logged within 24 hours of the allegation, even if all information about the allegation is not known. Offices must follow the specific Red Alert Process developed to handle incidents of abuse where an FCP staff member, leader or volunteer, Compassion International Staff or Volunteer, Compassion Canada Staff or Volunteer or Sponsor/Donor is accused of harming a child.
 - b. Category 2 Incident: A non-Compassion-related relationship is accused of abuse (e.g., family or community member)
 - i. The incident must be logged within 48 hours of the allegation, even if all information about the allegation is not known.
 - ii. Progress updates on open cases of abuse are updated in the Compassion Child Protection Incident Management web-based tool as information is received, but at least monthly.
4. All concerns reported to Compassion about the welfare of children and vulnerable people are reported as applicable to the relevant statutory agencies or authorities in accordance with statutory guidance including reporting any concerns of criminal behaviour.
5. Compassion Canada follows up safeguarding reports and concerns according to the Compassion Canada's Whistleblower Policy, and any applicable legal and statutory obligations.
6. Any Canadian employee or associated personnel reporting concerns or complaints through formal whistleblowing channels is protected by Compassion Canada's Whistleblower Policy.
7. Compassion understands that reporting issues can be difficult. Retaliation by the Respondent, or anyone acting on behalf of the Respondent, against the Complainant is strictly prohibited and will result in appropriate disciplinary action.

Section VI: Training

1. Compassion Canada conducts annual training for all staff members with Compassion Canada's Child Protection Specialist working with People and Culture to ensure it takes place.
2. All Compassion International employees receive Compassion Child Protection Training and sign and abide by the Compassion International Statement of Commitment to Child Protection and Code of Conduct within three (3) months of their start date or prior to interacting with participants if sooner than three (3) months.
3. All FCP staff, volunteers, and contactors with direct participant interaction or working with child data,

receive Child Protection Training and sign and abide by the Statement of Commitment to Child Protection and Code of Conduct prior to being on-site and working with beneficiaries.

4. Annually after engagement, all FCP staff, leaders, volunteers, and contractors receive basic training on Child Protection. Training opportunities are provided by the National Office, and training methodology are appropriate for the FCPs local context (e.g., if computer-based training is offered, the FCP has computers available for staff, volunteers, and contractors to complete the training). Topics for training are determined in collaboration between National Offices and FCPs.
 - a. All Child Protection training completion are tracked for FCP staff, volunteers and contractors using the relevant learning management system (such as a National Office LMS system or ForChildren.com). National Office training teams are responsible for ensuring all training completion information is loaded into the learning management system within two weeks of training completion (many learning management systems do this automatically for computer-based or other e-learning; this may only be necessary for “live” – in-person or virtual training attendance).
5. All National Offices support FCPs to obtain/develop child protection training materials for caregivers that is in alignment with their Child Protection Strategy. FCPs ensure caregiver training is offered to caregivers annually. FCPs maintain records of when this training is held, and who was in attendance during each session.

Section VII: Disciplinary Action and Remedial Measures

1. Appropriate corrective measures are applied to Canadian employees found in breach of this code of conduct in accordance with Compassion Canada's Ongoing Evaluation Guidelines.
2. Compassion Canada will inform Global Affairs Canada of any credible allegation of sexual exploitation and sexual abuse in the delivery of Canadian international assistance which may involve Global Affairs Canada funding or which could put the Global Affairs Canada's funding or reputation at risk within forty eight (48) hours after determining that an allegation is credible.
3. The well-being and restoration of the child following an incident of child maltreatment is Compassion's primary concern. Our commitment to the best interest of victims of abuse and prevention of future harm guides all our follow-up actions. As such, all of the following criteria must be met prior to considering closing an incident in Resolver.
 - a. Adequate investigation or follow-up has been completed and Compassion has an adequate understanding of the assessment of the allegations.
 - b. Whenever possible, the victim(s) impacted by the incident(s) is in a safe, stable situation and safeguards are in place to prevent further harm from occurring by the alleged perpetrator.
 - c. The victim(s) is receiving or has received appropriate and reasonable interventions to recover from the harm they experienced (for example, medical care, psychological counseling, spiritual support, foster care placement, legal support, etc.).
 - d. If determined to be Sexual Exploitation or Abuse, an intentional and honest debrief has been completed and documented to understand lessons learned and provide valuable insights.
4. If there is reasonable belief that a crime was committed, Compassion will notify local authorities and work with its general council as it engages law enforcement / judiciary.
5. Compassion takes steps to ensure that no person who has been dismissed from any role at Compassion for perpetrating abuse is re-engaged by Compassion.
6. Where Compassion has concerns about the behaviour or conduct of a sponsor, safeguards are put in place to mitigate any risks to Participants or their caregivers or Compassion employees and associated personnel.
7. All FCPs maintain a personnel file for each employee, leader, contractor, or volunteer which includes records of any disciplinary action or termination related to child protection violations or concerns.
8. Safeguarding violation(s) by a partner may result in Compassion transitioning or suspending the relationship.

Section VIII: Revision Control

Effective Date	Revision	Reviewer