

# Safeguarding and Welfare Policy – Oxford Centre for Mission Studies

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## 1. Introduction/background

- 1.1 Oxford Centre for Mission Studies (OCMS) does not work directly with children and vulnerable adults, however it is committed to proactively safeguarding and promoting the welfare of its beneficiaries and staff and to taking reasonable steps to ensure those who come into contact with OCMS or its associated programmes do not, as a result, come to any harm.
- 1.2 This policy relates to OCMS' commitments to safeguarding (as defined by the Charity Commission) and protecting its beneficiaries.<sup>1</sup> Where any suspected wrongdoing is in relation to staff, the procedure set out in OCMS' Whistleblowing or Grievance Procedure should be followed, as appropriate. A list of these policies is set out in the 'other relevant policies' section below.
- 1.3 Over recent years there has been increasing recognition of the way in which people can be at risk of harm from organisations and institutions that are supposed to help them, either as a result of abuse and exploitation by individuals in positions of trust, or via programme activities in general.
- 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 staff and associates or as a result of any of the organisation's activities.
- 1.5 This duty of care extends beyond statutory safeguarding requirements. OCMS does not engage in any activity with children or vulnerable adults that is regulated by domestic safeguarding legislation but it does take 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 in light of widely recognised risks, OCMS has developed this policy to promote protection for all those people it comes into contact with, as well as staff and volunteers within OCMS itself.
- 1.7 Should it come into contact with vulnerable groups (including children), OCMS 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.

## 2. Understanding Risks

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<sup>1</sup> 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>

- 2.1 It is clear that 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 staff compliance with legal requirements. Also, deliberate actions may be taken by people with intent to abuse vulnerable people.
- 2.3 OCMS will maintain a risk register, which will be regularly reviewed, which identifies risks to the charity and how they will be managed and mitigated.

### **3. Scope of this policy**

#### **3.1 For Oxford Centre for Mission Studies staff and contractors**

- 3.1.1 Compliance with this policy is mandatory for all OCMS staff. For the purposes of this policy 'staff' is defined as anyone who works for, or is engaged by OCMS, either in a paid or unpaid, full time or part time capacity. This includes directly employed staff, contractors, agency staff, consultants, volunteers, interns and equivalents.

#### **3.2 For board members and trustees**

- 3.2.1 As board members and trustees must act at all times in the best interests of OCMS and its ultimate beneficiaries, they are also expected to comply with this policy. This expectation is made clear to board members and trustees through the OCMS Governing Board Manual.

#### **3.3 For partnership organisations**

- 3.3.1 This policy also applies in respect of partnership organisations who are delivering a programme or service on behalf of OCMS only. For the avoidance of doubt, this policy does not apply to partners whose relationship with OCMS is governed by a Memorandum of Understanding (see paragraph 7).
- 3.3.2 In respect of partnership organisations who deliver a programme or service on behalf of OCMS only, OCMS 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. OCMS recognises that some will already have protection policies and associated measures in place. Where this is the case they should have no difficulty in also complying with the standards set out in this policy.
- 3.3.3 OCMS will ensure that each partner has appointed a member of staff who will be responsible for promptly reporting to the OCMS Designated Safeguarding Officer (or, in the event that they are unavailable the Deputy 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 OCMS commits to taking all reasonable measures to ensure vulnerable groups (including children) impacted by projects and programmes delivered and/or supported by OCMS are protected as far as possible from harm, including exploitation, neglect and abuse of all kinds.

**5. Oxford Centre for Mission Studies commits to:**

- (a) Developing a zero tolerance 'safety culture' within OCMS that creates and maintains protective environments.
- (b) Placing safeguarding at the heart of recruitment practices by carrying out the highest level of DBS or other criminal record checks to which we are entitled, requesting two written references, considering gaps in work history, checking qualifications and certifications and, where appropriate, confirming a person's right to work in the UK.
- (c) Ensuring OCMS staff and board members are fully cognisant of protection issues and adhere to OCMS Code of Conduct.
- (d) Increasing understanding and raising the awareness of staff and trustees of risks relating to safeguarding within OCMS and in connection with its activities.
- (e) Taking appropriate and proportionate action if this policy is not complied with.
- (f) Developing criteria so that staff understand what constitutes non-compliance.
- (g) Maintaining adequate insurance in relation to OCMS' activities and the people involved, to the extent that is reasonably available.
- (h) Carrying out appropriate and relevant due diligence on partners who are delivering a programme or service on behalf of OCMS only, which may 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 OCMS' partnership or funding-related agreements, taking account of the Charity Commission's relevant guidance.<sup>2</sup>
- (i) Making sure protection considerations are integrated into all aspects of the organisation.
- (j) Ensuring all staff are aware of their responsibilities to report concerns and of steps to take/who to go to in order to report such concerns.
- (k) Ensuring that safeguarding concerns are addressed promptly and through the appropriate channels.

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<sup>2</sup> <https://www.gov.uk/government/publications/charities-due-diligence-checks-and-monitoring-end-use-of-funds>

- (l) Reporting safeguarding incidents, allegations or concerns to external authorities and regulators, as appropriate, and in accordance with best practice. OCMS will fully risk assess such reporting to 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.
- (m) Ensuring that its privacy policy remains suitably updated so that it is clear that, in keeping with OCMS' zero tolerance policy, it will report wrongdoing on the part of its trustees, staff and partners to appropriate authorities; will share such information as may be necessary to protect individuals from harm; and will provide fair and accurate references, which appropriately reflect OCMS' experience and interaction with trustees, staff and partners.

## **6. Embedding organisational commitment**

- 6.1 In order to make its policy commitments a practical reality, OCMS 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 of our activities, and that it is subject to monitoring and review.
- 6.2 OCMS staff and trustees will receive regular training/briefing on their responsibilities and obligations under this policy and it will form part of the induction for new staff and trustees.
- 6.3 Staff and trustees will be expected to acknowledge and accept their responsibilities under this policy. Breaches of this policy by staff will be treated seriously and will be treated as a potential cause for disciplinary action or termination of the relationship by other means. Breaches by trustees may result in the termination of their trusteeship.

## **7. Partners of Oxford Centre for Mission Studies**

- 7.1 OCMS has a number of relationships with partners which are governed by a Memorandum of Understanding. These partners do not provide programmes or services for, or on behalf of OCMS and as such are not required to adhere to this policy. OCMS expects that such partners will take reasonable steps in the cultural context to promote safety, and to alert OCMS should any issues or allegations be raised about an individual who has a relationship with OCMS and who has fallen short of this expectation.
- 7.2 Such partners may, for example, arrange for its faculty to join OCMS as a student in order to undertake further training. While any individuals from these partners are involved with us, they will individually be subject to OCMS' checks, policies and procedures which apply to its students generally. This includes being required to sign the Code of Conduct and attend an appropriate safeguarding orientation when they start.
- 7.3 In the event that faculty from partners work with OCMS in order to deliver a short programme (for example a one week module), they will be required to sign a

volunteer agreement. This will prescribe expectations on the faculty, how they should raise concerns and a requirement that they sign the Code of Conduct.

- 7.4 In respect of any other ways in which OCMS might engage with these partners, OCMS will take reasonable steps, which are documented, to ensure those who come into contact with OCMS or associated programmes do not, as a result, come to any harm.

## 8. Reporting concerns

- 8.1 A safeguarding concern may arise in a number of 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 OCMS staff are required to immediately report any concerns or suspicions of possible/actual harm to a beneficiary (or other person connected to the charity), including abuse, exploitation and neglect and policy non-compliance, or risk of such, resulting from action or inaction by anyone covered by this policy. This includes 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.**

- 8.4 You should follow the procedure set out below for making a report:

- (a) Assess the risk and take steps to ensure the person is not in immediate danger.
- (b) Arrange any medical treatment which is urgently required, notifying them that evidence should be preserved.
- (c) Keep yourself and others safe.
- (d) In the first instance any concerns should be reported to the Designated Safeguarding Officer.
  - (i) If the Designated Safeguarding Officer is not available or is implicated in the concern in any way, the concern should be reported to the Deputy Designated Safeguarding Officer.

- (ii) If the Designated Safeguarding Officer and the Deputy Designated Safeguarding Officer are not available or are implicated in the concern in any way, the concern should be reported to the Safeguarding Lead Trustee.
  - (e) 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.
  - (f) Suspicions must not be discussed with anyone other than those nominated above.
- 8.5 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.
- 8.6 The Safeguarding Lead Trustee, who sits on OCMS' board of trustees, will have oversight of safeguarding and welfare arrangements and will receive reports of any safeguarding and welfare incidents that arise. The Safeguarding Lead Trustee will have a regular slot at meetings of the board of trustees to ensure that trustees are appropriately apprised of matters that arise.
- 8.7 The names of the Designated Safeguarding Officer, Deputy Designated Safeguarding Officer and 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.<sup>3</sup> 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.<sup>4</sup>
- 9.2 Decisions to report to external authorities will be fully risk assessed and anonymisation/pseudonimisation considered when necessary. Reporting will not be avoided on the basis that it may harm OCMS' reputation or give rise to litigation and 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.

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<sup>3</sup> 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>

<sup>4</sup>[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/780835/Criminal\\_reporting\\_of\\_safeguarding\\_offences\\_including\\_overseas\\_v3.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/780835/Criminal_reporting_of_safeguarding_offences_including_overseas_v3.pdf)

9.3 On a case by case basis, the Designated Safeguarding Officer 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) Consider whether the Designated Safeguarding Officer has the relevant knowledge, expertise and capacity to address the concern. If necessary, OCMS will arrange appropriate external support.
- (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.
- (c) Consider whether the Safeguarding Lead Trustee and/or Board of Trustees need to be informed straight away or whether it can be reported at the next board meeting.
- (d) At all times provide appropriate support to the survivor. All decision making on what support is provided should be informed by the survivor's wishes.
- (e) For reports relating to serious incidents: undertake an immediate risk assessment to determine whether there are any current or potential risks to any stakeholders, and develop a mitigation plan if required. This should be kept under review and updated on a regular basis throughout and after the case, as required.
- (f) If at this stage or any stage in the process criminal activity is suspected, consider reporting to the relevant authorities in accordance with paragraph 9.1 and 9.2 above.
- (g) Check and 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);
  - (iii) Insurance provider.

When submitting information to any of these bodies, confidentiality implications must be very carefully considered. The default position is that all information must be anonymised.

- (h) 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 reasonable steps that OCMS may take)

- (ii) Investigation is required to gather further information
  - (iii) Immediate disciplinary action of a member of staff if no further information needed
  - (iv) Review, and possible termination, of agreement or relationship with the partnership organisation
  - (v) Referral to relevant authorities
- (i) Document all steps and decision made clearly, with access appropriately restricted.
  - (j) Record anonymised data to feed into organisational reporting requirements (e.g. serious incident reporting to the Board) and to feed into learning for dealing with future cases. This will include removal not only of individuals' names but also such information that may otherwise make them identifiable.
- 9.4 OCMS will develop strategies and tools to ensure effective implementation of this policy and to enable the Designated Safeguarding Officer, Board and others to monitor its performance.
- 9.5 Existing systems for risk management, due diligence, monitoring and evaluation, audit and review, and other organisational performance mechanisms will be adapted to include indicators and processes by which implementation of the safeguarding policy can be measured and these processes will be periodically reviewed to ensure that they remain effective and up-to-date in respect of best practice.
- 9.6 OCMS will implement and keep updated a Whistleblowing and a Complaints Policy aimed at encouraging a culture of openness and accountability wherein staff and members of the public are, respectively, confident that they can raise any matter of genuine concern without fear of reprisal in the knowledge that they will be taken seriously and that matters will be investigated appropriately and managed on a need-to-know basis, with appropriate remedial action taken.

## 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 OCMS may also be relevant to safeguarding matters:
- (a) Whistleblowing Policy
  - (b) Complaints Policy (Student Handbook)
  - (c) Grievance procedure (Staff Handbook)

- (d) Disciplinary policy/procedures
- (e) Code of conduct
- (f) Data protection policy
- (g) Health and Safety policy
- (h) Dignity at work
- (i) Equal Opportunities policy
- (j) Anti-Bullying and Anti-Harassment Policy

## 12. **Contact information**

- 12.1 OCMS' Designated Safeguarding Officer is currently Nicky Clargo. The Deputy Designated Safeguarding Officer is David Brunt.
- 12.2 OCMS' Safeguarding Lead Trustee is Sarah Hinson
- 12.3 These individuals have access to the email inbox for reporting concerns, which is [safeguarding@ocms.ac.uk](mailto:safeguarding@ocms.ac.uk).
- 12.4 If you are not comfortable with submitting your report via email to that address, please call +441865655293 and ask to speak with the relevant person.

## 13. **Publishing this policy**

- 13.1 OCMS will ensure that this policy is at all times publicly accessible on its website.

**Date of policy:** 15 April 2021

**Date of next review of the policy:** June 2021