

# OCCA

The Oxford Centre for  
Christian Apologetics

## SAFEGUARDING POLICY, PROCEDURES AND CODES OF CONDUCT

*February 2023*

# OCCA

OCCA The Oxford Centre for Christian Apologetics is operated by OCCA House Limited, a charitable company limited by guarantee, registered in England.  
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# SAFEGUARDING POLICY

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*Safeguarding children, young people, and adults.*

## 1. PURPOSE

This policy with its appendices outlines how we will:

- 1.1. Ensure that we provide a healthy, nurturing, and protective environment for everyone who engages with our organisation
- 1.2. Ensure that every member of our organisation and those who engage with us are protected from harm and abuse and that if abuse is identified, it is handled effectively, promptly, and proportionately
- 1.3. Ensure that our trustees, staff, workers, students and volunteers are clear about their responsibilities and duties and are supported to competently and confidently fulfil them
- 1.4. Support the development of an open and transparent culture that listens to the views and wishes of every member of our organisation and those who engage with us and supports the raising of concerns and complaints
- 1.5. Provide leadership and accountability for every member of our organisation and those who engage with us in relation to safeguarding

## 2. SCOPE

- 2.1. This policy applies to everyone who works on our behalf with children, young people, their parents / carers and adults at risk of abuse whether trustees, senior leaders, paid staff, volunteers, or others working on our behalf

## 3. CONTEXT

OCCA The Oxford Centre for Christian Apologetics are a Registered Charity, charity number: 1067314; company number: 03449676

The main aims of the organisation are:

- We desire the fulfilment of the great commission of Jesus Christ. (Matthew 28:18-20)
- We will accomplish this by commending the gospel truth with compassion and integrity.

The main activities of the organisation are:

- Equipping and Training by:
  - o Partnering with the church;
  - o Developing believers;
  - o Intellectual integrity
- Persuasive Evangelism through:
  - o Honest answers to honest questions;
  - o Sharing evidence for Christ in the public square;
  - o Engaging with today's challenging issues
- Reflecting Christian Character

The organisation is led by Board of Trustees and Senior Leadership Team



## 4. VALUES AND BELIEFS

- 4.1. Everyone who engages with our organisation has the right to be protected from any form of bullying or harassment, exploitation or abuse and we will seek to ensure that we provide a caring and nurturing environment that is open and transparent and that promotes the raising of concerns with senior leaders
- 4.2. We have a particular responsibility to protect and promote the wellbeing of those who are vulnerable; particularly to children, young people and adults at risk of abuse; ensuring they are safe while in our care and that we respond appropriately to disclosures or indicators that they are experiencing abuse or neglect while in our care or elsewhere
- 4.3. Every member of our organisation and those who engage with us have a responsibility to act to support the values and commitments outlined in this policy
- 4.4. **Our approach to safeguarding is shaped by our belief as Christians that:**
  - 4.4.1. We are to honour those that God has set in authority over us and to live as responsible and good citizens in the time and place that God has set us in
  - 4.4.2. Every human life, including that of the unborn, is valuable to God and each person bears his image
  - 4.4.3. We live in a fallen and sinful world, where there are many risks and dangers and we must seek to protect everyone, but particularly the vulnerable in our midst from those dangers
  - 4.4.4. God cares for the widow, the orphan, and the stranger; he calls us to protect and care for those who are vulnerable in our society and to oppose exploitation
  - 4.4.5. Jesus example was one of valuing, accepting, and caring about everyone
  - 4.4.6. We are to love those around us as God loves them and to seek to bring healing, restoration and reconciliation to broken and damaged lives by the manifestation of the love of God through us
  - 4.4.7. We are not a gathering of sinless and perfect people, but rather a community of grace where we seek to encourage one another to grow in faith and obedience to God
    - 4.4.7.1. We are called to encourage and challenge each other lovingly and to spur one another on to greater holiness and obedience to God in an attitude of humility, grace and forgiveness
  - 4.4.8. Where necessary, the organisation may impose formal discipline on trustees, staff, workers, students and volunteers in accord with its policies and procedures.

## 5. OUR RESPONSIBILITIES AND COMMITMENTS

### 5.1. OUR RESPONSIBILITIES

- 5.1.1. To ensure that the protection of all members of our community, but particularly children, young people and adults at risk of abuse and the promotion of their welfare is of paramount importance to us and that best practice in safeguarding is embedded into the culture of our organisation
- 5.1.2. To treat each person as equal in the sight of God; equally sinful, equally loved and equally offered the gift of salvation and reconciliation to God and equally protected and respected
- 5.1.3. To seek to minister to, and to encourage growth in obedience to God and his word with equity, transparency and sensitivity, in accordance with our fundamental beliefs as laid out in our statement of faith.
- 5.1.4. To value, respect and listen to the wishes of every member of our community, including those who are vulnerable or find it difficult to make their voice heard
- 5.1.5. To ensure that as an organisation we are alert to our duties around the Prevent duty 2016 and to report appropriately
- 5.1.6. To work in partnership with children, young people, their parents / carers adults at risk of abuse and local and national partner agencies and organisations to promote the welfare of and to protect each member of our community, and particularly the vulnerable
- 5.1.7. To work to develop and maintain an environment that is protective, caring and nurturing for all who engage with our community, in accordance with our doctrines and beliefs as outlined in our policies and procedures

## 5.2. HOW WE WILL SEEK TO FULFILL THESE RESPONSIBILITIES

- 5.2.1. We will seek to visibly demonstrate our commitment to safeguarding throughout the organisation and our most senior leaders will support the development of best practice and provide accountability to everyone who works (whether paid or voluntarily) on our behalf; including providing accountability and challenge to each other
- 5.2.2. We will ensure that those who are responsible for safeguarding at the various levels of the organisation are appropriately trained and supported to competently and confidently fulfil their role
- 5.2.3. We will actively seek to create and maintain a culture that is consistent with our biblical principles and best practice in safeguarding
- 5.2.4. We will ensure that we have robust and relevant policies, procedures and systems that support the culture of our organisation and the work of all those involved in safeguarding and that these are regularly reviewed for effectiveness
- 5.2.5. We will ensure that any contractors, volunteers, or other workers who will partner with the organisation for events, meetings, projects etc, will understand they are subject to the OCCA's safeguarding policy and procedures, and be required to undergo appropriate training including obtaining DBS checks if required.  
If it was someone who was self-employed we will ask them to be DBS checked if required. If someone is working for another organisation, it is their employer's responsibility to have their staff DBS checked.
- 5.2.6. When our staff, trustees, workers, students and volunteers are engaged with events, meetings, projects etc at the invitation of external agencies, we will clarify safeguarding authority at the outset. Where the safeguarding authority/responsibility lies with the external inviting organisation (eg a church, school, business) then our workers will be required to see and adhere to the safeguarding policy and procedures of that organisation, including knowing with whom to report concerns and complaints. Where the safeguarding procedures are deemed to be lesser than our policy and procedures, our workers will ensure they operate within the scope and compliance of our policy and procedures.
- 5.2.7. We will ensure that we appoint a Designated Safeguarding Lead and at least one deputy who will take responsibility for leading safeguarding children and adults across the organisation
  - 5.2.7.1. Safeguarding will be promoted and overseen by our senior leaders
  - 5.2.7.2. Delegation of tasks and responsibilities will be clearly outlined in the relevant role descriptions and the organisation's safeguarding structures, complete with contact details, will be included in our procedures and made publicly available
- 5.2.8. We will adopt safer recruitment best practice in the recruitment and selection of staff and volunteers
- 5.2.9. We will provide effective leadership, management and support for our staff and volunteers who deliver services on our behalf including:
  - 5.2.9.1. Ongoing training and skills development
  - 5.2.9.2. Supervision and pastoral support
  - 5.2.9.3. Quality and performance management measures
- 5.2.10. We will ensure that we consider safety in all areas of our work and ministry;
  - 5.2.10.1. Developing a positive culture
  - 5.2.10.2. Managing health and safety through effective policies and procedures; using risk assessments, processes and proportionate systems
  - 5.2.10.3. Creating a positive and nurturing environment in all aspects of the community, including physical, social, emotional, psychological, spiritual etc environments
  - 5.2.10.4. Considering the online as well as the physical environments; including our use of social media and technology
- 5.2.11. We will ensure that we monitor the conduct of our staff and that we have policies, procedures and systems for managing allegations against staff or volunteers, supported by a culture of listening to allegations and responding with rigor, fairness and transparency
- 5.2.12. We will ensure that our expectations in relation to the conduct of members of our community are clear through codes of conduct, policies and procedures including:
  - 5.2.12.1. Anti-bullying and zero-tolerance approach to bullying; including cyber-bullying and the bullying of staff and leaders
  - 5.2.12.2. Dealing with peer-abuse and harassment (including sexual harassment)
  - 5.2.12.3. Clear accountability processes and sanctions for infringements of the codes of conduct

- 5.2.12.4. Equality and diversity and a culture of zero-tolerance of discriminatory or abusive attitudes, language or behaviours
- 5.2.13. We will seek to clearly identify concerns about the safety or wellbeing of those who are part of our community and to respond appropriately and proportionately:
  - 5.2.13.1. To signpost or refer them to local or national services that can help them
  - 5.2.13.2. To provide information, guidance and support as we are able, to help them overcome their challenges
  - 5.2.13.3. To share information appropriately with partner agencies where we have concerns about the safety of an individual and statutory thresholds and / or criteria are met
- 5.2.14. We will record and store information accurately, keeping it securely in line with our legal duties, information sharing policies and national and local guidance and agreements. This will include records such as:
  - 5.2.14.1. Consent forms
  - 5.2.14.2. Attendance data for work with children, young people and adults at risk of abuse
  - 5.2.14.3. Accident and incident reporting
  - 5.2.14.4. Confidential recording of safeguarding concerns
  - 5.2.14.5. Etc
- 5.2.15. We will involve children, young people, their parents or carers and adults at risk of abuse in our safeguarding processes wherever possible; making reasonable adjustments where necessary to enable them to participate in the decisions that affect them
- 5.2.16. We will ensure that we have a culture and policies and procedures for raising concerns or complaints by any member of our community including children, young people, adults at risk or abuse and their parents / carers and for dealing with those concerns in an efficient, open, honest and fair manner; including clear appeals processes
  - 5.2.16.1. We will also ensure that our leaders are competent and confident in handling complaints
- 5.2.17. We will develop a culture that encourages every member of our community to identify and raise concerns and will support this with a clear whistleblowing policy

We will ensure that relevant policies, procedures, codes of conduct etc are publicly available

## SAFEGUARDING PROCEDURES

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### 6. PURPOSE

These procedures aim to provide trustees, staff, workers, students with clear and simple instructions as to how safeguarding is promoted and how concerns should be handled. They are not provided for training purposes and will not be used as a substitute for training.

### 7. SCOPE

These procedures will be applied to all trustees, staff, workers, students who act on behalf of the organisation.

### 8. DEFINITIONS

- 8.1. Staff: refers to any paid employee or worker
- 8.2. Volunteer(s): refers to anyone who is appointed by the organisation to a role for which they receive no payment (other than out-of-pocket expenses that are appropriately authorised)
- 8.3. Students: refers to those engaged in the organisation's training programmes.
- 8.4. Trainees: refers to our Board who have overall legal responsibility for the organisation.



## 9. GOVERNANCE AND OVERSIGHT

The Trustees will provide effective oversight of safeguarding across the organisation by:

- 9.1. Ensuring that the organisation leadership promote the importance of safeguarding and lead the development of a culture that is biblically faithful, healthy, transparent, and accountable
- 9.2. Ensuring that a suitably knowledgeable and appropriately skilled Designated Safeguarding Lead (DSL) and a deputy are appointed and that they are adequately supported and resourced
- 9.3. Ensuring that a proportionate and legally compliant safeguarding policy is in place and that it is reviewed by the trustees with input and support from the DSL and Deputy DSL at least annually, but more frequently as required
- 9.4. That the DSL provides a verbal update to People Committee meetings (which can be conveyed via one of the trustees) and that a formal annual review is provided to the trustees by the DSL and Deputy DSL
- 9.5. That the effectiveness of the safeguarding arrangements is reviewed annually in line with the review of the policy and procedures
- 9.6. That role clarity is achieved through a clear definition of the responsibilities of all those involved in safeguarding across the organisation (see appendix A)

## 10. RECRUITMENT AND ONGOING SUPPORT OF STAFF AND VOLUNTEERS

*The recruitment and support of staff and volunteers is of critical importance to the organisation and to our work and ministry. In order to fulfil our legal duties and to ensure we meet the still higher standards dictated by scripture, all staff and volunteers will be subject to appropriate recruitment processes*

### 10.1. MANAGEMENT OF RECRUITMENT PROCESS

- 10.1.1. At least one person who is involved in the process of recruitment of staff or appointment of volunteers will be trained in Safe Recruitment
- 10.1.2. Appropriate records will be kept of all recruitment processes
- 10.1.3. A "Single Central Record" of recruitment checks and a training log will be maintained
  - 10.1.3.1. DBC certificates will be returned to the applicant and no copies will be kept. The Single Central record is the only record that will be retained by the organisation
- 10.1.4. Staff and volunteers will be provided with written Job / role descriptions and person specifications prior to deciding whether to take up the position / role

### 10.2. RECRUITMENT PROCESS

- 10.2.1. Prior to appointment, all staff will be required to submit a CV and Cover Letter and volunteers an application form (see appendix D). Where necessary and appropriate (e.g. lack of literacy skills, English as a second language etc) support can be provided for completion of the forms.

### 10.3. PAID STAFF POSITIONS

- 10.3.1. Prior to appointment all paid staff will be required to attend a formal interview, regardless of whether a competitive process is in operation
- 10.3.2. Prior to appointment of staff, references will be sought, including, where possible, a reference from the current or previous employer
- 10.3.3. Upon commencement of their position, all staff will be required to complete a formal induction process as outlined in their role description and including any matters identified during the recruitment process



## 10.4. VOLUNTEER POSITIONS

- 10.4.1. Prior to appointment, all volunteers will be required to attend a formal discussion to ensure their suitability and clarity of understanding of the role and its requirements
- 10.4.2. Prior to appointment, references will be sought.
- 10.4.3. Following appointment and prior to commencement of the role, volunteers will be required to complete a formal induction process as defined in the role description

## 10.5. PROBATIONARY PERIODS

- 10.5.1. All staff will be subject to a formal probationary period
- 10.5.2. Prior to commencement of the role, a clear statement of the criteria for successful completion of the probationary period will be provided
- 10.5.3. Regular support, guidance and review will be provided throughout the probationary period and the outcome (passed, extended, failed) will be communicated to the employee prior to the end of the probationary period and records will be retained of all discussions

## 10.6. ONGOING SUPPORT AND SUPERVISION

- 10.6.1. All staff and volunteers will receive proportionate supervision and pastoral care. Supervision will include both personal wellbeing and performance management
- 10.6.2. Where DBS checks are required, this will be identified in the role description and these checks will be updated at least every three years

## 10.7. TRAINING

- 10.7.1. All staff and volunteers in roles that involve regulated activity or those who manage such staff will be required to attend regular safeguarding training
  - 10.7.1.1. Trustees on the People Committee will receive initial training. There is no requirement for formal update training, however, the trustees must ensure that they are competent in their role and that their knowledge of compliance with legislation and Charity Commission guidance up to date
  - 10.7.1.2. Volunteers and staff involved in working with children, young people or adults at risk of abuse are required to update their training at least every three years
  - 10.7.1.3. The Designated Safeguarding Lead and the Deputy DSL are required to attend formal update training at least every two years
  - 10.7.1.4. All staff, volunteers and trustees will undergo some informal update activity annually
  - 10.7.1.5. Any contractors, volunteers, or other workers who will be partnering with the organisation for events, meetings, projects etc, will be required to undergo appropriate training.
- 10.7.2. A log of training and DBS checks will be maintained by the DSL

## 11. ENSURING A SAFE AND HEALTHY ENVIRONMENT

*OCCA fully recognises that there are many factors that impact on and contribute to the safety of the environment for everyone; some of these being procedural and others cultural. Here we describe only the procedural aspects.*

### 11.1. HEALTH AND SAFETY

- 11.1.1. The Health and Safety Officer will ensure that the health and safety of everyone who enters our organisation community is protected by:



- 11.1.1.1. Regularly reviewing our health and safety policy to maximise effectiveness and ensure ongoing legal compliance
- 11.1.1.2. Maintaining and implementing proportionate Risk Assessments for both the premises and the activities of the organisation
- 11.1.1.3. Maintenance and analysis of Accident and Incident Reports on receipt to ensure appropriate lessons are learned and timely responses are implemented and an overview analysis of reports that examines trends and recurring themes will be conducted at least annually
- 11.1.1.4. Ensuring that adequate First Aid cover is available, and that only qualified First Aiders administer First Aid, except in emergency situations and where instructed to do so by Emergency Services
- 11.1.1.5. Ensuring that appropriate safety equipment such as First Aid kits, Fire Extinguishers etc are available and maintained on an ongoing basis
- 11.1.1.6. Key Health and Safety information will be prominent and best practice will be promoted through announcements, effective signage etc

**11.2. WE WILL:**

- 11.2.1. Ensure that registers of children attending, and leaders present are maintained
- 11.2.2. Ensuring that those involved in such ministries have been appointed in accordance with our Safe Recruitment procedures
- 11.2.3. Ensure that consent is obtained for their attendance at the group and that contact details and information about any additional or specific needs are recorded
- 11.2.4. Ensure that appropriate child: adult ratios are maintained in line with guidance from the NSPCC:
  - 11.2.4.1. 0 – 2 years - one adult to three children
  - 11.2.4.2. 2 – 3 years - one adult to four children
  - 11.2.4.3. 4 – 8 years - one adult to six children
  - 11.2.4.4. 9 – 12 years - one adult to eight children
  - 11.2.4.5. 13 – 18 years - one adult to ten children
- 11.2.5. Ensure that appropriate accident/incident reporting is in place and that any accidents or incidents are reported to parents/carers in a timely manner
- 11.2.6. Ensure that appropriate order and discipline are maintained

**11.3. WHEN CHILDREN OR YOUNG PEOPLE ARE PRESENT AT EVENTS THAT ARE PRIMARILY AIMED AT ADULTS AND CHILDCARE IS NOT PROVIDED AND THEIR PARENTS ARE PRESENT:**

- 11.3.1. During these times, children remain the responsibility of their parents who are responsible for their safety and care
- 11.3.2. Any concerns or support needs identified will be recorded and reported to the DSL in the usual way

**11.4. WHEN YOUNG PEOPLE ARE PRESENT AT EVENTS THAT ARE PRIMARILY AIMED AT ADULTS AND PARTICIPATING IN THAT MEETING IN THEIR OWN RIGHT**

- 11.4.1. If the individual is not believed to be competent to consent to attendance, consent will be sought from their carers
- 11.4.2. If the individual is believed to be competent to consent to attendance, they will be encouraged to be open and transparent with their carers and consent will be sought for the organisation to contact them with a view to establishing open communication and transparency
- 11.4.3. Leaders of the organisation or the event in question will be vigilant to ensure that the individual is adequately protected
- 11.4.4. Any concerns or support needs identified will be recorded and reported to the DSL in the usual way

## 11.5. WHEN MINISTERING TO ADULTS AT RISK OF ABUSE OR ADULTS WITH ADDITIONAL SUPPORT NEEDS

- 11.5.1. If the individual is not believed to be competent to consent to attendance, consent will be sought from their carers
- 11.5.2. If the individual is believed to be competent to consent to attendance, they will be encouraged to be open and transparent with their carers and consent will be sought for organisation to contact them with a view to establishing open communication and transparency
- 11.5.3. Leaders of the organisation or the event in question will be vigilant to ensure that the individual is adequately protected
- 11.5.4. Any concerns or support needs identified will be recorded and reported to the DSL in the usual way

## 11.6. GENERAL PROVISIONS

- 11.6.1. The organization will ensure that information related to safeguarding, including contact details and other relevant information is prominently displayed in the building and online
- 11.6.2. Leaders will promote the need for every member to be vigilant to safeguarding concerns through the process, teaching and culture of the organisation and by personal example

## 12. RESPONDING TO AND REPORTING SAFEGUARDING CONCERNS AND DISCLOSURES

### MANAGING IMMEDIATE RISK

- 12.1. Upon identification of a concern or receipt of a disclosure, the worker involved should make an assessment as to whether any immediate action is necessary to protect the individual
  - 12.1.1. The worker may seek advice from the team leader or from the DSL, however, the seeking of advice should not unnecessarily delay or prevent the protective action or place the individual at risk of further or increased harm
  - 12.1.2. In such urgent situations and if the DSL cannot be immediately contacted, the worker should contact either the police on 999 or children's Social Care to obtain support. Under such circumstances, the DSL should be notified at the earliest possible opportunity

### MANAGING THE RISKS: THE ROLE OF THE DSL

- 12.2. In discussion with the worker reporting the concern, the DSL will review any immediate actions taken and will be responsible for follow-up or further action that may be required
- 12.3. Upon receipt of the completed form, the DSL will establish a "Confidential File" in relation to the person at risk
  - 12.3.1. A Chronology (See appendix D) will be established and inserted at the front of the confidential file
  - 12.3.2. The confidential file will be updated with any further discussions or actions, including any advice sought or referrals made and updating will continue on an ongoing basis
    - 12.3.2.1. The DSL will confirm to the person raising the concern that the matter has been actioned. The DSL will not provide any unnecessary information. Information is only shared on a "need to know" basis
- 12.4. Where the concern meets the statutory threshold, the DSL will notify the parent or carer of the individual concerned (or the individual themselves if they are an adult) that a referral is being made to Social Care
  - 12.4.1. Information will not be shared with the parent / carer in situations where:
    - 12.4.1.1. To do so would place a child at increased risk of harm or neglect
    - 12.4.1.2. To do so would place an adult at increased risk of harm or abuse
    - 12.4.1.3. The concern relates to Fabricated or Induced Illness

- 12.4.2. The referral will be made to the appropriate Social Care service (See appendix B for contact details)
- 12.4.3. If the referral has not been acknowledged within 3 working days, the DSL will follow up with Children's Social Care
- 12.4.4. The DSL will work with the Local Authority and other partners on behalf of the OCCA to ensure that we fully participate in the safeguarding process
- 12.4.5. All conversations, correspondence, and documentation etc will be placed into the confidential file and the "Record of action" and Chronology will be maintained on an ongoing basis
- 12.5. Confidential files will be stored in a locked filing cabinet.
- 12.6. The DSL will share information as necessary with other individuals in the organisation to facilitate effective safeguarding

### 13. ALLEGATIONS AGAINST OR CONCERNS ABOUT TRUSTEES, STAFF, WORKERS, STUDENTS AND VOLUNTEERS

*OCCA takes allegations against our trustees, staff, workers, students and volunteers very seriously and will ensure that they are investigated thoroughly, via a transparent process that expedites the matter in a timely manner. We recognise that that we have a responsibility to take the allegation seriously, to manage the situation effectively while the investigation takes place and to and to support the person accused throughout the process.*

- 13.1. Allegations against trustees, staff, workers, students and volunteers within the organisation should be reported to the DSL or HR@theocca.org
  - 13.1.1. If the allegation is against the DSL, it should be reported Chair of the Board
- 13.2. Full details of the allegation will be recorded
- 13.3. The organisation's investigating officer must first assess whether any immediate action is required to ensure the safety of everyone involved
  - 13.3.1. Dependent upon circumstances and the immediate action required, notifying the individual that an allegation has been received may be unavoidable
  - 13.3.2. If so, care should be taken not to compromise the gathering of evidence.
  - 13.3.3. If it is necessary to notify the individual at this stage, details of the allegation should not be divulged
  - 13.3.4. Support must be offered to the subject of the allegation as well as any potential victims
- 13.4. At the earliest opportunity, the LADO (Local Authority Designated Officer) should be consulted
  - 13.4.1. If the LADO cannot be contacted due to working hours, initial advice can be sought from Christian Safeguarding Services (CSS)
- 13.5. If the allegation meets the threshold for LADO, the organisation's investigating officer will work with LADO to ensure that the allegation is thoroughly investigated, and all issues raised are addressed
- 13.6. If the allegation does not meet the threshold for LADO, the investigating officer will consult with CSS, who will provide independent support and advice to ensure transparency
- 13.7. Thorough records of all aspects of the handling of the allegation will be retained throughout the process.
  - 13.7.1. These records will be held confidentially in a locked filing cabinet
- 13.8. The DSL will seek and follow specialist advice throughout the process

### 14. MANAGEMENT OF EX-OFFENDERS OR THOSE WHO POSE AN ACTUAL OR POTENTIAL RISK TO OTHERS; PARTICULARLY TO VULNERABLE PEOPLE

*As an organisation, we believe in the power of God to forgive and transform individuals. We also believe that every individual is valuable to God and should be protected; particularly those who are vulnerable.*

- 14.1. Where the organisation becomes aware that an individual is an ex-offender or that they may pose a risk to vulnerable people, the organisation leaders will enter into an open and frank discourse with that individual to understand the context and the risks
- 14.2. With the consent of the individual, the organisation will seek to work in partnership with probation services or other agencies supporting the individual where this is appropriate
- 14.3. The leaders will assess the risk posed by the individual and a formal risk assessment will be formulated
- 14.4. A formal agreement with the individual will be drawn up and will be signed by both the organisation leaders. The agreement will include:
  - 14.4.1. The organisation's commitments to the individual who poses the risk
  - 14.4.2. The steps the organisation will take to support the individual while simultaneously protecting everyone in the organisation community
  - 14.4.3. The restrictions and conditions that will be applied to the individual's involvement in the life of the organisation
  - 14.4.4. The consequences of failure to comply with the agreement
  - 14.4.5. When and how the risk assessment and formal contract will be reviewed
- 14.5. All decisions and agreements will be formally recorded and securely stored
- 14.6. The individual who poses a risk will be fully involved in the planning process and information will only be shared with others in the organisation by the leaders either:
  - 14.6.1. With the agreement of the individual who poses a risk
  - 14.6.2. Where information needs to be shared to protect vulnerable people and then, only the minimum information that is essential will be shared and the individual will be informed in advance what information will be shared
- 14.7. If the individual chooses to leave the organisation to avoid the management of the risk and starts work with another organisation, the organisation leaders will take specialist advice as to whether this information should be passed on

## 15. CONCERNS ABOUT PRACTICE AND WHISTLEBLOWING

- 15.1. Concerns about the culture or practice within the organisation should be raised with HR
- 15.2. Those concerns will be carefully considered, and a formal response will be provided to the individual
- 15.3. If the complainant is not satisfied with the response, they should formally raise the matter with the organisation leadership, explaining their concerns about the adequacy of the initial response. Details of how this can be done will be communicated at the same time as the initial response
- 15.4. Once the organisation leadership have considered the matter, they will formally respond to the complainant in writing, explaining their findings and the rationale for their decision
  - 15.4.1. Details of how to raise the complaint externally will also be provided as part of the response
  - 15.4.2. This will include contacting the Charity Commission, details of the organisation's whistleblowing policy and independent whistleblowing helpline, NSPCC whistleblowing helpline and any other measures that the organisation wish to offer

## 16. BASIS OF POLICY AND LEGAL FRAMEWORK

This policy is consistent with:

- Current legislation
- National guidance
- Local arrangements
- Our charitable objectives, policies and procedures

Full details are available in appendix B

Related policies and procedures

This policy should be read in conjunction with:

- Our statement of Faith
- Staff Handbook

Policy due for review: 02/02/2024	Policy last reviewed 02/02/2023	Last review conducted / approved by: Hannah Tenbeth (HR)
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## APPENDICES

<b>APPENDIX A – SAFEGUARDING ROLE ALLOCATION</b>	
<i>The specific duties of each role are defined in the relevant role description</i>	
<b><u>Legal responsibility</u></b>	<b><u>Spiritual responsibility / authority</u></b>
<b>Governance / strategic level</b>  Legal compliance and final responsibility for safeguarding rests with The Board of Trustees	<b>Governance / strategic level</b>  Spiritual / doctrinal matters are the responsibility of CEO
<b>Allegations against trustees, staff, workers, students and volunteers and concerns about practice</b>  Concerns about conduct of trustees, staff, workers, students and volunteers or about practice within the organisation should be addressed to HR@theoCCA.org  Name: Zachary Jackman Role: Director of Operations E-mail: <a href="mailto:Zachary.Jackman@theoCCA.org">Zachary.Jackman@theoCCA.org</a> or <a href="mailto:hr@theoCCA.org">hr@theoCCA.org</a> Phone: 07918 324372  If they are unavailable, their deputies are:  Name: Charlie Styles Role: Chief Executive Officer E-mail: <a href="mailto:charlie.styles@theoCCA.org">charlie.styles@theoCCA.org</a> Phone: 07380 449448	
<b>Operational management level</b>  Designated Safeguarding lead  Name: Zachary Jackman Role: Director of Operations E-mail: <a href="mailto:Zachary.Jackman@theoCCA.org">Zachary.Jackman@theoCCA.org</a> Phone: 07918 324372  Deputy Designated Safeguarding Lead  Name: Clare Williams Role: OCCA Speaker and Tutor E-mail: <a href="mailto:clare.williams@theoCCA.org">clare.williams@theoCCA.org</a> Phone: 01865 302900	<b>Practical level</b>  Specific responsibility for students  Name: Naomi Thomas Role: Events and Training Coordinator E-mail: <a href="mailto:admin@theoCCA.org">admin@theoCCA.org</a> Phone: 01865 302900

<p>Details of external specialist support:</p> <p>Christian Safeguarding Services advice line</p> <p>Phone: 0116 218 4420</p> <p>E-mail: <a href="mailto:contact@thecss.co.uk">contact@thecss.co.uk</a></p>	
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## APPENDIX B - KEY SAFEGUARDING CONTACTS

<p><b>Organisational</b>  Name: Zachary Jackman  Role: Director of Operations  E-mail: <a href="mailto:Zachary.Jackman@theoCCA.org">Zachary.Jackman@theoCCA.org</a> or <a href="mailto:hr@theoCCA.org">hr@theoCCA.org</a>  Phone: 07918 324372</p> <p><b>Leadership</b>  Name: Charlie Styles  Role: Chief Executive Officer  E-mail: <a href="mailto:charlie.styles@theoCCA.org">charlie.styles@theoCCA.org</a>  Phone: 07380 449448</p> <p><b>Designated Safeguarding Lead</b>  Name: Zachary Jackman  Role: Director of Operations  E-mail: <a href="mailto:Zachary.Jackman@theoCCA.org">Zachary.Jackman@theoCCA.org</a> or <a href="mailto:hr@theoCCA.org">hr@theoCCA.org</a>  Phone: 07918 324372</p> <p><b>Deputy Designated Safeguarding Lead</b>  Name: Clare Williams  Role: OCCA Speaker and Tutor  E-mail: <a href="mailto:clare.williams@theoCCA.org">clare.williams@theoCCA.org</a>  Phone: 01865 302900</p> <p>Our policies and other useful information about safeguarding can be found on our website, or via the staff network</p> <p><a href="https://theoCCA.org/">https://theoCCA.org/</a></p>	<p><b>Statutory services</b></p> <p><b>Local Authority details</b>  <a href="https://www.oxford.gov.uk/info/20101/community_safety/348/keeping_people_safe">https://www.oxford.gov.uk/info/20101/community_safety/348/keeping_people_safe</a></p> <p><b>Safeguarding children</b>  Safeguarding Children's Board  <a href="https://www.oscb.org.uk/">https://www.oscb.org.uk/</a></p> <p>Multi-Agency Safeguarding Hub 0345 050 7666 during office hours (8.30am – 5pm, Monday to Thursday, 8.30am – 4pm, Friday)  Outside office hours call the Emergency Duty Team on 0800 833 408  Email <a href="mailto:oscb@oxfordshire.gov.uk">oscb@oxfordshire.gov.uk</a>  <i>(Please remember that e-mail is NOT secure so confidential or sensitive data should not be included)</i></p> <p><b>Safeguarding Adults</b></p> <p>Safeguarding Adults Board  <a href="https://www.osab.co.uk/">https://www.osab.co.uk/</a>  <a href="https://service.oxfordshire.gov.uk/raiseconcernforadult">https://service.oxfordshire.gov.uk/raiseconcernforadult</a></p> <p>Multi-Agency Safeguarding Hub 0345 050 7666 during office hours (8.30am – 5pm, Monday to Thursday, 8.30am – 4pm, Friday)  Outside office hours call the Emergency Duty Team on 0800 833 408  Email <a href="mailto:oscb@oxfordshire.gov.uk">oscb@oxfordshire.gov.uk</a>  <i>(Please remember that e-mail is NOT secure so confidential or sensitive data should not be included)</i></p>
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## APPENDIX C - BASIS OF THE POLICIES AND PROCEDURES AND THE LEGAL FRAMEWORK

- Our statement of faith
  - This policy reflects the organisation’s fundamental biblical beliefs and should be read in conjunction with the statement of faith
- Our governing documents (e.g. constitution / Memorandum and Articles of Association etc)

### Safeguarding Children

- National legislation and guidance (Safeguarding Children)
  - Children Acts (1989 & 2004)
  - Children and Families Act 2014
  - Children and Social Work Act 2017
  - Working together to safeguard children (2018)
  - What to do if you’re worried a child is being abused: advice for practitioners (Department for Education, 2015)
  - Protection of Children Act 1999
  - Safeguarding vulnerable groups act 2006
  - Protection of freedoms Act 2012
  - Disqualification under the childcare act 2006 (2018 amended)
  - Prevent duty guidance 2016
  - Sexual offences Act 2003
  - The Safe Network Standards (available from the NSPCC website)
  - The policy also takes account of the principles outlined in:
    - Keeping Children Safe in Education 2021
    - FGM duty guidance

### Safeguarding Adults

- National legislation and guidance (Safeguarding adults)
  - The Care Act 2014
  - Human Rights Acts 1998
  - Care Standards Act 2000
  - Mental Capacity Act 2005
  - Deprivation of Liberty Safeguards 2007
  - Sexual Offences Act 2003
  - Police and Criminal Evidence Act 1984
  - Fraud Act 2006
  - Public Interest Disclosure Act 1998
  - Health and Social Care Act 2008
  - Disclosure and Barring Service (DBS)
  - Multi-Agency Public Protection Arrangements (MAPPA)
  - Multi-Agency Risk Assessment Conference (MARAC)
  - LSAB Multiagency Policy and Procedures

□ Local guidance and procedures  
<https://www.oscb.org.uk/>

□ Local guidance and procedures  
<https://service.oxfordshire.gov.uk/raiseconcernforadult>

## APPENDIX D - STANDARD DOCUMENT SAMPLES

	Application to volunteer
	Concerns reporting form
	Confidential file chronology
	Confidential file record of conversations and actions
	Template report from DSL to trustees

Accessed via [HR@theoCCA.org](mailto:HR@theoCCA.org)

## APPENDIX E – CODES OF CONDUCT

### Code of conduct for trustees, staff, workers, students and volunteers working with children or young people

#### Those working with children and young people will

- Ensure that they understand the policies, procedures, systems, guidelines and risk assessments etc that are provided and that they are implemented
- Attend safeguarding training on the frequency stipulated in this policy
- Work in a transparent and responsible manner that ensures that they are accountable to the organisation leaders and that they are open to discussion with and challenge from parents
- Ensure that their conduct embraces their responsibility for the safety of the children in their care
- Maintain a state of vigilance to identify and report any safeguarding concerns, including concerns about adults who may pose a risk to children
- Refrain from any abuse of their power or authority as adults and leaders within the group
- Only take responsibility for children if they are physically and mentally fit and able to do so
- Treat them with respect and dignity
- Treat them in an age appropriate way that recognises their developmental stage and ability
- Provide them with appropriate levels of choice
- Treat them as individuals
- Respect their views and wishes
- Promote and ensure appropriate behaviour towards one-another
- Ensure that appropriate professional boundaries are maintained
- Ensure that age appropriate boundaries are clearly explained and consistently implemented in accordance with this policy
- Ensure that any age appropriate physical contact is child led
- Ensure that physical intervention is only used as a last resort to ensure the safety of an individual child or the group
- Refrain from any physical chastisement
- Refrain from making any social media connections with them
- Will not engage in any sexualised, aggressive, humiliating, demeaning or discriminatory (etc) language or behaviour with them
- Act with fairness and treat children equitably; avoiding discrimination or favouritism
- Seek to avoid any language or behaviour or adopting any attitude that could lead to misunderstanding

**Code of conduct for trustees, staff, workers, students and volunteers working with Vulnerable Adults at Risk of Abuse**

Those working with vulnerable adults including adults at risk of abuse will:

- Ensure that they understand the policies, procedures, systems, guidelines and risk assessments etc that are provided and that they are implemented
- Attend safeguarding training on the frequency stipulated in this policy
- Work in a transparent and responsible manner that ensures that they are accountable to the organisation leaders and that they are open to discussion with and challenge
- Ensure that their conduct embraces their responsibility for the safety of those with whom they are working
- Maintain a state of vigilance to identify and report any safeguarding concerns, including concerns about people who may pose a risk to them
- Refrain from any abuse of their power or position and will always seek to act in the best interest of the individual
- Only engage in activity for which they are physically and mentally fit
- Treat them with respect and dignity
- Ensure that support is client led and that their views, wishes and choices are respected
- Treat them as individuals
- Promote and seek to ensure appropriate behaviour towards one-another
- Ensure that appropriate professional boundaries are maintained
- If working in groups, seek to ensure that necessary behavioural and interpersonal boundaries are clearly explained and consistently implemented
- Ensure that any physical contact is client led
- Ensure that proportionate physical intervention is only used as a last resort to ensure the safety of an individual or the group
- Will not engage in any sexualised, aggressive, humiliating, demeaning or discriminatory (etc) language or behaviour with them
- Act with fairness and treat each person equitably; avoiding discrimination or favouritism
- Seek to avoid any language or behaviour or adopting any attitude that could lead to misunderstanding

**Code of conduct for trustees, staff, workers, students and volunteers providing pastoral care**

*(please note: this code of conduct is not intended to cover disciplinary issues, although the broad principles would still apply)*

Those involved in providing pastoral care will:

- Ensure that support provided is led by the person receiving the support
- Ensure that the dignity and wishes of the individual are respected at all times
- When delivering challenge or difficult messages, will do so in a respectful, compassionate and gentle way that is in line with their best interests (including their emotional and spiritual wellbeing)
- Will seek to ensure that the individual's right to question or ignore any advice or suggestions is fully understood
- Attend safeguarding training on the frequency stipulated in this policy
- Work in a transparent and responsible manner that ensures that they are accountable to the organisations leaders and that they are open to discussion with and challenge
- Maintain a state of vigilance to identify and report any safeguarding concerns, including concerns about people who may pose a risk to them
- Refrain from any abuse of their power or position and will always seek to act in the best interest of the individual
- Only engage in activity for which they are physically and mentally fit
- Ensure that appropriate professional boundaries are maintained
- Ensure that any physical contact is client led
- Ensure that proportionate physical intervention is only used as a last resort to ensure the safety of an individual or the group
- Will not engage in any sexualised, aggressive, humiliating, demeaning or discriminatory (etc) language or behaviour with them
- Act with fairness and treat each person equitably; avoiding discrimination or favouritism
- Seek to avoid any language or behaviour or adopting any attitude that could lead to misunderstanding