



Safeguarding Policy

Document ID: LGPOL16

Version: 2.0

All NOC Policies and Procedures apply to NOC Innovations unless otherwise stated.

Document Control

Version	Date	Author(s)	Comment	Approval
1.0	18/03/2021	Helen Storey	Final	Executive
2.0	May 2022	Rachael Whitaker, Head of Legal & Governance	Regular review - updated for current Charity Commission and UKRI guidance, and to expand/clarify.	Board

Policy Owner: Associate Director (AD), Corporate Business Support (CBS)

Updates: The effectiveness of policies and procedures is monitored on an ongoing basis. This ensures that regulatory/legal change, incident occurrence and/or stakeholder engagement is considered and incorporated as the policy owner may deem necessary. This policy will be regularly reviewed, always following a serious incident and at least once a year, in accordance with Charity Commission guidance. Additionally, NOC's policy framework and procedure are subject to an effectiveness review every 3 years, records of which will be kept by the Legal & Governance Team. For further information please contact NOC_governance@noc.ac.uk

Deletion Date: When a policy is superseded or no longer required.

1. Purpose and Scope

- 1.1 The National Oceanography Centre (NOC) is committed to supporting the development of the highest standards in organisational culture, systems and practice required to prevent and tackle all incidents of harm and abuse. We are working collectively, with our partners in the research and development community to strengthen our safeguarding practices and compliance processes.
- 1.2 As a charity, NOC has a responsibility to ensure that it does not cause harm to anyone that comes into contact with NOC. This includes:
 - 1.2.1 Identifying and managing risks;
 - 1.2.2 Having suitable policies and practices in place, which everyone understands and uses;
 - 1.2.3 Carrying out necessary checks;
 - 1.2.4 Protecting staff and volunteers;
 - 1.2.5 Handling and reporting incidents appropriately;
- 1.3 For some activities, NOC may be required to comply with additional safeguarding provisions imposed by institutions providing funding for NOC's research and innovation activity, as a condition of receiving such funding.
- 1.4 We condemn all forms of inappropriate behaviour, harm and abuse, including bullying, and sexual and other forms of harassment. We take a zero-tolerance approach to harm and abuse to any individual employed through or associated with our programmes in all contexts; whether in humanitarian or fragile and conflict-affected settings, in other field contexts, or within the international or UK research and development community which we support.
- 1.5 NOC has responsibilities to its staff, those they work with and any visitors, including children, young people and vulnerable adults, who may visit NOC sites or take part in any events, activities or any interactions in which NOC participates, to ensure they are appropriately safeguarded.
- 1.6 This policy outlines the NOC approach to safeguarding. This policy applies to all trustees; staff; students; external partners and the people with whom they work on activities conducted by NOC, whether in the UK or overseas, including on our research ships. It also applies to any visitors, volunteers and students on NOC sites, inclusive of all children, young people and vulnerable adults.
- 1.7 The purpose of this policy is to explain what NOC considers to be inappropriate behaviour and NOC's approach to taking all reasonable steps to prevent and address incidents of exploitation, abuse or harm:
 - **To** individuals directly involved in NOC's activities, including staff, students, trustees, and any other individuals that come into contact with NOC, including associated personnel, **by** (i) any other individual(s) directly involved in NOC's activities; or (ii) individuals not directly involved in NOC's activity, such as members of the public or other groups, where such exploitation, result or harm is a direct result of the individual's involvement in NOC's activities; or
 - To any child, young person or vulnerable adult who is not directly involved in activities undertaken by NOC, but may be vulnerable to exploitation, abuse or harm by staff, students

or any associated personnel directly involved in NOC's activity while they are conducting the activity.

This policy sets out how staff, students, trustees and other individuals involved in NOC's activities, including associated personnel, should work with others in relation to safeguarding. Having this policy in place assists individuals engaged in activities with NOC to understand what is acceptable and what is not. It also provides information on what to do if there is a concern, and how NOC will respond appropriately if harm does occur.

2. Policy

- 2.1 NOC recognises that the nature of scientific endeavour is such that research teams may be working with individuals or communities facing systemic vulnerabilities, and where junior staff may be dependent upon senior staff for mentorship and support, or where research staff may be engaged on short-term contracts. This presents situations in which abuses of power may occur.
- 2.2 NOC is committed to high standards of behaviour across our sector, recognising the strength of existing good practices and working in partnership with the development research community. NOC places utmost importance on the protection from harm and abuse of all individuals; including research participants and their communities, and those that volunteer, work (researchers and others) or study in the research sector.

2.3 Inappropriate behaviour

It is vital that all staff understand what is meant by inappropriate behaviour as it includes a wide range of potential behaviours. Throughout this document, the term "inappropriate behaviour" (which may range from mild to grossly inappropriate behaviour) is intended to include, but is not limited to:

- Bullying
- Verbal, physical or sexual harassment or abuse
- Exploitation (including sexual exploitation)
- Abuse (including sexual abuse and abuse of power)
- Any actions that harm children or place them at risk of harm
- Intimidation
- Any form of discrimination
- Entering into relationships which cause, or could potentially cause, conflicts of interest at work
- Entering into relationships where consideration is provided for acts of a sexual nature
- Behaviour that brings, or could potentially bring, the organisation into disrepute
- Showing a lack of respect for the dignity of others
- Behaving in a culturally insensitive manner
- Behaving in a manner which leads to, or could potentially lead to, health or security problems for the individual concerned and/or for other people
- Unauthorised use or possession of NOC property – or of the property of a third party - while acting or claiming to act on behalf of NOC, and serious negligence or deliberate misuse of NOC property
- Criminal behaviour including theft, fraud, bribery, physical violence including rape or sexual offences
- Abuse for extremist purposes
- Exposure to extremist or radicalised ideologies

2.4 Additional guidance on what standards of behaviour are expected may be found in the NOC Ethics Policy (LGPOL01), the NOC Values and the NOC Code of Conduct (PSPOL04). Guidance on how NOC will deal with bullying and harassment are set out in the Dignity at Work Policy (PSPOL05).

2.5 Understanding and applying our safeguarding policies and procedures

2.5.1 NOC expects all staff and trustees to promote a culture in which harm and abuse is less likely to happen, and to act swiftly to respond to cases that do emerge, in line with international standards. NOC will ensure its staff and trustees are aware of their responsibilities and requirements in relation to safeguarding and how they can work, act and engage in ways that increase the safety and protection of others, including children young people and vulnerable adults with whom the organisation is in contact.

2.5.2 NOC will ensure that parties they work with and that access the NOC sites are aware of this policy and that it is accessible to all. NOC will do this by signposting this Safeguarding Policy and associated documents to new joiners in their induction process and by making the relevant information available on the NOC intranet and website.

2.6 Pre-recruitment checks

Prior to the recruitment of new staff, appropriate checking is undertaken by the People & Skills team with assistance from external partners as appropriate. During employment and for each project, the risk of the activity is noted, assessed and mitigated as appropriate. This is particularly important for projects overseas but must be considered for all activity.

2.7 Reporting concerns

2.7.1 Individuals are invited to raise issues either through their line management chain (in the case of staff) or outside it, through whistleblowing or approaching an appropriate person within the organisation. More detail of how to raise an issue can be found in the Grievance Policy (PSPOL11) and Whistleblowing Policy (LGPOL08) and associated procedures. These procedures also include external, confidential contacts for staff to raise any issues should they feel unable to raise these internally or feel that in doing so, would present more of a safeguarding risk to an individual.

2.7.2 NOC will not ignore any allegation, it will take it seriously and investigate the matter appropriately. Where inappropriate actions are found to have occurred, disciplinary action will be taken in line with the Disciplinary Policy (PSPOL06). In addition, where appropriate, matters may be reported to the police or relevant authority for investigation. More detail of how an allegation will be handled and guidance for staff may be found in the Safeguarding Guidance and Reporting Procedure (LGPRO03).

2.8 Reporting of serious incidents to the Charity Commission

NOC has an obligation to report serious incidents to the Charity Commission in line with the Reporting of Serious Incidents Procedure (LGPRO20). A **serious incident** is defined by the Charity Commission as “an adverse event, whether actual or alleged, which results in, or risks, significant:

- harm to a charity’s beneficiaries, staff, volunteers or others who come into contact with the charity through its work (who are collectively referred to by the Charity Commission as “people who come into contact with your charity through its work”);
- loss of a charity’s money or assets

- damage to a charity's property
- harm to a charity's work or reputation

“**Significant**” means significant in the context of the charity, taking account of its staff, operations, finances and/or reputation.

2.9 Stalking Protection Act 2019

Under the Stalking Protection Act 2019 (the “**SP Act**”), a civil court may impose a Stalking Protection Order (**SPO**) which imposes prohibitions and requirements on a perpetrator of alleged stalking.

2.9.1 Individuals protected by an SPO

Staff under the protection of an SPO may advise the NOC Legal & Governance team of the existence of the SPO, in which case, NOC will assess any risk to the member of staff in attending NOC sites or carrying out NOC activities and determine whether any other individuals need to be notified of the SPO and if so what details should be disclosed.

2.9.2 Individuals subject to an SPO

There is no requirement under the SP Act for an employee to disclose to their employer that they are subject to an SPO. In circumstances where both the victim and the individual subject to an SPO are employees of NOC, it may be necessary for NOC to take steps to ensure the terms of the SPO are not breached, which could include amending hours of work or working areas and instituting random checks. Any such actions will be dealt with by the People & Skills and Legal & Governance teams.

2.10 Breaches of Policy

NOC will take any breach of this Policy seriously and will act to investigate and where appropriate take disciplinary action in accordance with the Code of Conduct (PSPOL04); the Disciplinary Policy (PSPOL06); and the Disciplinary Procedure (PSPRO09); and/or any contractual arrangement in place with the relevant party. In some cases, a breach of this Policy may ultimately lead to dismissal of employees or termination of contractual arrangements with other parties. NOC may also make referrals to statutory authorities and/or governing bodies in the relevant jurisdiction, where appropriate.

3. Monitoring and evaluation

Issues raised for investigation will be reported to the Executive Committee for consideration. This policy will be monitored to ensure it reflects the law and good practice in the sector.

4. Definitions and Key Terms

For the purposes of this policy

- In relation to activity undertaken by NOC which is funded by UKRI, “**associated personnel**” means a person directly involved in the activity, including but not limited to:
 - Staff or students from partner organisations, contractors, consultants, collaborators, fieldworkers, volunteers etc. who are named on a UKRI grant;
 - Those whose posts are partly or wholly funded through a grant;

- Those whose services are procured through a grant;
- Those whose salaried time is partially or wholly contributed to the grant, as an in-kind contribution from an organisation;
- Those whose time is volunteered to complete specific activities identified in a grant.
- A **“child”** is someone aged under 18, in accordance with the United Nations Conventions on the Rights of the Child.
- **“Youth”, “Young Person” or “Young People”** are used in accordance with United Nations definitions, and including young women, young men and young persons of other gender identities, aged between 15 and 24 years old.
- Students, work experience students and apprentices under the age of 18 are covered by this Safeguarding Policy.
- A **“vulnerable adult”** is a person aged 18 or over, who is in receipt of or may need community care or other recognised services by reason of mental or other disability, or illness and who is or may be unable to take care of themselves, or unable to protect themselves against significant harm or exploitation.
- A **“responsible person”** is the teacher, parent or carer of a child, young person or vulnerable adult.

5. Associated Documents

The following are associated documents:

Related Policies

Code of Conduct (PSPOL04)

Dignity at Work Policy (PSPOL05)

Disciplinary Policy (PSPOL06)

Ethics Policy (LGPOL01)

Grievance Policy (PSPOL11)

NOC Values

Whistleblowing Policy (LGPOL08)

Related Procedures

Safeguarding Guidance and Reporting Procedure (LGPRO03)

Access Control Procedure (BEPRO21)

Bribery Response Procedure (LGPRO08)

Disciplinary Procedure (PSPRO09)

Due Diligence and Project Risk Management Procedure (LGPRO26)

Fraud Response Procedure (LGPRO09) and Anti-Fraud Practical Guidance and Reporting Procedure (LGPRO07)

Grievance Procedure (PSPRO015)

Hosting Visitors and Students to the NOC Procedure (PSPRO33)

Investigation Procedure (LGPRO22)

NOC Visitor Policy (PSPOL22)

Recruitment and Resourcing Policy (PSPOL17)

Reporting of Serious Incidents Procedure (LGPRO20)

Whistleblowing Guidance Procedure (LGPRO10)

External Guidance

See also the external guidance at:

<https://www.ukcdr.org.uk/what-we-do/our-work/safeguarding/>

<https://www.gov.uk/guidance/safeguarding-duties-for-charity-trustees#policies-procedures-and-practices-you-need-to-have>