

# Safeguarding Policy

**Safeguarding Children, Young  
People & Adults with Care and  
Support Needs**

Revised by College Council: November 2025

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# 1. Information & Key Contacts

## 1.1 Organisational Information

Name: Oak Hill College

Address: Chase Side, Southgate, London, N14 4PS

Telephone: 020 8449 0467

Registered Charity: [The Kingham Hill Trust, Charity Number 1076618](#)

Company Number: 00365812

Insurers: Travelers Insurance Company Limited

Principal: Revd Dr James Robson  
e: [jamesr@oakhill.ac.uk](mailto:jamesr@oakhill.ac.uk) t: 020 8449 0467

## 1.2 Key Contacts

<p><b>To raise a safeguarding concern - see <a href="#">page 15</a></b></p>	
College Safeguarding Officer:	<p>Steven Nichols  <a href="mailto:safeguarding@oakhill.ac.uk">safeguarding@oakhill.ac.uk</a>            020 8449 0467 ext. 203</p>
Alternate Contact: College Safeguarding Lead and Director of Pastoral Care	<p>Andrew Nicholls  <a href="mailto:andrewn@oakhill.ac.uk">andrewn@oakhill.ac.uk</a>            020 8449 0467 ext. 224            07740 865094</p>
Second Alternate Contact: Director of Operations and Finance	<p>Helen Archer-Smith  <a href="mailto:helena-s@oakhill.ac.uk">helena-s@oakhill.ac.uk</a>            020 8449 0467 ext. 231</p>
London Diocesan Safeguarding Helpline 9am - 5pm	<p>020 7932 1224  <a href="mailto:safeguarding@london.anglican.org">safeguarding@london.anglican.org</a></p>
Thirtyone:eight Out of Hours Helpline 5pm - 9am	<p>030 3003 1111</p>
Local Social Services (Barnet)	<p><b>Children's Services</b>            9-5.15 M-Th, 9-5 F: 020 8359 4066            Out of hours: 020 8359 2000</p> <p><b>Adult Services</b>            Telephone: 020 8359 5000</p>
Police Contact Details	<p>Emergencies: 999, Non emergencies: 101</p>
<p><b>Other Contacts</b></p>	
Council Safeguarding Representative	<p>Tom Custance  <a href="mailto:tomc@oakhill.ac.uk">tomc@oakhill.ac.uk</a></p>
Trust Secretary	<p>Fiona Edwards  <a href="mailto:fionae@oakhill.ac.uk">fionae@oakhill.ac.uk</a></p>

## 1.3 About Oak Hill College

1.3.1 Oak Hill College exists to see the church flourish. We do this by offering the space, practical training, and supportive community needed for men and women to delight in Jesus and thrive in ministry.

1.3.2 The College offers full-time and part-time courses. The College has a residential community which is made up of staff, students and their families (including both children and young people).

1.3.3 The college does not routinely work directly with children or adults with care and support needs. **Children on site remain under the care and supervision of their parents or guardians.**

## 1.4 About this Safeguarding Policy

1.4.1 The College is established within an independent charity. Because we are approved for the training of Anglican ordinands alongside other students, this policy complies with national statutory and regulatory documents and with Church of England requirements.

1.4.2 The College grounds overlap the Anglican dioceses of London (Edmonton Area) and St Albans, and the College reports formally to both London and St Albans dioceses. Both dioceses agree that the College consults only the London Diocesan Safeguarding Team in the day-to-day management of safeguarding matters relevant to the Church of England, involving other local dioceses where relevant to the case.

1.4.3 Full details of relevant source documents can be found at [Appendix 5](#).

1.4.4 This document, and a one page Safeguarding Essentials document, will be posted on the College website and on the College's Virtual Learning Environment (VLE), to which staff and students will be directed during their induction. Each student and staff member will confirm their familiarity with the appropriate document when signing their Code of Conduct annually.

## 2: Governance and Leadership

### 2.1 Our Commitment

Foundationally, the College believes that every individual, whether child or adult, has value as one made in the image of God. We therefore accept the UN Universal Declaration of Human Rights, the International Covenant of Human Rights and the Convention on the Rights of the Child. We recognise the need to provide a living and working environment which is safe and caring for all members of the College community - students, staff, their spouses and their children - and all others with whom we come into contact. The College also recognises that children, young people and adults can be the victims of physical, sexual and emotional abuse, and neglect.

Section 11 of the Children Act 2004 places duties on a range of organisations and individuals to ensure that their functions, and any services that they contract out to others, are discharged having regard to the need to safeguard and promote the welfare of children. The range of organisations includes 'Faith Organisations' (*Working Together for Children 2023 - Statutory Guidance sections 314-315*).

The Charity Commission's guidance requires charities and trustees to prioritise safeguarding:

"All charities have a responsibility to ensure they don't cause harm to anyone who has contact with them."<sup>1</sup>

The College therefore commits to the following principles shared with the Church of England:

- Promote a safer environment and culture
- Safely recruit and support all those with any responsibility related to children and adults at risk within the Church
- Respond promptly to every safeguarding concern or allegation
- Care pastorally for victims/survivors of abuse and other affected persons
- Care pastorally for those who are the subject of concerns or allegations of abuse and other affected persons
- Respond to those that may pose a present risk to others"<sup>2</sup>

and in addition the College commits to:

- follow statutory denominational and specialist guidelines in relation to safeguarding children and adults
- implement the requirements of all relevant legislation including, but not limited to; Working Together to Safeguard Children 2023, the Disability Discrimination Acts

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<sup>1</sup> Charity Commission, 'Safeguarding for Charities and Trustees', November 2021, <https://www.gov.uk/guidance/safeguarding-for-charities-and-trustees>.

<sup>2</sup> <https://www.churchofengland.org/safeguarding>

1995 and 2005, Equality Act 2010 and refer concerns about adults with care and support needs to the local authority under the Care Act 2014.

- support, resource and train those who undertake this work in the College
- keep up to date with national and local developments relating to safeguarding
- ensure that all staff and students agree to abide by this policy and Oak Hill's Code of Conduct (see [appendix 7](#)), and to emphasise that **safeguarding is everyone's responsibility**.

The College fully recognises the lead role of the statutory services. Children's Social Care has lead responsibility for investigating all allegations or suspicions of abuse where there are concerns about a child. Adult Social Care has lead responsibility for investigating all allegations or suspicions of abuse where there are concerns about an adult with care and support needs. Where an allegation suggests that a criminal offence may have been committed then the police should be contacted as a matter of urgency.

## 2.2 Governance

Oak Hill College is constituted under the Kingham Hill Trust, a registered charity. The Kingham Hill Trust retains ultimate legal responsibility for safeguarding and all statutory compliance across its operations, including the reporting of serious incidents to the Charity Commission. However, day-to-day oversight and implementation of safeguarding policies and procedures have been formally delegated to the College Council and in turn to the College Leadership Team. These bodies are accountable to the Trust for ensuring that safeguarding arrangements are robust, compliant, and effectively embedded in the life and work of the College.

The standards and behaviours of an organisation may be referred to as the culture of the organisation or "the way we do things around here". Culture can be shaped in both negative and positive ways:

*"The culture of a charity goes beyond mere compliance with legal and regulatory demands. Charity governance is most effective when it provides assurances not just that legal requirements are met, but that the behaviour of people working for the charity, and those who come into contact with it, is proper and ethical. Culture, alongside good governance, can be pivotal to whether a charity achieves its stated object" (IICSA The Governance Institute, 2017).*

This Safeguarding Policy aims both to meet the requirements of ensuring a safe environment for those accessing activities in our organisation and also to contribute to an open culture where:



- those who lead do so by example, committed to the safeguarding of all
- those that work or volunteer are safely recruited and trained for their roles
- there are accountability structures with clear codes of conduct
- the values of the organisation are embedded in the actions and behaviours of its people
- there is open communication

## 2.3 Responsible Officers

The following Responsible Officers are appointed by the Council and the Leadership Team:

### *Safeguarding Officer*

The first point of contact for any concerns or allegations relating to safeguarding.

### *Safeguarding Lead*

The Safeguarding Lead is accountable to the Principal and Leadership Team for safeguarding policy, procedures, culture, and training, and provides support to the Safeguarding Officer. They do not hold primary responsibility for overseeing or managing individual safeguarding cases. The Safeguarding Lead will report to the Principal at least weekly on safeguarding matters and it will be a standing item on the Leadership Team agenda.

A fuller description of these roles is included at [Appendix 3](#).

## 3: Prevention

### 3.1 Understanding abuse and neglect

Defining child abuse or abuse against an adult is a difficult and complex issue. A person may abuse by inflicting harm or failing to prevent harm. Children and adults with care and support needs may be abused within a family, an institution or a community setting. Very often the abuser is known or in a trusted relationship with the child or adult.

For outline definitions of the many kinds of abuse, see [Appendix 1: Types of Abuse](#). For more information, including legal definitions, see [here](#).<sup>3</sup>

#### *Children and Young People*

With respect to **children and young people**, a child is defined as anyone who has not yet reached their eighteenth birthday (including unborn children). The fact that a child has reached sixteen years of age, is living independently or is in Further Education, is a member

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<https://thirtyoneeight.org/dashboard/knowledge-hub/responding-to-concerns/recognise/types-of-abuse/>

of the Armed Forces, is in hospital or is in custody does not change his/her status or entitlements to services or protection.

### *Adults at Risk*

An **Adult at Risk of harm** is defined by the Care Act 2014 as any person aged 18 years or older who:

- has needs for care and support<sup>4</sup> (whether or not these needs are being met by the local authority),
- is experiencing, or is at risk of, abuse or neglect, and
- is unable to protect themselves because of their care and support needs.

Examples of adults who may in some circumstances fall under this definition include, but are not limited to:

- older adults with physical or cognitive impairments,
- adults with learning disabilities,
- adults with mental health needs,
- adults with substance misuse issues,
- adults living with dementia,
- adults who are homeless or at risk of exploitation.

This definition replaces the earlier term “vulnerable adult” and aligns with statutory guidance for safeguarding adults at risk of harm.

Safeguarding an Adult at Risk of Harm protects an adult’s right to live in safety, free from the risks and experience of abuse and neglect. At the same time it must make sure that the adult’s wellbeing is promoted including, where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action. This must recognise that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear or unrealistic about their personal circumstances.

## **3.2 Matters outside these definitions**

The College is committed to providing a healthy, supportive environment that promotes the wellbeing of students, staff, and other members of the community. It seeks to address harmful behaviour of all kinds.

A concern reaches the legal threshold for reporting to statutory services when it involves harmful behaviour towards a child or an ‘adult at risk’. Beneath this threshold, while not technically a ‘safeguarding’ matter, people may still experience harm such as:

- Bullying and / or harassment
- Coercive, controlling or manipulative behaviour
- Unlawful discriminatory behaviour

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<sup>4</sup> for detail about the kinds of needs in view see here

<https://www.scie.org.uk/assessment-and-eligibility/determination-eligibility/eligibility-outcomes/>

The College takes all such matters extremely seriously. “Reporting Concerns” procedures are there for this purpose and are [linked](#) in the footer on the [College website](#).

Where there is uncertainty about whether the concern is covered by this policy, the procedures in Section 4 below should be followed. The Safeguarding Officer will make the determination.

### 3.3 Positions of Trust

Positions of Trust can be used to perpetrate abuse and this needs to be widely understood within a culture if it is to operate safely.

The staff and students of Oak Hill College occupy positions of trust in the College community and more widely. All those in positions of trust need to understand the power this can give them over those they care for and the responsibility they have because of this relationship. This is particularly important where our culture grants or appears to grant elevated status to some people or roles. Examples might include a member of faculty, a member of the Leadership Team, or a student office-holder. Abuse of such a position (for example by grooming, or ‘spiritual’ abuse) could lead to an adult becoming an Adult at Risk.

It is vital to ensure that positions of power and authority are not used inappropriately. Staff and students should always maintain appropriate boundaries and avoid behaviour which could be misinterpreted. The [Codes of Conduct](#)<sup>5</sup> help to define those boundaries, and [Appendix 2](#) provides more detail, including Warning Signs that boundaries may not be operating as they should.

Where a member of the College community has a concern about the behaviour of a person in a position of trust which affects a child or adult at risk, or if there is any uncertainty whether it affects a child or adult at risk, this must be raised promptly with the College Safeguarding Officer. Concerns which do not affect a child or adult at risk should be raised using the [Reporting Concerns](#) procedures detailed on the College website. Registering concerns in this way allows patterns of behaviour to become apparent.

### 3.4 Responsibility

#### *Children*

The College **expects parents and guardians to take responsibility for the welfare of their children whilst on College premises**; this includes satisfying themselves that, where parental responsibility is delegated to another person for a time, the individual concerned is a suitable and appropriate person. The College bears no responsibility for informal arrangements made between parents.

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<sup>5</sup> see [appendix 7](#) for an example

While the College is maintained as a generally safe and healthy environment, it is not designed to be safe for unsupervised children.

#### *Adults with Care and Support Needs*

Where the College believes that an adult (whether a student or a member of staff) is an 'adult at risk', it will arrange an initial meeting between that individual and the College Safeguarding Officer to discuss what support can be provided. If a student, they will be encouraged to discuss any academic support needs with the Additional Needs Officer. Both Officers will share information with limited staff members only to the extent necessary to assist with studies, vocational formation and personal welfare.

The College will fully support those with capacity in making their own decisions. It will always respond with regard to the wishes of the adult, but where capacity is in question it will not always be able to respond in accordance with them.

### 3.5 Student Recruitment

All admissions to the College will be subject to an admissions process. Admissions procedures will include:

- Completion of an application form;
- Completion of a confidential self-declaration form;
- Consistent interviewing and assessment methods;
- The uptake of written references and appropriate follow up;
- Verification of identity and relevant qualifications prior to enrolment;
- Sharing the Code of Conduct which all students sign annually;
- Appropriate induction, including awareness of the Safeguarding Policy.

In addition, all full and part time students who will undertake a placement as part of their studies will be required to undergo an **enhanced DBS for child and adult workforces including barred lists check** (and/or an overseas criminal records check, where appropriate) prior to the commencement of their studies (or as soon as is reasonably possible thereafter) as ministry is a regulated vocation.

### 3.6 Staff Recruitment and Management

All appointments within the College will be subject to a recruitment process, vetting checks and a mandatory probation period. Recruitment procedures will include:

- A clear, written job description and person specification for each post;
- Completion of an application form;
- Completion of a confidential self-declaration form;
- Consistent interviewing and assessment methods, including discussion of safeguarding;
- The uptake of written references and appropriate follow up;

- Verification of identity and relevant qualifications prior to appointment;
- Sharing the Code of Conduct which all staff sign annually;
- Completion of a DBS Check, at a level appropriate to the role (including overseas criminal records check, where appropriate) - see [Appendix 4](#);
- Appropriate induction, supervision, training and support (including agreement to the Safeguarding Policy and specific training on safeguarding where appropriate to the role - see below);
- Completion of a designated probationary period.

Any DBS Check will be repeated after every 3 years of employment, or its continuing status confirmed via the DBS Update Service.

Temporary staff working in student-facing roles, including Associate Teachers (teaching at least a substantial part of a module), will be made aware of the College's arrangements for safeguarding, and of their own responsibilities within those arrangements, as part of their induction and orientation; where appropriate, they will also be required to sign a copy of the Code of Conduct. This will not apply to Visiting Teachers (usually teaching on just one day), who will be checked by the College's Prevent process.

### 3.7 Safeguarding Training

The College is committed to on-going safeguarding training and development opportunities for all staff, developing a culture of awareness of safeguarding issues to help protect everyone. The weekly Leadership Team meetings have a standing item on safeguarding, and all our staff will undertake appropriate safeguarding training on a regular basis. This may be in person or online.

The College adopts the training framework required by the Church of England for its training institutions<sup>6,7</sup>. The necessary training for each employee, trustee, council member or volunteer is described [here](#)<sup>8</sup>; this will also apply to temporary staff in student-facing roles, including Associate Teachers, but not to Visiting Teachers. All staff training will be renewed at least every three years.

Students complete compulsory safeguarding training within the curriculum.

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<https://www.churchofengland.org/safeguarding/safeguarding-e-manual/safeguarding-learning-and-development-framework>

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<https://www.churchofengland.org/safeguarding/safeguarding-e-manual/application-safeguarding-guidance-theological-education-institutions>

8

<https://www.churchofengland.org/safeguarding/safeguarding-e-manual/application-safeguarding-guidance-theological-education-institutions/section-5-role-equivalence-learning-required>

## 3.8 Safeguarding Ethos

The College will endeavour to build an appropriate ethos within its community, for example by:

- developing a culture of awareness that safeguarding is everyone's responsibility;
- modelling appropriate behaviour as outlined in the Code of Conduct;
- developing a culture where everyone's voice is heard and where those who find it difficult to make their voice heard are supported to do so.

All students on Theology for Mission and Ministry programmes or the MA in Contemporary Christian Leadership programme, and all staff in student-facing roles will be required to read the main body of this policy. Students on the Foundation Award and staff not in student-facing roles will be required to read the Safeguarding Essentials document. All staff and students will be required to confirm this reading and to sign a Code of Conduct annually; these records will be held securely by the College in a manner consistent with the provisions of the Data Protection Act 2018 and in line with our Data Protection Policy.

Our safeguarding culture is also reflected in other policies and procedures including Reporting Concerns and Whistleblowing. All relevant policies may be found on the College website, [www.oakhill.ac.uk/policies](http://www.oakhill.ac.uk/policies). The Data Protection Policy may be found in the Privacy Notices on that page.

## 3.9 Inviting external speakers

PREVENT is a national initiative in response to the problem of radicalisation. As a place of Higher Education, the College operates a PREVENT policy which includes the requirement for every external speaker and visiting teacher to be risk-assessed. We take this opportunity to consider not only the risk of radicalisation but also the risk of abusive speech or behaviour. Where a medium or high risk is identified the matter is referred to the Leadership Team.

## 3.10 Use of the College Network

All staff, students and spouses with access to the College computer network will be expected to read and abide by the College's 'Computers Acceptable Use Policy'. Use of the College's network will be monitored. For more information please refer to the Computers Acceptable Use Policy [on Acorn under College Life/ IT](#).

## 3.11 Arrangements for College Placements

Some students are required to complete one or more placements as part of their training. Placements will be arranged by the College's Placements Coordinator, and require a placement supervisor from within the placement setting, such as a church leader. Before a placement is confirmed in a church, chaplaincy or other organisation, the College

Placements Coordinator will check that the placement provider has a suitable Safeguarding Policy, and obtain confirmation that necessary insurances are in place and that any named placement supervisor has the correct DBS check.

The College acts as 'employer' for placement students and will ensure that an Enhanced DBS Check for Child and Adult workforces including Barred Lists check has been obtained. The College will confirm to placement providers that all appropriate checks have been completed. The placement provider does not need their own DBS check.

If the check is not clear the College Safeguarding Team will risk-assess the student with reference where necessary to the London Diocesan Safeguarding Team or other safeguarding professional. A favourable risk assessment will be shared with the placement supervisor. If the risk assessment is unfavourable, a student may need to accept a Safeguarding Agreement or may not be placeable. This may affect their suitability for study at Oak Hill; any such issues should be disclosed during the Admissions process.

### 3.13 Use of College Spaces by outside organisations

The diversity of organisations who may use the College means there can be great variation in practice when it comes to safeguarding children, young people and adults with care and support needs. This can be because of varying cultural traditions, beliefs and religious practices or understanding, for example, of what constitutes abuse. The College expects that any organisation using our premises will have their own policy that meets our safeguarding standards, and that this is confirmed within the letting agreement. For more information see the [Booking Events & Rooms](#)<sup>9</sup> page on Acorn or contact [reception@oakhill.ac.uk](mailto:reception@oakhill.ac.uk).

Groups may hire the Chapel and/or rooms in the Main House, Founders Court and the Academic Centre, as well as some outside spaces. Each area is clearly demarcated and the College community is informed about such hires in advance by email. Bookings will stipulate the areas of the College site that groups are allowed to access, but the College cannot ensure any such restrictions are adhered to; neither can it prevent people trespassing on the site. **Those responsible for children cannot assume guaranteed safety at all times in all parts of the College.**

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<https://sites.google.com/oakhill.ac.uk/acorn-college-life/finance-it-site/facilities-site/booking-events-rooms>



## 4: Handling Concerns

### 4.1 General Procedure

**No member of staff or student should ever carry out their own investigation into an allegation or suspicion of abuse, past or present. Instead, the following principles should be followed.**

#### ***Recognise***

Be alert to the signs and symptoms of abuse, remembering any training and relevant guidance.

Accept and take seriously what is being said, without displaying shock or disbelief and without investigating or asking leading questions.

#### ***Respond***

If there is an immediate risk of harm to any individual or urgent medical intervention is needed, report the matter to the police or other emergency services by calling 999 without delay.

Establish whether the person disclosing needs support and record any support needs or wishes expressed by them.

#### ***Record***

Make a written record of the disclosure and inform the person making the disclosure that is what is being done. The record must be signed by the person receiving the allegation, timed and dated and it must include the location or the means (in person, online, phone call) through which the allegation was received. A form is provided for this purpose [at the end of this document](#).

#### ***Refer***

If there is no immediate risk of harm or urgent medical intervention needed, the matter must be referred within one working day. See below for referral pathway.

In all cases, all records that have been made must be included with the referral.

#### ***4.1.1 Responding Well - Victim-Blaming and Use of Language***

Victim-blaming occurs when responsibility for abuse, neglect, or harm is implicitly or explicitly placed on the person who has experienced it, rather than on the perpetrator or systemic failings. Examples include questioning why a victim did not leave a situation sooner, criticising their choices or lifestyle, or implying complicity in their own abuse. Such attitudes can retraumatise victims, discourage disclosure, and obstruct safeguarding



responses. The correct approach is to listen without judgement, and to be affirming and supportive of the decision to come forward.

Here are some examples of helpful and unhelpful responses:

Helpful:

- Listen without judgement: e.g. "I'm sorry this happened", "Thank you for telling me."
- Affirm: "You did the right thing by sharing this"
- Focus on the alleged perpetrator's actions, not the victim's choices.
- Use calm language.
- Record disclosures factually, without opinion.

Avoid:

- Questions implying blame: "Why didn't you leave/report?"
- Minimising harm: "It's not that bad."
- Suggesting complicity: "Were you leading them on?"
- Casting doubt: "Are you sure?"

#### *4.1.2 Referral*

To make the referral, contact the **Safeguarding Officer:**

Steven Nichols  
Tel: 020 8449 0467 ext 203  
Email: [safeguarding@oakhill.ac.uk](mailto:safeguarding@oakhill.ac.uk)

The above is nominated by the Leadership Team to act on their behalf in dealing with the disclosure, allegation or concern, including referring the matter to the statutory authorities.

If unavailable, or if the concern involves the above, contact the **Director of Pastoral Care/Safeguarding Lead:**

Andrew Nicholls  
Email: [andrewn@oakhill.ac.uk](mailto:andrewn@oakhill.ac.uk)  
Tel: 07740 865094

or the **Director of Operations and Finance**

Helen Archer-Smith  
Email: [helena-s@oakhill.ac.uk](mailto:helena-s@oakhill.ac.uk)  
Tel: 020 8449 0467 ext 231

or contact the Diocese of London Safeguarding Team or 31:8, using the [Key Contacts on page 4](#).

#### *4.1.3 Advice and Next Steps*

The Safeguarding Officer may seek advice (for example, from the London Diocesan Safeguarding Team or Thirtyone:eight). Based on the concern, they may then contact the relevant statutory services, which may include:

- Barnet Children's Social Services: 020 8359 4066
- Barnet Adult Social Services: 020 8359 5000
- Police: 101 or 999 if risk of harm

If the allegation concerns a student or staff member or volunteer working with someone under 18,

- Local Authority Designated Officer (LADO) for Barnet: via Multi-Agency Safeguarding Hub (MASH) 020 8359 4066

The Safeguarding Officer may need to inform others including the Principal, the College Council Safeguarding Representative, the Director of Operations and Finance and the Trust Secretary who may need to liaise with the insurance company, or the Charity Commission for England and Wales to report a serious incident.

If the allegation or concern is against a Church Officer of the Church of England, the Safeguarding Officer will always inform the London Diocesan Safeguarding Team, and if it is against an ordinand, the sending Diocesan Safeguarding Team.

The College will support the Safeguarding Officer(s) in taking any action that is required (either immediately or subsequently).

#### *4.1.4 Information Sharing*

The role of the Safeguarding Officer is to collate and clarify the details of the concern and pass this information to statutory agencies who have a legal duty to investigate. A written record of the concerns and their progress, with advice received, actions taken and the rationale for all decisions should be made in accordance with these procedures and kept in a secure place or online portal.

Staff will only pass on information to the minimum number of people who must be told to ensure proper action is taken. Staff will never tell anyone who does not have a clear 'need to know'. See [appendix 9](#).

#### *4.1.5 Right to Refer Directly*

It is the right of any individual as a citizen to make a direct referral to the statutory agencies or to seek advice from the Diocese, Thirtyone:eight, or anyone else, although the College hopes and expects that members of the organisation will follow this Policy. If an individual with a concern feels that the Safeguarding Officer has not responded appropriately, or where they have a disagreement, it is always open to them to contact an outside agency directly.

#### *4.1.6 Responsibility for Ongoing Involvement*

The College's responsibility is not discharged by reporting to the proper authorities. Where a report does not result in the proper action or where there is uncertainty about whether it has, or where the College's ongoing involvement is invited, see [appendix 8](#) for the procedure to follow.

## 4.2 Further procedures in particular cases

### *4.2.1 Allegations of physical injury, neglect or emotional abuse of a child:*

If a child has a physical injury, a symptom of neglect or where there are concerns about emotional abuse, the Safeguarding Officer will:

- if the child requires immediate medical attention, contact the relevant medical services, informing the Doctor of any concerns.
- contact the Diocese, Barnet Children's Social Care or Thirtyone:eight for advice in cases of deliberate injury, if concerned about a child's safety or if a child is afraid to return home.
- if the disclosure, allegation or concern is directly about the parents/guardians, **not tell the parents or carers unless advised to do so**, having contacted Barnet Children's Social Care.
- for lower-level concerns, signpost to other sources of help
- where the parent/carers is unwilling to seek help, offer to accompany them. In cases of real concern, if they still fail to act, contact Barnet Children's Social Care directly for advice.
- seek and follow advice from the Diocese or Thirtyone:eight (who will confirm their advice in writing) if unsure whether to refer a case to Children's Social Care.

### *4.2.2 Allegations of sexual abuse of a child:*

In the event of allegations or concerns of sexual abuse, the Safeguarding Officer will:

- contact Barnet Children's Social Care for children and families and the police on 101.
- consider whether it is appropriate to speak to the parents/guardians of the child, taking advice.
- seek and follow advice if they are unsure if the allegation or concern is of sexual abuse.

### *4.2.3 Concerns or allegations of abuse or harm of an adult at risk including physical, sexual, organisational, financial, discriminatory, neglect, self-neglect, forced marriage, modern slavery or domestic abuse*

If there is concern about any of the above, the Safeguarding Officer will:

- if the adult is in immediate danger or has sustained a serious injury contact the Emergency Services on 999, informing them of any suspicions.
- contact Adult Social Care (England, Wales, Scotland) or Adult Social Work Services (Northern Ireland) who will be able to advise whether this reaches the safeguarding threshold and actions required. Alternatively, Thirtyone:eight or London Diocese can be contacted for advice.

#### 4.2.4 Concerns or allegations of spiritual abuse

If there is a concern regarding spiritual abuse, the Safeguarding Officer will:

- seek advice from the Diocese or Thirtyone:eight and consider action appropriate to the scale of the concern.
- identify support services for the Survivor such as counselling or other pastoral support.

#### 4.2.5 Allegations of abuse **against a person who works with children/young people**

If an accusation is made against a worker who works with children or young people, (whether a volunteer or paid member of staff) the Safeguarding Officer will:

- make or ensure a referral to the Local Authority Designated Officer (LADO - England and Wales), Children's Social Care (Scotland) or the Gateway Team (Northern Ireland) whose function is to handle all allegations against adults who work with children and young people whether in a paid or voluntary capacity.
- make or ensure a referral where relevant to the Disclosure and Barring Service (England and Wales), Disclosure Scotland (Scotland) or AccessNI (Northern Ireland) for consideration of the person being placed on the barred list for working with children or adults with care and support needs. This decision should be informed by the Local Authority Designated Officer (England and Wales), Children's Social Care (Scotland) or the Gateway Team (Northern Ireland) if they are involved.
- share information about the concern with the Police, Police Scotland or Police Service Northern Ireland (PSNI).

#### 4.2.6 Allegations of abuse **against a person who works with adults with care and support needs**

The Safeguarding Officer will:

- liaise with Adult Social Care (England, Wales, Scotland) or Adult Social Work Services (Northern Ireland) to establish whether this can be investigated under their safeguarding processes.
- make or ensure a referral where relevant to the Disclosure and Barring Service (England and Wales), Disclosure Scotland (Scotland) or AccessNI (Northern Ireland) following the advice of Adult Social Services.
- share information about the concern with the Police, Police Scotland or Police Service Northern Ireland (PSNI).

The legislation across all four UK nations (The Care Act 2014, Adult Support and Protection (Scotland) Act 2007, Adult Safeguarding: Prevention and Protection in Partnership key documents 2015 (Northern Ireland) and Social Services and Wellbeing (Wales) Act 2014) places the duty upon Adult Social Care to investigate situations of harm to adults with care and support needs. This may result in a range of options including action against the person or organisation causing the harm, increasing the support for the carers or no further action if the 'victim' chooses for no further action and they have the capacity to communicate their decision. However, this is a decision for Adult Social Care.

#### *4.2.7 Allegations made by an adult of non-recent sexual abuse*

'Non-recent abuse' describes abuse experienced as a child but reported when an adult. If an accusation is made by a child of sexual abuse, the procedure in relation to sexual abuse will be followed as above whenever the abuse took place.

If an accusation is made by an adult of non-recent sexual abuse, the Safeguarding Officer will give the adult the option to report this to the Police (England and Wales), Police Scotland or Police Service Northern Ireland (PSNI). If the adult does not wish to report this to the police, then the Safeguarding Officer can pass on the information relating to the alleged Perpetrator, but must not share details of the Survivor.

If the alleged Perpetrator is in a role working or volunteering with children or young people, a referral will be made to the Local Authority Designated Officer - LADO (England and Wales), Children's Social Care (Scotland) or the Gateway Team (Northern Ireland) whose function is to handle all allegations against adults who work with children and young people whether in a paid or voluntary capacity.

If the alleged Perpetrator is in a role working with adults with care and support needs, Adult Social Care (England, Wales, Scotland) or Adult Social Work Services (Northern Ireland) will be involved to establish whether this can be investigated under their safeguarding processes.

If the alleged Perpetrator is in a role within the College, London Diocesan Safeguarding Team or Thirtyone:eight will be consulted on appropriate action with regard to the scale of the concern.

# 5: Support for those affected

## 5.1 Support for those affected by abuse

The College will offer appropriate pastoral care and support for any member of the College community reporting or alleging abuse which has occurred at Oak Hill, and for any student reporting or alleging abuse which has occurred elsewhere. This may be done in agreement with involved local and/or church authorities and may take the form of appropriate referrals to other external support agencies (e.g. specialist counselling services, independent authorised listeners appointed by the Diocese). Support will also be signposted for immediate family members and for other members of the College community who have been directly involved in the identification or reporting of alleged or actual abuse.

To explore support and how to access it, contact the Director of Pastoral Care. If it is preferred to contact someone outside the College, the [London Diocesan Safeguarding Team](#)<sup>10</sup> (which also has a long list of alternative sources of help) or [SafeSpaces](#)<sup>11</sup> are helpful places to begin.

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<sup>10</sup> <https://www.london.anglican.org/church-and-parish-support/safeguarding/support-for-survivors/>

<sup>11</sup> <https://safespacesenglandandwales.org.uk/>

## 6. Managing Allegations or Concerns of Abuse Against Staff or Students

6.1 Some actions as noted below will be taken “where appropriate”. In determining what is appropriate in any given situation, the College will take advice from the London Diocesan Safeguarding Team and/or from other safeguarding professionals or relevant authorities outside the College.

### 6.2 Procedure if a student is accused/suspected of abuse

#### *6.2.1 Caring for the Person(s) suspected*

The College acknowledges that being the subject of a safeguarding complaint may precipitate a degree of vulnerability in the reported person. The College will discuss pastoral support options with such individuals (see below). A legal presumption of innocence will be maintained during the statutory and (where appropriate) Church inquiry process.

Students who are the subject of concerns or allegations of abuse are part of the wider College community and may belong to families. The College will be mindful of the need to provide support to members of families and the wider community affected by the concerns or allegations.

#### *6.2.2 Normal Procedure*

If a student is suspected or accused of abuse, the following will normally apply:

6.2.2.1 Consideration will be given to the need to preserve evidence. In some circumstances, the student will not be notified of the allegation before the Diocesan Safeguarding Team have been consulted and/or the matter referred to the police or local authority.

6.2.2.2 The student will be required to attend a meeting with the College Safeguarding Officer within 1 working day of the allegation being made; if that is not practicable, for example because the student is away from the College at the time of the allegation and cannot come back (e.g. if they are overseas or at an unreasonable distance) then the meeting should be within 1 working day of when it becomes practicable.

6.2.2.3 The Diocesan Safeguarding Team will be informed of the allegation within 1 working day of it being made known to the College Safeguarding Officer. If the accused student is an Ordinand then their sponsoring diocese will also be informed; if the accused student is not an Ordinand then any relevant sponsoring agency will be informed.

6.2.2.4 An assessment will be carried out of any risk posed by the alleged perpetrator to their own family including children in their care, partners/ex partners and other family members. Referrals to statutory services will be made where any risks are identified.

6.2.2.5 Where appropriate, the student's placement church (and, if different, their normal place of worship) will be informed of the allegation and the student may be withdrawn from ministry for as long as necessary during the investigation.

6.2.2.6 Where appropriate, the student may be required to withdraw from classes and from use of College facilities (such as the Library) and to study remotely using recordings and lecture handouts made available through the College's VLE. This will be for no longer than is necessary and will be kept under review.

6.2.2.7 If the student needs to come onsite for any reason (including if they live onsite in College property) or needs to access any of the College's facilities (such as the Library) then they may be required to be accompanied at all times by an adult who is not their spouse: if so, the College will nominate an appropriate, independent person for this purpose.

6.2.2.8 The College will report to and cooperate fully with the police and with the local and church authorities as required throughout the investigation.

6.2.2.9 These steps are intended to be neutral acts to facilitate investigation and to provide appropriate protections. A decision to take or not take any of these steps should not be taken to indicate the degree to which an accusation/suspicion is well founded.

6.2.2.10 If the allegation is not upheld, then, subject to any risk assessment and necessary measures, any access and privileges that had been suspended will be restored. Where appropriate, the College may communicate the outcome to third parties in order to reduce the risk of any adverse inferences being drawn (including the Diocesan Safeguarding Team, the placement church, the place of worship and any College officers). Given that the College is fairly small, it may also be necessary to communicate this clearly and formally to the College community as a whole: in such cases, the College will use reasonable endeavours to agree on the timing, format and wording of the communication with the student.

6.2.2.11 If the allegation is upheld, then the College will work with the Diocesan Safeguarding Team and other local and church authorities as necessary to determine the best course of action. Depending on the nature and seriousness of the offence, this may include:

- Expulsion of the student from the College;
- Allowing the student to continue their studies but subject to certain conditions (for example being accompanied at all times onsite);
- Any other sanctions which the Diocesan Safeguarding Team recommend as the result of a formal risk assessment;
- Referral to the Disclosure and Barring Service (even if the student withdraws from study): without reasonable justification, failing to make a referral is an offence; and
- Reporting the incident to the Charity Commission.

6.2.2.12 In all of the above, and in tandem with any relevant local authorities, the College will also endeavour to provide appropriate pastoral support and, if needed, specialist counselling for the student concerned, with a view to helping the student to deal with the issues which have arisen and any consequences that will flow from them in terms of future



vocation, relationships with peers etc. It will also, where appropriate, endeavour to provide support for the student's immediate family.

## **6.3 Procedure if a member of staff is accused/suspected of abuse:**

### *6.3.1 Caring for the Person(s) suspected*

The College acknowledges that being the subject of a safeguarding complaint may precipitate a degree of vulnerability in the reported person. The College will discuss pastoral support options with such individuals (see below). A legal presumption of innocence will be maintained during the statutory and (where appropriate) Church inquiry process.

Staff who are the subject of concerns or allegations of abuse are part of the wider College community and may belong to families. The College will be mindful of the need to provide support to members of families and the wider community affected by the concerns or allegations.

### *6.3.2 Normal Procedure*

If a member of staff is suspected or accused of abuse, the following will normally apply:

6.3.2.1 Consideration will be given to the need to preserve evidence. In some circumstances, the member of staff will not be notified of the allegation before the Diocesan Safeguarding Team has been consulted and/or the matter referred to the police or local authority.

6.3.2.2 The member of staff will be required to attend a meeting with the College Safeguarding Officer and Director of Operations and Finance within 1 working day of the allegation being made; if that is not practicable, for example because the member of staff is away from the College at the time of the allegation and cannot come back (e.g. if they are overseas or at an unreasonable distance) then the meeting should be within 1 working day of it becoming practicable.

6.3.2.3 The Diocesan Safeguarding Team will be informed of the allegation within 1 working day of it being made known to the College Safeguarding Officer.

6.3.2.4 An assessment will be carried out of any risk posed by the alleged perpetrator to their own family including children in their care, partners/ex partners and other family members. Referrals to statutory services will be made where any risks are identified.

6.3.2.5 Where appropriate, the staff member's normal place of worship will be informed so that they may be withdrawn from ministry for as long as necessary during the investigation.

6.3.2.6 Where appropriate, the staff member will be suspended. Suspension will not impact the pay and benefits the staff member is entitled to. Suspension will be for no longer than necessary and will be kept under review. During suspension, teaching, pastoral activities (such as leading Fellowship Group and/or preaching in Chapel) and administrative responsibilities will be covered by other members of staff or by associate teachers/temporary staff as required.

6.3.2.7 If the member of staff lives on site it may be appropriate for the staff member to be relocated off site temporarily and possibly until the conclusion of the investigation. This decision would be reviewed regularly. Alternative accommodation would be at the College's expense.

6.3.2.8 If the member of staff needs to come on site for any reason then they may be required to be accompanied at all times by an adult who is not their spouse: if so, the College will nominate an appropriate, independent person for this purpose. ('On site' for these purposes would not include the confines of the member of staff's living accommodation when they remain living on site.)

6.3.2.9 The College will report to and cooperate fully with the police and with the local and church authorities as required throughout the investigation.

6.3.2.10 These steps are intended to be neutral acts to facilitate investigation and to provide appropriate protections. A decision to take or not take any of these steps should not be taken to indicate the degree to which an accusation/suspicion is well founded.

6.3.2.11 If the allegation is not upheld then, subject to any risk assessment and necessary measures, any access and privileges that had been suspended will be restored. Where appropriate, the College may communicate the outcome to third parties (including the Diocesan Safeguarding Team, the staff member's place of worship and any College officers) in order to reduce the risk of any adverse inferences being drawn. Given that the College is fairly small, it may also be necessary to communicate this clearly and formally to the College community as a whole: in such cases, the College will use reasonable endeavours to agree on the timing, format and wording of the communication with the staff member.

6.3.2.12 If the allegation is upheld, the College will work with the Diocesan Safeguarding Team and other local and church authorities as necessary to determine the best course of action.

6.3.2.13 Depending on the nature and seriousness of the offence, and taking into account the College's disciplinary policy, this may include:

- Termination of employment;
- Allowing the individual to continue in post but subject to certain conditions (for example being accompanied at all times onsite, being withdrawn from pastoral/tutorial activities etc.);
- Any other sanctions which the Diocesan Safeguarding Team recommend as the result of a formal risk assessment;
- Referral to the Disclosure and Barring Service (even if the member of staff resigns): absent reasonable justification, failing to make a referral is an offence; and
- Reporting to the Charity Commission.

6.3.2.14 In all of the above, and in tandem with any relevant local or Church authorities, the College will also endeavour to provide appropriate pastoral support and, if needed, specialist counselling to the member of staff concerned, with a view to helping him/her to deal with the issues which have arisen and any consequences that will flow from them in terms of future employment, relationships with other members of the College community

etc. It will also, where appropriate, endeavour to provide support for the staff member's immediate family.

## **6.4 Working with those who may pose a risk**

6.4.1 When someone attending the organisation is known to pose a potential risk to children, or adults with care and support needs, the College will supervise the individual concerned and offer wellbeing support and pastoral care.

6.4.2 In its safeguarding commitment to the protection of children and adults with care and support needs, it may set boundaries for that person, which they will be expected to keep. These boundaries will be based on a risk assessment and through consultation with appropriate external parties.

6.4.3 Examples of the kinds of boundaries that might be included are provided in [Appendix 5](#).

# Appendices

**This section contains important information which expands on the policy proper, providing relevant background information or details for a particular context.**

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# Appendix 1: Types of Abuse

Abuse is mistreatment by any other person or persons that violates a person's human and civil rights. The abuse can vary, from treating someone with disrespect in a way that significantly affects the person's quality of life, to causing actual physical or mental suffering.

## 1. Physical Abuse

### **Definition:**

Causing physical harm or injury to a person deliberately. This includes actions such as hitting, shaking, poisoning, burning, drowning, suffocating, misuse of medication, restraint, or force-feeding. It also includes making up symptoms of a serious illness or causing illness.

### **Possible signs:**

- Unexplained or multiple bruises, injuries or medical complaints
- Flinching or fearfulness around certain individuals
- Reluctance to be touched or to go home
- Sudden deterioration in physical condition
- Disclosure of being hurt

## 2. Emotional or Psychological Abuse

### **Definition:**

Persistent emotional maltreatment which severely and adversely affects emotional development. It includes belittling, threatening, isolating, scapegoating, rejecting, humiliating, or corrupting behaviour. Witnessing domestic abuse as a child is considered experiencing emotional abuse.

This could also include the inappropriate use of religious belief or practice, including the misuse of the authority of leadership or penitential discipline, oppressive teaching, or intrusive healing or deliverance ministries. Sometimes abuse of this nature is described as "spiritual" abuse. While not a distinct legal category, this term may describe the context within which the abuse occurs or its possible effects.

### **Possible signs:**

- Low self-esteem or excessive self-criticism
- Withdrawn, anxious, or overly compliant behaviour
- Developmental delays (in children)
- Sudden changes in confidence or communication
- Excessive need for affection or attention
- Reluctance to be alone with a particular person

## 2a. 'Spiritual' Abuse

### Definition:

Spiritual abuse is a kind of emotional abuse in a context of faith and belief. It is an abuse of power—often done in God's name—that disregards a person's autonomy, manipulating them into compliance through coercion and control. It can involve manipulation, enforced accountability, censorship of decision-making, secrecy, pressure to conform, misuse of scripture or authority, enforced obedience, claims of divine authority, and isolation from outside influence.

### Possible signs:

- Reluctance to disclose details after threatened consequences of doing so
- Pressure to conform
- Misuse of scripture or the pulpit to control behaviour
- Requirement of obedience to the abuser, perhaps as to God
- Isolation from others outside the abusive context

## 3. Sexual Abuse

### Definition:

Forcing or enticing a person to take part in sexual activities, whether or not they are aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children or adults at risk in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or 'grooming' a child (including via the internet). Sexual abuse is not solely perpetrated by adults; other children can also commit acts of sexual abuse.

Child sexual exploitation is a form of child sexual abuse where a child is sexually exploited for money, power or status.

### Possible signs:

- Sexualised behaviour or language inappropriate for age
- Guilt in relation to sexual feelings aroused by the abuse
- Injuries to intimate areas or sexually transmitted infections
- Sudden avoidance of a particular person or place
- Regression to earlier developmental behaviours (in children)
- Disclosure or indirect hints about abuse
- Bleeding, pain or itching in the genital area or when walking or sitting.
- Sexually transmitted diseases or infections
- Pregnancy in a woman who is unable to consent to sex
- Self-harming
- Poor concentration, withdrawal, sleep disturbance
- Difficulty forming adult relationships can result from childhood sexual abuse

## 4. Neglect

### Definition:

Persistent failure to meet a person's basic physical or emotional needs, likely to result in the serious impairment of health or development. This can include failing to provide adequate food, shelter, clothing, supervision, or access to medical care. 'Institutional' or 'organisational' abuse is neglect within a care setting, and may also include denying people appropriate choice or autonomy. It may arise under poor management or supervision, through inadequate staffing, or lack of knowledge of whistleblowing procedures.

### Possible signs:

- Constant hunger, tiredness, or poor personal hygiene
- Untreated medical conditions
- Inadequate supervision or unsafe living conditions
- Poor attendance or engagement (in children/students)
- Persistent lack of attention or affection
- Inappropriate or inadequate clothing
- Signs of malnutrition or not being given enough food
- Having frequent, untreated medical issues or an accumulation of untaken medication
- Body issues such as sores, skin complaints, poor muscle tone or prominent joints
- Poor language or social skills

**The above are the only legally-recognised categories in respect of children, but these can include types of abuse recognised under names such as criminal exploitation of a child, and honour-based abuse including female genital mutilation and forced marriage.**

Other recognised categories of abuse in adults include:

## 5. Domestic Abuse

### Definition:

Any incident or pattern of incidents of controlling, coercive, threatening, degrading or violent behaviour, including sexual violence, between those aged 16 or over who are (or have been) intimate partners or family members. It encompasses psychological, physical, sexual, financial, and emotional abuse. Children who witness domestic abuse are also considered to have suffered emotional abuse and must also be treated as victims and reported and protected accordingly.

Coercive or controlling behaviour is a key part of domestic abuse and includes a range of acts designed to make a person subordinate and/or dependent, such as isolating them from support, exploiting their resources, depriving them of independence, or regulating their everyday behaviour.



**Possible signs:**

- Nervousness or fearfulness around partner or family member
- Frequent injuries with unlikely explanations
- Isolation from friends, support systems, or education
- Restricted access to money, documents, or communication
- Limited freedom of choice
- Subdued or changed behaviour
- Changes in weight, being excessively under or overweight or malnourished.
- Feeling that the abuse is their fault when it is not

## **6. Financial or Material Abuse**

**Definition:**

The unauthorised or improper use of a person's funds, property, or financial resources. It can include theft, fraud, exploitation, or coercion regarding wills or financial transactions.

**Possible signs:**

- Sudden loss of money or valuables
- Unexplained withdrawals or lifestyle changes
- Reluctance to talk about finances
- Bills left unpaid despite apparent resources
- Someone speaking or acting on behalf of the person without consent
- Sudden inclusion of additional names on a bank account or where a signature does not resemble the person's normal signature
- A substantial gift to a carer or other third party
- A sudden interest by a relative or other third party in the welfare of the person

## **7. Discriminatory Abuse**

**Definition:**

Harassment, slurs, or unfair treatment because of race, gender, disability, age, sexual orientation, religion, or other protected characteristics.

**Possible signs:**

- Being excluded from services or opportunities
- Verbal abuse or discriminatory language
- Withdrawal or lack of engagement linked to identity
- Person expressing that they feel marginalised or targeted
- Lack of dignity or respect shown in care or support
- Low self-esteem, attachment issues, depression, self-harm, and eating disorders.
- Signs of distress, tearfulness, anger or anxiety

## 8. Self-Neglect

### Definition:

An adult's neglect of themselves and their personal needs, which threatens their health or safety. This includes not attending to personal hygiene, health, or surroundings and can involve hoarding.

### Possible signs:

- Poor hygiene, unclean clothing, or malnutrition
- Unsafe living conditions (e.g., fire risk, infestation, squalor)
- Refusal of help or services despite clear risk
- Social withdrawal or isolation
- Risk of exploitation or abuse due to vulnerability
- Neglecting household maintenance
- Hoarding things or collecting a large number of animals in inappropriate conditions
- Inability or unwillingness to take medication or treat illness or injury

## 9. Bullying

### Definition:

Repeated behaviour that is intended to hurt someone physically or emotionally, often involving an imbalance of power. It may be verbal, physical, or psychological, and can take place in person or online (cyberbullying).

### Possible signs:

- Reluctance to attend work, study, or social settings
- Sudden drop in confidence or performance
- Unexplained injuries or damaged belongings
- Withdrawal, anxiety, or depression
- Excessive use of phone or internet, or fear of messages

## 10. Stalking and Harassment

### Definition:

Repeated and unwanted contact or attention which causes distress, fear, or alarm. This may include following, watching, repeated calls or messages, monitoring online activity, or appearing at someone's home or workplace.

### Possible signs:

- Fearfulness or hypervigilance
- Reports of being followed or repeatedly contacted
- Changes in routine, avoidance of certain places or people
- Increased anxiety, sleep disturbance, or isolation
- Disclosure of threats or unwanted communication

## 11. Romance Fraud

### **Definition:**

Exploitation of a relationship or perceived romantic connection for financial gain, emotional control, or other benefit. Often involves grooming, manipulation, and deceit, typically via online dating or social media.

### **Possible signs:**

- Sudden secrecy about a new relationship
- Sending money or gifts to someone never met in person
- Requests for financial help due to fabricated crises
- Withdrawal from friends and family
- Embarrassment or shame if questioned about the relationship

## 12. Hate Crime

### **Definition:**

Any criminal offence perceived by the victim or anyone else to be motivated by hostility or prejudice based on a person's race, religion, sexual orientation, disability, or transgender identity. Hate incidents may also occur outside the scope of criminal law but still cause harm.

### **Possible signs:**

- Disclosure of verbal abuse, threats, or vandalism
- Withdrawal from community or religious life
- Fear of leaving home or engaging in normal activity
- Changes in mood, confidence, or social participation
- Signs of injury, property damage, or targeted harassment

# Appendix 2: Positions of Trust

Positions of Trust can be used to perpetrate abuse and this needs to be widely understood within a culture if it is to operate safely.

The list below details ways in which abuses of Positions of Trust may first come to light.

## Warning Signs of Abuse of Position of Trust

### 1. Boundary Violations

- Inappropriate personal relationships developing between the trusted adult and those in their care.
- Private or secretive communication (e.g., personal texts, social media messaging outside professional channels).
- Inviting or meeting individuals alone outside appropriate professional contexts.

### 2. Exploitation of Power

- Using authority to pressure or coerce someone into compliance or silence.
- Favouritism or special treatment towards certain individuals (e.g., gifts, privileges).
- Imposing unreasonable rules or expectations not consistent with organisational policies.

### 3. Grooming Behaviours

- Gradually breaking down professional boundaries under the guise of "friendship" or "mentorship."
- Offering excessive personal attention or support that isolates an individual from peers or other trusted adults.
- Requesting secrecy about interactions ("Don't tell anyone else...").

### 4. Emotional or Psychological Manipulation

- Undermining an individual's confidence or independence to increase dependence on the authority figure.
- Threatening negative consequences if the person does not comply.
- Exploiting respect for their role to suppress challenge ("You should trust me because I'm your [teacher/minister/tutor].").

## 5. Financial or Practical Exploitation

- Asking for or accepting money, gifts, or favours from those in their care.
- Using their influence to access personal resources, property, or services.

## 6. Suppression of Oversight

- Discouraging or blocking contact with supervisors, parents, or safeguarding teams.
- Avoiding or resisting monitoring and accountability measures (e.g., refusing to log meetings/interactions).
- Seeking out unsupervised or unmonitored settings (e.g., closed-door meetings, off-site encounters).

## 7. Sexualised Conduct or Harassment

- Sexual comments, jokes, or innuendo towards those they are responsible for.
- Physical contact that is unnecessary, overly familiar, or sexualised.
- Progression from minor boundary violations (e.g., "friendly hugs") to overt sexual misconduct.

## 8. Warning Signs in the Victim

- Withdrawal, anxiety, or distress linked to time spent with the authority figure.
- Reluctance or fear about being alone with them.
- Sudden secrecy, defensiveness, or changes in behaviour around family or peers.

## Appendix 3: Role Definitions

A3.1 The College appoints a **Safeguarding Officer**. The appointee will play an essential role in fulfilling the Trust's commitment to safeguard and promote the welfare of children and adults at risk. They will:

- be the first point of contact for people raising concerns regarding suspicions of abuse and other safeguarding matters, whether in respect of children, adults at risk or any other members of the college community, and hold the primary responsibility to recognise, respond, record and refer as appropriate all allegations and concerns on safeguarding or potential safeguarding matters.
- ensure that all such actions are taken in a timely manner, normally meaning that an initial assessment and response is made within 1 working day, and in line with this Policy, London Diocesan policy and best practice.
- report these concerns to the London Diocesan Safeguarding Team and/or elsewhere as necessary and liaise with other authorities as needed.
- maintain secure and up-to-date records of all concerns and actions.

A3.2 The College also appoints a **Safeguarding Lead**. They will oversee matters of safeguarding policy and culture and support the Safeguarding Officer. Responsibilities of the Safeguarding Lead are:

- Develop, implement, and regularly review safeguarding policies and procedures in line with best practice and the Church of England.
- Ensure safeguarding is embedded in institutional culture, policies, and practice.
- Act as the senior point of contact for safeguarding concerns and liaise with relevant external agencies, overseeing the work of the safeguarding officer.
- Ensure staff are appropriately trained and aware of their safeguarding responsibilities. This includes monitoring safeguarding records and ensuring that staff are completing their update training promptly.
- Maintain secure and up-to-date records of safeguarding concerns and actions.
- Provide safeguarding updates to the Principal at least weekly, and on a more timely basis with any serious matters.
- For each regular Council meeting (typically held three times a year), provide a Safeguarding and Prevent report. A separate Safeguarding Case Log will be submitted to the Council Safeguarding Lead and the Chair of the Council. These reports will be forwarded to the Heads of Safeguarding for London and St Albans Dioceses.
- Present for Council approval and forward the Safeguarding Annual Report for the Bishops of London and St Albans and Diocesan Safeguarding Advisory Committees.
- Attend Council meetings if required to report on Safeguarding matters.
- Liaise regularly with the Safeguarding Council Representative.
- Support the Safeguarding Officer in their role, and in completing suitable training.
- Act as the second to the Safeguarding Officer, as an accessible point of contact for students and staff with safeguarding concerns.

- Responsible for coordinating and completing DBS checks (or equivalent for those coming from overseas) for all students, staff and Council members, ensuring the appropriate level of check is applied and renewed in line with best practice.
- Conduct Prevent checks for all individuals as required, and promptly report any concerns to the Principal
- Stay up to date with developments in safeguarding policy and practice and advise the Principal on recommended changes or enhancements.
- Report on any issues or concerns with the implementation of the Safeguarding Policy and its associated procedures.

A3.3 Both Officer and Lead will be required to complete, and be supported in attending, suitable training every 2 years, and to keep their knowledge up to date in between.

## Appendix 4: DBS Check Eligibility

Two types of DBS check are commonly used. Basic Checks can be completed on any person at recruitment, whereas Enhanced Checks are only legal for certain kinds of activity or role.

Role	Type of Check	When checked
Student with Placement expected in the curriculum	Enhanced Check for Adult and Child Workforces including Barred Lists check	On admission; may be checked annually on DBS Update Service or repeated every three years
College Principal	Enhanced Check for Adult and Child Workforces (including Barred Lists check if also ordained)	On recruitment; may be checked annually on DBS Update Service or repeated every three years
Safeguarding Lead, Safeguarding Officer, Director of Operations & Finance	Enhanced Check for Adult and Child Workforces	On recruitment; may be checked annually on DBS Update Service or repeated every three years
Ordained Anglican Staff in any role	Enhanced Check for Adult and Child Workforces including Barred Lists	By licensing diocese; to be confirmed on recruitment and then every three years
All Other Staff	Basic Check	On recruitment; may be checked annually on DBS Update Service or repeated every three years
Trustee	Basic Check	On recruitment; may be checked annually on DBS Update Service or repeated every three years



# Appendix 5: Key Safeguarding Documents and Guidance

This appendix lists the statutory and Church-based safeguarding documents that inform the safeguarding policy and practice of this College. The list is organised in three sections:

1. **National Statutory and Legal Safeguarding Guidance**
  2. **Church of England Safeguarding e-Manual**
  3. **Additional Church of England Safeguarding Documents (not yet included in the e-manual)**
- 

## 1. National Statutory and Legal Safeguarding Guidance

This safeguarding policy and procedures are informed by the following national documents, which define good safeguarding practice and legal obligations:

- [Working Together to Safeguard Children \(2023\)](#): Statutory guidance on inter-agency working to safeguard and promote the welfare of children in England.
- [Keeping Children Safe in Education \(2024\)](#): Statutory guidance for schools and colleges, used as a benchmark for safe practices involving children and young people.
- [Care and Support Statutory Guidance \(under the Care Act 2014\)](#): Guidance that outlines safeguarding responsibilities for adults with care and support needs.
- [Prevent Duty Guidance \(2023\)](#): Statutory guidance for higher and further education providers to prevent people from being drawn into terrorism.
- [Disclosure and Barring Service \(DBS\) Code of Practice](#): Guidance for all organisations that request DBS checks on how to handle the information fairly and legally.
- [Care Act 2014 and Care and Support Statutory Guidance](#): The Care Act 2014 is the key legislation for adult safeguarding, and this guidance provides statutory directions on safeguarding adults with care and support needs.
- [Charity Commission Guidance: Safeguarding and Protecting People for Charities and Trustees](#): Guidance explaining trustees' safeguarding responsibilities and best practices to protect beneficiaries, staff, and volunteers.
- [Safeguarding Vulnerable Groups Act \(2006\)](#): Establishes the legal framework for vetting and barring individuals who are unsuitable to work with children or adults at risk.
- [Mental Capacity Act \(2005\)](#): Provides a framework for making decisions on behalf of adults who lack capacity, and supports decisions by those who do have capacity.

## 2. Church of England Safeguarding e-Manual

The College aligns its safeguarding policy and procedures with the [Church of England Safeguarding e-Manual](#), which is the central and continually updated source of national safeguarding policy, guidance, and standards.

The e-manual includes key documents such as:

- [Application of Safeguarding Guidance to Theological Education Institutions](#)
- **Safer Recruitment and People Management**
- **Responding to, Assessing and Managing Safeguarding Concerns or Allegations Against Church Officers**
- **Safeguarding Learning and Development Framework**

The College commits to monitoring changes in the e-manual and updating its policy and practice accordingly.

## 3. Additional Church of England Safeguarding Documents (Not Yet Included in the e-Manual)

The following national Church of England safeguarding documents remain in force but are not yet integrated into the e-manual. This TEI recognises their continued authority and reflects their guidance in safeguarding practice:

- [Safeguarding and Clergy Discipline Measure 2016: Code of Practice](#)
- [Responding Well to Those Who Have Been Sexually Abused \(2011\)](#)
- [Responding to, Assessing and Managing Safeguarding Concerns or Allegations Against Church Officers \(2017\)](#)
- [Responding Well to Domestic Abuse Practice Guidance \(2017\)](#)
- [Safeguarding Records: Joint Practice Guidance \(2015\)](#)

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**Note:** This appendix will be reviewed to ensure all hyperlinks remain current and all referenced documents remain in force.

# Appendix 6: Sample Clauses in a Safeguarding Agreement

Here are some examples of clauses that may be considered when drawing up a contract or agreement with an offender, to indicate ways in which offenders can be included safely in the life of a Christian community. This is not an exhaustive list and some clauses will not apply in every context. The particular circumstances of the individual and the context would always be considered.

## *Boundaries*

- I will never allow myself to be in a situation where I am alone with children, young people or adults with care and support needs
- I will attend meetings and activities as directed by the leadership
- I will sit where directed at activities (e.g. religious meetings, social gatherings) and will not place myself near children, young people and adults at risk
- I will not enter certain parts of the building designated by the leadership, nor any area where activities for children, young people and adults at risk are in progress
- I will decline invitations of hospitality where there are children, young people or vulnerable adults in the home
- I accept that "x" and "y" will sit with me during activities (e.g. religious meetings, social gatherings) and accompany me when I need to use other facilities. They will know I am a sex offender.
- I accept there are certain people who will need to be told of my circumstances in order for them to protect the children, young people or adults at risk for whom they care
- I accept that contact will need to be made with my probation officer, who will meet with leaders as and when necessary (where appropriate)
- I accept that "z" will provide me with pastoral care.
- I understand that if I do not keep to these conditions, I may be barred from attending activities. In such circumstances the leadership may choose to inform the statutory agencies (e.g. police, probation, Adult Services, Children's Social Services), and any other relevant organisations, as well as members of the faith community or organisation.
- I understand that any other concerns will be taken seriously and reported
- I understand that this contract will be reviewed regularly every \_\_\_\_\_ months and will remain for an indefinite period.

### *Pastoral care*

Oak Hill College would not normally expect to be sole providers of pastoral care for an offender, and the examples below might much more likely be met within a church family. They are included as an example of the kinds of ways an offender can be supported by a Christian community.

‘X’ and ‘Y’ and ‘Z’ have agreed to provide you with pastoral care and support; as part of that undertaking, they and the leadership of the organisation agree to:

- Support you in finding suitable employment opportunity which will not bring you into contact with children or adults at risk.
- Support you in seeking any specialist help e.g. attendance on any Sex Offender Treatment Programmes, drug or alcohol or psychiatric rehabilitation or any counselling appointments.
- Liaise with any previous Places of Worship you have attended, with the Prison Chaplaincy Team, or any other organisation you have worked with prior to joining us.
- Work closely as a place of worship / organisation with any statutory authorities with responsibility for you, such as your probation officer, police public protection team or children’s social services, cooperating with them in helping and supporting you.
- Where appropriate, ask for any risk assessment in order to determine how best we can meet your needs while protecting children and vulnerable adults.
- Attempt to meet any practical needs you may have, including assisting with options for accommodation.
- Support you in joining Circles of Support or any other similar programme.
- Provide pastoral care and support to anyone with whom you are living with. We recognise that partners of known sex offenders need pastoral care, and ‘space’ to share without judgement.

# Appendix 7: Code of Conduct - Example

Each student and member of staff signs annually a Code of Conduct appropriate for their role in the College. Below is the version signed by students on the Theology for Ministry and Mission programmes, and by staff in student facing roles. Other versions are shorter, and are provided to students on the offer of a place or to staff on the offer of a post.

## Introduction

In all our interactions with each other we should strive to be beyond reproach. Like any church, the College community includes some people, such as children and young people, with whom we must take special care. This Code describes safe, godly and loving ways to behave towards those outside our immediate family who are our neighbours here.

The Code refers to the College Safeguarding Policy and Safeguarding Essentials guide. You can find them on both the website and on Acorn under College Life / Safeguarding and Policies / Safeguarding.

Each year you will be asked to confirm that you have read and understood the Code, and that you will act in accordance with it. If you are unable to agree to abide by this Code, please make an appointment with your tutor or the Director of Pastoral Care as a matter of urgency.

## Your commitments

I will:

- treat everyone with dignity, keeping my language, attitude and body language respectful
- speak up about inappropriate attitudes and behaviour that might be harmful to others
- never use drugs except for medical reasons under appropriate supervision
- not smoke in the presence of a child or young person, or within 5 metres of any College building
- not be under the influence of alcohol when responsible for a child, young person or adult at risk, or to the detriment of my behaviour
- avoid physical contact except where appropriate to the needs of an activity (e.g. sport) and within normal boundaries
- obtain consent before taking photographs/video of anyone
- never use sexually provocative words or gestures, or any forms of physical punishment
- never scapegoat, ridicule or reject an individual or group or allow others to do so
- not show favouritism towards an individual or group
- not encourage attention-seeking behaviour towards me by a child, young person or adult at risk
- not permit an unknown adult to have access to children, young people or adults at risk

- not invade an individual's privacy
- not befriend children, young people or an adult who may be at risk on social media
- always operate within the principles, procedure and guidelines of the Oak Hill College Safeguarding Policy and Safeguarding Essentials guide.

## Your duty to report

I will immediately notify the College if I am or become:

- subject to any change in my circumstances that affects my right to work or study in the United Kingdom
- barred from working with children or adults at risk
- the subject of a referral to the Disclosure and Barring Service or any successor body
- the subject of any change in circumstances which has or may result in me or any member of my household being disqualified from providing childcare in connection with early or later years provision or from being directly involved in its management
- arrested, charged or convicted of any criminal offence
- subject to an investigation for any allegation of a disciplinary nature at any other organisation, including any at which I am a volunteer
- in receipt of a police caution, reprimand or warning, or if there is a formal child protection investigation of me or any member of my household
- aware of any circumstances (whether related to me or anyone with whom I have an association) that may reasonably be considered to pose a risk or an increased risk to children and adults at risk.

I have read and understood the College Safeguarding Policy and the Safeguarding Essentials, and know that I can access them on the College's VLE.

I understand that it is my duty to protect the children, young people and adults at risk with whom I come into contact.

I know what action to take if abuse is suspected, discovered or disclosed.

# Appendix 8: Responsibility for ongoing involvement with a case

The College recognises that reporting a matter correctly does not discharge its responsibility fully. In particular:

8.1 From time to time a College representative may be asked to join a Safeguarding Case Management Group. Where this occurs, the College representative (normally the Safeguarding Officer or Lead) will clarify their role in the group, be transparent about actual or potential conflicts of interest, be vigilant for the proper functioning of the Group, abide by the Group's agreed information sharing pathways, and keep careful notes of their involvement and of the Group's progress in the case file. This may include the secure filing of minutes of the Group's meetings with their own case records.

8.2 Safeguarding organisations and Statutory Authorities may not always respond promptly and correctly, or at all, when matters are reported to them. Where there is no response or an unsatisfactory response from a safeguarding agency, or from the Police, LADO, or other statutory service after a safeguarding referral, the College will, normally through the Safeguarding Officer or Safeguarding Lead:

- **Clarify & Record (Day 0):**
  - Confirm referral date, agency, and named contact (if any).
  - Note the concern (no response/dissatisfaction).
- **Initial Follow-Up (Within 5 Working Days):**
  - Contact the agency to request an update.
  - Record all attempts and responses.
- **Escalate Within the Agency (If No Progress):**
  - Ask to speak with a manager/safeguarding lead.
  - Refer to the agency's escalation or complaints process.
- **Notify Immediately:**
  - Inform the Diocesan Safeguarding Team (DST) or Thirtyone:eight (31:8).
  - Seek advice/support for next steps.

- **Escalate via Safeguarding Partnership (If Still No Resolution):**
  - Raise a formal concern (or ensure that one is raised) using the relevant safeguarding partnership's escalation route.<sup>12</sup>
- **Keep Records:**
  - Log every action, conversation, and decision taken.
  - Continue to monitor risk and review with DST/31:8 until resolved.

The safety and welfare of the individual at risk must always come first. Normally there should be no more than **5 working days** between each escalation step, and for urgent cases this should be much quicker.

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<sup>12</sup> for example, see [Barnet Council Child Safeguarding Escalation Protocol](https://www.barnet.gov.uk/sites/default/files/2021-12/BSAB%20escalation%20protocol%202021.pdf):  
<https://www.barnet.gov.uk/sites/default/files/2021-12/BSAB%20escalation%20protocol%202021.pdf>



# Appendix 9: Record Keeping & Reporting

## 9.1 Record Keeping and Information Sharing

9.1.1 A complete record of any case will be maintained by the Safeguarding Officer. This will include notes and/or minutes of meetings or conversations; any decisions made and the reasons for them; and key documents such as risk assessments or papers relating to disciplinary action. Records will be dated and include the author's name, with the name and role of their author clearly shown. The College may use a secure online portal to hold these records.

9.1.2 Within the College community itself, information will be shared by the Safeguarding Officer in a limited way and only on a need to know basis. The Safeguarding Officer operates independently but may consult freely with the Safeguarding Lead on any safeguarding matter. Except where the concern involves the College Principal, the College Principal will be informed of safeguarding matters to the extent necessary for them to discharge their safeguarding leadership responsibilities, including arranging pastoral care, managing organisational risk, reputational considerations linked to safeguarding, or ensuring statutory compliance. Any information shared will be minimal, relevant, and proportionate.

Safeguarding will be a recurring item in the regular Leadership Team meeting, with information shared only on a need-to-know basis.

9.1.3 All relevant safeguarding issues, along with information about any actions taken in response, will be reported by the Safeguarding Officer or Lead to the College Council Safeguarding Representative and the Trustee Safeguarding Representative to enable proper oversight of the Safeguarding Officer and ensure the proper discharge of all safeguarding responsibilities by the Trust.

9.1.4 Matters will also be reported to and recorded securely and confidentially by the Trust Secretary of the Kingham Hill Trust for monitoring and compliance purposes.

## 9.2 Retention of safeguarding records

9.2.1 All case work records made for safeguarding purposes, including notes recording allegations and concerns, and how these are handled, advice received, action taken, decisions reached and eventual outcomes will be kept until 70 years after the last contact with the individual concerned, or in the case of an allegation against an employee, for 75 years after the employment ceases, whichever is later. Any records of activity involving children will be kept for 50 years after the activity ceases.

9.2.2 Paper records will be stored securely in a lockable cabinet, with all keys held securely and issued only to the Safeguarding Officer or Lead. Digital records will be kept securely on a separate server accessible only by the Safeguarding Officer and Lead, and by the ICT Officer, or on a secure online portal with access granted only to the Safeguarding Team. Information sent in email form will wherever possible be encrypted or unidentifiable, and where sensitive information is unavoidably sent by unsecure email it will be removed from the email server as soon as possible and a copy kept securely with other digital records.

## Appendix 10: Reporting and Review

10.1 The Safeguarding Lead will report to each meeting of the Council on the implementation of the College's Safeguarding Policy. This will include a review of any allegations made or concerns raised; analysis of any cases against the relevant policy and practice guidelines; identification of any weaknesses and of any changes to the policy or procedures that need to be made as a result.

10.2 The Safeguarding Lead will undertake regular reviews of the Safeguarding Policy and its associated procedures and will ensure that updated copies of the Policy are made available to all members of the College community as outlined at paragraph 1.4.4. Updates of outdated information will be made promptly and recorded in [Appendix 11](#).

10.3 The College Council will review the policy every 3 years, or earlier if the need arises.

# Appendix 11: Document History

Date	Event	Person Responsible
5.11.2025	Policy approved	College Council

# Record of Concern Form

Can be filled in electronically. Handwriting must be legible.

<b>Child/Adult's Name</b> (subject of concern):	<b>Date of Birth/Age:</b>	<b>Address:</b>
<b>Date/Time of Incident:</b>	<b>Location of incident/disclosure and means by which you heard</b> (online meeting, email, phone call, in person etc)	
<b>Your Name (print):</b>		<b>Role/Job Title:</b>
<b>Nature of concern</b> Do not investigate. Describe what you observed or were told, or what caused your concern. Use direct quotes where possible. <i>(Include as much detail in this section as possible. Include additional sheets if necessary.)</i>		
What is the child/adult saying about what has happened? Did they express a wish or ask for anything?		
Any other relevant information eg previous concerns, vulnerabilities, witnesses or others present		
<b>Immediate Action Taken</b> - did you respond or reassure? - did you seek emergency or medical help? - Safeguarding Officer informed? - other agency informed?		
Any follow-up or ongoing actions already planned?		

Signature: \_\_\_\_\_ Date \_\_\_\_ / \_\_\_\_ / \_\_\_\_ Time \_\_\_\_ : \_\_\_\_ am/pm

**Pass this form to the Safeguarding Officer without delay.**  
**Do not retain a copy once receipt is confirmed.**