

Safeguarding Children, Young People & Adults Experiencing or at Risk of Abuse or Neglect

Policy & Procedures 2021

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1. Introduction and Key Contacts

Organisational Information:

Name: Oak Hill College (part of the Kingham Hill Trust)
Address: Chase Side, Southgate, London, N14 4PS
Telephone: 020 8449 0467
Charity Number: 1076618

About Oak Hill College:

Oak Hill College exists to serve churches worldwide as they carry out the Great Commission of the Lord Jesus Christ (Matt 28:18-20) by equipping their people to serve with a grasp of God's revealed truth that is adaptable, deep, broad and integrated.

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

The college does not routinely work directly with children, adults in need of support, or other groups generally understood to be at particular risk of abuse. Children on site remain under the care and supervision of their parents.

Important Contact Details:

College Safeguarding Officer	Kristi Mair safeguarding@oakhill.ac.uk Telephone: 020 8449 0467 ext. 216
Alternate Contact; College Safeguarding Lead and Director of Pastoral Care	Andrew Nicholls andrewn@oakhill.ac.uk Telephone: 020 8449 0467 ext. 224
Local Social Services (Barnet)	Children's Services: Telephone (24 hours): 020 8359 4066 Adult Services: Telephone (24 hours): 020 8359 5000
Police Contact Details	Emergencies: 999, Non emergencies: 101
London Diocesan Safeguarding Team/ Helpline	020 7932 1224 Email: safeguarding@london.anglican.org
Diocesan Safeguarding Advisors (London)	Martin Goodwin (Head of Safeguarding) Andrew Munro: 020 3837 5092 Maggie McMahon: 020 3837 5092
Out of hours – 31:8 helpline - (CCPAS)	030 3003 1111 5pm – 9am

About the College's Safeguarding Policy and Procedures:

The College's Safeguarding Policy and Procedures follow the requirements laid out in the following Government guidance documents:

- *Working Together to Safeguard Children: A guide to inter-agency working to safeguard and promote the welfare of children* (HM Government, 2018)¹
- *Statement of Government Policy on Adult Safeguarding* (Department of Health, 2011)²
- *Keeping Children Safe in Education* (Department for Education, 2014)³
- Care Act 2014 and the Care Act guidance⁴
- Charity Commission guidance for charities and trustees⁵

It is also based upon the provisions laid out in *Safeguarding in the Diocese of London* (2012, 2015)⁶, and the following national Church of England safeguarding policies and procedures:

- *Promoting a Safe Church: Safeguarding policy for adults* (2006)⁷
- *Responding to Domestic Abuse: Guidelines for those with pastoral responsibility* (2006)⁸
- *Protecting All God's Children: Safeguarding policy for children and young people* (Fourth Edition, 2010)⁹
- *Responding Well to those who have been Sexually Abused* (2011)¹⁰
- *Practice Guidance: Responding to Serious Safeguarding Situations* (Dec 2015)¹¹
- *Safeguarding Records: Joint Practice Guidance for the Church of England and the Methodist Church* (2015)¹²
- *Safeguarding and Clergy Discipline Measure 2016*¹³
- *Practice Guidance: Safer Recruitment* (revised 2017)¹⁴
- *Promoting a Safer Church: House of Bishops policy statement* (2017)¹⁵
- *Responding Well to Domestic Abuse: Policy and Practice Guidance* (March 2017)¹⁶
- *Promoting a Safer Church: Safeguarding policy statement for children, young people and adults* (2017)¹⁷
- *Parish Safeguarding Handbook, 'Promoting a Safer Church' House of Bishops*, (Version 0.1 2018)¹⁸
- *Practice Guidance: Safeguarding Training & Development* (July 2021)¹⁹
- *Safeguarding Records Retention: Records management toolkit* (Dec 2015)²⁰

A copy of this Policy, along with a signed copy of the Diocese's *Safeguarding Policy Statement*, is lodged with the College Safeguarding Officer. It will be updated annually by the Safeguarding Team with a full review by Council not later than every three years.

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¹ <http://media.education.gov.uk/assets/files/pdf/w/working%20together.pdf>

² www.gov.uk/government/uploads/system/uploads/attachment_data/file/215591/dh_126770.pdf

³ www.gov.uk/government/uploads/system/uploads/attachment_data/file/215591/dh_126770.pdf

⁴ [Care and support statutory guidance - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

⁵ [Safeguarding and protecting people for charities and trustees - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

⁶ <https://www.churchofengland.org/clergy-office-holders/protecting-and-safeguarding-children-and-vulnerable-adults/national-policy-practice-guidance.aspx>

⁷ <https://www.churchofengland.org/sites/default/files/2017-11/promotingasafechurch.pdf>

⁸ <https://www.churchofengland.org/sites/default/files/2017-11/responding-well-to-domestic-abuse-formatted-master-copy-030317.pdf>

⁹ <https://www.churchofengland.org/sites/default/files/2017-11/protectingallgodschildren.pdf>

¹⁰ https://www.churchofengland.org/sites/default/files/2017-11/Responding%20Well%20to%20those%20who%20have%20been%20sexually%20abused_0.pdf

¹¹ <https://www.gloucester.anglican.org/content/pages/documents/1456764905.pdf>

¹² <https://www.churchofengland.org/sites/default/files/2017-11/safeguarding%20joint%20practice%20guidance%20-%20safeguarding%20records.pdf>

¹³ https://www.churchofengland.org/sites/default/files/2018-01/gs%201952%20-%20draft%20safeguarding%20and%20clergy%20discipline%20measure_July14.pdf

¹⁴ https://www.churchofengland.org/sites/default/files/2017-11/safeguarding%20safer_recruitment_practice_guidance_2016.pdf

¹⁵ <https://www.churchofengland.org/sites/default/files/2017-11/cofe-policy-statement.pdf>

¹⁶ <https://www.churchofengland.org/sites/default/files/2017-11/responding-well-to-domestic-abuse-formatted-master-copy-030317.pdf>

¹⁷ <https://www.churchofengland.org/sites/default/files/2017-12/PromotingSaferChurchWeb.pdf>

¹⁸ <https://www.churchofengland.org/sites/default/files/2019-03/Parish%20Safeguarding%20Handbook%20March%202019.pdf>

¹⁹ <https://www.churchofengland.org/media/3467>

²⁰ https://www.churchofengland.org/sites/default/files/2017-10/safeguarding_records-_retention_tool_kit_-dec_15_002_0.pdf

The College policy and supporting documentation will be made available to staff and students during their induction, as part of regular safeguarding training, and via the College's Virtual Learning Environment (VLE).

The College undertakes to support the College Safeguarding Officer and Lead in the implementation and regular review of this Policy and the provisions it contains.

2. Commitment to Safeguarding

Section 11 of the Children Act 2004²¹ 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':

"Churches, other places of worship and faith-based organisations provide a wide range of activities for children and have an important role in safeguarding children and supporting families. Like other organisations who work with children they need to have appropriate arrangements in place to safeguard and promote the welfare of children as described in Working Together (Chapter 2 paragraph 4)."

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

Protecting people and safeguarding responsibilities should be a governance priority for all charities. It is a fundamental part of operating as a charity for the public benefit.

As part of fulfilling your trustee duties, you must take reasonable steps to protect from harm people who come into contact with your charity.

This includes:

- *people who benefit from your charity's work*
- *staff*
- *volunteers*
- *other people who come into contact with your charity through its work*²²

The Church of England works in partnership with other Christian Churches and agencies in delivering safeguarding. In doing so, the Churches subscribe to the following principles to which, in partnership, the College also subscribes:

- The care and nurture of, and respectful pastoral ministry with, all children, young people and adults;
- The safeguarding and protection of all children, young people and adults;
- The establishment of safe, caring communities which provide a loving environment where victims of abuse can report or disclose abuse, and where they can find support and best practice that contributes to the prevention of abuse.

In particular, **the College aims to:**

²¹ <http://media.education.gov.uk/assets/files/pdf/w/working%20together.pdf> (see p.47 onwards)

²² [Safeguarding and protecting people for charities and trustees - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/60422/Safeguarding_and_protecting_people_for_charities_and_trustees_-_GOV.UK.pdf) (See section 1 – "Managing the risks")

- Reduce the risk of significant harm to children or adults from harassment, abuse or other types of exploitation, whilst listening to and supporting individuals;
- Respond without delay to any allegation or suspicion of abuse, including cooperating with the police and local authorities in any investigation;
- Ensure that safeguarding is everybody's business, with this institution playing its part in preventing, detecting and reporting neglect and abuse;
- Ensure that arrangements are in place locally to protect those less able to protect themselves;
- Care pastorally for victims/survivors of abuse and other affected persons;
- Ensure that our recruitment processes are fair, consistent and transparent, and follow good practice for 'Safer Recruitment';
- Challenge any abuse of power, especially by anyone in a position of respect and responsibility where they are trusted by others;
- Respond appropriately to those who may pose a present risk;
- Care pastorally for those who are the subject of concerns/allegations of abuse and other affected persons.

In matters affecting the Church of England, the College involves the London Diocesan Safeguarding Team.

3. Definitions and Scope

Children and adults at risk²³ can be harmed by deliberate action (for example physical, sexual or emotional abuse) or by omission (for example neglect). Abuse can occur within all cultures, religions and classes; it may occur at the hands of a stranger or, more frequently, at the hands of someone known to the individual, including those who occupy a position of trust; and it may occur in a variety of locations and settings - within the home, in a community setting or, increasingly, using digital technology. For more detailed definitions, please see Appendix 1: Types of Abuse.

The College believes that every individual, whether child or adult, has value as one made in the image and likeness of God. The aim of this policy is therefore to establish a safe living and working environment for all members of the College community: students, staff, their spouses and their children. This is necessarily a collaborative endeavour which will involve all members of that community. As such the College will endeavour to establish a safe, caring and loving environment for all members of the College community through the implementation of this Safeguarding Policy and its associated procedures. This will include:

- Safer recruitment procedures;
- Appropriate training for all staff and students
- Awareness-raising within the College
- Support and protection of members of our community
- Working in partnership with statutory services or other partners to protect and promote the welfare of members of our community

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 of the Armed Forces, is in hospital or is in custody does not change his/her status or entitlements to services or protection. The College expects parents to take responsibility for the welfare of their children whilst on College premises: this

²³ As noted in the Church of England's *Practice Guidance: Responding to Serious Safeguarding Situations* (2015), the Department of Health now uses the term 'adults experiencing, or at risk of abuse or neglect' in place of the previously used term 'vulnerable adult' (*Practice Guidance*, p.6). The shorter term 'adults at risk' is used here simply for concision.

includes satisfying themselves that, where that 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.

An **adult at risk** is someone eighteen years old or over, who (whether or not *they* consider themselves to be so) may be at risk by reason of age, illness or disability; it also includes any adult who has been put at risk by their situation or circumstances, such as by discrimination or as a victim/survivor of abuse. In this connection, the College accepts the Diocese of London's definition as outlined in Safeguarding and Clergy Discipline Measure (Jan 2016):

'a person aged 18 or over whose ability to protect himself or herself from violence, abuse, neglect or exploitation is significantly impaired through physical or mental disability or illness, old age, emotional fragility or distress, or otherwise; and for that purpose, the reference to being impaired is to being temporarily or indefinitely impaired.'²⁴

Where the College believes that an adult (whether a student or a member of staff) falls into this category, then it will arrange a meeting for that individual with the College Safeguarding Officer and, where necessary, the Director of Pastoral Care to discuss what support can be provided.

Where this involves support for academic reasons the student will discuss the matter with the College's Disability Officer and information will be shared 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.

Matters outside the Safeguarding Policy

The College recognises that it has a responsibility to provide a healthy and nurturing environment that promotes the wellbeing of students and staff and addresses harm that may fall below the current legal threshold for statutory reporting to statutory services. To meet this threshold, a concern must be raised of harmful behaviour towards a child or adult at risk. Where this criterion is not met, a person who is not a child or adult at risk may nonetheless experience, for example:

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

The College takes all such matters extremely seriously. The procedure for reporting any such concerns that are outside the scope of this Safeguarding Policy may be found [here](#) and by the link in the footer on the College website.

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

²⁴ <https://publications.parliament.uk/pa/jt201516/jtselect/jtecc/79.pdf> HL Paper 79 - A Measure passed by the General Synod of the Church of England, laid before both Houses of Parliament pursuant to the Church of England Assembly (Powers) Act 1919, Sec 6.

4. Responsible Officers

Although the College believes that safeguarding is a matter for everyone within its community, ultimate responsibility rests with the Trustees. This is largely exercised through the College Council and, at an operational level, the Leadership Team. The following Responsible Officers have been appointed by the Council and the Leadership Team:

College Safeguarding Officer	Kristi Mair safeguarding@oakhill.ac.uk Telephone: 020 8449 0467 ext. 216 Study: NW 114
College President	Revd Johnny Juckes Telephone: 020 8449 0467 ext. 210 Email: johnnyj@oakhill.ac.uk Office off Main Square
Director of Operations & Finance	Grant Farrant Telephone: 020 8449 0467 ext. 231 Email: grantf@oakhill.ac.uk Office off Main Square
Director of Pastoral Care; Safeguarding Lead	Dr Andrew Nicholls Telephone: 020 8449 0467 ext. 224 Email: andrewn@oakhill.ac.uk Study: NW131
College Council Representative	Mr Tom Custance Member of the Oak Hill College Council Email: available from the Director of Operations
Trustee Representative	Mr Jeremy Anderson Trustee and Chair of the College Council Email: available from the Director of Operations

Safeguarding Officer

The Safeguarding Officer has been nominated by the College to act on its behalf in dealing with all matters relating to actual or alleged abuse; this includes making a written record of any concerns raised and referring the matter as appropriate to the local authorities (such as the Local Children's Social Care Department and/or the NSPCC), the Police, the Charity Commission and to the Diocesan Safeguarding Team.

The Job Description for the College Safeguarding Officer is at Appendix 2. As noted there, the person appointed to the role of College Safeguarding Officer will be a Christian, expected to be a member of their local church and able to demonstrate a commitment to safeguarding children and adults at risk who are from all cultural backgrounds and abilities; s/he will have a good awareness of Diocesan policies and procedures, statutory legislation and guidance, and will undertake regular training in safeguarding and child protection (for example, as provided by the local authority and/or by local diocesan officers) at least every three years.

Deputy Safeguarding Officer

A Deputy Safeguarding Officer may be appointed from time to time to assist the College Safeguarding Officer. They will be an alternative person for people to approach with concerns relating to safeguarding. They will liaise with the College Safeguarding Officer who will retain responsibility for the roles listed above.

Director of Pastoral Care and Safeguarding Lead

The Director of Pastoral Care will lead on safeguarding in the faculty meeting, may advise and assist in matters of policy and procedural norms for the College and may assist in training students and/or staff, but will not carry primary responsibility for the oversight or processing of individual cases.

The Director of Pastoral Care will provide supervision to the Safeguarding Officer(s) in their safeguarding role and an opportunity to debrief and consider any pastoral care needs following a safeguarding incident involving them. This process may include the sharing of relevant confidential information.

5. Awareness and Prevention of Abuse

Students:

- All prospective students are required to complete a self-declaration of any criminal records
- All full and some part time students will be required to undergo a DBS 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 and in preparation for placements.
- All students will receive compulsory safeguarding training as part of their programme.
- All students will be required to sign a Code of Conduct on an annual basis: these records will be held securely by the College Safeguarding Officer in a manner consistent with the provisions of the Data Protection Act 2018.

The Safeguarding Policy and Procedure is available in secure electronic form through the College's VLE; a quick-reference, accessible version (Appendix 3) is available on the VLE, in the Library and the SCR and all students are directed towards the Policy during Welcome Week.

Recruitment of Staff:

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 a confidential self-declaration form as part of the application
- 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;
- Completion of a DBS Check, where appropriate to the role (including overseas criminal records check, where appropriate);
- Repeat of DBS Check, where appropriate to the role, after 3 years of employment;
- Appropriate induction, supervision, training and support (including specific training on safeguarding where appropriate to the role);
- Completion of a designated probationary period.

Staff will receive regular safeguarding training/updates from the College Safeguarding Officer, Safeguarding Lead or another appropriate individual. The Safeguarding Policy and Procedure is available in secure electronic form through the College's VLE and in paper format through the Library. Staff without access to the VLE have a copy available in their department. A quick reference guide (Appendix 3) will also be widely available and on display in relevant staff areas.

All teaching and support staff will be required to sign a Code of Conduct at the beginning of each academic year: these documents will be held securely by the College Safeguarding Officer in a manner consistent with the provisions of the Data Protection Act 2018. Temporary staff working in relevant areas of the college 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.

Safeguarding Ethos within the College:

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

- developing a culture of awareness in order to protect children and adults at risk
- modelling appropriate behaviour in all interactions with children and adults at risk
- providing information on where to seek help and on procedures for reporting suspected abuse (through this Policy and through safeguarding training).
- 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
- taking seriously any safeguarding concerns or disclosures and responding proportionately and in a timely manner

Use of the College Network:

All teaching staff, students and spouses will be provided with access to the VLE and 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 the VLE under College Life/ IT.

Arrangements for College Placements:

All students are normally required to complete at least one placement as part of their training, with the type and number of placements varying according to the length of the programme and the specialism being followed. Placements will be arranged by the College's Placements Coordinator in conjunction with Course Directors. Before a student is placed in a church, chaplaincy or other faith-based organisation, the College Placements Coordinator will ask for a copy of that organisation's Safeguarding Policy Statement: this will be kept on file by the College for the duration of the placement.

The College acts as 'employer' for placement students and will confirm to placement providers that all appropriate checks have been completed and are clear. 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. A favourable risk assessment will be shared with the placement supervisor. If the risk assessment is unfavourable, a student may not be placed. The placement provider does not need their own DBS check.

College Activities involving Children:

- Crèche facilities are occasionally provided during College events (such as the annual Commissioning and Graduation Services). Those responsible for arranging, coordinating and running the activities will be required to have a College DBS check and will be asked to agree to the College's Code of Conduct by signing a copy.
- Risk Assessments for all of these activities, including the ratio of leaders to children and other safeguarding matters, will be submitted by the activity leader to the College Safeguarding Officer and the Director of Operations & Finance.

Safety in College spaces:

The welfare of children and young people is the immediate responsibility of those caring for them. Groups may hire the Chapel and/or rooms in the Main House, Founders Court and the Academic Centre. 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 and some areas are monitored by CCTV, but the College cannot ensure any 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 part of the College.

Safeguarding relating to events run by outside agencies using College spaces is the responsibility of the hirer or person running the event. For more information see our Premises Booking Policy.

6. Action in Cases of Suspected Abuse (Child or Adult)

Concerns about a child, young person or adult may present themselves in a number of ways. No member of staff or student should **ever** carry out their own investigation into an allegation or suspicion of abuse, past or present, since action of this nature may interfere with a formal investigation at a later date. Instead, the following procedures should be followed:

- The person in receipt of an allegation of abuse (whether past or present, and whether from the child or adult at risk themselves or from a third party), or who suspects that abuse may be taking place, should **make a careful record** of what they have seen, heard or become concerned about (within an hour if possible). They should ensure that they **do not** promise confidentiality to the person concerned.
 - NB If it is necessary to take immediate action** to protect life and limb, then the person involved should dial 999 to contact the police and/or ambulance service as necessary, and follow the instructions given. As soon as possible, and within 24 hours, the matter should be reported to the College Safeguarding Officer (or one of the other Responsible Officers as above).
- In cases involving the suspected abuse of a child or adult at risk, or if it is uncertain whether the matter amounts to this, the concern should be reported immediately (and no later than 24 hours) to the College Safeguarding Officer (or a Deputy Safeguarding Officer if one exists). If the College Safeguarding Officer or Deputy is unavailable, or if the concern in any way involves the Safeguarding Officers, then the report should be made to the Director of Pastoral Care/Safeguarding Lead. In the unlikely event that all are either unavailable or the subject of an allegation, then the matter should be reported to the Director of Operations and Finance. If no College Representative is available, please contact local Social Services.
- Suspicions must not be discussed with anyone other than the above-named.

The College will support the Safeguarding Officer(s) in taking any action that is required (either immediately or subsequently) with respect to the alleged or actual abuse of a child, young person or adult. It accepts that any information in the possession of the Safeguarding Officer will be shared in a limited way, on a need to know basis, and that this may include referral to the appropriate local, diocesan and judicial authorities.

7. Procedures, Care and Support for Those Involved

Support for those affected by abuse:

The College will endeavour to offer appropriate pastoral care and support for any member of the College community who has been the victim of abuse or otherwise affected by it. This will usually be done in tandem with local and church authorities and, where appropriate, may include appropriate referrals to other external support agencies (e.g. specialist counselling services, independent authorised listeners appointed by the Diocese etc.). Support will also be provided if required for immediate family members and for those members of the College community who have been directly involved in the identification or reporting of alleged or actual abuse. Consideration may be given to the provision of funded support, where appropriate, although this should not be deemed to constitute an admission of liability on the part of the College.

Procedures

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.

Procedure if a student is accused/suspected of abuse:

If a student is suspected or accused of abuse, the following action will normally be taken:

- 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.
- 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.
- 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 an Independent then any relevant sponsoring agency will be informed.
- 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.
- 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.

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

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 timing, format and wording of the communication with the student.

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): absent reasonable justification, failing to make a referral is an offence; and
- Reporting the incident to the Charity Commission.

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, provide support for the student's immediate family.

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

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

- 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 have been consulted and/or the matter referred to the police or local authority.
- 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.
- The Diocesan Safeguarding Team will be informed of the allegation within 1 working day of it being made known to the College Safeguarding Officer.
- 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.

- 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 visiting lecturers/temporary staff as required.
- 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.
- 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.
- The College will report to and cooperate fully with the police and with the local and church authorities as required throughout the investigation.
- 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.

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 timing, format and wording of the communication with the staff member.

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.

Depending on the nature and seriousness of the offence, and taking into account the College's disciplinary policy and the advice of HR personnel, 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.

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 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, provide support for the staff member's immediate family.

Record Keeping and Reporting:

A complete record of any case will be maintained by the College 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 signed and dated, with the name and role of their author clearly shown.

In line with Diocesan policy, records concerned with abuse will be kept indefinitely, and will be stored safely and securely by the College Safeguarding Officer in accordance with the provisions of the Data Protection Act 2018.

Within the College community itself, information will be shared by the appropriate College 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. All relevant safeguarding issues, along with information about any actions taken in response, will be reported by the College Safeguarding Officer to the College Council Safeguarding Representative and may also be shared with a Trustee Safeguarding Representative where this is necessary to enable proper oversight of the Safeguarding Officer and ensure the proper discharge of all safeguarding responsibilities by the Trust.

Retention of safeguarding records:

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 75 years after the last contact with the individual concerned, or in the case of an allegation against an employee, for 70 years after the employment ceases, whichever is later. Any records of activity involving children will be kept for 50 years after the activity ceases.²⁵

Paper records will be stored securely in a lockable cabinet, with all keys held securely and issued only to individuals entitled to view the records. Digital records will be kept securely on a separate server accessible only by the Safeguarding Officer and Lead, and by the IT system administrator. 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.

²⁵ https://www.churchofengland.org/sites/default/files/2017-10/safeguarding_records_-_retention_tool_kit_-_dec_15_002_0.pdf

8. Review of the Safeguarding Policy and Procedures

The College Safeguarding Lead and/or Officer 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 agreement of any changes that need to be made as a result.

The College Safeguarding Lead and/or Officer will also undertake an annual review of the Safeguarding Policy and its associated procedures and will ensure that copies of the Policy are made available to all members of the College community as outlined in Section 5.

The College Council will review the policy at least every 3 years.

9. Agreement and Signature

College Safeguarding Officer:

Kristi Mair

Signature:

Date:

Director of Pastoral Care and Safeguarding Lead

Dr Andrew Nicholls

Signature:

Date:

Director of Operations & Finance:

Grant Farrant

Signature:

Date:

College Council Representative:

Tom Custance

Signature:

Date:

Trustee Representative

Jeremy Anderson

Signature:

Date:

Appendix 1: Types of Abuse

For more details, see:

- Children: *Working Together to Safeguard Children*²⁶ (2013, p.85)
- Adults: *No Secrets*²⁷ (paragraph 2.7)
- Children & Adults: *Safeguarding in the Diocese of London* (2012, pp.41-48)

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. It is not temperately disagreeing on a theological or other issue.

Physical Abuse	May involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child or adult. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
Sexual Abuse	Involves forcing or enticing a child or adult to take part in sexual activities, whether or not the child or adult is 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 in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males; women can also commit acts of sexual abuse, as can other children.
Neglect/Acts of Omission	The persistent failure to meet an individual’s basic physical and/or psychological needs, likely to result in the serious impairment of their health or development. This includes ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services, and the withholding of the necessities of life, such as medication, adequate nutrition and heating.
Emotional/Psychological Abuse (inc. web-based bullying and witnessing Domestic Violence/Abuse)	The persistent emotional maltreatment of a child or adult such as to cause severe and persistent adverse effects on the individual’s emotional development. It may involve conveying to them that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. 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 falling within this heading 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.

²⁶ <http://media.education.gov.uk/assets/files/pdf/w/working%20together.pdf>

²⁷

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/194272/No_secrets_guidance_on_developing_and_implementing_multi-agency_policies_and_procedures_to_protect_vulnerable_adults_from_abuse.pdf

Institutional Abuse	Occurs where the routines and regimes within care settings (day, residential, hospital or other institutions including TEIs) deny people rights, choices and opportunities. Abuse can be caused by weak or oppressive management, inadequate staffing (numbers, competence), inadequate supervision or support, "closed" communication, lack of knowledge of Whistleblowing policies and lack of training.
Discriminatory Abuse	Abuse connected to racism, sexism, a person's disability, sexual orientation, religious belief (including absence of belief) or other protected characteristics.
Financial/Material Abuse	Including theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.
Domestic Violence/Abuse	Physical, sexual, psychological or financial violence that takes place within an intimate or family-type relationship and that forms a pattern of coercive and controlling behaviour. This can include forced marriage and so-called 'honour crimes'. Domestic violence may include a range of abusive behaviours, not all of which are in themselves inherently physically violent.
"Spiritual" Abuse	See "emotional/psychological abuse" above.

Appendix 2: Job Descriptions

The College will appoint one or more people to act as the **College 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 hold the primary responsibility to receive, recognise, record and refer all allegations and concerns on safeguarding or potential safeguarding matters, and that all such actions are taken in a timely manner, normally meaning that an initial assessment and response is made within 1 working day.

The College may appoint a **Safeguarding Lead**. They will oversee matters of safeguarding policy and support the Safeguarding Officer. They will be responsible to see that the College policy and procedures track and are consistent with relevant changes in national and Diocesan policy and procedures.

A **Deputy Safeguarding Officer** may also be appointed with particular responsibility to be an alternative first point of contact (first bullet point below). The Deputy does not share all other listed responsibilities, but will communicate all relevant information immediately to allow the proper discharge of those responsibilities.

Main responsibilities for Safeguarding Officer alone

- Be the first point of contact for children, adults at risk and other members of the College community regarding suspicions of abuse and other safeguarding concerns.
- Respond to all safeguarding concerns in line with this Policy, Diocesan policy and best practice, reporting these concerns to the London Diocesan Safeguarding Team and liaising with other authorities as needed.

Other Responsibilities shared between Safeguarding Officer and Safeguarding Lead

- Be a source of support, advice and information on all matters of safeguarding children and adults at risk in the College.
- Keep the Leadership Team informed of all concerns, responses and activities relating to safeguarding children and adults at risk.
- Maintain the profile of safeguarding within the College, ensuring that it remains a high priority on the Leadership Team's agenda and report on any issues or concerns with the implementation of the Safeguarding Policy and its associated procedures.
- Ensure that the requirements for DBS checks are met for the appropriate roles.
- Complete a list of 'local contacts' as per Safeguarding in the Diocese of London annually.
- Report to London Diocesan Safeguarding Team when aware of any safeguarding issues.
- Report to St Albans Diocesan Safeguarding Team on an annual basis (currently June) regarding any safeguarding issues.

Those suitable for the role of College Safeguarding Officer

The person appointed to this role should be a Christian who is a member of a local church and can demonstrate a commitment to safeguarding children and adults at risk who are from all cultural backgrounds and abilities. S/he should have a good awareness of Diocesan policies and procedures, statutory legislation and guidance. Some training in safeguarding and child protection is needed when accepting the role. Where this cannot be evidenced it should take place within three months of being appointed. Ongoing training at least every three years will be required.