

Christ Theological College

Criminal Convictions Policy

Level 5/5 Microcredential Provision - Validated by Union School of Theology

Document Control

Version: 1.0

Date Approved: July 2026

Approved By: CTC Leadership Team

Policy Owner: Academic Dean

Review Cycle: Bi-annual

Next Review Date: July 2028

Applicable Programmes: CTC Micro-credentials (Level 4/5)

Applies to: All students registered on CTC provision, and applicants complaining about the handling of an application, including those studying or applying from outside the United Kingdom.

Validating Partner: Union School of Theology

Preamble

Christ Theological College (CTC) delivers short, credit-bearing microcredentials at Levels 4 and 5, validated by Union School of Theology (UST). All teaching and assessment take place online. There is no campus, no residential element, no placement, and no part of study that brings a student into unsupervised contact with children or vulnerable adults.

CTC's starting point is that having a criminal record does not disqualify anyone from studying with the College. A conviction says something about a person's past; it does not by itself say whether they are ready to study, or whether study would be good for them. At the same time CTC has a duty of care towards its other students and its staff, and it has legal obligations governing what it may ask about, what it must ignore, how it uses what it is told, and how long it may keep it. This policy holds those responsibilities together.

In practice it does three things. It tells applicants what they are required to disclose and, equally important, what they must not disclose, since the law protects certain convictions and cautions from ever being taken into account. It separates the question of a conviction from the academic entry decision entirely, so that a disclosure can never influence the judgement of whether someone is capable of the study. And it sets out how any information disclosed is stored, who can see it, and when it is destroyed.

Because CTC's microcredentials are not regulated programmes, no applicant is asked to obtain a DBS certificate and none is required. Anyone unsure whether their circumstances need to be disclosed at all is encouraged to raise it confidentially with the Principal before applying, rather than guess.

1. Purpose and Scope

1.1 CTC recognises the obstacles faced by people with a criminal record who wish to study. Having a criminal record does not automatically prevent someone from studying with CTC.

1.2 This policy sets out when a conviction must be disclosed, how CTC considers a disclosure, and how the information is handled.

1.3 It applies to applicants and to enrolled students. CTC's provision is delivered entirely online, with no residential or placement element and no unsupervised contact with children or vulnerable adults arising from study.

1.4 This policy should be read alongside the CTC Admissions Policy, Safeguarding Policy and Data Protection Policy.

2. Legal Framework

CTC's approach reflects:

- the Rehabilitation of Offenders Act 1974
- the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975, as amended in 2013
- the UK GDPR and the Data Protection Act 2018
- the Equality Act 2010

3. Policy statement

3.1 CTC's microcredentials are not regulated programmes. They do not lead to a professional registration that requires a criminal record check, and CTC does not require applicants to obtain a DBS certificate.

3.2 Applicants must disclose any unspent criminal conviction at the point of application.

3.3 Spent convictions should not be disclosed, unless the conviction falls within the categories specified in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975. Applicants are referred to that Act for the meaning of "spent" and "unspent".

3.4 Convictions and cautions that are "protected" under the 2013 amendment to the Exceptions Order must not be disclosed, and CTC will not take them into account.

3.5 A disclosure does not by itself lead to refusal. It triggers a separate consideration under section 4, which takes place only after the applicant has been assessed as meeting the academic entry requirements. The disclosure plays no part in the academic entry decision.

3.6 Where an applicant is unsure whether a conviction needs to be disclosed, or would like to discuss their circumstances confidentially before applying, they are encouraged to contact the Principal at [email].

3.7 Completion of a CTC microcredential does not constitute a recommendation as to a person's suitability for any ministry, employment or voluntary role. Any

organisation considering someone for such a role is responsible for its own recruitment and safeguarding checks.

3.8 If an applicant does not disclose a conviction that this policy requires them to disclose, and this later comes to CTC's attention, CTC may withdraw an offer or terminate the student's registration under the CTC Termination of a Student's Registration Policy.

4. Procedure for Considering Disclosure

4.1 Where a relevant conviction is disclosed and the academic entry requirements are met, the Principal will write to the applicant and ask for:

- details of the offence and the sentence;
- the date of the offence and the date of any sentence completion;
- details of any current licence conditions, monitoring or restrictions;
- the name and contact details of any probation or supervising officer, and consent to contact them;
- any other information the applicant wishes CTC to take into account.

4.2 The applicant will be given at least 10 working days to respond, and may ask for more time.

4.3 The Principal will consider the disclosure alongside a second person, e.g. a nominated trustee or a senior colleague. Relevant considerations include: the nature and seriousness of the offence; how long ago it occurred; the applicant's circumstances since; any current legal restrictions; any risk to other students in CTC's online learning environment; and any adjustments that would make study appropriate.

4.4 The applicant may make written representations and may ask to speak to the Principal by video call before a decision is made.

4.5 A written decision, with reasons, will be issued within 10 working days of receiving the applicant's information. The decision may be to admit, to admit subject to conditions, or to decline the application.

4.6 Anyone involved in a subsequent interview or assessment of the applicant will not be told about the disclosure, so that it does not influence the academic judgement.

5. Students Convicted During Their Studies

5.1 A student who is convicted of a criminal offence during their registration must inform the Principal within 10 working days of the conviction.

5.2 The Principal, together with [a nominated trustee], will consider the matter using the factors at 4.3 and will decide whether the student may continue, may continue subject to conditions, or whether the matter should be referred under the CTC Termination of a Student's Registration Policy.

5.3 The student will be invited to make written representations and will receive a written decision, with reasons, within 10 working days.

6. Appeals

6.1 An applicant or student may appeal a decision made under this policy within 10 working days of receiving it.

6.2 The only grounds for appeal are:

a. evidence of bias; b. relevant evidence was not taken into account; c. CTC did not follow this policy.

6.3 The appeal will be considered by [a member of the Board of Trustees / governing body] who has had no previous involvement in the case. A written outcome will be issued within 15 working days. This is the final stage of CTC's internal process.

7. Storage, Retention and Disposal Information

7.1 Information disclosed under this policy is sensitive personal data and is held in accordance with the UK GDPR, the Data Protection Act 2018 and the CTC Data Protection Policy.

7.2 It is stored securely and separately from the general application or student file, with access restricted to the Principal and to any other person named in section 4 or 5 for the purpose of reaching a decision.

7.3 Records relating to applicants who are not admitted are retained for [6 months] and then deleted. Records relating to admitted students are retained for [the duration of registration plus 12 months] and then deleted.

7.4 The information is not shared with tutors, assessors or other students.

8. Responsibilities, Approval and Review

8.1 The Principal is responsible for the operation of this policy.

8.2 The Board of Trustees approves this policy. It is reviewed every two years, or sooner if the law, CTC's provision, or UST requirements change.

9. Communication

9.1 This policy is published on the CTC website at www.ctcollege.org/policies and referenced in application materials.

9.2 CTC will provide this policy in an alternative format on request.

Version Control

Version	Author	Date	Reason for change	Equality impact check	Approval date
1.0	NMH	July 2026	New CTC policy, adapted with permission from the Union School of Theology Criminal Conviction Policy and contextualised for CTC's online, non-regulated Level 4/5 microcredential provision	July 2026	July 2026
1.0	[name]	[date]	New CTC policy, adapted with permission from the Union School of Theology Criminal Conviction Policy and contextualised for CTC's online, non-regulated Level 4/5 microcredential provision	[checked / date]	[date]