

Christ Theological College

Safeguarding Children and Adults at Risk Policy

Level 4/5 Microcredentials Provision - Validated by Union School of Theology

Document Control

Version: 2.0 (extends and supersedes the Online Learning Safeguarding Policy, which is incorporated at Section 12 and Appendix 5)

Date Approved: July 2026

Approved By: CTC Leadership Team

Policy Owner: Designated Safeguarding Lead

Review Cycle: Annual and immediately following any serious incident

Next Review Date: July 2027

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 (UST)

Contents

1. Safeguarding Contacts
2. Statement of Commitment
3. Legal and Reference Framework
4. Scope of the Policy
5. Definitions
6. Quality Framework: Approach, Deployment, Review, Improvement (ADRI)
7. Safeguarding Roles and Responsibilities
8. Positions of Trust
9. Safer Recruitment
10. Disclosure Checks
11. Safeguarding Training
12. Online Learning and Online Safety
13. Radicalisation and Extremism
14. Students Studying Outside the United Kingdom
15. Recognising Abuse and Neglect
16. Responding to a Concern or Disclosure
17. Concerns About a Student
18. Concerns About a Member of Staff, Volunteer or Trustee
19. Allegations Involving the Designated Safeguarding Lead
20. Spiritual Abuse and the Misuse of Religious Authority
21. Student Wellbeing, Self-Harm and Suicide Risk
22. Placements, Ministry Contexts and Sending Churches
23. In-Person Events and Premises
24. Working with Those Who May Pose a Risk
25. Pastoral Care and Support
26. Safeguarding Records, Confidentiality and Information Sharing
27. Partnership Working with the Validating Partner
28. Monitoring, Reporting and Review
29. Policy Communication
- Appendix 1: Definitions and Indicators of Abuse
- Appendix 2: CTC Safeguarding Concern Form
- Appendix 3: Safeguarding Response Flowchart
- Appendix 4: Code of Conduct for Staff and Volunteers
- Appendix 5: Expectations for Online Teaching and Learning Sessions
- Version Control

1. Safeguarding Contacts

1.1 CTC Safeguarding Contacts

Role	Name	Contact
Designated Safeguarding Lead (DSL)	Rev Dr Eben Adu	Eben.adu@ctcollege.org 02036334006
Deputy DSL and Online Safety Coordinator	Dr Naar Mfundisi-Holloway	Naar.mfundisi-holloway@ctcollege.org 02036334006
Safeguarding link, Advisory Board	Bishop Dr Leonard Amechi	Leorard.amechi@ctcollege.org 02036334006
Principal	Rev Dr Eben Adu	Eben.adu@ctcollege.org
Academic Dean	Dr Matthew Reifsnider	Matthew.reifsnider@ctcollege.org
Technical support (VLE and online platforms)	CTC IT team	admin@ctcollege.org
Safeguarding trustee/Governing Board lead	Bishop Dr Leonard Amechi	Leorard.amechi@ctcollege.org

1.2 External contacts - United Kingdom

Service	Contact
Emergency services (immediate risk)	999
Police non-emergency	101
Local authority children's social care - Kent County Council Children's Social Care	03000411111
Local authority adult social care - Kent County Council Adult Social Care	03000416161
Local authority out-of-hours emergency duty team	03000419191
Local Authority Designated Officer (LADO), for allegations against people who work with children	03000410888
NSPCC Helpline	0808 800 5000
Childline	0800 1111
National Domestic Abuse Helpline	0808 2000 247

Samaritans	116 123
Independent safeguarding advice service used by CTC - Thirtyone:eight (independent Christian safeguarding service)	03030031111

2. Statement of Commitment

2.1 Christ Theological College exists to equip and empower Christians from around the world to follow Christ and serve in God's mission, by providing contextually relevant theological education and ministerial training in the United Kingdom and beyond. CTC seeks to foster an environment that intellectually challenges and spiritually empowers both men and women to become genuine disciples with Christian virtues, ready to contribute to churches, communities and the marketplace.

2.2 CTC's activities are underpinned by its Christian ethos and guided by its values: a global Christian perspective; contextual relevance; empowerment for mission; intercultural competence; and innovative theological education. Safeguarding is an expression of those values, not an administrative addition to them. A College that trains people for ministry carries a particular responsibility to model the safety and integrity it teaches.

2.3 CTC recognises that abuse can occur in any setting, including a religious one, and that those in religious leadership hold power that can be misused. CTC does not treat its Christian character as a reason for lesser vigilance, and will never place the reputation of the College, of an individual, or of a church above the safety of a person at risk.

2.4 CTC is committed to:

- protecting children and adults at risk who come into contact with CTC, its staff, students or activities, whether online or in person;
- creating a culture in which concerns can be raised early, without fear of disbelief, of blame, or of adverse consequence;
- responding to every concern promptly, proportionately and in accordance with this policy;
- working openly with statutory agencies and with its validating partner;
- recruiting safely and training everyone who works or volunteers for CTC;
- offering pastoral care to those affected by abuse, and to those against whom allegations are made;

- learning from every concern raised and improving practice as a result.

2.5 Safeguarding is everyone's responsibility. No member of the CTC community may decide alone that a concern is too minor to report, or that it should be dealt with internally rather than referred.

3. Legal and Reference Framework

3.1 This policy has been developed with reference to the following. Each reference is cited so that the basis of any statement of compliance can be verified.

- Children Act 1989 and Children Act 2004 ¹
- HM Government, *Working Together to Safeguard Children* (2023)²
- DfE, *Keeping Children Safe in Education*, adopted as good practice³
- Care Act 2014 and *Care and Support Statutory Guidance*, chapter 14⁴ ⁵
- Sexual Offences Act 2003, as amended by the Police, Crime, Sentencing and Courts Act 2022 (positions of trust in religious settings)⁶
- Safeguarding Vulnerable Groups Act 2006 and DBS eligibility guidance ⁷
- Equality Act 2010⁸
- Data Protection Act 2018 and the UK GDPR ⁹
- Charity Commission, *Safeguarding and Protecting People for Charities and Trustees* ¹⁰

¹ Children Act 1989, c. 41; and Children Act 2004, c. 31, s. 11, which places duties on specified organisations to ensure their functions are discharged having regard to the need to safeguard and promote the welfare of children.

² HM Government, *Working Together to Safeguard Children: Statutory Guidance on Inter-Agency Working to Safeguard and Promote the Welfare of Children* (London: Department for Education, 2023), 12-24.

³ Department for Education, *Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges* (London: DfE, 2024), Part One. CTC is not a school or a further education college within the scope of this guidance but adopts its definitions of abuse and its principles on responding to disclosure as good practice.

⁴ Care Act 2014, c. 23, ss. 42-47, which sets out the local authority duty to make safeguarding enquiries in relation to adults with care and support needs.

⁵ Sexual Offences Act 2003, c. 42, ss. 16-24 (abuse of a position of trust), as amended by the Police, Crime, Sentencing and Courts Act 2022, c. 32, s. 47, which extended the positions of trust provisions to those coaching, teaching, training, supervising or instructing a child in a sport or a religion

⁶ Department of Health and Social Care, *Care and Support Statutory Guidance* (London: DHSC, updated 2024), chap. 14, "Safeguarding."

⁷ Disclosure and Barring Service, *DBS Eligibility Guidance* (London: DBS, updated 2024); and Safeguarding Vulnerable Groups Act 2006, c. 47, s. 53 and sch. 4, on regulated activity in relation to children and to adults.

⁸ Equality Act 2010, c. 15, ss. 4-27 and s. 91.

⁹ Data Protection Act 2018, c. 12, sch. 1, pt. 2, para. 18 (safeguarding of children and of individuals at risk); and the UK General Data Protection Regulation, being Regulation (EU) 2016/679 as retained in UK law by the European Union (Withdrawal) Act 2018, c. 16.

- Counter-Terrorism and Security Act 2015, adopted voluntarily as good practice¹¹
- UK Council for Internet Safety guidance on safeguarding in remote education¹²
- Modern Slavery Act 2015; Female Genital Mutilation Act 2003; Domestic Abuse Act 2021¹³
- Union School of Theology, Safeguarding Children and Adults at Risk Policy, as validating partner¹⁴

3.2 This policy should be read alongside the following CTC documents: Code of Conduct; Student Complaints Policy and Procedure; Academic Appeals Policy and Procedure; Data Protection Policy; Equality, Diversity and Inclusion Policy; Acceptable Use of IT Policy; Admissions Policy; and Staff Handbook.

3.3 Where CTC operates in, or its students are resident in, a jurisdiction other than England, the requirements of that jurisdiction apply in addition to this policy. Section 14 sets out how this is managed

4. Scope of the Policy

4.1 This policy applies to all staff, associate tutors, students, volunteers, trustees, Advisory Board members and visitors, whether their involvement with CTC is long-term or occasional, paid or unpaid.

4.2 It applies to all CTC activity, including:

- online teaching, tutorials, supervision and pastoral conversations delivered through Microsoft Teams, Zoom or the virtual learning environment;

¹⁰ Charity Commission for England and Wales, *Safeguarding and Protecting People for Charities and Trustees* (London: Charity Commission, updated 2024). Trustees are expected to take reasonable steps to protect from harm people who come into contact with the charity.

¹¹ Counter-Terrorism and Security Act 2015, c. 6, s. 26 and sch. 6. CTC is not currently a specified authority listed in Schedule 6 and is therefore not subject to the statutory Prevent duty; the principles set out at Section 13 are adopted voluntarily as good practice. This position is to be reviewed if CTC's regulatory status changes.

¹² UK Council for Internet Safety, *Safeguarding and Remote Education and Education for a Connected World* (London: UKCIS, 2020–2022), on managing safeguarding risk in online and remote learning environments

¹³ Modern Slavery Act 2015, c. 30; Female Genital Mutilation Act 2003, c. 31, s. 5B (mandatory reporting duty); and Domestic Abuse Act 2021, c. 17, s. 1 (definition of domestic abuse).

¹⁴ Union School of Theology, *Safeguarding Children and Adults at Risk Policy*, version 3.3 (September 2025). CTC provision is validated by UST, and this policy is designed to be compatible with UST's safeguarding requirements for validated provision.

- written communication between staff and students, including email and messaging;
- any in-person teaching, residential, conference or event organised by or on behalf of CTC;
- placements, ministry practice and fieldwork undertaken as part of a CTC programme;
- research involving human participants;
- activity undertaken by students in the name of CTC.

4.3 CTC's student body is composed principally of adults, and CTC does not organise activities for children. Nevertheless this policy addresses children because:

- CTC may admit a student under the age of 18, and will apply this policy in full if it does;
- CTC students minister to children in churches and communities, and a disclosure about a child may reach CTC through a student;
- children may be present in the background of an online session held in a domestic setting;
- children may attend an in-person CTC event with a parent or carer.

4.4 CTC recognises that a concern may reach it about a person who is not a member of the CTC community, for example a member of a student's congregation. CTC will act on such a concern by supporting the student to report it in their own jurisdiction, and by reporting directly where there is a risk to a person in the UK or where the student is unable or unwilling to act.

4.5 This policy does not confer on CTC any function of investigation. CTC recognises and records concerns, and refers them to the agencies with statutory responsibility to investigate.

5. Definitions

5.1 A child is any person under the age of 18. The fact that a 16- or 17-year-old is studying at higher education level, is living independently, or is in employment does not change this.

5.2 An adult at risk is a person aged 18 or over who has needs for care and support (whether or not those needs are being met by a local authority), is experiencing or at risk of abuse or neglect, and as a result of those needs is unable to protect themselves against the abuse or neglect or the risk of it. This may include people who:

- have a learning disability;
- have a physical or sensory impairment;
- have a mental illness, including dementia;
- are elderly and frail;
- are experiencing a mental health crisis;
- are dependent on others for care;
- are experiencing domestic abuse, modern slavery or exploitation;
- are asylum seekers, refugees, or otherwise in an insecure immigration position;
- are isolated by language, culture or geography from sources of support.

5.3 CTC recognises that vulnerability is situational as well as personal. A capable adult may become an adult at risk temporarily through bereavement, illness, trauma, financial crisis, isolation while studying far from home, or the exercise of coercive control over them.

5.4 A safeguarding concern is any information, observation, disclosure or suspicion that suggests a child or adult at risk is being, has been, or is at risk of being abused, neglected or exploited. A concern does not require proof, certainty, or a complete account.

5.5 A disclosure is an account given by a person that they, or another person, have experienced abuse. A disclosure may be partial, indirect, retracted or repeated, and may be made in an online session, in writing, in an assignment, or in passing.

5.6 The Designated Safeguarding Lead (DSL) is the person with lead responsibility for safeguarding at CTC. Categories and indicators of abuse are set out at Appendix 1.

6. Quality Framework: Approach, Deployment, Review, Improvement (ADRI)

6.1 Approach (philosophy and design)

CTC's approach is preventative, proportionate and referral-based. CTC does not investigate allegations of abuse; it recognises, records and refers. The design reflects the College's actual operating model: predominantly online delivery to an adult, internationally distributed student body, with no children's activities and no residential campus provision. Rather than replicating the arrangements of a large campus institution, CTC concentrates its safeguarding effort where its risk actually sits: the online learning environment, the pastoral relationship between tutor and

student, positions of religious trust, and students ministering in settings CTC does not control.

6.2 Deployment (implementation)

The approach is deployed through: a named DSL and Deputy DSL with published contact details (Section 1); safer recruitment and disclosure checking (Sections 9 and 10); induction and annual refresher training for all staff and volunteers (Section 11); published expectations for online sessions (Section 12 and Appendix 5); a standard Safeguarding Concern Form and response flowchart (Appendices 2 and 3); a Code of Conduct signed before any work begins (Appendix 4); and a secure safeguarding record (Section 26).

6.3 Review (evaluation)

Each concern is reviewed by the DSL at the point of closure to confirm that the response was timely, that referral thresholds were correctly applied and that any support offered was appropriate. Annually, the DSL prepares a safeguarding report for the Governing Board covering the number and type of concerns, referral outcomes, training completion, disclosure check currency, and any lessons identified. The safeguarding link on the Advisory Board provides independent challenge to that report.

6.4 Improvement (enhancement)

Lessons from concerns, from the annual report and from independent challenge are used to amend this policy, to strengthen training, and to improve the design of online sessions and pastoral arrangements. Each action is recorded with a named owner and a target date, and completion is reported to the Governing Board. Following any serious incident, this policy is reviewed immediately rather than at the next scheduled review.

7. Safeguarding Roles and Responsibilities

7.1 The Designated Safeguarding Lead has lead responsibility for safeguarding at CTC and is responsible for:

- receiving, recording and assessing all safeguarding concerns;
- deciding, with advice where necessary, whether a referral to a statutory agency is required, and making that referral;
- maintaining the safeguarding record and the central safeguarding log;

- ensuring that training is delivered, recorded and kept current;
- advising staff and students on safeguarding matters;
- reporting to the Principal and to the Governing Board;
- notifying the validating partner where required under Section 27;
- reviewing this policy annually and after any serious incident.

7.2 The Deputy DSL acts with the full authority of the DSL in the DSL's absence, and holds specific responsibility as Online Safety Coordinator for the matters set out at Section 12.

7.3 The DSL and Deputy DSL must not both be unavailable. Where both will be absent, an alternative contact is named and communicated to all staff and students in advance.

7.4 The Principal is accountable to the Governing Board for the operation of this policy, ensures that the DSL has the time, training and authority to fulfil the role, and handles allegations made against the DSL under Section 19.

7.5 The Governing Board approves this policy, receives the annual safeguarding report, satisfies itself that safeguarding arrangements are effective, and is notified without delay of any serious incident. Trustees are reminded that safeguarding is a governance priority.¹⁵

7.6 The safeguarding link on the Advisory Board provides independent challenge and scrutiny, may request sight of anonymised records, and may escalate a concern directly to the Chair of the Governing Board.

7.7 The IT team is responsible for the technical security of the virtual learning environment and online platforms, for implementing access controls, for preserving evidence such as session logs and chat records when asked to do so by the DSL, and for reporting technical incidents with a safeguarding dimension to the Online Safety Coordinator on the same day.

7.8 All staff, associate tutors, volunteers and students are responsible for being alert to indicators of abuse, for reporting every concern to the DSL without delay, for never promising confidentiality, for never investigating on their own initiative, and for complying with the Code of Conduct.

7.9 CTC does not hold statutory safeguarding expertise in-house. Where a concern is complex, or where the DSL is uncertain whether a referral threshold is

¹⁵ Modern Slavery Act 2015, c. 30; Female Genital Mutilation Act 2003; and Domestic Abuse Act 2021, c. 17 (definition of domestic abuse)

met, CTC will seek advice from an independent safeguarding advisory service.
Action: CTC to establish and record a membership or advice arrangement with a recognised independent safeguarding advisory body before this policy is published, and to insert the contact details at Section 1.2.

7.10 Where a role in this policy is vacant, the Principal will assign it to a named individual in writing within five working days and communicate the assignment to all staff and students.

8. Positions of Trust

8.1 Everyone who teaches, supervises, mentors or provides pastoral care at CTC holds a position of trust. Those in positions of trust must understand the power the position gives them and the responsibility that follows from it.

8.2 It is a criminal offence for a person in a position of trust in a religious setting to engage in sexual activity with a 16- or 17-year-old under their care, supervision or instruction, even where that young person is over the age of consent. Staff, tutors and volunteers must be aware of this.

8.3 A sexual or romantic relationship between a member of CTC staff or an associate tutor and a student they teach, supervise, assess or provide pastoral care to is prohibited, regardless of the ages of those involved and regardless of consent. The imbalance of power makes genuine consent difficult to establish and compromises academic integrity.

8.4 Where a personal relationship exists, or develops, between a member of staff and a student, the member of staff must declare it to the Principal without delay. The Principal will arrange for teaching, supervision, pastoral care and assessment responsibilities to be transferred, and will record the arrangement. Non-declaration is a disciplinary matter.

8.5 Those in positions of trust must maintain professional boundaries at all times. In particular they must:

- conduct pastoral and tutorial conversations through CTC accounts and platforms, not through personal accounts or private messaging;
- avoid one-to-one contact in unobserved or private settings, and hold one-to-one online meetings through CTC systems with the meeting recorded in the calendar;
- not give or receive gifts of significant value;
- not lend or borrow money from students;

- not offer to provide accommodation to a student in a personal capacity without the Principal's prior written agreement;
- not use spiritual authority, prayer, prophecy or scriptural teaching to secure compliance, silence or personal advantage.

8.6 CTC recognises that pastoral and spiritual accompaniment is a proper part of theological formation. The requirement is not that staff keep students at a distance, but that care is offered transparently, through CTC channels, and in a way that could be explained comfortably to a third party.

9. Safer Recruitment

9.1 CTC applies safer recruitment principles to every appointment, whether paid or voluntary, and whether the role is UK-based or overseas.

9.2 For every role CTC will ensure that:

- a written job description and person specification exists, stating any safeguarding responsibility;
- the recruitment advertisement and pack refer to CTC's commitment to safeguarding;
- applicants complete an application form recording their history, and explain any gaps in it;
- shortlisted applicants are interviewed, and safeguarding is explicitly discussed at interview;
- at least two written references are obtained and followed up where anything is unclear, including a reference from the applicant's current or most recent church or employer;
- identify and, where relevant, qualifications are verified against original documents;
- a disclosure check is obtained where the role is eligible (Section 10);
- the applicant makes a self-declaration of any criminal record, caution, or safeguarding allegation or investigation, whether in the UK or elsewhere;
- the appointee reads this policy and signs the Code of Conduct at Appendix 4 before beginning work;
- the appointee completes safeguarding induction training before, or within four weeks of, beginning work; and
- the appointment is subject to a probationary period.

9.3 A record of each of the steps at 9.2 is retained on a single recruitment record for every appointee, so that safe recruitment can be evidenced at audit. The Registrar maintains this record.

9.4 Where an applicant has lived or worked outside the United Kingdom, CTC will seek an overseas criminal records check or equivalent where one is obtainable, and will record the position where one is not. Where no check is obtainable, CTC will record the additional assurance steps taken, for example additional references, or supervision arrangements.

9.5 Panel members involved in recruitment must have completed safer recruitment training. Where CTC does not have a trained panel member available, it will obtain external input and record that it has done so.

10. Disclosure Checks

10.1 CTC obtains a disclosure check from the Disclosure and Barring Service at the level for which the role is legally eligible. CTC does not request a check at a level for which a role is not eligible.

10.2 CTC will assess each role against DBS eligibility criteria and record the outcome. Roles teaching or supervising adult students only are unlikely to constitute regulated activity; roles involving contact with children or with adults receiving care, or involving placement supervision, may be. The DSL records for each role the level of check assessed as appropriate and the reason.

10.3 Where a role is not eligible for a DBS check, CTC will require a self-declaration and take up references, and will record that this is the position, rather than implying that a check has been carried out.

10.4 Disclosure checks are renewed every three years, or more frequently where CTC considers it appropriate. The Registrar maintains a record of the date of each check and the date renewal falls due.

10.5 The disclosure of a criminal record does not automatically prevent appointment. Each case is considered individually, having regard to the nature, seriousness and relevance of the offence, the time elapsed and the circumstances, and the decision and reasoning are recorded in writing by the Principal.

10.6 CTC will not appoint any person barred from working with children or adults to a role involving contact with those groups, and will make a referral to the DBS where CTC removes a person from a role because they have harmed, or pose a risk of harm to, a child or adult at risk.

11. Safeguarding Training

11.1 All staff, associate tutors and volunteers complete safeguarding induction training before, or within four weeks of, beginning their role, and refresher training annually.

11.2 Induction training covers: this policy; the categories and indicators of abuse; how to receive a disclosure; how and to whom to report; the specific risks of the online environment; positions of trust; and the Code of Conduct.

11.3 The DSL and Deputy DSL undertake enhanced safeguarding training appropriate to their role, refreshed at least every two years, delivered by an external provider.

11.4 Trustees and Advisory Board members receive safeguarding briefing on appointment and annually thereafter, covering their governance responsibilities.

11.5 Students receive safeguarding information at induction covering: how to raise a concern; who the DSL is and how to contact them; expectations for online conduct; and, for students undertaking placement or ministry practice, their responsibilities in those settings.

11.6 The Registrar maintains a training register recording, for each individual, the training completed, the date, the provider, and the date the next refresher is due. The register is reviewed termly by the DSL and reported annually to the Governing Board.

11.7 Where an individual has not completed required training within the specified period, the DSL will notify the Principal, and the Principal will determine whether the individual may continue in a role involving contact with students pending completion.

11.8 Training completion is confirmed by each individual in writing, and confirmation forms part of the annual review process for staff.

12. Online Learning and Online Safety

12.1 CTC delivers the substantial majority of its teaching online. The online environment is therefore where most of CTC's safeguarding risk sits, and this section applies to all online teaching, tutorial, supervisory and pastoral activity.

12.2 The Deputy DSL acts as Online Safety Coordinator and is responsible for the operation of this section, supported by the IT team.

12.3 Expectations for online sessions

Detailed expectations for students and staff in online sessions are set out at Appendix 5. These include requirements as to environment, punctuality, dress, camera and microphone use, and the prohibition on recording or sharing images of others. Staff are responsible for reinforcing these expectations and for addressing breaches at the time where it is safe to do so.

12.4 Platform and account security

- Teaching is delivered through CTC-approved platforms only – currently Microsoft Teams, Zoom and the CTC virtual learning environment.
- Sessions are held in accounts administered by CTC, not in staff personal accounts.
- Meeting links are shared only with enrolled participants and are not published publicly.
- Waiting rooms or lobbies are enabled, and the host admits participants individually.
- Screen sharing by participants is disabled by default and enabled by the host when needed.
- Access is removed promptly when a student withdraws or a member of staff leaves.

12.5 Conduct of one-to-one online meetings

- One-to-one tutorials and pastoral conversations are held through CTC platforms and are recorded in the CTC calendar.
- Staff conduct sessions from an appropriate location, dressed appropriately, with a neutral or blurred background.
- Staff do not conduct one-to-one sessions with a student from a bedroom or a private space where this can be avoided.
- Where a student is under 18, one-to-one online sessions are not held without a second member of staff present or the session being recorded, and the parent or carer is informed.
- Communication about pastoral matters takes place through CTC email or platforms, not through personal social media or private messaging applications.

12.6 Recording, image and consent

12.6.1 Lectures are recorded for CTC quality assurance purposes and so that students may review the material. Recordings are held within approved College systems and are not retained indefinitely. The retention period for teaching recordings is [insert period] and is recorded in the Information Asset Register.

12.6.2 Students are told at the start of a session when it is being recorded, and how the recording will be used and stored.

12.6.3 Students must not record one another's online interactions, or film, screenshot, download, copy, share or distribute images of staff or students.

Sharing images of a person without their consent may be unlawful.¹⁶

¹⁶ Voyeurism (Offences) Act 2019, c. 2; and Sexual Offences Act 2003, s. 67A, on the recording and sharing of images without consent. See also Online Safety Act 2023, c. 50, Part 10, on offences relating to intimate image abuse.

12.6.4 No image or photograph may be copied, downloaded, shared or distributed from the learning platform without the permission of the owner of the image.

12.6.5 Breach of 12.6.3 or 12.6.4 is treated as a serious matter under the Code of Conduct, and, where the image is of an intimate nature or involves a child, as a safeguarding matter and potentially a criminal one.

12.7 Risks specific to the online environment

Staff should be alert to the following, which arise particularly in online delivery:

- a student appearing distressed, frightened or controlled during a session;
- another person present off-camera who appears to be monitoring or directing the student;
- visible injury, or a marked change in appearance, demeanour or engagement;
- a domestic environment that raises concern for the student or for a child present;
- a child visible or audible in circumstances that give rise to concern;
- disclosure made privately in a session chat, which may be seen only by the recipient;
- a student disclosing abuse, coercion or crisis in an assignment or reflective journal;
- a student's sudden and unexplained disengagement from an online programme.

Any of these should be reported to the DSL under Section 16. Session chat is monitored by the host during teaching, and private chat between participants is disabled where the platform allows.

12.8 Reporting online incidents

12.8.1 All serious safety incidents involving technology are logged and reported to the Registrar and the Academic Dean at the earliest opportunity.

12.8.2 Any suspected online risk, abuse or infringement is reported to the Designated Safeguarding Lead on the same day.

12.8.3 The IT team preserves relevant technical evidence, including session logs, chat transcripts and access records, on the instruction of the DSL, and does not delete material that may be needed by a statutory agency.

12.8.4 Where a student breaches CTC rules on acceptable use of technology, the Academic Dean will apply a sanction that is appropriate and proportionate to the breach in accordance with the Code of Conduct. Where the breach has a safeguarding dimension, the safeguarding response under this policy takes precedence and runs first.

13. Radicalisation and Extremism

13.1 CTC is not currently a specified authority subject to the statutory Prevent duty. CTC nevertheless adopts the principles of that duty voluntarily, as good practice, and because theological education engages directly with questions of belief, authority and allegiance.

13.2 Radicalisation is treated as a safeguarding matter. A concern that a person is being drawn into terrorism, or into support for extremist violence, is reported to the DSL under Section 16 and is not treated differently from any other safeguarding concern.

13.3 The DSL will seek advice before making any referral, and will consider the risk of stigmatising a student on the basis of religion, ethnicity or nationality. A student expressing an unfamiliar, conservative or unpopular theological position is not for that reason a safeguarding concern. Academic freedom and freedom of religious expression are protected, and disagreement is a normal part of theological study.

13.4 The concern arises where there are indications that a person is being drawn towards, or is drawing others towards, the justification of violence or the dehumanisation of an identifiable group.

13.5 This position will be reviewed if CTC's regulatory status changes such that the statutory duty applies.

14. Students Studying Outside the United Kingdom

14.1 A significant proportion of CTC students study from outside the United Kingdom. UK statutory safeguarding agencies have no jurisdiction over a concern arising wholly in another country, and CTC cannot make a referral to a UK local authority in respect of a person who is not in the UK.

14.2 Where a concern arises in respect of a person outside the UK, CTC will:

- l. record the concern on the Safeguarding Concern Form in the same way as any other concern;
- m. assess with the student, where it is safe to do so, what support and reporting routes exist in their own jurisdiction;
- n. provide information about local reporting routes and support services where these can be identified;
- o. where the concern involves a person in the UK, or a UK national, make a referral in the UK in the usual way;
- p. where the concern involves a CTC staff member, associate tutor or student, act under Sections 17 and 18 regardless of where the person is located;
- q. seek advice from an independent safeguarding advisory service; and

r. record what was and was not possible, and why.

14.3 CTC will not represent to a student that it can secure a statutory intervention in a jurisdiction where it cannot. Honesty about the limits of what CTC can do is itself a safeguarding obligation, because a student who is falsely reassured may not seek help elsewhere.

14.4 Where a student is studying in a jurisdiction in which disclosure of certain matters including sexual violence, domestic abuse, or a person's identity or beliefs could place them at risk of legal or community sanction, CTC will take particular care over what is recorded, what is shared, and with whom, and will discuss this with the student before acting.

14.5 Where a CTC learning group or partner meets in person overseas, the local leader is responsible for identifying local reporting arrangements and for complying with local law, and this responsibility is recorded in the written agreement with that partner.

15. Recognising Abuse and Neglect

15.1 Definitions and indicators of the categories of abuse recognised by CTC are set out at Appendix 1. All staff are expected to be familiar with them.

15.2 Abuse may be a single act or a pattern; may be an act or a failure to act; and may occur in a family, an institution, a church or a community setting. Very often the person causing harm is known to, and trusted by, the person harmed.

15.3 Staff are not expected to determine whether abuse has occurred. They are expected to notice, to record and to report. The threshold for reporting to the DSL is a concern, not a certainty.

15.4 Where there is doubt, the concern is reported. It is the DSL's role, with advice, to decide what follows.

16. Responding to a Concern or Disclosure

16.1 A member of staff, volunteer or student who receives a disclosure, or who becomes concerned, must never conduct their own investigation. Doing so may compromise a later statutory investigation and may increase the risk to the person concerned.

16.2 Receiving a disclosure

s. Listen carefully and without interrupting. Allow the person to say what they wish to say in their own words.

t. Do not ask leading or probing questions. Open prompts such as "can you tell me more about that?" are appropriate.

- u. Do not promise confidentiality. Explain, kindly and early, that you will need to pass the information to the Designated Safeguarding Lead in order to get the right help.
- v. Do not express shock, disbelief or judgement, and do not criticise the person alleged to have caused harm.
- w. Do not delay in order to gather more detail.
- x. Reassure the person that they were right to speak.

16.3 Recording

- y. Complete the Safeguarding Concern Form at Appendix 2 as soon as possible, ideally within one hour and in any event the same day.
- z. Record the exact words used by the person, so far as they can be recalled, rather than an interpretation of them.
- aa. Distinguish clearly between what was seen or heard directly, what was reported by another person, and what is the recorder's own view.
- bb. Record the date, time, location or platform, and who was present.
- cc. Sign and date the record

16.4 Reporting

- dd. Contact the DSL, or in their absence the Deputy DSL, as soon as possible and within 24 hours at the latest.
- ee. Where there is an immediate risk of serious harm and the person is in the UK, call 999 first, then inform the DSL.
- ff. Where neither the DSL nor the Deputy is available, contact the Principal.
- gg. Do not discuss the matter with anyone else, in or outside CTC, other than those named above.

16.5 Action by the DSL

On receiving a concern the DSL will:

- hh. record receipt in the central safeguarding log within 24 hours;
- ii. assess the immediate risk and take any action needed to secure the person's safety;
- jj. seek advice from an independent safeguarding advisory service or from the relevant local authority where the threshold or the appropriate route is unclear;
- kk. make a referral to children's or adult social care, or to the police, where the threshold is met, and record the date, time, recipient and reference number;
- ll. consider whether the person alleged to have caused harm holds a role at CTC, and if so act under Section 18;
- mm. consider whether any interim measure is needed to protect others pending the outcome;

- nn. inform the Principal, and inform the Governing Board where the matter is serious;
- oo. consider notification to the validating partner under Section 27, and to the Charity Commission as a serious incident report where applicable;
- pp. ensure that pastoral support is offered to those affected (Section 25);
- qq. keep the person who reported the concern appropriately informed that action has been taken, without disclosing detail they do not need; and
- rr. record the closure of the concern, the reasoning, and any lesson identified.

16.6 Where the DSL decides not to refer a concern to a statutory agency, the reasons for that decision are recorded in the same detail as a decision to refer. A decision not to refer is reviewed by the Deputy DSL, who records agreement or disagreement.

16.7 Any person who considers that a concern has not been responded to appropriately may contact the statutory agencies directly. This right is absolute, is not conditional on CTC's agreement, and no person will face any consequence for exercising it in good faith.

17. Concerns About a Student

17.1 Where a student is suspected of, or alleged to have caused, abuse or harm, the DSL will:

- ss. not notify the student of the allegation until advice has been sought, so as not to prejudice an investigation or increase risk;
- tt. contact the police or social care where relevant;
- uu. once advice has been received, arrange to meet the student, ordinarily within 24 hours, online where the student studies at a distance;
- vv. assess whether any interim measure is required, such as suspension of access to online sessions or to the virtual learning environment, and record the reason;
- ww. consider, in consultation with the Principal, whether the student's sending church, learning group or sponsoring organisation should be informed, the deciding criterion being the safety of the person at risk;
- xx. make arrangements, where appropriate, for the student to continue studying by means that do not create risk;
- yy. consider referral to the DBS and, where applicable, a serious incident report to the Charity Commission; and
- zz. ensure that pastoral support is offered both to the person who raised the concern and to the student.

17.2 Any disciplinary consequence for the student is handled under the Code of Conduct after, and separately from, the safeguarding response.

17.3 Where the student is under 18, the parent or carer is informed unless doing so would place the young person at greater risk, in which case advice is sought first and the reasoning recorded.

18. Concerns About a Member of Staff, Volunteer or Trustee

18.1 Where an allegation is made against a member of staff, an associate tutor, a volunteer or a trustee, the DSL will:

- aaa. not inform the individual until advice has been sought;
- bbb. where the allegation concerns a child and the individual works with children, refer to the Local Authority Designated Officer (LADO) in the relevant local authority;
- ccc. where the allegation concerns an adult at risk, contact adult social care;
- ddd. contact the police where a criminal offence may have been committed;
- eee. consider, with the Principal, whether the individual should be suspended or have duties restricted as a neutral precautionary measure pending the outcome, and record the reasoning;
- fff. arrange a meeting with the individual once advice permits, ordinarily within 24 hours of that point;
- ggg. ensure the individual is told what is alleged, so far as advice permits, and is given a fair opportunity to respond;
- hhh. ensure that support is offered both to the person raising the concern and to the individual, from separate people;
- iii. consider a referral to the DBS where CTC removes the individual from a role because they have harmed, or pose a risk of harm to, a child or adult at risk;
- jjj. consider a serious incident report to the Charity Commission; and
- kkk. notify the validating partner under Section 27.

18.2 Suspension is a neutral act and is not a disciplinary sanction or an indication that the allegation is accepted.

18.3 Where an allegation is not upheld, CTC will consider whether a risk assessment is needed before the individual resumes duties, and will offer support on return.

18.4 Where an allegation is upheld, the matter is dealt with under the staff disciplinary procedure, which is separate from and follows the safeguarding response.

18.5 A person who reports a concern about a colleague in good faith will be supported and protected from detriment, whether or not the concern is upheld.

19. Allegations Involving the Designated Safeguarding Lead

19.1 Where a concern or allegation concerns the DSL, it is reported to the Principal, who assumes the DSL's functions for that matter.

19.2 Where a concern concerns both the DSL and the Deputy DSL, it is reported to the Principal and to the Chair of the Governing Board.

19.3 Where a concern concerns the Principal, it is reported to the Chair of the Governing Board, who will seek external advice before acting.

19.4 Where a concern concerns the Chair of the Governing Board, it is reported to another trustee and to an independent safeguarding advisory service.

19.5 In any of these circumstances, any person may report directly to the police or to the relevant local authority. CTC's internal routes exist to help, not to stand in the way.

19.6 These routes are published to students and staff alongside this policy, so that no person is left unclear who to contact when the usual route is not available to them.

20. Spiritual Abuse and the Misuse of Religious Authority

20.1 CTC recognises spiritual abuse as a form of emotional and psychological abuse occurring in a religious context, in which religious or spiritual language, scripture, position or practice is used to control, coerce, manipulate, silence or harm.¹⁷

20.2 Because CTC trains people for ministry, it has a particular obligation both to guard against spiritual abuse within its own community and to equip students to recognise it in the settings in which they will serve.

20.3 Indicators may include: the use of scripture or spiritual authority to secure compliance or silence; the treatment of questioning or dissent as sin or disloyalty; requirements of secrecy framed as confidentiality; the withholding of pastoral or spiritual acceptance as leverage; enforced accountability practices that require disclosure of private matters; and the framing of a person's legitimate safeguarding concern as a spiritual failing.

20.4 A concern about spiritual abuse is reported to the DSL and handled under Section 16 in the same way as any other concern.

20.5 Where the concern relates to a student's own church or ministry setting rather than to CTC, the DSL will support the student in identifying a route to raise it, will offer pastoral support, and will consider whether a referral is required where a person is at risk.

20.6 CTC will not treat theological disagreement, robust teaching, or the exercise of legitimate spiritual leadership as spiritual abuse. The distinguishing

¹⁷ Oakley, Lisa, and Justin Humphreys, *Escaping the Maze of Spiritual Abuse: Creating Healthy Christian Cultures* (London: SPCK, 2019), 25-48; and Church of England, *Responding Well to Spiritual Abuse* guidance, for the working definition adopted at Appendix 1.

feature is the use of spiritual authority to serve the interests of the person holding it, at the expense of the person subject to it.

21.Student Wellbeing, Self-Harm and Suicide Risk

21.1 CTC recognises that concerns about a student's mental health and wellbeing may arise in teaching, in tutorials, in pastoral conversation or in written work, and that studying at a distance can be isolating.

21.2 Where a member of staff becomes concerned that a student may be at risk of harm to themselves, they will:

- lll. remain with the student, or in contact with them, where it is safe and practicable to do so;
- mmm. respond with warmth and without judgement, and avoid promising confidentiality;
- nnn. where there is an immediate risk to life and the student is in the UK, call 999;
- ooo. where the student is outside the UK, seek to identify with the student a local emergency number or trusted contact;
- ppp. inform the DSL the same day; and
- qqq. record the concern.

21.3 The DSL will consider what support CTC can offer, what external support should be signposted, whether an emergency contact should be involved, and whether any reasonable adjustment to study is appropriate.

21.4 CTC does not provide clinical or counselling services and will not represent that it does. Its role is to notice, to respond with care, to signpost, and to make reasonable adjustments to study.

21.5 Staff are not expected to carry these concerns alone. Any member of staff dealing with a distressing disclosure is entitled to debrief with the DSL, and the DSL will offer this proactively.

22.Placements, Ministry Contexts and Sending Churches

22.1 Where a CTC programme includes placement, ministry practice or fieldwork, CTC will, before the placement begins:

- rrr. confirm in writing that the placement provider has its own safeguarding policy, and obtain a copy;
- sss. confirm that the provider will comply with, or operate to a standard equivalent to, this policy;
- ttt. confirm what disclosure checking the provider requires of the student, and whether the placement constitutes regulated activity;

uuu. agree in writing how a safeguarding concern arising on placement will be reported, to whom, and within what timescale;

vvv. ensure the student knows both the provider's and CTC's reporting routes; and

www. Record all of the above on the placement agreement.

22.2 A student on placement who becomes aware of a safeguarding concern must report it to the placement provider's safeguarding lead and to the CTC DSL.

Reporting to one does not discharge the obligation to report to the other.

22.3 Where a student ministers to children or adults at risk as part of a CTC programme, CTC will confirm what checks and training the receiving organisation requires, and will not place a student in a role for which the receiving organisation has not made appropriate arrangements.

22.4 Where a concern arises about the placement setting itself, CTC will report it under Section 16 and will consider whether to suspend the placement and whether other students are affected.

22.5 Where a student is sponsored or sent by a church or organisation, CTC will not disclose safeguarding information to that body except where the safety of a person at risk requires it, or with the student's consent. The deciding criterion is safety, not the expectations of the sending body.

23. In-Person Events and Premises

23.1 CTC does not operate residential accommodation and does not organise activities for children.

23.2 Where CTC holds an in-person teaching session, residential, conference or event, the organiser will, in proportion to the size and nature of the event:

xxx. complete a written risk assessment covering safeguarding as well as health and safety;

yyy. identify who holds safeguarding responsibility for the duration of the event and how they can be contacted;

zzz. confirm the local reporting routes for the venue's area;

aaaa. brief those leading the event on this policy; and

bbbb. record the arrangements.

23.3 Where children may attend an event with a parent or carer, CTC will make clear in writing that children remain the responsibility of their parent or carer at all times, and that CTC does not provide childcare or supervision.

23.4 Where a third party uses premises CTC controls, CTC will request a copy of that organisation's safeguarding policy, provide a copy of this policy, and obtain written confirmation that the organisation will comply with its own arrangements and has carried out relevant risk assessments.

23.5 Photography and filming at CTC events require consent. No image of a child will be used by CTC without the written consent of a parent or carer.

24. Working with Those Who May Pose a Risk

24.1 CTC will not employ, or engage as a volunteer, any person with a conviction for an offence of abuse against a child or an adult at risk, or a related offence.

24.2 CTC recognises that theological education attracts applicants seeking restoration after past wrongdoing, and that the gospel it teaches speaks of forgiveness. Forgiveness does not remove risk, and does not entitle any person to a position of trust.

24.3 Where an applicant or student discloses a relevant conviction, caution or safeguarding history, the DSL will carry out a written risk assessment before a decision on admission is made, in consultation with the Principal and, where appropriate, external advice.

24.4 Where a student is admitted in such circumstances, the DSL will draw up a written safeguarding agreement with the student, specifying: any restriction on their participation; any restriction on placement or ministry practice; the arrangements for supervision and review; the person responsible; and the frequency of review. The agreement is signed by the student and reviewed at least annually.

24.5 Admission may be refused, or a place withdrawn, where CTC concludes that the risk cannot be managed within its resources. CTC will be honest with itself about the limits of what a small, largely online institution can supervise.

24.6 Where a student subject to such an agreement undertakes ministry practice, the receiving organisation will be informed, with the student's knowledge, of what it needs to know in order to keep people safe.

25. Pastoral Care and Support

25.1 CTC is committed to offering pastoral care to anyone affected by abuse who is part of, or in contact with, the College. This may include the person harmed, the person who raised the concern, witnesses, and members of staff involved in responding.

25.2 Pastoral support is offered to a person against whom an allegation is made, from a different person to the one supporting the complainant, and without prejudging the outcome.

25.3 CTC does not provide clinical, therapeutic or counselling services. Where these are needed, CTC will signpost to appropriate external services and, where the student is outside the UK, will work with the student to identify what is available locally.

25.4 Engagement with pastoral support is voluntary and has no bearing on any academic or disciplinary process.

25.5 Where staff have been involved in responding to a serious concern, the DSL will arrange a debrief, and will consider whether external supervision or support is needed.

26.Safeguarding Records, Confidentiality and Information Sharing

26.1 Every safeguarding concern is recorded on the Safeguarding Concern Form at Appendix 2 and entered in the central safeguarding log maintained by the DSL. The log records the date received, the nature of the concern, the action taken, any referral made and its outcome, and the date of closure.

26.2 Safeguarding records are held separately from academic and HR records, in a restricted-access encrypted folder within CTC's document management system. Access is limited to the DSL, the Deputy DSL and the Principal. Any hard-copy record is held in a locked cabinet to which only those individuals hold a key. Access permissions and the location are recorded in the CTC Information Asset Register.

26.3 Safeguarding records are retained in accordance with the retention schedule in the Data Protection Policy. Records relating to allegations of abuse are retained until the subject's 75th birthday or for a minimum of 25 years, whichever is longer, in line with the expectations of statutory inquiries into institutional abuse. The retention period and its rationale are recorded.

26.4 Personal data is processed under the safeguarding provisions of the Data Protection Act 2018 and the UK GDPR. Data protection is not a reason to withhold information where a person is at risk of harm; the legislation expressly provides for processing and sharing for safeguarding purposes.

26.5 Information is shared on a strict need-to-know basis. Staff must not discuss a safeguarding matter with colleagues, students, family or church contacts.

26.6 CTC will not agree to a request from any person that a safeguarding concern be kept secret, and will explain at the earliest appropriate point why it cannot.

26.7 Where a safeguarding record contains personal data about more than one person, a subject access request is handled in accordance with the Data Protection Policy, and third-party data is redacted or withheld as required.

27.Partnership Working with the Validating Partner

27.1 CTC provision is validated by Union School of Theology. CTC will operate safeguarding arrangements that meet UST's requirements for validated provision.

27.2 The DSL will notify UST's designated safeguarding contact, without delay, of:

- any safeguarding concern involving a student on validated provision that has been referred to a statutory agency;
- any allegation against a member of CTC staff or an associate tutor teaching on validated provision;
- any serious incident reported to the Charity Commission;
- any material change to this policy or to CTC's safeguarding arrangements or personnel.

27.3 Notification is of the fact and the nature of the matter and the action taken. Personal data is shared only so far as necessary and lawful.

27.4 CTC will cooperate fully with any safeguarding review, audit or site visit undertaken by UST, and will provide the annual safeguarding report and the training register on request.

27.5 The named UST safeguarding contact for CTC is Dr Iain McGee

28. Monitoring, Reporting and Review

28.1 The DSL maintains the central safeguarding log and reviews it termly.

28.2 The DSL prepares an annual safeguarding report for the Governing Board covering: the number and nature of concerns raised; referrals made and their outcomes; training completion against the training register; disclosure check currency; any allegation against a member of staff or student and its outcome; compliance with the response timescales in Section 16; lessons identified and actions taken; and a statement of whether safeguarding arrangements are considered fit for purpose.

28.3 The safeguarding link on the Advisory Board reviews the annual report before it is submitted and provides independent challenge, recording any recommendation.

28.4 The Governing Board considers the annual report, records its consideration in the minutes, and satisfies itself that safeguarding arrangements are effective. Safeguarding is a standing item on the Governing Board agenda.

28.5 A nil return is itself reported. An absence of concerns is not treated as evidence that there are none; the DSL will consider whether staff and students know how to raise a concern and feel able to do so.

28.6 This policy is reviewed annually by the DSL and approved by the Governing Board. It is reviewed immediately following any serious incident, any statutory referral revealing a weakness in CTC practice, any change in legislation or statutory guidance, or any change in the requirements of the validating partner.

29. Policy Communication

29.1 This policy is published on the CTC website at www.ctcollege.org and on the virtual learning environment.

29.2 A one-page summary showing who to contact and what to do is displayed on the virtual learning environment and circulated to all staff and students annually.

29.3 The policy is covered at staff and student induction, and a record of coverage is retained by the Registrar.

29.4 All staff, associate tutors and volunteers confirm in writing annually that they have read this policy.

29.5 Every effort will be made to respond to a request for this policy in an alternative format.

Appendix 1: Definitions and Indicators of Abuse

The categories below are drawn from Working Together to Safeguard Children, Keeping Children Safe in Education and the *Care and Support Statutory Guidance. They are not exhaustive, and the presence of an indicator does not prove abuse.

Category	Description	Possible indicators
Physical abuse	Hitting, shaking, throwing, burning, drowning, suffocating, or otherwise causing physical harm; misuse or withholding of medication; undue restraint; inappropriate sanctions.	Unexplained or inconsistently explained injury; injury in an unusual place; reluctance to be seen on camera; flinching; covering the body inappropriately for the weather.
Sexual abuse	Forcing or enticing a person to take part in sexual activity, whether or not they are aware of what is happening; contact and non-contact acts, including involving a person in the production of or exposure to sexual images, and online grooming.	Sexualised behaviour inappropriate to age; disclosure, however partial; fear of a particular person; withdrawal; unexplained gifts or money.
Emotional or psychological abuse	Persistent emotional mistreatment causing severe and lasting adverse effects; conveying that a person is worthless, unloved or inadequate; imposing inappropriate expectations; humiliation; isolation; coercive control.	Low self-worth; extreme fear of failure; excessive deference; sudden withdrawal; apparent monitoring by another person during online sessions.
Neglect	Persistent failure to meet basic physical or psychological needs, including failure to provide food, clothing, shelter, medical care or supervision; self-neglect.	Poor hygiene; untreated medical conditions; inadequate heating visible in the online environment; consistent hunger; deteriorating self-care.
Domestic abuse	Abusive behaviour between people aged 16 or over who are personally connected, including physical, sexual, violent, threatening, controlling, coercive, economic, psychological or emotional abuse. Witnessing domestic abuse is itself harmful to a child.	Fear of a partner or family member; monitored or interrupted online participation; controlled finances; sudden disengagement; injuries attributed to accidents.
Financial or material abuse	Theft, fraud, exploitation, coercion in connection with wills, property or inheritance; misuse or misappropriation of money, benefits or possessions.	Unexplained inability to pay fees; another person controlling the student's finances; sudden change in circumstances.
Spiritual abuse	Emotional and psychological abuse in a religious context; the misuse of scripture, spiritual authority or religious practice to control, coerce, silence or harm.	Fear of questioning leadership; requirement of secrecy framed as confidentiality; withdrawal of spiritual acceptance as leverage;

		guilt attached to legitimate concern.
Discriminatory abuse	Abuse motivated by a protected characteristic, including harassment, slurs and unequal treatment.	Reports of harassment; exclusion; distress connected to identity.
Organisational abuse	Neglect or poor practice within an institution arising from its own processes, culture or convenience, where individual needs are subordinated to the running of the organisation.	Rigid routines; complaints ignored or discouraged; a culture in which concerns are not raised.

Appendix 2: CTC Safeguarding Concern Form

Complete this form as soon as possible after the concern arises, ideally within one hour and in any event the same day. Record the exact words used wherever you can. Pass it to the Designated Safeguarding Lead within 24 hours. If there is immediate danger to a person in the UK, call 999 first.

Section 1: About you

Your name	
Your role at CTC	
Your contact details	
Date and time you are completing this form	

Section 2: about the person you are concerned about

Name	
Age or date of birth (if known)	
Are they a child (under 18) or an adult at risk?	
Their relationship to CTC (student, visitor, other)	
Country in which they are located	
Contact details (if known)	

Section 3: About the concern

Date, time and place or platform of the incident or disclosure	
Who was present?	
Is this a new concern, or connected to a previous one? Give details.	
Did the person make a disclosure, or is this something you observed?	

Section 4: What was said or seen?

Record what happened in as much detail as you can. Use the exact words the person used, in quotation marks, wherever possible. Make clear what you saw or heard yourself, what was reported to you by someone else, and what is your own view. Do not add interpretation to the account itself. Continue on a separate sheet if necessary.

Section 5: The person's own words

If the person described what happened in their own words, record those words here as closely as you can.

Section 6: Witnesses

Name	Role or relationship	Contact details

Section 7: Person alleged to have caused harm (if known)

Name	
Their relationship to the person at risk	
Do they hold any role at CTC? If so, what?	
Do they have contact with other children or adults at risk?	

Section 8: Immediate action taken

What did you say or do at the time?	
Did you contact emergency services? If so, when and what was said?	
Is the person safe now, so far as you know?	
Have you told anyone else? Who, and why?	

Section 9: Supporting material

List anything you are attaching, for example screenshots, emails, chat transcripts, or session logs. Do not alter or delete original material.

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Section 10: Your signature

Signed		Date		Time	
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Section 11: For completion by DSL

Date and time received	
Received by	
Logged in central safeguarding log on	
Initial risk assessment	
Advice sought (from whom, when, what was advised)	
Referral made? To whom, when, reference number	
If no referral, reasons recorded	
Reviewed by Deputy DSL (name, date, agree/disagree)	
Principal informed on	
Governing Board / Charity Commission / validating partner notified?	
Support offered to those affected	

Action taken and outcome	
Date closed	
Lesson identified / action for policy or practice	
DSL signature and date	

Step	Action	Timescale
1	A concern arises, or a disclosure is made, to any member of staff, tutor, volunteer or student.	Immediate
2	Is anyone in immediate danger? If the person is in the UK, call 999. If overseas, help the person identify a local emergency number where it is safe to do so.	Immediate
3	Listen. Do not investigate. Do not promise confidentiality. Do not ask leading questions.	At the time
4	Complete the Safeguarding Concern Form (Appendix 2), recording exact words.	Within 1 hour; same day at the latest
5	Pass the form to the Designated Safeguarding Lead. If unavailable, the Deputy DSL. If neither, the Principal. If the concern is about the DSL, see Section 19.	Within 24 hours
6	DSL logs the concern in the central safeguarding log and assesses immediate risk.	Within 24 hours of receipt
7	DSL seeks advice where the threshold or route is unclear, from an independent safeguarding advisory service or the relevant local authority.	Same or next working day
8	DSL refers to children's or adult social care, or the police, where the threshold is met, recording date, time, recipient and reference. If not referring, records reasons; Deputy DSL reviews.	Without delay
9	DSL considers: interim protective measures; whether the person alleged to have caused harm holds a CTC role (Sections 17-18); LADO referral; DBS referral.	Same day
10	DSL informs the Principal; informs the Governing Board where serious; considers notification to the Charity Commission and to the validating partner (Section 27).	Without delay
11	Pastoral support offered to all affected, including the person who reported (Section 25).	Within 5 working days
12	Records stored securely in the restricted-access safeguarding folder (Section 26).	Ongoing
13	DSL records the outcome, closes the concern, and identifies any lesson for policy or practice.	On conclusion
14	Lesson reported to the Governing Board in the annual safeguarding report (Section 28).	Annually

If at any point you believe a concern has not been acted on appropriately, you may contact the police or the relevant local authority directly. You do not need CTC's permission, and no one will face any consequence for doing so in good faith.

Appendix 4: Code of Conduct for Staff and Volunteers

This code applies to every member of CTC staff, associate tutor, volunteer and trustee. It is signed before any work or ministry on behalf of CTC begins, and re-confirmed annually. It supplements, and does not replace, the CTC Code of Conduct.

Expected practice

- Treat every person with dignity, respect and fairness, with proper regard for their rights, safety and welfare.
- Work transparently and accountably; conduct your work in a way you would be content to explain to a third party.
- Maintain professional boundaries, including online and in written communication.
- Use CTC accounts, platforms and channels for all contact with students.
- Work in observable settings; avoid unobserved one-to-one contact, and record scheduled one-to-one meetings in the CTC calendar.
- Listen carefully to those you support, and take what they tell you seriously.
- Report every safeguarding concern to the DSL without delay, and never promise confidentiality.
- Be prepared to challenge unacceptable behaviour, and to be challenged yourself.
- Seek advice from the DSL whenever you are unsure.
- Complete safeguarding training when required and keep it current.

Unacceptable practice

- Failing to report a concern, or delaying a report.
- Conducting your own investigation into an allegation.
- Promising a person that you will keep a disclosure secret.
- Contacting students through personal social media, personal email or private messaging.
- Developing a sexual or romantic relationship with a student you teach, supervise, assess or provide pastoral care to.
- Failing to declare a personal relationship with a student to the Principal.
- Using spiritual authority, scripture, prayer or prophecy to control, coerce, silence or gain advantage over another person.
- Recording, screenshotting or sharing images of staff or students without their consent.
- Giving or receiving gifts of significant value, or lending or borrowing money.
- Showing favouritism, or excluding a person from support or opportunity.

- Being under the influence of alcohol or of illegal substances while undertaking work or ministry on behalf of CTC.
- Taking unnecessary risks, or placing yourself in a position that could be misinterpreted

Breach of this code

Any breach will be addressed under CTC's disciplinary arrangements. Depending on the seriousness of the matter you may be asked to withdraw from the activity immediately, and a referral may be made to the police, to social care or to the Disclosure and Barring Service. Anyone aware of a breach, by themselves or by another person, must report it to the DSL and, where relevant, their line manager.

Declaration

I confirm that I have read the CTC Safeguarding Children and Adults at Risk Policy and this Code of Conduct, that I understand my responsibilities, and that I agree to abide by them.

Name	
Role	
Signature	
Date	
Date of most recent safeguarding training	
Annual re-confirmation (date and initials)	

Appendix 5: Expectations for Online Teaching and Learning Sessions

These expectations are retained from the CTC Online Learning Safeguarding Policy and apply to all online sessions delivered through Microsoft Teams, Zoom or the CTC virtual learning environment. Oversight of the quality of online learning and teaching is provided by the Academic Management Team.

Purpose

The online learning platform exists to foster a supportive environment that enhances student learning, accommodates the diverse abilities and needs of all learners, and increases engagement with content, instructors and peers, as well as confidence in the learning process. These expectations exist so that all student activity in online settings is safe and secure.

Expectations of students

Students should follow the guidance of their lecturer or facilitator during online sessions, and are expected to show the same respect and discipline as they would in a physical classroom. This includes:

- joining from an environment that is quiet, safe and free from distraction;
- being ready to begin the session on time;
- being prepared to contribute when asked;
- dressing appropriately for the session;
- switching off mobile phones for the duration of the session, unless the device is being used to connect to it;
- closing other applications so that full attention can be given to the session;
- showing intellectual courage, and interacting with tutors and peers respectfully;
- joining with the camera on and the microphone muted until asked a direct question or contributing to discussion;
- keeping the camera on unless permission has been given by the lecturer in advance of the session; and
- not recording one another's online interactions, and not filming or sharing images of staff or students. Sharing images of people without their consent may be unlawful.

Expectations of staff or guest lecturers

- Host sessions from CTC-administered accounts, with waiting rooms enabled.
- State at the start of a session whether it is being recorded, and explain how the recording will be used.
- Monitor the session chat, and disable private participant-to-participant chat where the platform allows.
- Model the expectations set out above, including as to environment and dress.

- Be alert to the indicators at Section 12.7, and report any concern to the DSL the same day.
- Remove access promptly when a student withdraws.

Images, recording and reporting

Images and videos of learners and lectures are stored within approved College systems. Lectures are recorded for CTC auditing purposes and so that students may review the material; recordings are not kept indefinitely. No image or photograph may be copied, downloaded, shared or distributed from the learning platform without the permission of the owner of that image.

Feedback

Christ Theological College welcomes constructive feedback on this and any other College policy. Feedback may be sent to the Registrar.

Version Control

Version	Author	Date	Reason for change	EIA check	Approval
1.0	Dr Naar Mfundisi-Holloway	13 March 2025	Online Learning Safeguarding Policy created and reviewed.		
2.0	Designated Safeguarding Lead	[insert]	Extended from an online-learning-only policy to a full Safeguarding Children and Adults at Risk Policy. Added: legal and reference framework with citations; scope; definitions; positions of trust; safer recruitment and disclosure checking; training and training register; radicalisation; provisions for students outside the UK; response and reporting procedure with timescales; procedures for concerns about students, staff and the DSL; spiritual abuse; student wellbeing; placements; in-person events; work with those who may pose a risk; records and retention; partnership working with the validating partner; and monitoring and review. Online learning provisions of version 1.0 retained in full at Section 12 and Appendix 5. Appendices added: definitions of abuse, concern form, response flowchart, and staff code of conduct.	[insert]	[insert]
			Next review: [insert]. To be reviewed immediately following any serious incident.		

Outstanding actions before publication

#	Action	Owner
1	Complete every field marked [insert] at Section 1, including local authority children's and adult social care numbers, the out-of-hours duty team and the LADO for CTC's registered address.	DSL
2	Establish and record an advice or membership arrangement with an independent safeguarding advisory body, and insert its details (Section 7.9).	DSL / Principal
3	Confirm CTC's charity registration status and whether Charity Commission serious incident reporting applies.	Principal
4	Confirm CTC is not a specified authority under the Counter-Terrorism and Security Act 2015 and record the date of confirmation (Section 13).	Principal
5	Assess each CTC role for DBS eligibility and record the level assessed and the reason (Section 10.2).	DSL / Registrar
6	Confirm the named UST safeguarding contact and insert at Section 27.5.	Academic Dean
7	Set the retention period for teaching recordings and record it in the Information Asset Register (Section 12.6.1).	Online Safety Coordinator
8	Name the safeguarding trustee on the Governing Board and insert at Section 1.1.	Principal
9	Establish the training register and record current training and disclosure check dates for all staff (Section 11.6).	Registrar
10	Confirm arrangements for cover when both DSL and Deputy DSL are unavailable (Section 7.3).	Principal