



WTC SAFEGUARDING CODE OF CONDUCT

AUGUST 2025

The Designated Officer for Safeguarding and Prevention of Abuse is
Nigel Langford

The Deputy Designated Officer for Safeguarding and Prevention of Abuse is
Sarah Coppin

The Board Representative for Safeguarding and Prevention of Abuse is
Amanda Bedzrah

WTC Safeguarding Code of Conduct	
Purpose	To set out clearly WTC's commitment and procedure to safeguard adults at risk by protecting them from all forms of abuse, harassment and manipulation including physical, emotional and sexual misconduct and abuse. Also the process by which WTC will deal with complaints relating to safeguarding issues.
Enquiries	Enquiries about the Safeguarding Code of Conduct should be directed to the Chief Operating Officer (Nigel Langford) at coo@wtctheology.org.uk
UKPRN	10030973
Legal Address	16-17 Clarence Parade, Cheltenham, GL50 3PA
Author	Chief Operating Officer
Approved by	Board of Trustees
Next Review	October 2025 (Annual)
Staff member responsible for update	Chief Operating Officer
Policy / procedure relevant to	On MyWTC for students, Faculty On www.wtctheology.org.uk for the public.

Introduction

Westminster Theological Centre (WTC) WTC is a not-for-profit, interdenominational, theological college with the vision of making theological study accessible to church leaders and members across the UK. Our goal is to equip and empower people of all ages and backgrounds for leadership, mission, and discipleship and, through this, to effect personal and community transformation. WTC offers part-time, university-accredited qualifications in theology to around 230-250 students per year.

Our student body represents a wide age range (18-80), drawn from a broad cross-section of professional and socio-economic backgrounds in the UK. Students come from a range of church denominations but the primary constituency is the independent church sector, which have no dedicated theological colleges. A number of students left school with no formal education qualifications, while others come to study with WTC already having multiple degrees. This richness in backgrounds, thought and experience is part of what makes studying with WTC such a rewarding experience.

WTC's high value on making our programmes of study accessible includes providing a bursary (Principal's Bursary Fund - PBF) for those with a recent history of offending and/or addiction, and a programme of study for those currently in prison. This means that our student body includes those with known criminal convictions. Annex 1 sets out the due diligence processes for students applying for a PBF to ensure the safety of the whole study body and any student with a criminal conviction.

Statement of Intent

It is the policy of WTC to safeguard our students, staff, Faculty, contractors and volunteers, particularly those who are at risk, by protecting them from all forms of abuse, harassment and manipulation including physical, emotional and sexual misconduct and abuse.¹

At WTC we are committed to:

- Providing a safe and trusted environment for theological study including the care and respectful pastoral ministry for all students, Faculty, staff members (which is understood here to include WTC Hub Directors (HD) and Programme Directors (PD)) and volunteers, particularly adults at risk who engage with WTC
- Ensuring that students, staff, Faculty, Hub Directors (HD), Programme Directors (PD), contractors, and volunteers accept and recognise their responsibilities to develop awareness of issues which cause harassment and

¹ In line with Office for Student guidance, 'harassment' is defined as in section 26 of the Equality Act 2010 and section 1 of the Protection from Harassment Act 1997 and sexual misconduct means any unwanted or attempted unwanted conduct of a sexual nature and includes, but is not limited to sexual harassment, sexual assault and rape.

(<https://www.officeforstudents.org.uk/for-providers/student-protection-and-support/harassment-and-sexual-misconduct/condition-e6-harassment-and-sexual-misconduct/> pp6-7)

harm to adults at risk.

- Providing initial support and signposting adults who disclose harassment and sexual misconduct and abuse towards agencies and organisations which can support them.

WTC aims to:

- Reduce risks of significant harm to adults at risk (among the students, Faculty, staff, contractors and volunteers) from abuse, harassment and exploitation, while listening to and supporting individuals
- Ensure that all students, staff, Faculty, contractors and volunteers know that safeguarding is everyone's business, and that WTC has a responsibility to prevent, detect and report harassment, sexual misconduct and abuse and to respond appropriately by providing appropriate support and directing those in need to relevant services and organisations.

WTC study setting and delivery

WTC provides tertiary education for adult students. WTC students, together with staff, Faculty members, contractors and volunteers are the subject of this Code of Conduct.

WTC attracts students from around the UK, from a wide variety of church denominations and independent churches, and across a very wide age range. While anyone aged 18 and over can study with WTC, the significant majority are between 35-55, with very few aged between 18-25. Given WTC's innovative programme delivery model, students study while staying at home with the exception of the two intensive teaching weeks at the Residentials. They therefore can take advantage of their normal support structures from their churches, families and communities throughout their programmes of study. In addition to the two Residential weeks, students gather together for the Hub evenings and MA Saturdays. While students may disclose harassment and abuse experienced apart from their studies with WTC, this Code of Conduct pertains particularly to relationships associated with their studies with WTC. During Hub evenings and MA Saturdays held at Hub locations, students are protected by the Safeguarding Policies of Hub locations. During Residentials, they are protected by this Code of Conduct.

This Code of Conduct also applies to WTC staff members in pursuit of their work responsibilities in the office or elsewhere and to all relationships between relevant staff members (Faculty and those with direct professional responsibilities) to students, both online and in person.

This Code of Conduct is based on WTC values and beliefs:

- The inspiration and authority of Scripture in matters of faith and practice
- A priority on respecting and caring for the spiritual, physical and emotional well-being of our students, staff, Faculty, contractors and volunteers
- A commitment to relinquishing power, control and manipulation in relationships
- The complete equality of men and women in all spheres of life

and on:

- Human rights and the law
- Good safeguarding practice
- Office for Students requirements²
- Learning from the past

WTC will:

- Promote a safe environment and culture at Hubs and at the Residentials for students, Faculty and WTC staff, contractors and volunteers, and in the WTC office for WTC staff
- Ensure that all those providing pastoral and other support to students, Faculty and staff are aware of, and behave in accordance with, this Safeguarding Code of Conduct and good practice
- Respond promptly to every safeguarding and harassment concern or allegation
- Share information about concerns with agencies who need to know with reference to adults at risk following legal requirements and the expressed wishes of survivors
- Provide appropriate and safe support for those who disclose harassment and abuse and other affected persons, including signposting them to statutory agencies who can help them in the longer term
- Care pastorally for those who are the subject of concerns/allegations of abuse and other affected persons
- Respond appropriately to those who may pose a risk to others and to perpetrators
- Provide effective management oversight for staff, Faculty, contractors and volunteers through supervision, support and training
- In line with Office for Students guidance, and WTC's responsibility to protect students from any actual or potential conflict of interest and/or abuse of power, intimate personal relationships which do not pre-date a student's starting to study with WTC are banned between staff or Faculty and students.

² As set out in:

<https://www.officeforstudents.org.uk/for-providers/student-protection-and-support/harassment-and-sexual-misconduct/condition-e6-harassment-and-sexual-misconduct/>

Contact Telephone Numbers

The Designated Officer for Safeguarding and Prevention of Abuse is Nigel Langford (07481 990452)

The Deputy Designated Officer for Safeguarding and Prevention of Abuse is Sarah Coppin (07767 955136).

The Designated Trustee with responsibility for Safeguarding is Amanda Bedzrah (07861 659617)

Other relevant service contacts:

Police Emergencies 999 Police

Non emergencies 101

National Domestic Violence Helpline 0808 2000 247 (lines free and open 24 hours)
Phone if you are experiencing domestic abuse

[Women's Aid confidential chat line](#)

Samaritans Free Helpline: 116 123

There are local helplines to ring where you live to report domestic abuse and violence against women and girls. Look for these on the internet.

Restored relationships <https://www.restored-uk.org/> and PressRed <https://pressred.org/> are Christian NGOs working to raise awareness of and end violence against women in the church. Restored also provides training to equip and enable churches to respond appropriately to domestic abuse.

Types of abuse and harassment include:

1. *Physical abuse* - Including hitting, shaking, poisoning, burning, scalding and/or causing physical harm.
2. *Sexual abuse and misconduct* - Includes forcing or enticing adults at risk to take part in sexual activities including penetrative or non-penetrative acts. Includes unwanted sexual conduct and non-contact activities and involvement in the production of inappropriate sexual online images without prior permission of the person involved.
3. *Emotional abuse* - Persistent emotional maltreatment such as to cause severe and persistent adverse effects on emotional development, such as conveying that someone is worthless, bullying, causing them frequently to feel in danger.
4. *Spiritual abuse* - A form of emotional and psychological abuse characterised by a systematic pattern of coercive and controlling behaviour in a religious context. Includes control through the use of sacred texts/teaching,

manipulation and exploitation, enforced accountability, censorship of decision-making, coercion to conform.

5. *Financial abuse* - The use or mis-use of money limiting or controlling a partner's current and future actions and their freedom of choice.
6. *Harassment* - Unwanted conduct which violates the dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment for another person relating to their age, disability, gender reassignment, race, religion/belief, sex or sexual orientation.³

Guidelines for students, Faculty, WTC Staff, volunteers and contractors

Students, Faculty, staff, contractors and volunteers must at all times show respect and understanding for an individual's rights, safety and welfare, and conduct themselves in a way consistent with WTC values:

- Treat everyone, and particularly adults at risk, with respect and dignity
- Always *listen* to what an individual tells you
- Value others and recognise the unique contribution each individual can make
- Use appropriate language: While respecting everyone's right to freedom of speech, avoid language and behaviour which could reasonably be considered harassment⁴
- Those in positions of authority, or with a potential ability to manipulate, control or influence (e.g. a member of staff who has direct academic responsibilities or other direct professional responsibilities in relation to students) must never misuse their position or give any indication that students or those in less powerful positions need to behave in a particular way to gain access to resources, or to achieve academic or other results
- Respect individuals' right to privacy; e.g. pray and provide pastoral care in a respectful manner in line with WTC's Prayer, Prophetic and Deliverance Ministries Policy (including not invading personal space or touching someone without their permission i.e. asking if this is appropriate)
- Do not spend excessive time alone with a person on their own
- Do not draw conclusions about others without checking facts

³ 2010 Equality Act, section 26

⁴ Definitions of harassment in section 26 of the Equality Act 2010 (Equality Act) and section 1 of the Protection from Harassment Act 1997 (Harassment Act) include 'objective' and 'reasonableness' tests:

- a. In the terms of the Equality Act, this includes taking into account the perception of the person receiving the conduct, other circumstances of the case, whether it is reasonable for the conduct to have that effect introducing some objectivity into the test; i.e. the person at the receiving end of the conduct is not the only relevant consideration in determining whether or not the conduct amounts to unlawful harassment.
- b. In the terms of the Harassment Act, an offence is committed only if the person knows the conduct amounts to harassment or a reasonable person in possession of the same information would think the conduct amounted to harassment of the other person.

- Never trivialise or exaggerate harassment and/or abuse issues, or make suggestive remarks or gestures, even in fun

WTC is a member of Thirtyone:eight (<https://thirtyoneeight.org/>) and has access to their Safeguarding Helpline (0303 003 111) where we can ask for and receive advice on safeguarding questions from their team of professionals.

Reporting harassment or abuse

If you have information about a safeguarding situation where an adult is in immediate danger or requires immediate medical attention call the emergency services on 999.

For adult survivors of harassment or abuse, it is *their* decision whether to report incidents and press charges. Survivors' informed decisions should be followed.

When an allegation of harassment, sexual misconduct or abuse is made against a member of staff, Faculty, contractor, volunteer or student, the allegation must be passed to the Safeguarding or Deputy Safeguarding Officers and the Board contact informed. WTC's Disciplinary/Complaints Procedure will be followed.⁵ Allegations could be made by the target of harassment, sexual misconduct or abuse or by a third party who witnessed the incident.

In the case of a serious safeguarding complaint about a student, the church leader who provided them with a reference will be informed of the complaint.

Response to disclosure

- Listen to the adult making the allegation, rather than questioning them directly
- Offer them reassurance without making promises (i.e. abuse is never the survivor's fault, they have done the correct thing in coming forward)
- Take what they say seriously
- Allow them to speak without interruption
- Accept what is said. It is not your role to investigate or question unless you have safeguarding responsibilities
- Do not overreact
- Alleviate feelings of guilt and isolation while passing no judgement
- Advise that you will try to offer support, and ask if they wish to pass the information on to the designated Safeguarding officers for WTC
- Point the survivor to relevant organisations which can help (see telephone numbers above)
- Record the discussion accurately as soon as possible after the event
- Use the survivor's words/explanations - do not translate into your own words

⁵ See [WTC Student Complaints Policy](#)

in case you have misconstrued what they are trying to say. Record any discussions or actions taken within 24 hours

- Do not discuss the disclosure with anyone except the principle Safeguarding contacts for WTC and the Board contact.

Reports of all allegations, the process followed by WTC, and the response taken will be kept securely and confidentially whether or not the survivor wishes to pursue a course of action.

Publicising the Code of Conduct

This Code of Conduct is publicly available on the WTC website and on the student, staff and Faculty portals. It will be reviewed annually by the Board. All members of staff, Faculty, HDs, PDs and volunteers will familiarise themselves with the details of this Code of Conduct annually.

Safeguarding Officers will receive appropriate training on a regular basis, at least every three years.

Responsibility for Safeguarding

Everybody is responsible for being aware of safeguarding issues and knowing how to respond appropriately should an allegation or disclosure be made. Managers must manage risks and ensure that safeguarding policies and procedures are in place, reviewed once a year, available to the public and are known to staff, Faculty, HDs, PDs and students.

Trustees are ultimately accountable and responsible for putting things right if something goes wrong.

<https://www.gov.uk/government/news/review-your-charitys-safeguarding-and-governance-arrangements-charity-commission-advises>

ANNEX 1: Due diligence process for applicants with a known criminal conviction

Student applications

Student application forms to study with WTC on any course require applicants to indicate whether or not they have a previous or current conviction.

For any positive responses, the COO makes contact with the applicant and clarifies the nature of the conviction, whether it is spent or not, to assess potential safety concerns for the WTC student body should they be given a place to study.

The applicant is confirmed only if there are no reasonable grounds for concern.

Principal's Bursary Fund (PBF) Applications

For all new PBF applicants, the Principal has a personal zoom/telephone call with the applicant to discover their personal circumstances, their background, and why they wish to study with WTC. The Principal also makes contact with the student referee to discover whether they have a support network in place which would enable them to study successfully, and to get an independent assessment of the applicant.

The application for the bursary is contingent on the Principal being assured that the individual is in a place and has support in place which should mean they can study successfully, and that they do not constitute a security/safety concern to other students in their Hub or at the Residentials.

Prison Pilot

The WTC Prison Pilot, currently being run at HMP The Mount, seeks to offer validated theological study (CertHE level 4) to prisoners currently serving time in the prison. In this instance, all security/safeguarding falls under the auspices of the prison authorities.