



WTC SAFEGUARDING CODE OF CONDUCT

AUGUST 2026

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

The Deputy Designated Officer for Safeguarding and Prevention of Abuse is
Diane Lincoln

The Designated Trustee 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 our students, staff, Faculty, contractors and volunteers, with additional duties where a person is an adult at risk (see "Who this Code protects"), 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 Concerns or complaints relating to the Designated Officer should instead be directed to the Designated Trustee for Safeguarding (details on page 6).
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Published	On MyWTC for students, Faculty. On www.wtctheology.org.uk for the public.
Applies to	All WTC students, staff, Faculty, Hub Directors, Programme Directors, contractors and volunteers, in respect of all WTC activity wherever it takes place, online and in person.

Introduction

Westminster Theological Centre (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 has 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 student 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 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,

¹In line with Office for Students 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. [Review note: the original read "Office for Student guidance" and omitted the comma after "limited to".]

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

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.

Who this Code protects: adults at risk

This Code applies to everyone connected with WTC. Additional duties apply where a person is an adult at risk.

For the purposes of this Code, and in line with section 42 of the Care Act 2014, an adult at risk is an adult aged 18 or over who:

- has needs for care and support (whether or not the local authority is meeting any of those needs);
- is experiencing, or is 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.

Where the Designated Officer considers that this threshold may be met, WTC will make a safeguarding referral to the adult social care safeguarding team of the local authority for the area in which the adult lives. The adult will be told that a referral is being made, and their views sought, unless doing so would increase the risk to them or to others. The Designated Officer will record the decision and the reasons for it.

Where a person may lack the mental capacity to make decisions about their own safety, the principles of the Mental Capacity Act 2005 apply. In those circumstances WTC will seek advice from the local authority and/or from Thirtyone:eight before deciding what action to take.

Concerns about a child (anyone under 18) — for example where a student discloses a concern about a child, or where a child is present at a WTC event or a Hub venue — must be passed to the Designated Officer the same day. The Designated Officer will refer to the children's services department of the relevant local authority, and to the police where a child is in immediate danger.

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.

This Code of Conduct applies to all WTC activity wherever it takes place, including Hub evenings, MA Saturdays, Residentials and online teaching. Where a Hub venue has its own safeguarding policy, that policy operates in addition to this Code and not instead of it. WTC does not delegate responsibility for the safety of its students to a host venue. WTC requires written confirmation from each Hub venue that it holds a current

safeguarding policy, and each Hub Director is responsible for knowing both the venue's reporting route and WTC's.

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, including any relevant historical reviews or findings from other organisations

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, acknowledging every report within three working days and confirming next steps within ten working days
- 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
- Never use, or ask any person to sign, a non-disclosure agreement, confidentiality clause or similar agreement in relation to a complaint or disclosure of harassment or sexual misconduct

²As set out in:

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

- Protect anyone who reports harassment, sexual misconduct or abuse, or who supports or takes part in an investigation, from victimisation or any other detriment as a result of having done so
- 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. Any intimate personal relationship that pre-dates a student's studies must be declared in writing to the Designated Officer, who will record it and put arrangements in place to remove the conflict of interest, for example by reassigning marking, supervision or pastoral responsibility. This requirement applies to staff, Faculty, Hub Directors, Programme Directors, contractors and volunteers. Breach will be dealt with under WTC's Disciplinary Procedure.

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 Diane Lincoln (07870 277982)

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

Where a concern or allegation relates to the Designated Officer, the Principal or a Trustee, it must be reported directly to the Designated Trustee for Safeguarding. Where it relates to the Designated Trustee, it must be reported to the Chair of the Board and to Thirtyone:eight (see below). No one is ever required to raise a concern with the person the concern is about.

Other relevant service contacts:

Police Emergencies 999. Police non-emergencies 101

National Domestic Abuse Helpline (run by Refuge) 0808 2000 247 (free, 24 hours). Phone if you are experiencing domestic abuse

Women's Aid confidential chat line — live webchat at [womensaid.org.uk](https://www.womensaid.org.uk)

Samaritans Free Helpline: 116 123

Men's Advice Line (for male victims of domestic abuse): 0808 8010 327

Rape Crisis England & Wales: 0808 500 2222

Victim Support: 08 08 16 89 111

Local services vary by area.

Restored (<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, inappropriate restraint or sanctions, and the misuse of medication.
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 sexual images or recordings without the informed consent of the person involved. Sharing intimate images without consent is a criminal offence.

3. *Emotional abuse* - Persistent emotional maltreatment such as to cause severe and persistent adverse effects on a person's emotional wellbeing, 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* - Theft, fraud, or the use or misuse of a person's money, property or possessions. Includes coercion in relation to money, wills, property or benefits, undue pressure to give financially, and the use of money to limit or control another person's current or future actions and 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

7. Neglect and acts of omission - Ignoring medical, emotional or physical care needs, failing to provide access to appropriate health, care or educational services, or withholding the necessities of life.

8. Self-neglect - Neglecting to care for one's own personal hygiene, health or surroundings, and behaviour such as hoarding. Relevant where a student's circumstances, mental health or recovery from addiction places them at risk.

9. Discriminatory abuse - Harassment, slurs or unequal treatment because of a protected characteristic under the Equality Act 2010.

10. Domestic abuse - Any incident or pattern of incidents of controlling, coercive, threatening, degrading or violent behaviour between people aged 16 or over who are personally connected, as defined by the Domestic Abuse Act 2021. Includes physical, sexual, emotional and economic abuse.

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

³Equality Act 2010, section 26.

⁴Definitions 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, and 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.

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
- Keep contact with students through WTC channels. Do not initiate private social media contact, one-to-one messaging outside WTC platforms, or personal contact of a kind you would not be willing for a colleague to see
- Do not draw conclusions about others without checking facts
- 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 1111, Monday to Friday, 9am–5pm) 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. This applies to reporting to the police and other external agencies. It does not remove the requirement on WTC staff, Faculty, contractors and volunteers to pass every safeguarding concern to the Designated Officer. WTC may need to act without the survivor's consent where there is a risk of harm to others, where the adult lacks the mental capacity to make the decision, or where WTC has a legal duty to act. Where this happens, the reasons will be explained to the survivor wherever it is safe to do so, and recorded in writing.

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 Designated Trustee 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.

Where a serious safeguarding complaint is made about a student and there is a risk of harm to others, WTC may inform the church leader who provided that student's reference. This will be decided case by case by the Designated Officer in consultation with the Safeguarding working group and Designated Trustee, having considered the wishes of the person who raised the concern and whether the church leader may themselves be connected to it. The decision and the reasons for it will be recorded in writing, and the student will normally be

⁵See WTC Student Complaints Policy.

told. Any such disclosure will be made in accordance with WTC's obligations under UK GDPR and its privacy notice.

Response to disclosure

- Listen to the adult making the allegation, rather than questioning them directly
- Never promise confidentiality.
- 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
- Remain calm; avoid reacting with shock, disbelief or anger
- Alleviate feelings of guilt and isolation while passing no judgement
- Advise that you will try to offer support, and explain that you must pass the information to the Designated Safeguarding Officer. Ask what they would like to happen next and record their wishes
- 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 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 principal Safeguarding contacts for WTC and the Designated Trustee.

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. Safeguarding records are held separately from academic and HR records, with access restricted to the Designated Officer, the Deputy Designated Officer and the Designated Trustee. They are retained for [insert] years in line with WTC's retention schedule, and are processed under UK GDPR Article 9(2)(b) and (g) and Schedule 1 of the Data Protection Act 2018 (safeguarding of individuals at risk).

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.

The Designated Officer and Deputy Designated Officer will receive appropriate designated-lead safeguarding training at least every two years. All staff, Faculty, Hub Directors, Programme Directors, contractors and volunteers will receive safeguarding training appropriate to their role on appointment, and refresher training at least every two years, covering how to recognise harassment, sexual misconduct and abuse, how to respond to a disclosure, and where to signpost people for support. Students will be given accessible information on how to report and where to get support at the start of each academic year.

This Code of Conduct is WTC's single comprehensive source of information on harassment and sexual misconduct, as required by Office for Students condition E6. It

should be read with the WTC Student Complaints Policy, the Disciplinary Procedure and the Prayer, Prophetic and Deliverance Ministries Policy, all of which are linked from the same page of the WTC website.

WTC will not use, and will not ask any person to sign, a non-disclosure agreement or confidentiality clause in relation to a complaint or disclosure of harassment or sexual misconduct.

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. For more information on Trustee accountability, please visit: <https://www.gov.uk/guidance/safeguarding-duties-for-charity-trustees>

Trustees are also responsible for reporting serious incidents, including safeguarding incidents, to the Charity Commission promptly, and for ensuring that any matter which is a reportable event is notified to the Office for Students within the required timescale. The Designated Trustee will bring an annual anonymised safeguarding report to the Board, covering the number and type of reports received, how they were handled, and any lessons learned.

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. The COO will record in writing the information considered, the decision reached and the reasons for it. An applicant who is refused a place on these grounds may ask for the decision to be reviewed by the Principal.

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. The prison authorities lead on security and on safeguarding within the establishment, and WTC tutors work within the prison's procedures. This Code of Conduct continues to govern the conduct of WTC staff and Faculty delivering the programme, and any concern arising must be reported both to the prison's safeguarding lead and to WTC's Designated Officer.