

ST AUGUSTINE'S
COLLEGE OF THEOLOGY

Safeguarding Policy

2018-19

Introduction

Since March 2013, government guidance has advised that faith organisations should adhere to the same standards as statutory organisations within the safeguarding sector e.g. adult and children’s services, police, health, and education. This policy document reflects St. Augustine’s commitment both to comply with these standards and to foster an informed and responsible culture regarding the safeguarding of children as well as of adults at risk of abuse or neglect.¹ In the main body of the document, two sections cover:

- I. Environment and Education
 - a. Safeguarding Officers
 - b. Safe Recruitment
 - i. Staff and Trustees
 - ii. Students
 - c. Safeguarding Training
 - i. Staff and Trustees
 - ii. Students (OMs, Readers, Independents)
- II. Procedures for Addressing Safeguarding Incidents

The Appendices include definitions, a list of sources and relevant literature, further information regarding procedures, and a checklist of statutory responsibilities.

Section I: Environment and Education

a. Safeguarding Officers

St. Augustine’s Safeguarding Officer: Rebecca Young,
r.young@staugustinescollege.ac.uk 0791 4480849

St. Augustine’s Deputy Safeguarding Officer: Simon Stocks,
s.stocks@staugustinescollege.ac.uk, 07964 104148

St. Augustine’s Trustee Representative for Safeguarding: Ven. Rosemary Lain-Priestly,
associate.archdeacon@london.anglican.org.

Diocesan Safeguarding Advisers:

Southwark:	Kate Singleton	020 7939 9423 / 07982 279713
Chichester:	Colin Perkins	01273 425792 / 07500 771210
Rochester:	Janice Keen	01634 56000 / 07787 445032
Canterbury:	Paul Brightwell	01732 384734 / 07398 009951
Canterbury:	Elaine Rose	01233 720930 / 07831 860218

¹The phrase “adults at risk of abuse or neglect” has replaced the earlier term “vulnerable adults,” see the *Care Act 2014*, which came into force on 1st April 2015.

Responsibilities of the St. Augustine’s Safeguarding Officer:

Training:

- i. Attend diocesan C2 training in safeguarding for adults and children once every three years;
- ii. Attend national training with reference to policy and practice changes that significantly affect St. Augustine’s safeguarding policy and practice;
- iii. Maintain familiarity with the Church of England’s national safeguarding policies and recommendations for good practice, and with those of the Southwark, Chichester, Canterbury, Rochester, and London dioceses;
- iv. If required by the Principal, attend other training events relevant to safeguarding e.g. provided by police, local authority, educational bodies.

Policy Documents:

- i. Conduct an annual review of St. Augustine’s safeguarding policy, present the report to the Board of Management and Council, and revise policy document in accordance with changes approved by Council;
- ii. Maintain a digital library of government, Church of England, and local diocesan legal and policy documents concerning safeguarding policy and practice;²
- iii. Keep up to date contact information for local diocesan and national safeguarding personnel.
- iv. Ensure a current copy of St. Augustine’s safeguarding policy is distributed to all trustees, staff, ministry facilitators, placement supervisors, tutors, and students; is sent to local diocesan safeguarding Advisers; and is posted on the St. Augustine’s website.

Safeguarding Information:

- i. Advise trustees and core, sessional, and tutorial staff on safeguarding policy and practice;
- ii. Inform the Principal of significant national or local changes in safeguarding policy and practice;
- iii. Answer student enquiries concerning safeguarding policy and practice.

Safeguarding Policies:

- i. Ensure and maintain records of trustee and staff compliance with safer recruiting practices, DBS, and training requirements (see below);
- ii. Ensure and maintain records of student compliance with DBS and training requirements (see below).

²Southwark, Chichester, Canterbury, Rochester, and London dioceses are defined as “local” for the purposes of this document.

Safeguarding Incidents

- i. In the event that a safeguarding incident is reported, oversee full compliance with the relevant procedures (see below);
- ii. Liaise with diocesan and statutory bodies, as necessary to ensure full compliance;
- iii. Other than with those that the safeguarding policy requires be informed, maintain strict confidentiality regarding safeguarding concerns and incidents;
- iv. Complete and maintain full and secure records of all safeguarding concerns and incidents.

Deputy Safeguarding Officer:

The Deputy Safeguarding Officer is responsible for covering the Safeguarding Officer's responsibilities in the event of the latter's absence.

Trustee Representative for Safeguarding:

The Trustee Representative supports and advises the Safeguarding Officer, liaises between the Safeguarding Officer and Council, and is the Trustee contact in the event of a safeguarding incident. The Trustee Representative is also responsible, in collaboration with the Safeguarding Officer, for providing regular education in safeguarding for the Council (see below under Safeguarding Training).

b. Safer Recruiting

St. Augustine's offers educational programs to students accepted for Ordained Ministry training and for Licensed Lay Ministry training. In addition, students are admitted to study independently of any denominational authorisation for training as public ministers. In the case of Ordained Ministry and Licensed Lay Ministry programs, students are admitted after national and/or diocesan vetting, including an enhanced DBS check. The sponsoring diocese provides confirmation of the DBS check for all entering OM and Reader students.⁴ St. Augustine's requires Independent students to produce two references as part of the application process. The reference form includes questions regarding the safeguarding of children and adults at risk of neglect or abuse. (on DBS checks for Independent students, see notes below).

Recruitment policy for 'core staff' i.e. those in possession of a standard St. Augustine's job contract, includes a requirement that all clergy staff receive an enhanced DBS from the dioceses in which they have 'permission to officiate' or a 'preacher's license'. All reference forms for staff recruitment include safeguarding questions. Should any staff member, lay or clergy, serve in a supervisory role for work with children or, as part of their duties, be responsible for children, e.g. in providing child care for a teaching event, an enhanced DBS is required. (On 'adults at risk', see notes below).

⁴ Ordained ministry or licensed lay ministry students from other denominations will be required to complete the DBS procedure through their denominational organisation.

Any staff member appointed as either Safeguarding Officer or Deputy Safeguarding Officer must have DBS clearance, as must the trustee Representative for Safeguarding.

The St. Augustine's Principal, whether ordained or lay, must also have DBS clearance before they take the role.

All St. Augustine's staff or trustees who have to secure DBS clearance must maintain this clearance as long as they continue their employment or service with St Augustine's DBS checks are re-conducted every five years.⁵ The Safeguarding Officer is responsible for monitoring and recording compliance.

Notes:

i. As **Trustees** are not involved in the supervision of children on St. Augustine's behalf, nor engaged with adults in a regulated activity, they are not eligible for an enhanced DBS. However, a confidential 'personal disclosure form' is required of all trustees and of any person who serves within the governance structure of St. Augustine's (a sample form is included below as Appendix 1⁶).⁷

ii. **Sessional teachers** are required to submit a personal disclosure form. However, since, in the course of their contractual duties, they have no responsibility for children or the supervision of students working with children, and nor do they provide services for adults defined as regulated activities, they are not eligible for an enhanced DBS.⁸

iii. **Personal tutors** are required to submit a personal disclosure form but are not eligible for an enhanced DBS since, though they work 'one-on-one', they do not meet the frequency criteria nor do they engage in a regulated activity for which the frequency criteria do not apply.⁹

⁵ House of Bishops guidelines, see *Church of England Practice Guide: Safer Recruitment* (2015), 10.

⁶ The sample form differs from the actual form only as to formatting.

⁷ Only the Safeguarding Officer will have access to the disclosure form, which will be kept securely in accordance with the Data Protection Act. Should the form contain a disclosure relevant to safeguarding, the 'core group' (see below, sect. II.iii) will decide the implications for the trustee's continuing service, if necessary after consultation with the Diocesan Safeguarding Adviser.

⁸ The law covering adults at risk works differently from that concerned with children. Children are identified as at risk *per se* but adults only with reference to services provided by others. Thus, if a church provides regular transportation, a DBS is needed for drivers; similarly, if pastoral care involves helping a person eat or dress, or if a church visitor is asked to handle money or go to the shops for a parishioner, a DBS is required since these are regulated activities. On the other hand, that a church has an elderly congregation does not, in itself, mean that PCC members, wardens, ordinands, or students on placement, etc., have to get DBS checked, see *Church of England Practice Guide: Safer Recruitment*, 14-16.

⁹ The frequency criteria are positive for services provided once a week or more; four days or more in any 30 day period; or overnight between the hours of 02:00 & 06:00. Certain regulated activities, however, require a DBS check irrespective of frequency. These include providing healthcare; advising on financial matters or handling money, including any shopping whatsoever; and providing transportation specifically to a healthcare facility. No independent student should engage in any of these activities during the course of a St. Augustine's placement. Should an independent student be asked, in the course of a St. Augustine's placement, to transport adults at risk owing to age, disability, or illness, the frequency conditions apply with respect to any destination other than one related to healthcare provision.

iv. Any staff or sessional tutor who provides coaching that addresses deficits associated with a **diagnosed learning disability** and whose work meets the frequency criteria, is required to secure enhanced DBS clearance.

v. **Independent students** need enhanced DBS clearance in the event that a placement context requires them to work with or supervise work with children.¹⁰

Safeguarding Training¹¹

Safeguarding Officer, Deputy Safeguarding Officer, and Trustee Representative:

The Safeguarding Officer must attend diocesan training in safeguarding for adults and children once every three years, as well as any national training with reference to policy and practice changes that significantly affect St. Augustine's safeguarding policy and practice. The Deputy Safeguarding Officer must attend diocesan training once every three years and meet with the Safeguarding Officer in the event of changes to safeguarding policy and practice. The Trustee Representative is expected to have attended regular safe-guarding training in the course of his or her profession.

Trustees:

Bi-annually, as part of their INSET, all trustees receive a presentation on safeguarding regulations and procedures as they apply to St Augustine's.

Staff:

All core staff, both teaching and administrative are expected to attend diocesan training once every three years.¹²

Ordained and Reader Ministry Students:

All OM and Reader students must undertake the C1 safeguarding course offered either through the Church of England online safeguarding portal or through their Diocese. This should be completed before their Induction Weekend. In the event that this is not possible for scheduling reasons, the training must be completed within the student's first term at St Augustine's.¹³

All Reader and OM students must complete the C2 safeguarding course either with their own diocese or with St Augustine's. St Augustine's will run this course annually.

¹⁰ Concerning work with adults at risk, see also, previous note. The student will meet the cost of DBS clearance, unless their diocese has recommended them to undertake their St. Augustine's program. In the latter case, the diocese is responsible for the DBS fee.

¹¹ New requirements, coming into force over the next year, provide, in the case of students, for the equivalent of five hours of training, spread across two 'modules' – Foundation and Leadership (C1 and C2) – both of which may be combined on the same day. Staff will also need this training which dioceses will offer as a development of the current modules. Under the new rules, Safeguarding Officers must take a module on 'safer recruitment' and further modules on domestic abuse, pastoral relationships, and sexual abuse are recommended. For full details, see *Safeguarding Learning and Development in the Church of England. A Practice Guide Document* (2015).

¹² Ordained Staff are required to complete C3 level training, Lay Staff C1 & C2; the Principal must complete C4

Independent Students:

Independent students must complete the same safeguarding training as OM and Reader students prior to their placement. This training is negotiated with the students' diocese or denominational authority.¹⁴

Specialist Modules:

The Church of England is developing a series of modules on particular areas of safeguarding e.g. domestic abuse, safe recruiting, grooming for sexual abuse. Students will be informed of the availability of these modules and encouraged to take advantage of them.

Section II: Procedure for Addressing Safeguarding Incidents

For a TEI, as for a parish church, the procedure for responding to a safeguarding incident is simplified in that TEI staff should not investigate any such incident. St. Augustine's role, therefore, is one of reporting and compliance with the instructions of those responsible for investigation and action i.e. the Diocesan Safeguarding Advisers and those to whom they refer the incident, such as the Police, Local Authority, Children's Social Services. For the kinds of abuse that constitute a safeguarding incident, see Appendix III. A more detailed account of the procedure below appears in the flow chart (Appendix II).

- i. In the case of any safeguarding incident at the West Malling centre, alleged incident, or concern over a potential incident, whether that incident involves student or staff, the Safeguarding Officer must inform the Safeguarding Adviser for Rochester. This applies to all incidents, wherever they occur. In addition, should the incident take place at a residential weekend or teaching event, the Safeguarding Officer will also inform the Adviser for the diocese in which the incident occurred.¹⁵
- ii. In the case of a safeguarding incident, alleged incident, or concern over a potential incident, occurring in the context of a student's placement, the ministry facilitator or placement supervisor will inform their diocesan Safeguarding Adviser, as well as the St. Augustine's Safeguarding Officer, who will continue to liaise with the Diocesan Adviser.¹⁶

¹³ OM students from other denominations will need to complete the safeguarding training offered by their denomination, also prior to the end of their first term at St Augustine's. In the event that their sponsoring church does not provide such training, they will attend Church of England diocesan training by negotiation with the appropriate diocese.

¹⁴ New guidelines, see note 9 above, require that all independent students receive the initial safeguarding training.

¹⁵ This process applies also to students from other denominations/churches, however, in these cases the appropriate denominational/church authority will also be informed.

¹⁶ In the case of students from other denominations/churches, the appropriate denominational/church authority will be informed. The St. Augustine's Safeguarding Officer will continue to liaise with that authority: if deemed necessary, the Safeguarding Officer will also seek advice from a diocesan safeguarding team.

- iii. In all cases, the Safeguarding Officer will report the incident or concern to the Trustee Representative, the Chair of Council, and the Principal. The Safeguarding Officer, Trustee Representative, the Chair of Council, and the Principal constitute the 'core group' referred to in the flow chart (Appendix II).
- iv. In any case in which immediate safety is at issue, the Safeguarding Officer or a member of the St. Augustine's staff will contact the Police without delay.
- v. The Diocesan Safeguarding Advisers will advise the St. Augustine's Safeguarding Officer as to contacting the appropriate investigative agency. In the case of an incident in a placement context, the Adviser shall contact the agency, following Diocesan Safeguarding procedures.
- vi. The Safeguarding Officer will oversee full compliance with the instructions of the Police, Social Service agencies or any other statutory body to which the incident is reported.
- vii. The Safeguarding Officer will keep a full written record of any safeguarding incident, alleged incident, or concern over a potential incident.

Notes:

- a. If a student is accused of misconduct in relation to children or adults at risk of abuse or neglect, the student's bishop or appropriate denominational authority will be informed immediately.
- b. St. Augustine's will offer pastoral care to those involved in a safeguarding incident as recommended by the Safeguarding Adviser and in consultation with the 'core group' (see above).
- c. The core group, together with the Diocesan Safeguarding Adviser, will decide whether a student involved in an investigation should continue to attend classes.
- d. A staff member under investigation could be relieved of all duties until the investigation is complete.
- e. St. Augustine's will make a report to the Disclosure and Barring Service if a member of staff is removed or resigns from post, or a student withdraws from training, due to a safeguarding issue.

Church of England Confidential Declaration Form

The Confidential Declaration Form must be completed by all those wishing to work with children and / or adults experiencing, or at risk of abuse or neglect. It applies to all roles, including clergy, employees, ordinands and volunteers who are to be in substantial contact with children and / or adults experiencing, or at risk of abuse or neglect. This form is strictly confidential and, except under compulsion of law, will be seen only by those involved in the recruitment / appointment process and, when appropriate, the Diocesan Safeguarding Adviser or someone acting in a similar role / position. All forms will be kept securely in compliance with the Data Protection Act 1998.

If you answer yes to any question, please give details, on a separate sheet if necessary, giving the number of the question which you are answering.

Please note that the Disclosure and Barring Service (DBS) is an independent body, which came into existence on 1st December 2012. It combines the functions of the Criminal Records Bureau (CRB) and the Independent Safeguarding Authority (ISA).

1. Have you ever been convicted of or charged with a criminal offence or been bound over to keep the peace that has not been filtered in accordance with the DBS filtering rules¹⁷? (Include both 'spent'¹⁸ and 'unspent' convictions) YES / NO
2. Have you ever received a caution, reprimand or warning from the police that has not been filtered in accordance with the DBS filtering rules¹⁹? YES / NO

Notes applicable to questions 1 and 2: Declare all convictions, cautions, warnings, and reprimands etc. that are not subject to the DBS filtering rules.

*Broadly, where your position / role involves substantial contact with children and / or adults experiencing, or at risk of abuse or neglect (i.e. where you are eligible for an enhanced criminal records check) you will be expected to declare **all** convictions and / or cautions etc., even if they are 'spent' provided they have not been filtered by the DBS filtering rules.*

If your position / role does not involve substantial contact with children and / or adults experiencing, or at risk of abuse or neglect you should only declare 'unspent' and 'unfiltered' convictions / cautions etc.

¹⁷You do not have to declare any adult conviction where: (a) 11 years (or 5.5 years if under 18 at the time of the conviction) have passed since the date of the conviction; (b) it is your only offence; (c) it did not result in a prison sentence or suspended prison sentence (or detention order) and (d) it does not appear on the DBS's list of specified offences relevant to safeguarding (broadly violent, drug related and/or sexual in nature). Please note that a conviction must comply with (a), (b), (c) and (d) in order to be filtered. Further guidance is provided by the DBS and can be found at www.gov.uk/government/publications/filtering-rules-for-criminal-record-check-certificates and www.gov.uk/government/publications/dbs-filtering-guidance

¹⁸Please note that the 'rehabilitation periods' (i.e. the amount of time which has to pass before a conviction etc. can become 'spent') have recently been amended by the Legal Aid, Sentencing and Punishment of Offenders Act 2012. Since 10 March 2014, custodial sentences greater than 4 years are never 'spent'. For further guidance in relation to the 'rehabilitation periods', please see <http://hub.unlock.org.uk/knowledgebase/spent-now-brief-guide-changes-roa/>

¹⁹You do not have to declare any adult caution where: (a) 6 years (or 2 years if under 18 at the time of the caution, reprimand or warning) have passed since the date of the caution etc. and (b) it does not appear on the DBS's list of specified offences referred to in footnote 1 above. **Please note that a caution etc. must comply with (a) and (b) in order to be filtered**

Convictions, cautions etc. and the equivalent obtained abroad must be declared as well as those received in the UK.

If you are unsure of how to respond to any of the above please seek advice from an appropriate independent representative (e.g. your solicitor) because any failure to disclose relevant convictions, cautions etc. could result in the withdrawal of approval to work with children and / or adults experiencing, or at risk of abuse or neglect.

3. Are you at present (or have you ever been) under investigation by the police or an employer or other organisation for which you worked for any offence/misconduct? YES / NO

4. Are you or have you ever been prohibited and / or barred from work with children and/or vulnerable adults? YES / NO

5. Has a family court ever made a finding of fact in relation to you, that you have caused significant harm to a child and / or vulnerable adult, or has any such court made an order against you on the basis of any finding or allegation that any child and / or vulnerable adult was at risk of significant harm from you²⁰? YES / NO

6. Has your conduct ever caused or been likely to cause significant harm to a child and / or vulnerable adult, and / or put a child or vulnerable adult at risk of significant harm? YES / NO

Note: Make any statement you wish regarding any incident you wish to declare

7. To your knowledge, has it ever been alleged that your conduct has resulted in any of those things? YES / NO

Note: Declare any complaints or allegations made against you, however long ago, that you have significantly harmed a child, young person or adult who is vulnerable. Any allegation or complaint investigated by the police, Children's Services, an employer, voluntary body or other body for which you worked must be declared. Checks will be made with the relevant authorities.

8. Has a child in your care or for whom you have or had parental responsibility ever been removed from your care, been placed on the Child Protection Register or been the subject of child protection planning, a care order, a supervision order, a child assessment order or an emergency protection order under the Children Act 1989, or a similar order under any other legislation? YES / NO

Note: All these matters shall be checked with the relevant authorities

²⁰'Significant harm' involves serious ill-treatment of any kind including neglect, physical, emotional or sexual abuse, or impairment of physical or mental health development. It will also include matters such as a sexual relationship with a young person or adult for whom an individual had pastoral responsibility or was in a position of respect, responsibility or authority, where he/she was trusted by others.

Declaration

I declare the above information (and that on any attached sheets) is true, accurate and complete to the best of my knowledge.

Signed.....

Full Name.....Date of Birth.....

Address.....

.....

Date.....

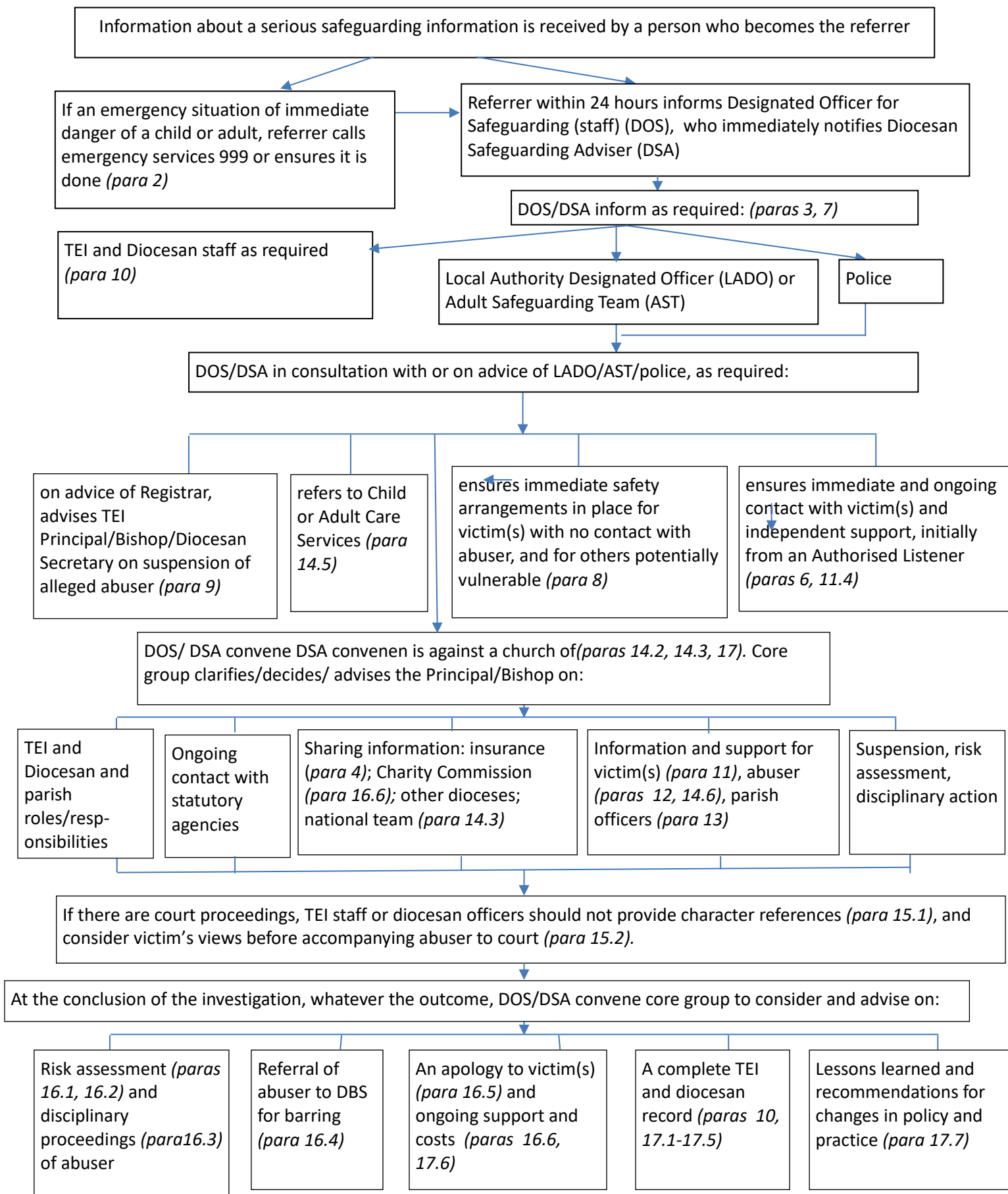
Please return the completed form to:
Rebecca Young, St. Augustine’s Safeguarding Officer.

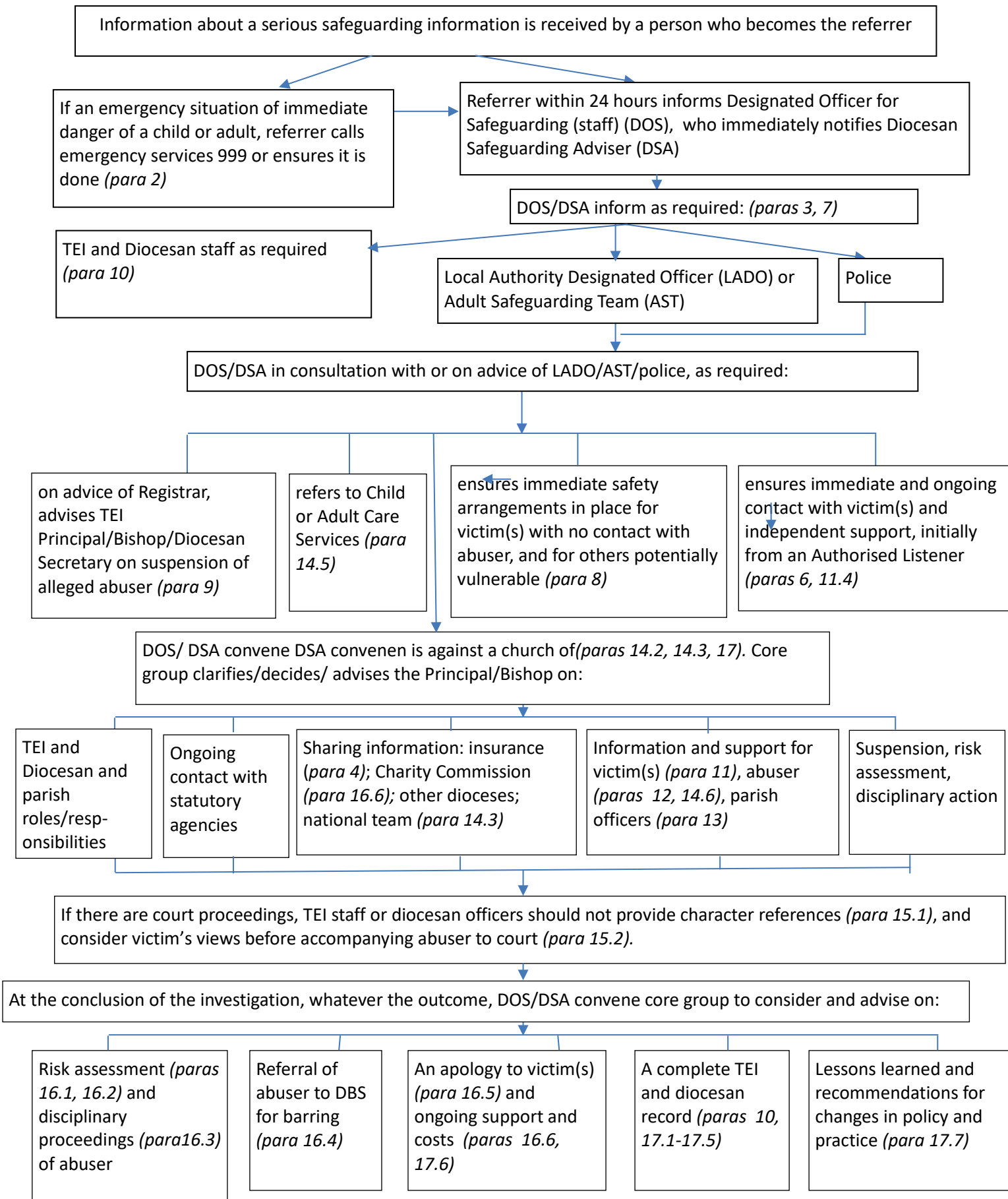
Before an appointment can be made applicants who will have substantial contact with children and / or adults experiencing, or at risk of abuse or neglect in their roles will be required to obtain an enhanced criminal record check (with or without a barred list check (as appropriate)) from the Disclosure and Barring Service.

All information declared on this form will be carefully assessed to decide whether it is relevant to the post applied for and will only be used for the purpose of safeguarding children, young people and / or adults experiencing, or at risk of abuse or neglect.

Please note that the existence of a criminal record will not necessarily prevent a person from being appointed, it is only if the nature of any matters revealed may be considered to place a child and / or an adult experiencing, or at risk of abuse or neglect at risk.

Responding to Serious Situations
Flow chart extracted and adapted from Church of England Safeguarding Practice
Guidance: Responding to Serious Situations





Types of abuse for more details see¹

Abuse is mistreatment by any other person or persons that violates a person's human and civil rights. The abuse can vary, from treating someone with disrespect in a way that significantly affects the person's quality of life, to causing actual physical or mental suffering.

1. Physical Abuse. A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child or adult. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
2. Sexual Abuse. Involves forcing or enticing a child or adult to take part in sexual activities, whether or not the child or adult is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children or vulnerable adults in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.
3. Neglect and acts of omission. The persistent failure to meet an individual's basic physical and/or psychological needs, likely to result in the serious impairment of their health or development. Including ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.
4. Emotional/psychological Abuse (including Web-based bullying and witnessing Domestic Violence/Abuse). The persistent emotional maltreatment of a child or adult such as to cause severe and persistent adverse effects on the individual's emotional development. It may involve conveying to them that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.
5. Institutional Abuse. Institutional Abuse occurs where the routines and regimes within care settings (day, residential, hospital or other institutions including TEIs) deny people rights, choices and opportunities. Abuse can be caused by weak or oppressive management, inadequate staffing (numbers, competence), inadequate supervision or support, "closed" communication, lack of knowledge of Whistleblowing policies and lack of training.
6. Discriminatory Abuse. Including racist, sexist, that based on a person's disability, sexual orientation, and other forms of harassment, slurs or similar treatment.
7. Financial / material abuse. Including theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits;
8. Domestic Violence/Abuse. Domestic violence is physical, sexual, psychological or financial violence that takes place within an intimate or family-type relationship and that forms a pattern of coercive and controlling behaviour. This can include forced marriage and so-called 'honour crimes'. Domestic violence may include a range of abusive behaviours, not all of which are in themselves inherently physically violent
9. Spiritual Abuse. The inappropriate use of religious belief or practice. This can include the misuse of the authority of leadership or penitential discipline, oppressive teaching, or intrusive healing and deliverance ministries.

¹ For children see [Working Together to Safeguard Children](#) page 85 and for adults [No secrets](#) paragraph 2.7

