



## WYCLIFFE HALL

### Safeguarding Policy

#### Preamble

Wycliffe Hall is committed to supporting and promoting the welfare of its students, staff and families and to the promotion of a safe, positive environment. The Hall recognises that, within the course of its activities, its students and staff may come into contact with children or vulnerable adults who are not members of the Hall. The Hall wishes to ensure that it maintains the highest possible standards to meet its social, moral and legal responsibilities to protect and safeguard the welfare of children and vulnerable adults with whom the Hall's work brings it into contact. The Hall is committed to promoting good practice in relation to safeguarding. In the management of its community, the discharge of its functions, and the implementation of this policy, the Hall will remain mindful of its duty of care and other legal obligations owed under statute.

#### Background & Core Principles

1. Wycliffe Hall is an independent Company and Regulated Activity Provider and is, therefore, required to incorporate all relevant legislation and Government guidance in its safeguarding policy and is responsible for its independent implementation and compliance. Ultimate authority and responsibility for safeguarding rests with Wycliffe Hall Council.
2. Wycliffe Hall is a Church Body of the Church of England and is, therefore, subject to relevant Church of England legislation and guidance in its safeguarding policy. Wycliffe Hall adopts and implements [the House of Bishops' Policy Promoting a Safer Church](#) by whatever means is required and reasonable in its function as a Church Body.
3. Wycliffe Hall is a Permanent Private Hall of the University of Oxford and is, therefore, subject to [relevant University statutes and guidance](#) in its safeguarding policy.
4. Whilst all efforts have been undertaken to incorporate all relevant legislation and guidance from all institutions under which the Hall is accountable, priority will be given to 1., above, when considering the Hall's response and actions to safeguarding concerns.

## **Key Safeguarding Roles & Contact Details**

### **Wycliffe Hall Safeguarding Lead:**

- Hall policy compliance
- Staff compliance
- Safeguarding reporting
- Staff & Student training

**John Olson**

01865 274200

[safeguarding@wycliffe.ox.ac.uk](mailto:safeguarding@wycliffe.ox.ac.uk)

### **Wycliffe Hall Safeguarding Deputy Lead:**

- Administrative support
- Student compliance
- Safeguarding reporting

**Lorand Deszpa**

01865 274200

[lorand.deszpa@wycliffe.ox.ac.uk](mailto:lorand.deszpa@wycliffe.ox.ac.uk)

[safeguarding@wycliffe.ox.ac.uk](mailto:safeguarding@wycliffe.ox.ac.uk)

### **Wycliffe Hall Trustee for Safeguarding**

**Mrs Sarah Finch**

[sarahafinch@yahoo.co.uk](mailto:sarahafinch@yahoo.co.uk)

### **Oxford Diocesan Safeguarding Team:**

01865 208295

[safeguardingreferrals@oxford.anglican.org](mailto:safeguardingreferrals@oxford.anglican.org)

[safeguarding@oxford.anglican.org](mailto:safeguarding@oxford.anglican.org)

### **Oxford Safeguarding Adults Board:**

<https://www.osab.co.uk/>

[Reporting Concerns about Adults](#)

### **Oxford MASH (Safeguarding Children):**

0345 050 7666

[Reporting Concerns about Children](#)

### **University of Oxford Safeguarding:**

Regarding Staff:

Director of Human Resources

[director.hr@admin.ox.ac.uk](mailto:director.hr@admin.ox.ac.uk)

Regarding Students or Children:

Director of Student Welfare & Support Services

[director.swss@admin.ox.ac.uk](mailto:director.swss@admin.ox.ac.uk)

### **Emergency, Immediate Response Needed:**

**999**

## **Reporting a Safeguarding Concern**

Safeguarding is everyone's business.

If any staff member, student, trustee, member of the Hall, or wider community has any past, ongoing, or potential future safeguarding concerns, they should be reported to the Safeguarding Lead or Safeguarding Deputy Lead. In cases in which it was not possible or expedient to report to Safeguarding staff, any Hall staff member or trustee can receive the report and then refer it to the Safeguarding Lead.

If a safeguarding concern is raised against the Safeguarding Lead or any other senior Hall staff member, it should be reported directly to the Diocesan Safeguarding Advisor.

A safeguarding concern involving a child or vulnerable adult should also be reported to the relevant statutory agency and/or police.

Documentation should be kept including the facts of the safeguarding report, the person receiving the report, and the person or agency receiving any subse

For more practice guidance on responding to safeguarding concerns, see *Practice Guidance: Responding to Safeguarding Concerns or Allegations that Relate to Children, Young People and Vulnerable Adults* (Church of England, 2018), [here](#).

## **Key Definitions**

### **Child:**

Any person under 18 years of age.

### **Vulnerable Adult:**

According to the *Care Act 2014*, a vulnerable adult is a person,

"Aged 18 or over; Who may be in need of care services by reason of mental or other disability, age or illness; and who is unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation."

According to *Clergy & Discipline Measure 2016*, a vulnerable adult is a person,

"Aged 18 or over whose ability to protect himself or herself from violence, abuse, neglect or exploitation is significantly impaired through physical or mental disability or illness, old age, emotional fragility or distress, or otherwise; and for that purpose, the reference to being impaired is to being temporarily or indefinitely impaired."

N.B. Adult vulnerability is not necessarily to replace mental capacity under the *Mental Capacity Act 2005* and it should be assumed that an adult retains all legal capacity unless sectioned by an appropriate legal agent or professional. For the purposes of this policy, members of the Hall should always avoid making a judgement about an adult being vulnerable in terms of their capacity and to report safeguarding concerns to the appropriate agencies regardless of potential adult vulnerability in line with its statutory safeguarding obligations.

*When in doubt, it is always best practice to refer and consult with the appropriate external agencies and support those parties in undertaking their subsequent evaluation and work.*

## **Staff Safeguarding Policies & Procedures**

All Hall staff are to have appropriate background checks, safeguarding training, and safer recruitment process appropriate to their role and responsibilities.

### **DBS Checks**

All Hall staff will have a current DBS at the highest level allowed by law according to their job description and role responsibilities. The Hall understands that DBS are measured according to the actual performance of Regulated Activities and that relevant legislation prevents it from requesting more information than is allowed by the appropriate level of DBS check for each role or job description.

Appropriate DBS eligibility depending on job description and role responsibilities can be found here: <https://www.gov.uk/find-out-dbs-check>. For most positions in the Hall, a Basic DBS will be appropriate.

Hall employees who are Church Officers (ordained clergy or any other role operating under a Bishop's licence) will undergo an Enhanced DBS check, including Adult and Children disbaring lists, regardless of job description or role responsibility. Basic DBS check applications can be completed online at: <https://www.gov.uk/request-copy-criminal-record>. Enhanced DBS checks are to be completed by Oxford University Security Services (OUSS). The Hall will pay for all fees associated with DBS checks for employees.

Certain specific Hall employees will require an Enhanced DBS including Children disbaring lists. Hall employees with professional credentials or registration that require a higher level of DBS check (i.e. registered social workers, counsellors/psychotherapists, healthcare providers, etc) will undergo an Enhanced DBS check with Adult and Children disbaring lists included, regardless of job description or role responsibility.

All DBS certificates are valid for three years and will be kept on file by the Hall. DBS renewals will be requested by the Hall, as necessary.

### **International Staff Background Checks**

For international staff who are eligible for a Basic DBS check, an international background check can be carried out by OUSS, or the Hall can accept a police records check from the country(ies) or state(s) of residence from past five calendar years.

For international staff eligible for an Enhanced DBS, an international background check can be carried out by OUSS.

The Hall will pay for all fees associated with international background checks for employees.

### **Safer Recruitment**

Any Hall staff member whose job description and role responsibilities include contact with children or vulnerable adults will be hired according to the Church of England's Safer Recruitment Process (<https://www.churchofengland.org/safeguarding/safeguarding-e-manual/safer-recruitment-and-people-management-guidance>)

Roles requiring Safer Recruitment hiring procedures include: Creche coordinator and Creche coordinator line manager, or any other staff position that works directly with children or vulnerable adults.

### Staff Safeguarding Training

All Hall staff will complete safeguarding training to the level appropriate to their job description and role responsibility. See the training matrix, below:

	Basic Awareness	Foundations	Leadership	Senior Leadership	Domestic Abuse	Safer Recruitment
All Hall Staff	X	X			X	
All ordained	X	X	X		X	
Fellowship Group Tutors	X	X	X		X	
Line Managers/Hiring Staff	X	X	X		X	X
SMT	X	X	X		X	X
Safeguarding Lead	X	X	X	X	X	X
Principal/Vice-Principal	X	X	X	X	X	X

The following modules can be completed online via the Church of England Safeguarding Portal at: <https://safeguardingtraining.cofeportal.org/>

- Basic Awareness
- Foundations
- Domestic Abuse
- Safer Recruitment

Note:

- Leadership Safeguarding is taught live or online via the diocese or approved trainer.
- Senior Leadership is taught via the National Safeguarding Team.
- Completion of required safeguarding modules will be kept on file by the Hall.
- All safeguarding training modules are valid for three years.

### **Trustee Safeguarding Policies & Procedures**

Trustees (Hall Council members) are required to undergo an Enhanced DBS check if their specific role as a Trustee is in relation to overseeing a Regulated Activity on behalf of the Hall. This would include any Trustees for Safeguarding.

Trustees who are ordained will have undergone an Enhanced DBS by their diocese by virtue of their status as a Church Officer.

Trustees are encouraged to complete Basic Awareness and Foundation safeguarding training modules (see above). Some trustees will have been required to complete these modules by virtue of their status as a Church Officer.

The Governance & Nominations Committee of Wycliffe Hall Council may require trustees to undergo a Basic or Enhanced DBS check and to complete safeguarding training at their discretion.

### **Serious Incident Reporting**

Wycliffe Hall trustees carry responsibility for reporting any Serious Incidents to the Charity Commission according to Charity Commission guidance, found here:

<https://www.gov.uk/guidance/how-to-report-a-serious-incident-in-your-charity>

## **Student Safeguarding Policies & Procedures**

Students are not required to hold a DBS check nor complete any safeguarding training in order to be a member of the Hall, but certain students are required to undergo a DBS check and/or complete safeguarding training modules by virtue of their status in the Church of England or if they wish to engage in a Regulated Activity on behalf of the Hall.

### **DBS Checks**

All ordinands are required to undergo an Enhanced DBS check, including Adult and Children disbarring lists by virtue of their status as Church Officers in the Church of England. It is expected that sending dioceses will have completed an Enhanced DBS check on all ordinands prior to approving them for ordination training, but the Hall can assist ordinands in acquiring an Enhanced DBS check through OUSS, as needed. The Hall should pay the application fee to OUSS on behalf of the student but invoice the sending diocese for reimbursement.

Independent students only need to undergo a DBS check if they wish to perform a Regulated Activity on behalf of the Hall. This includes, but is not limited to:

- Creche volunteering
- Ministry placements
- Missions

Independent students will generally be limited to Basic DBS checks, including for volunteering in creche. Exceptions may be made for placements or missions when the independent student should have a DBS check at the level expected by the receiving organisation. The Hall should determine what level of DBS check is required for independent student participants in advance of sending students on mission or placement in order to assist them in applying for the proper level of DBS check. The Hall notes that it is a violation of legislation to require independent students to apply for a DBS beyond the scope of the type of work they expect to perform on behalf of the Hall, especially an Enhanced DBS check when one is not clearly required by law.

Appropriate DBS eligibility depending on student status and volunteer responsibility can be found here: <https://www.gov.uk/find-out-dbs-check>. Basic DBS check applications can be completed online at: <https://www.gov.uk/request-copy-criminal-record>. Enhanced DBS checks are to be completed by Oxford University Security Services (OUSS). Independent students are expected to pay for all fees associated with DBS checks.

### **International Students Background Checks**

International background checks are not normally required for creche volunteers. For placements and/or college mission, it is up to the discretion of the receiving organisation to require the scope and type of an international background check. The Hall should determine whether or not a receiving organisation requires an international background check well in advance of sending students on mission or placement in order to assist them in applying for the scope and type of international background check required.

For international students who are eligible for a Basic DBS check, an international background check can be carried out by OUSS, or the Hall can accept a police records check from the country(ies) or state(s) of residence from past five calendar years.

For international students eligible for an Enhanced DBS check, an international background check can be carried out by OUSS.

The Hall will invoice sending dioceses for all fees associated with international background checks for ordinands. Independent students are expected to pay for all fees related to international background checks.

### Student Safeguarding Training

Safeguarding training is not required for students in order to be a member of the Hall but is required for certain students in certain contexts. Please see the training matrix, below.

	Basic Awareness	Foundations	Leadership	Domestic Violence	Safer Recruiting
Ordinands	X	X	X	X	X
Independent Students	X	X		Optional	

The following modules can be completed online via the Church of England Safeguarding Portal at: <https://safeguardingtraining.cofeportal.org/>

- Basic Awareness
- Foundations
- Domestic Abuse
- Safer Recruitment

Note:

- Leadership safeguarding is to be taught annually. The Hall has a responsibility to arrange teaching in-college by an approved trainer. Completion of safeguarding training will be recorded on ordinands' final year reports.
- Ordinands are required to complete all required modules before ordination but must complete Basic Awareness and Foundations before participation in a ministry placement, mission, or Regulated Activity on behalf of the Hall.
- Independent students are required to complete Basic Awareness and Foundations before participation in a ministry placement, mission, or Regulated Activity on behalf the Hall.
- Completion of required safeguarding modules will be kept on file by the Hall.
- All safeguarding training modules are valid for three years.

### Confidentiality

Should an incident arise where information needs to be shared with internal stakeholders or external bodies, such as those indicated herein, the Hall will in all cases follow the University's Guidance on Confidentiality in Health and Welfare, which considers disclosure of personal information about students, including special category data about a student's physical or mental health, where welfare staff reasonably believe that a risk of serious harm to the student or others exists.

In general, information relating to the health and welfare of an individual will amount to special category data (as defined in the UK General Data Protection Regulation (UK GDPR)) and must be kept confidential and only disclosed with consent. The University's Guidance sets out the basis for dealing with exceptions to that general rule, and therefore where the Hall's Data Protection Policy will be superseded by this Guidance. Where safeguarding concerns have been raised, the Hall reserves the right to make contact with any relevant party or body and share these concerns.



It should be noted that a significant amount of sharing of personal data relating to students is already permitted and envisaged between University departments and Colleges under both the Terms and Conditions of the student's contract with the University (at <https://www.ox.ac.uk/students/new/contract>) and The student Privacy Notice (incorporated as part of that contract) at <https://compliance.admin.ox.ac.uk/student-privacy-policy>. The Student Privacy Notice was updated in 2020 to clarify limited circumstances in which special category data related to health might be shared even if students have not consented to it (i.e. where there is a risk of serious harm), providing the safeguards within the Student Privacy Notice and this Guidance are followed.

Those involved in safeguarding concerns or incidents should additionally note that the University Guidance refers to "Students on Professional Courses", and states that "Special considerations apply to students on courses leading to qualifications for professions governed by codes of conduct and health intended to protect the public for example, medicine and teaching".<sup>1</sup>

Those training for ordination should expect that DDOs, nominating Bishops, or other Church of England officials may need to be informed of any incidents or concerns that the Hall has, and that the Hall may seek the advice of Diocesan Safeguarding Officers or other parties when dealing with a risk of serious harm, and that reports may be kept within a student's personal file.

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<sup>1</sup> Section 9 of

[https://www.ox.ac.uk/sites/files/oxford/field/field\\_document/SWSS%20Confidentiality%20Statement.pdf](https://www.ox.ac.uk/sites/files/oxford/field/field_document/SWSS%20Confidentiality%20Statement.pdf).

## **Appendix: Key Legislation, Practice Guidance, & Sources**

The following sources were consulted in drafting this safeguarding policy:

- **UK Government:**

DBS Adult Workforce Guide (2022)

DBS Child Workforce Guide (2022)

Guidance on Rehabilitation of Offenders Act and the Exceptions Order 1975 (2020)

Police Act 1997 (Criminal Records) (Amendment) Regulations 2013

Regulated activity (Adults), *Department of Health*, 2011

Regulated activity in relation to children: scope, Factual Note, *Department for Education*, 2012

Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975

Safeguarding Vulnerable Groups Act 2006

Standard DBS Eligibility Guide

- **Charity Commission**

Guidance, "How to report a serious incident in your charity," accessed 22/01/2022

- **Church of England**

Code of Safer Working Practice 02.07.21

Key Roles & Responsibilities of Church Officers and Bodies Practice Guidance (2017)

Parish Safeguarding Handbook (2018)

Promoting a Safer Church, House of Bishops' Safeguarding Policy (2017)

Safeguarding & Clergy Discipline Measure (2016)

Safer Environment & Activities (Oct 2019)

Safer Recruitment Guidance

- **University of Oxford**

Safeguarding 'at-risk' adults and children Code of Practice (2015)

Guidance on Confidentiality in Student Health and Welfare

VERSION CONTROL					
Version Number	Policy Gatekeeper	Date of Approval	Committee	Date to Take Effect	Date of Next Review
New V1	JCT	17.11.22	Hall Council	17.11.22	MT23