

**Guidance for safe working practice with learners**

Reviewed August 2020

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**I. Definitions**

References made to ‘child’ and ‘children’ refer to children and young people under the age of 18 years. However, the principles of the document apply to professional behaviours towards all students, including those over the age of 18 years. ‘Child’ should therefore be read to mean **any student** at the education establishment.

References made to adults and staff refer to all those who work with students in an educational establishment, in either a paid or unpaid capacity. This would also include, for example, those who are not directly employed by the College e.g. Local Authority staff, sports coaches.

The term ‘allegation’ means where it is alleged that a person who works with children has

 behaved in a way that has harmed a child, or may have harmed a child;

 possibly committed a criminal offence against or related to a child; or,

 behaved towards a child or children in a way that indicates they may pose a risk of harm to children.

References are made in this document to legislation and statutory guidance which differ dependent on the setting and alter over time. However, the behavioural principles contained within the document remain consistent, hence, wherever possible, such references have been removed in order that the document does not appear to quickly become out of date or to apply only to certain staff or settings.

**II. Overview and purpose of guidance**

This document is an update by the Safer Recruitment Consortium of a document previously published for schools by DfES. It was initially issued as those working with children had expressed concern about their vulnerability and requested clearer advice about what constitutes illegal behaviour and what might be considered as misconduct. Education staff asked for practical guidance about which behaviours constitute safe practice and which behaviours should be avoided. This safe working practice document is NOT statutory guidance from the DfE; it is for employers, local authorities and/or LSCBs to decide whether to use this as the basis for their code of conduct / staff behaviour guidelines.

The document seeks to ensure that the responsibilities of educational settings leaders towards children and staff are discharged by raising awareness of illegal, unsafe, unprofessional and unwise behaviour. It should assist staff to monitor their own standards and practice and reduce the risk of allegations being made against them. It is also recognised that not all people who work with children work as paid or contracted employees. The principles and guidance outlined in this document still apply and should be followed by any person whose work brings them into contact with children.

The guidance will also support employers in giving a clear message that unacceptable behaviour will not be tolerated and that, where appropriate, legal or disciplinary action is likely to follow. Once adopted, as part of an establishment’s staff behaviour policy, the school or settings may refer to the document in any disciplinary proceedings.

Whilst every attempt has been made to cover a wide range of situations, it is recognised that any guidance cannot cover all eventualities. There may be times when professional judgements are made in situations not covered by this document, or which directly contravene the guidance given by the employer. It is expected that in these circumstances staff will always advise their senior colleagues of the justification for any such action already taken or proposed.

All staff have a responsibility to be aware of systems within their school which support safeguarding and these should be explained to them as part of staff induction and in regular staff training sessions. This includes the school’s child protection policy and staff behaviour policy (sometimes called code of conduct) of which this document will become a part.

It is recognised that the vast majority of adults who work with children act professionally and aim to provide a safe and supportive environment which secures the well-being and very best outcomes for children in their care. Achieving these aims is not always straightforward, as much relies on child and staff interactions where tensions and misunderstandings can occur. This document aims to reduce the risk of these.

It must be recognised that some allegations will be genuine as there are people who seek out, create or exploit opportunities to harm children. However, allegations may also be false or misplaced and may arise from differing perceptions of the same event. When they occur, they are inevitably distressing and difficult for all concerned. It is therefore essential that all possible steps are taken to safeguard children and ensure that the adults working with them do so safely.

The 2019 guidance made clear that whilst every attempt had been made to cover a wide range of situations, it should be recognised that any guidance cannot cover all eventualities. The current pandemic is one such example of a circumstance which had not been foreseen and where Government, local authorities, school leaders and staff are having to review and amend guidance rapidly.

Now more than ever before, professional judgements may need to be made in situations not covered by existing guidance, or which directly contravene the guidance given by the employer. In such circumstances, staff will always advise their senior colleagues of the justification for any such action already taken or proposed.

All staff have a responsibility to be aware of systems within their College which support safeguarding and any temporary amendment to these should be explained to them by senior managers. This includes the school’s child protection policy, staff behaviour policy (sometimes called the code of conduct) and online safety / acceptable use policy.

**III. Underpinning principles**

 The welfare of the child is paramount

Staff should understand their responsibilities to safeguard and promote the welfare of students

 Staff are responsible for their own actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motivation and intentions

 Staff should work, and be seen to work, in an open and transparent way

 Staff should acknowledge that deliberately invented/malicious allegations are extremely rare and that all concerns should be reported and recorded

 Staff should discuss and/or take advice promptly from their line manager if they have acted in a way which may give rise to concern

 Staff should apply the same professional standards regardless of culture, disability, gender, language, racial origin, religious belief and sexual orientation

 Staff should not consume or be under the influence of alcohol or any substance, including prescribed medication, which may affect their ability to care for children

 Staff should be aware that breaches of the law and other professional guidelines could result in disciplinary action being taken against them, criminal action and/or other proceedings including barring by the Disclosure & Barring Service (DBS) from working in regulated activity, or for acts of serious misconduct prohibition from teaching by the Teaching Regulation Agency (TRA)

 Staff and managers should continually monitor and review practice to ensure this guidance is followed

Staff should be aware of and understand their establishment’s child protection policy, arrangements for managing allegations against staff, staff behaviour policy, whistle blowing procedure and the procedures of the Multi-agency Partnership (MAP).

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| 1. **Introduction**   Adults have a crucial role to play in the lives of children. This guidance has been produced to help them establish the safest possible learning and working environments which safeguard children and reduce the risk of them being falsely accused of improper or unprofessional conduct. |  | *This means that these guidelines:*   * *Apply to all adults working in Education and Early Years settings whatever their position, role or responsibilities* |
| 1. **Responsibilities**   Staff are accountable for the way in which they: exercise authority; manage risk; use resources; and safeguard children.  All staff have a responsibility to keep students safe and to protect them from abuse (sexual, physical and emotional), neglect and safeguarding concerns. Students have a right to be safe and to be treated with respect and dignity. It follows that trusted adults are expected to take reasonable steps to ensure their safety and well-being. Failure to do so may be regarded as professional misconduct  The safeguarding culture of the College is, in part, exercised through the development of respectful, caring and professional relationships between adults and students and behaviour by the adult that demonstrates integrity, maturity and good judgement.  The public, local authorities, employers and parents/carers will have expectations about the nature of professional involvement in the lives of children. When individuals accept a role with the College they should understand and acknowledge the responsibilities and trust involved in that role.  Employers have duties towards their employees and others under Health and Safety legislation which requires them to take steps to provide a safe working environment for staff.  Legislation also imposes a duty on employees to take care of themselves and anyone else who may be affected by their actions or failings. An employer’s Health and Safety duties and the adults’ responsibilities towards safeguarding students should not conflict. Safe practice can be demonstrated through the use and implementation of these guidelines. |  | *This means that staff should:*   * *Understand the responsibilities that are part of their employment or role, and be aware that sanctions will be applied if these provisions are breached.* * *Understand how to raise a concern and contact designated staff or partner agencies if they have a concern about a child, particularly if the normal arrangements have been amended* * *Always act, and be seen to act, in the student’s best interests* * *Avoid any conduct which would lead any reasonable person to question their motivation and intentions.* * *Take responsibility for their own actions and behaviour.* |
| 1. **Making professional judgements** |  |  |
| This guidance cannot provide a complete checklist of what is or is not appropriate behaviour for staff. It does highlight however, behaviour which is illegal, inappropriate or inadvisable. There will be rare occasions and circumstances in which staff have to make decisions or take action win the best interests of a student which could contravene this guidance or where no guidance exists. Individuals are expected to make judgements about their behaviour in order to secure the best interests and welfare of the students in their charge and in doing so, will be seen to be acting reasonably. These judgements should always be recorded and shared with a manager.  Adults should always consider whether their actions are warranted, proportionate, safe and applied equitably. |  | *This means that where no specific guidance exists staff should:*   * *Discuss the circumstances that informed their action, or their proposed action with their line manager or, where appropriate, the College’s designated safeguarding lead. This will help to ensure that the safest practices are employed and reduce the risk of actions being misinterpreted.* * *Always discuss any misunderstanding, accidents or threats with the line manager or designated safeguarding lead* * *Always record discussions and actions taken with their justifications* * *Record any areas of disagreement and if necessary refer to another agency/ the LA/ Ofsted/TRA/Other regulatory body.* |
| 1. **Power and positions of trust and authority**   As a result of their knowledge, position and/or the authority invested in their role, all those working with children in the College are in a position of trust in relation to all students.  The relationship between a person working with students is one in which the adult has a position of power or influence. It is vital for adults to understand this power; that the relationship cannot be one between equals and the responsibility they must exercise as a consequence.  The potential for exploitation and harm of vulnerable students means that adults have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.  Staff should always maintain appropriate professional boundaries, avoid behaviour which could be misinterpreted by others and report and record any such incident. This is as relevant in the online world as it is in the classroom; staff engaging with students and / or parents online have a responsibility to model safe practice at all times.  Where a person aged 18 or over is in a position of trust with a child under18, it is an offence for that person to engage in sexual activity with or in the presence of that child, or to cause or incite that child to engage in or watch sexual activity. |  | *The means that staff should not:*   * *Use their position to gain access to information for their own advantage and/or a student’s or family’s detriment* * *Use their power to intimidate, threaten, coerce or undermine students* * *Use their status and standing to form or promote relationships with students which are of a sexual nature, or which may become so* |
| 1. **Confidentiality**   The storing and processing of personal information is governed by the General Data Protection Regulation (GDPR) 2018. Employers should provide clear advice to staff about their responsibilities under this legislation so that, when considering sharing confidential information. Those principles should apply.  Staff may have access to confidential information about students and their families which must be kept confidential at all times and only shared when legally permissible to do so and in the best interest of the student. Records should only be shared with those who have a legitimate professional need to see them.  Staff should never use confidential or personal information about a student or her/his family for their own, or others advantage (including that of partners, friends, relatives or other organisations). Information must never be used to intimidate, humiliate or embarrass the student. Confidential information should never be used casually in conversation or shared with any person other than on a need-to-know basis. In circumstances where the student’s identity does not need to be disclosed the information should be used anonymously.  There are some circumstances in which a member of staff may be expected to share information about a student, for example when abuse is alleged or suspected. In such cases, individuals have a responsibility to pass information on without delay, but only to those with designated safeguarding responsibilities.  If a student – or their parent/carer makes a disclosure regarding abuse or neglect, the member of staff should follow the Colleges procedures. The adult should not promise confidentiality to a child or parent, but should give reassurance that the information will be treated sensitively.  If a member of staff is in any doubt about whether to share information or keep it confidential he or she should seek guidance from the Designated Safeguarding Lead. Any media or legal enquiries should be passed to senior management. |  | *This means that staff:*   * *Need to know the name of their Designated Safeguarding Lead and be familiar with LSCB child protection procedures and guidance* * *Are expected to treat any information they receive about students and families in a discreet and confidential manner* * *Should seek advice from a senior member of staff (designated safeguarding lead) if they are in any doubt about sharing information they hold which has been requested of them* * *Need to be clear about when information can/must be shared and in what circumstances* * *Need to know the procedures for responding to allegations against staff and to whom any concerns or allegations should be reported* * *Need to ensure that where personal information is recorded using modern technologies that systems and devices are kept secure* |
| 1. **Standards of behaviour**   All staff have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of children. They should adopt high standards of personal conduct in order to maintain confidence and respect of the general public and those with whom they work.  There may be times where an individual’s actions in their personal life come under scrutiny from the community, the media or public authorities, including with regard to their own children, or children or adults in the community. Staff should be aware that their behaviour, either in or out of the workplace, could compromise their position within the work setting in relation to the protection of children, loss of trust and confidence, or bringing the employer into disrepute. Such behaviour may also result in – prohibition by the Teaching Regulation Agency (TRA), a bar from engaging in regulated activity or action by another relevant regulatory body.  The Childcare (Disqualification) Regulations 2018 set out grounds for disqualification under the Childcare Act 2006 where the person or a person living in the same household or employed in the same household meets certain criteria set out in the Regulations. For example, an individual will be disqualified where they have committed a relevant offence against a child; been subject to a specified order relating to the care of a child; committed certain serious sexual or physical offences against an adult; been included on the DBS children’s barred list; been made subject to a disqualification order or by the court; previously been refused registration as a childcare provider or provider or manager of a children’s home or had such registration cancelled. A disqualified person is prohibited from providing relevant early or later year’s childcare as defined in the Children’s Act 2006 or being directly concerned in the management of such childcare. Schools and private childcare settings are also prohibited from employing a disqualified person in respect of relevant early or later years child care.  The Disqualification under the Childcare Act 2006 (Regulations 2018) state that schools should make clear their expectation that staff should disclose any relationship or association (in the real world or online) that may impact on students. This applies to all staff in all schools and our college, not just those in early years settings. |  | *This means that a member of staff should not:*   * *Behave in a manner which would lead a reasonable person to question their suitability to work with children or to act as an appropriate role model* * *Make, or encourage others to make sexual remarks to, or about, a student* * *Use inappropriate language to or in the presence of students* * *Discuss their personal or sexual relationships with or in the presence of students* * *Make (or encourage others to make) unprofessional personal comments which scapegoat, demean or humiliate, or might be interpreted as such*   *This means that staff should:*   * *Inform the Head of HR of any cautions, convictions or relevant orders accrued during their employment, and/or if they are charged with a criminal offence* * *Be aware that behaviour by themselves or those with whom they share a household, or others in their personal lives, may impact on their work with children* |
| 1. **Dress and appearance**   A person’s dress and appearance are matters of personal choice and self-expression and some individuals will wish to exercise their own customs. However, staff should select a manner of dress and appearance appropriate to their professional role and which may be necessarily different to their adopted in their personal life. Staff should ensure they are dressed decently, safely and appropriately for the tasks they undertake, this also applies to online or virtual teaching or when working with small groups on site (in the case of schools/Colleges who remain open to vulnerable children or those of critical workers). Those who dress or appear in a manner which could be viewed as offensive or inappropriate will render themselves vulnerable to criticism or allegation. |  | *This means that staff should wear clothing which:*   * *Promotes a positive and professional image* * *Is appropriate to their role* * *Is not likely to be viewed as offensive, revealing, or sexually provocative* * *Does not distract, cause embarrassment or give rise to misunderstanding* * *Is absent of any political or otherwise contentious slogans* * *Is not considered to be discriminatory* * *Is compliant with professional standards* * *in online engagement, is similar to the clothing they would wear on a normal College day* |
| 1. **Gifts, rewards, favouritism and exclusion**   Staff need to take care that they do not accept any gift that might be construed as a bribe by others, or lead he giver to expect preferential treatment.  There are occasions when students or parents wish to pass small token of appreciation to staff e.g. at Christmas or as a thank-you and this is usually acceptable. However, it is unacceptable to receive gifts on a regular basis or of any significant value.  Similarly, it is inadvisable to give such personal gifts to students or their families. This could be interpreted as a gesture to either bribe or groom. It may also be perceived that a ‘favour’ of some kind is expected in return.  Any reward given to a student should be in accordance with agreed practice and not based on favouritism.  Adults should exercise care when selecting children for specific activities, jobs or privileges in order to avoid perceptions of favouritism or injustice. Similar care should be exercised when students are excluded from an activity. Methods of selection and exclusion should always be subject to clear, fair, agreed criteria. |  | *This means that staff should:*   * *Be aware of and understand the College’s relevant procedures and policies* * *Ensure that gifts received or given in situation s which may be misconstrued are declared and recorded* * *Only give gifts to students as part of an agreed reward system* * *Where giving gifts other than as above, ensure that these are of insignificant value and given to all students equally* * *Ensure that all section processes of students are fair and these are undertaken and agreed by more than one member of staff* * *Ensure that they do not behave in a manner which is either favourable or unfavourable to individual students.* |
| 1. **Infatuations and ‘crushes’**   All staff need to recognise that it is not uncommon for students to be strongly attracted to a member of staff and/or develop a ‘crush’ or infatuation. They should make every effort to ensure that their own behaviour cannot be brought into question, does not appear to encourage this and be aware that such infatuation may carry a risk of their words or actions being misinterpreted,  Any member of staff who receive a report, overhears something, or otherwise notices any sign, however small or seemingly insignificant, that a young person has become or may be becoming infatuated with either themselves or a colleague should immediately report this to their line manager. In this way early intervention can be taken which can prevent escalation and avoid hurt, embarrassment or distress for those concerned.  The line manager should give careful thought to those circumstances where the staff member, student and their parents/carers should be spoken to and should ensure a plan to manage the situation is put in place. The plan should respond sensitively to the student and staff member and maintain the dignity of all. The plan should involve all parties, be robust and regularly monitored and reviewed. |  | *This means that staff should:*   * *Report any indications (verbal, written or physical) that suggest a student may be infatuate with a member of staff* * *Always maintain professional boundaries.*   *This means that line managers should:*   * *Put action plans in place where concerns are brought to their attention.* |
| 1. **Social contact outside of the workplace**   It is acknowledged that staff may have genuine friendships and social contact with parents of students, independent of the professional relationship. Staff should, however, also be aware that professionals who sexually harm children often seek to establish relationships and contact outside of the workplace with both the child and their parents in order to ‘groom’ the adult and the child and/or create opportunities for sexual abuse.  It is also important to recognise that social contact may provide opportunities for other types of grooming such as for the purpose of sexual exploitation or radicalisation.  Staff should recognise that some types of social contact with students or their families could be perceived as harmful or exerting inappropriate influence on students and may bring the college into disrepute (e.g. attending a political protest, circulating propaganda).  If a student or parent seeks to establish social contact, or if this occurs coincidentally, the member of staff should exercise her/his professional judgement. This applies to social contacts made through outside interests or the staff member’s own family.  Some staff may, as part of their professional role be required to support a parent or carer. If that person comes to depend upon the staff member or seeks support outside of their professional role this should be discussed with the line manager and where necessary referrals made to the appropriate support agency. |  | *This means that staff must:*   * *Always approve any planned social contact with senior colleagues, for example when it is part of a reward scheme or pastoral care programme* * *Advise their line manager of any regular social contact they have with a student* * *Refrain from sending personal communication to students or parents unless agreed with their line manager* * *Report and record any situation which may place a student at risk or which might compromise the College or their own professional standing* * *Inform their manager of any relationship with a parent where this extends beyond the usual parent/professional relationship* * *Inform their line manager of any requests or arrangements where parents wish to use their services outside of the college, eg tutoring* |
| 1. **Communication with students (including the use of technology)**   In order to make the best use of the many educational and social benefits of new and emerging technologies students need opportunities to use and explore the digital world. Online risks are posed more by behaviours and values than the technology itself.  Staff should ensure that they establish safe and responsible online behaviours, working to local and national guidelines and acceptable use policies which detail how new and emerging technologies may be used.  Communication with students both in the ‘real’ world and through web based and telecommunication interactions should take place within explicit professional boundaries. This includes the use of computers, tablets, phones, texts, e-mails, instant messages, social media such as Facebook and Twitter, chat-rooms, forums, blogs, websites, gaming sites, digital cameras, videos, web-cams and other hand-held devices. (Given the ever-changing world of technology it should be noted that this list gives examples only and is not exhaustive.)  Staff should not request or respond to any personal information from students other than which may be necessary in their professional role. They should ensure that their communications are open and transparent and avoid any communication which could be interpreted as ‘grooming behaviour.’  Staff should not give their personal contact details to students for example. E-mail addresses, home or mobile telephone numbers, details of web-based identities. If students locate these by other means and attempt to contact or correspond with the staff member, the adult should not respond and must report the matter to their manager. The student be firmly and politely be informed that this is not acceptable.  Staff should, in any communication with students, also follow the guidance in the section ‘Standards of Behaviour.’  Staff should adhere to College policies, including those with regard to communication with regard to communication with parents and cares and the information they share when using the internet. |  | *This means that adults should:*   * *Not seek to communicate/make contact or respond to contact from students outside of the purposes of their work* * *Not give out their personal details* * *Use only equipment and internet services provided by the College* * *Follow the College’s Acceptable Use Policy* * *Ensure that their use of technologies could not bring their employer into disrepute* * *Not discuss or share data relating to students/parents/carers in staff social media groups* |
| 1. **Physical Contact**   There are occasions when it is entirely appropriate and proper for staff to have physical contact with students, however, it is crucial that they only do so in ways appropriate to their professional role and in relation to the student’s individual needs and any agreed care plan.  Not all students feel comfortable about certain types of physical contact; this should be recognised and, wherever possible, adults should seek the student’s permission before initiating contact and be sensitive to any signs that they may be uncomfortable or embarrassed. Staff should acknowledge that some students are more comfortable with touch than others and/or may be more comfortable with touch from some adults than others. Staff should listen, observe and take note of the student’s reaction or feelings and, so far as is possible, use a level of contact and/or form of communication which is acceptable to the student.  It is not possible to be specific about the appropriateness of each physical contact, since an action that is appropriate with one student, in one set of circumstances, may be inappropriate in another, or with a different student.  Any physical contact should be in response to the student’s needs at the time, of limited duration and appropriate to their age, stage of development, gender, ethnicity and background. Adults should therefore, use their professional judgement at all times.  Physical contact should never be secretive, or for the gratification of the adult, or represent a misuse of authority. If a member of staff believes that an action from them or a colleague could be misinterpreted, or if an action is observed which is possibly abusive the incident and circumstances should be immediately reported to the manager and recorded. Where appropriate, the manager should consult with the Local Authority Designated Officer (LADO.)  Extra caution may be required when it is known that a student has suffered previous abuse or neglect. Staff need to be aware that the student may associate physical contact with such experiences. They also should recognise that these students may seek out inappropriate physical contact. In such circumstances staff should deter the student sensitively and help them to understand the importance of personal boundaries.  A general culture of ‘safe touch’ should be adopted, where appropriate, to the individual requirements of each student. Students with special educational needs or disabilities may require more physical contact to assist their everyday learning. The arrangements should be understood and agreed by all concerned, justified in terms of the student’s needs, consistently applied and open to scrutiny. |  | *This means that adults should:*   * *Be aware that even well intentioned physical contact may be misconstrued by the student, an observer or any person to whom this action is described* * *Never touch a student in any way which may be considered indecent* * *Always be prepared to explain actions and accept that all physical contact be open to scrutiny* * *Never indulge in horseplay or fun fights* * *Always allow/encourage students, where able, to undertake self-care tasks independently* * *Ensure the way they offer comfort to a distressed student is age appropriate* * *Always tell a colleague when and how they offered comfort to a distressed student* * *Establish the preferences of students* * *Consider alternative, where it is anticipated that a student might misinterpret or be uncomfortable with physical contact* * *Always explain to the student the reason why contact is necessary and what form that contact will take* * *Report and record situation which may give rise to concern* * *Be aware if cultural or religious views about touching and be sensitive to issues of gender.* |
| 1. **Other activities that require physical contact**   In certain curriculum areas, such as PE, drama or music, staff may need to initiate some physical contact with students, for example to demonstrate technique in the use of a piece of equipment, adjust posture, or support a student so they can perform an activity safely or prevent injury.  Physical contact should take place only when it is necessary in relation to a particular activity, it should take place in a safe and open environment i.e. one easily observed by others and last for the minimum time necessary. The extent of the contact should be made clear and undertaken with the permission of the student. Contact should be relevant to their age/understanding and adults should remain sensitive to any discomfort expressed verbally or non-verbally by the student.  Guidance and protocols around safe and appropriate physical contact may be provided, for example, by sports governing bodies and should be understood and applied consistently. Any incidents of physical contact that cause concern or fall outside of these protocols and guidance should be reported to the senior manager and parent/carer.  It is good practice if all parties clearly understand at the outset, what physical contact is necessary and appropriate in undertaking specific activities. Keeping students informed of the extent and nature of any physical contact may also prevent allegations of misconduct or abuse arising. |  | *This means that staff should:*   * *Treat students* * *with dignity and respect and avoid contact with intimate parts of the body* * *Always explain to a student the reason why contact is necessary and what form that contact will take* * *Seek consent of parents where a student is unable to give this e.g. because of a disability* * *Consider alternatives, where it is anticipated that a student might misinterpret any such contact* * *Be familiar with and follow recommended guidance and protocols* * *Conduct activities where they can be seen by others* * *Be aware of gender, cultural and religious issues that may need to be considered prior to initiating physical contact* |
| 1. **Intimate/personal care**   Staff should follow the College’s agreed protocol on changing and intimate/personal care which ensure that the health, safety, independence and welfare of students is promoted and their dignity and privacy is respected. Arrangements for intimate and personal care should be open and transparent and accompanied by recording systems.  Students should be encouraged to act as independently as possible and to undertake as much of their own personal care as is possible and practicable. When assistance is required, this should normally be undertaken by one member of staff, however they should try to ensure that another appropriate adult is in the vicinity who is aware of the task to be undertaken and that, wherever possible, they are visible and/or audible. Intimate or personal care procedures should not involve more than one member of staff unless the student’s care plan specifies the reason for this.  A signed record should be kept of all intimate and personal care tasks undertaken and, where these have been carried out in another room, should include times left and returned.  Any vulnerability, including those that may arise from a physical or learning difficulty should be considered when formulating the individual student’s care plan. The views of parents, carers and the student, regardless of their age and understanding, should be actively sought in formulating the plan and in the necessary and regular reviews of these arrangements.  Any changes to the care plan should be made in writing and without delay, even if the change in arrangements is temporary; e.g. staff shortages, changes to staff rotas during the pandemic, etc.  Intimate and personal care should not be carried out by an adult that the student does not know. Anyone undertaking intimate / personal care in an education setting is in regulated activity and must have been checked against the relevant DBS barred list, even if the activity only happens once; this includes volunteers. Volunteers and visiting staff from other schools/colleges should not undertake care procedures without appropriate training  Students are entitled to respect and privacy at all times and especially when in a state of undress, including, for example, when changing, toileting and showering. However, there needs to be an appropriate level of supervision in order to safeguard students, satisfy health and safety considerations and ensure that bullying or teasing does not occur. This supervision should be appropriate to the needs and age of the young people concerns and sensitive to the potential for embarrassment. |  | *This means that staff should:*   * *Adhere to the College’s intimate and personal care protocols* * *Make other staff aware of the task being undertaken* * *Always explain to the student what is happening before a care procedure begins* * *Consult with colleagues where any variation from agreed procedure/care plan is necessary* * *Record the justification for any variations to the agreed procedure/care plan and share this information with the student and their parents/carers* * *Avoid any visually intrusive behaviour* * *Where there are changing rooms announce their intention of entering* * *Always consider the supervision needs of the students and only remain in the room where their needs require this*   *This means that adults should not:*   * *Change in the presence or sight of students* * *Shower with students* * allow any adult to assist with intimate or personal care without confirmation from senior leaders that the individual is not barred from working in regulated activity * *Assist with intimate or personal care tasks which the student is able to undertake independently* |
| 1. **Behaviour management**   Corporal punishment and smacking is unlawful in all schools and education settings.  Staff should not use any form of degrading or humiliating treatment to punish a student. The use of sarcasm, demeaning or insensitive comments towards students is completely unacceptable.  Where students display difficult or challenging behaviour, adults should follow the College’s behaviour and discipline policy using strategies appropriate to the circumstances of the situation.  Where a student has specific needs in respect of particularly challenging behaviour, a positive handling plan, including assessment of risk, should be drawn up and agreed by all parties, including, for example, a medical officer where appropriate. |  | *This means that staff should:*   * *Not use force as a form of punishment* * *Try to diffuse situations before they escalate e.g. by distraction* * *Keep parents informed of any sanctions or behaviour management techniques used* * *Be mindful of and sensitive to factors both inside and outside of the College which may impact on a student’s behaviour* * *Follow the College’s behaviour management policy* * *Behave as a role model* * *Avoid shouting at students other than as a warning in an emergency/safety situation* * *Refer to national and local policy and guidance regarding Restrictive Physical Intervention (RPI)* * *Be aware of legislation and potential risks associated with the use of isolation and seclusion* * *Comply with legislation and guidance in relation to human rights and restriction of liberty* |
| 1. **The use of control and physical intervention**   The law and guidance for schools states that adults may reasonably intervene to prevent a child from:   * Committing a criminal offence * Injuring themselves or others * Causing damage to property * Engaging in behaviour prejudicial to good order and to maintain good order and discipline.   Great care must be exercised in order that adults do not physically intervene in a manner which could be considered unlawful.  Under no circumstances should physical force be used as a form of punishment. The use of unwarranted or disproportionate physical force is likely to constitute a criminal offence.  In all cases where physical intervention has taken place, it would be good practice to record the incident and subsequent actions and report these to a manager and the student’s parents.  If physical restraint is likely to be required as part of an Education Health Care Plan, full training will be arranged for relevant staff.  Similarly, where is can be anticipated that physical intervention is likely to be required, a plan should be put in place which the student and parents/carers are aware of and have agreed to. Parental consent does not permit the College to use unlawful physical intervention or deprive a student of their liberty. |  | *This means that staff should:*   * *Always seek to defuse situations and avoid the use of physical intervention wherever possible* * *Where physical intervention is necessary, only use the minimum force and for the shortest time needed,*   *This means that staff should not:*   * *Use physical intervention as a form of punishment* |
| 1. **Sexual conduct with young people (under 18)**   Any sexual behaviour by a member of staff with or towards a student is unacceptable. It is an offence for a member of staff in a position of trust to engage in sexual activity with a student under 18 years of age and sexual activity with a child could be a matter for criminal and/or disciplinary procedures.  Students are protected by the same laws as adults in relation to non-consensual sexual behaviour. They are additionally protected by specific legal provisions depending on their age and understanding. This includes the prohibition of sexual activity with children by adults in a position of trust.  Sexual activity involves physical contact including penetrative and non-penetrative acts, however it also includes non-contact activities such as causing students to engage in or watch sexual activity or the production of pornographic material.  There are occasions when adults embark on a course of behaviour known as ‘grooming’ where the purpose is to gain the trust of a child, and manipulate the relationship so sexual abuse can take place. All staff should undertake appropriate training so they are fully aware of those behaviours that may constitute ‘grooming’ and of their responsibility to always report to a senior manager any concerns about the behaviour of a colleague which could indicate that a student is being groomed. |  | *This means that staff should:*   * *Not have any form of sexual contact with a student from the College* * *Avoid any form of touch or comment which is, or may be considered to be, indecent* * *Avoid any form of communication with student which could be interpreted as sexually suggestive, provocative or give rise to speculation e.g. verbal comments, letters, notes, by email or on social media, phone calls, texts, physical contact* * *Not make sexual remarks to or about a student* * *Not discuss sexual matters with or in the presence of students other that within agreed curriculum or as part of their recognised job role* |
| 1. **Relationships between staff and adult students (aged 18 or over)**   Staff are in a position of trust and care in relation to students and must not engage in behaviour which is likely to jeopardise this position. Staff who are in relationships with adult students are at risk of allegations being made against them. For example, students may make allegations of sexual harassment, or that marking, or assessment has been unjust or unfair. For these reasons, the College does not encourage personal relationships between staff and adult students.  However, there are clear instances where relationships between staff and adult students are inevitable e.g. when such a relationship existed prior to the student or member of staff joining the College. Where a relationship does exist between a member of staff and a student, the member of staff must inform their line manager. |  | *This means that staff should:*   * *Avoid developing personal relationships with adult students* * *Inform their line manager of any personal relationships they may have with adult students*   *This means that line managers should:*   * *Consider the possible negative impact of any relationships between staff and adult students, and take steps to minimise the risk of allegations being made e.g. by arranging for the student in question to be assessed/taught by a different member of staff* |
| 1. **One to one situations**   It is not realistic to state that one to one situations should never take place. However, one to one situations have the potential to make a child/young person more vulnerable to harm by those who seek to exploit their position of trust. Adults working in one to one setting with children and young people may also be more vulnerable to unjust or unfounded allegations being made against them, Staff should recognise this possibility and plan and conduct such meetings accordingly. Every attempt should be made to ensure the safety and security needs of both staff and students are met.  Any 1:1 situation should always be in response to a clear need on behalf of the students and should be avoided if staff have any concerns.  Pre-arranged meetings with students away from College premises should not be permitted unless approval is obtained from their parent (in the case of under 18s) and a member of CMT. |  | *This means that adults should:*   * *Avoid meetings with students in remote, secluded areas of the College* * *Ensure there is visual access and/or an open door in one to one situations* * *Inform other staff of the meeting beforehand, assessing the need to have them present or close by* * *Avoid use of ‘engaged’ or equivalent signs wherever possible. Such signs may create an opportunity for secrecy or the interpretation of secrecy.* * *Always report any situation where a student becomes distressed or angry to a senior colleague* * *Consider the needs an circumstances of the students involved* |
| 1. **Home visits**   All work with students and parents should usually be undertaken in College or other recognised workplace. There are however occasions, in response to an urgent, planned or specific situation or job role where it is necessary to make one-off or regular home visits.  Consideration should be given prior to any planned home visit taking place. The consideration should include an evaluation of any known factors regarding the student, parents/carers and any others living in the household. Consideration should be given to any circumstances which might render the staff member becoming more vulnerable to an allegation being made e.g. hostility, child protection concerns, complaints or grievances. Specific thought should be given to visits outside of ‘office hours’ or in remote or secluded locations. Following the assessment appropriate risk management measure should be put in place before the visit is undertaken. |  | *This means that staff should:*   * *Agree the purpose for any home visit with their manager* * *Adhere to agreed risk management strategies* * *Avoid unannounced visits wherever possible* * *Ensure there is visual access and /or an open door* * *Always make detailed records including times of arrival and departure* * *Ensure any behaviour or situation which gives rise to concern is discussed with their manager* * *Always go to a home visit with another colleague* * *observe social distancing at all times* * *except in an emergency, never enter a home without the parent or carer’s consent or when the parent is absent* |
| 1. **Transporting students**   In certain situations, staff or volunteers may be required to offer to transport students as part of their work. As for any other activity undertaken at work, the employer has a duty to consider the health and safety of their staff and to manage any known risks.  Consideration must be given to the potential distraction of the driver and the supervision of passengers. A judgement should be made about the likely behaviour of and the individual needs of the student(s). If any of them require close supervision, then another adult should travel in the vehicle so that the driver is not distracted or compromised.  Staff should not offer lifts to students unless the need for this has been agreed by a manager. A designated member of staff should be appointed to plan and provide oversight of all transport arrangements and respond to any concerns that may arise.  Wherever possible and practicable it is advisable that transport is undertaken other than in private vehicles and with at least one adult additional to the driver acting as an escort.  It is a legal requirement that all passengers wear seatbelts and the driver should ensure that they do so. They should also be aware of and adhere to current legislation regarding the use of car seats for younger children.  Staff should ensure that their behaviour is safe and that the transport arrangements and the vehicle meet all legal requirements. They should ensure that vehicle is roadworthy and appropriately ensured and that the maximum carrying capacity is not exceeded.  Staff should never offer to transport students outside of their normal working duties, other than in an emergency or where not doing so would mean the student may be at risk. In these circumstances the matter should be recorded and reported to both the manager, and in the case of a student under 18, to their parent’/carer. The college’s health and safety and Trips and Visits policy should set out the arrangements under which staff may use private vehicles to transport students. |  | *This means that staff should:*   * *Plan and agree arrangements with all parties in advice* * *Respond sensitively and flexibly where any concerns arise* * *Take into account any specific or additional needs of the student* * *Have an appropriate licence/permit for the vehicle* * *Ensure thy are fit to drive and free from any drugs, alcohol or medicine which is likely to impair judgement and/or ability to drive* * *Ensure that if they need to be alone with a student this is for the minimum time* * *Be aware that the safety and welfare of the student is their responsibility until this safely passes over to a parent/carer* * *Report the nature of the journey, the route and expected time of arrival in advance in accordance with agreed procedures* * *Ensure that their behaviour and all arrangements ensure vehicle, passenger and driver safety, this includes having proper and appropriate insurance for the type of vehicle being driven* * *Ensure that any impromptu or emergency arrangements of lifts are recorded and can be justified* * *Refer to local and National guidance for Educational Visits* |
| 1. **Educational visits**   Staff responsible for organising educational visits should be familiar with the Department for Education’s advice on Health and Safety available at <https://www.gov.uk/government/publications/health-and-safety-advice-for-schools>  The duties in the Health and safety at Work etc. Act 1974 and the supporting regulations apply to activities taking place on or off the college premises (including school visits) in Great Britain. All colleges must have a Health and Safety policy. This should include policy and procedures for off-site visits, including residential visits and any school-led adventure activities.  The Management of Health and Safety at Work Regulations (1999) impose a duty on employers to produce suitable and sufficient risk assessments. This would include assessment of any risks to employees, students or others during an educational visit, and the measures that should be taken to minimise these risks. For regular activities, such as taking students to local shops, the risks should be considered under the college’s general arrangements and a check to make sure that the precautions remain suitable is all that is required. For annual or infrequent activities, a review or an existing assessment may be all that is needed. For new higher-risk activities or trips, a specific assessment of the significant risks should be carried out.  Staff should take particular care when surprising students in the less formal atmosphere of an educational visit where a more relaxed discipline or informal dress and language code may be acceptable. However, staff remain in a position of trust and need to ensure that their behaviour cannot be interpreted as seeking to establish an inappropriate relationship or friendship.  Where out of college activates include overnight stays, careful consideration needs to be given to sleeping arrangement. Students, adults and parents/carers should be informed of these prior to the start of the trip. In all circumstances, those organising trips and outings should pay careful attention to ensure there is a safe staff/student ratio and suitable gender mix of staff. |  | *This means that staff should:*   * *Adhere to the College’s educational visits guidance* * *Always have another adult present on visits, unless otherwise agreed with senior managers* * *Undertake risk assessments* * *Haver parental consent to the activity* * *Ensure that their behaviour remains professional at all times* * *Never share beds with a student* * *Never share bedrooms unless it involves a dormitory situation and the arrangements have been previously discussed with senior management, parents and students* * *Refer to local and national guidance for Educational Visits, including exchange visits (both to the UK and abroad.)* |
| 1. **First Aid and Medication**   The college will have an adequate number of qualified first aiders. Parents should be informed when first aid has been administered to a student under 18.  Staff should receive sufficient and suitable training and achieve the necessary level of competency before they take on responsibility to support students with medical conditions.  Advice on managing medicines in included in the statutory guidance on supporting pupils in school with medical conditions. In circumstances where a student needs medication regularly, this would usually be recorded in their individual healthcare plan. This provides details of the level and type of support a student needs to manage effectively their medical condition in college and should include information about the medicine to be administered, the correct dosage and any storage requirements.  After discussion with parents students who are competent should be encouraged to take responsibility for managing their own medicines and procedures. This could include for example, the application of any ointment or sun cream, or use of inhalers or an Epipens.  If a member of staff is concerned or uncertain about the amount or type of a medication being given to a student this should be discussed with the Designated Safeguarding lead.  Adults taking medication which may affect their ability to care for students should seek medical advice regarding their suitability to do so and College should ensure that they only work directly with students if that advice confirms that the medication is unlikely to impair their ability to look after students. The College is also responsible for managing the performance of its staff and for ensuring they are suitable to work with children.  Risk assessment is likely to recommend that staff medication on the premises must be securely stored and out of reach of students at all times. |  | *This means that staff should:*   * *Ensure their first-aid training is kept up to date if they are a recognised first-aider* * *Adhere to College’s health and safety and supporting students with medical conditions policies* * *Make other staff aware of the task being undertaken* * *Have regard to the students’ individual health care plans* * *Always ensure that an appropriate health/risk assessment is undertaken prior to undertaking certain activities* * *Explain to the student what is happening* * *Always act and be seen to act in the student’s best interest* * *Make a record of all medications administered* * *Not work with students whilst taking medication unless medical advice confirms they are able to do so.* |
| 1. **Photography, videos and other images**   Many educational activities involve recording images. These may be undertaken for displays, publicity, to celebrate achievement and to provide records of evidence of the activity. Under no circumstances should staff be expected or allowed to use their personal equipment to take images of students at or on behalf of the college.  Whilst images are regularly used for very positive purposes adults need to be aware of the potential for these to be taken and/or misused or manipulated for pornographic or ‘grooming’ purposes.  Students who have been previously abused in a manner that involved images may feel particularly threatened by the use of photography, filming etc. Staff should remain sensitive to any student who appears uncomfortable and should recognise the potential for misinterpretation.  Making and using images of students will require the age appropriate consent of the individual concerned and their parents/carers. Images should not be displayed on websites, in publications or in a public place without such consent. The definition of a public place includes areas where visitors to the College have access.  For the protection of children, it is recommended that when using images for publicity purposes that the following guidance should be followed;   * If the image is used, avoid naming the student, (or, as a minimum, use first names rather than surnames) * If the student is named, avoid using their image * The College should establish whether the image will be retained for further use, where and for how long * Images should be securely stored and used only by those authorised to do so. |  | *This means that staff should:*   * *Adhere to the College’s policy* * *Only publish images of students where they and their parent/carer have given explicit written consent to do so* * *Only retain images when there is a clear and agreed purpose for doing so* * *Store images in an appropriate secure place in College* * *Ensure that a senior member of staff is aware that the photography/image equipment is being used and for what purpose* * *Be able to justify images of students in their possession* * *Avoid making images in one to one situations*   *This means that adults should not:*   * *Take images of students for their personal use* * *Display or distribute images of students unless they are sure that they have parental consent to do so (and, where appropriate consent from eh student)* * *Take images of students using personal equipment* * *Take images of students in a state of undress or semi-undress* * *Takes images of students which could be considered as indecent or sexual* |
| **24a. Use of technology for online / virtual teaching**  The College has reviewed its online safety and acceptable use policies and amended as necessary. All staff involved in virtual teaching or the use of technology to contact students have been briefed on best practice and any temporary changes to policy / procedures.  Wherever possible, staff should use college devices and contact students only via the students college email address / log in. This ensures that the college’s filtering and monitoring software is enabled.  Virtual lessons should be timetabled and senior staff, DSL and / or heads of department should be able to drop in to any virtual lesson at any time – the online version of entering a classroom.  Staff engaging in online learning should display the same standards of dress and conduct that they would in the real world; they should also role model this to students. The following points should be considered:-   * Think about the background; photos, artwork, identifying features, mirrors, ideally the backing should be blurred * Staff and students should be in living/communal areas – no bedrooms * Staff and students should be fully dressed * Filters at a student’s home may be set at a threshold which is different to the College * Resources/videos must be appropriate – the student may not have support immediately available if they feel distressed or anxious about content   It is the responsibility of the staff member to act as a moderator; raise any issues of suitability (of dress, setting, behaviour) with the student immediately and end the online interaction if necessary. Recording lessons does not prevent abuse. If staff wish to record the lesson they are teaching, consideration should be given to data protection issues; e.g., whether parental / student consent is needed and retention / storage. If a staff member believes that a student or parent is recording the interaction, the lesson should be brought to an end or that child should be logged out immediately.  If staff need to contact a student or parent by phone and do not have access to a work phone, they should discuss this with a senior member of staff and, if there is no alternative, always use ‘caller withheld’ to ensure the student / parent is not able to identify the staff member’s personal contact details. |  | This means that staff should:  ▪ adhere to the college’s policy  ▪ be fully dressed  ▪ ensure that a senior member of staff is aware that the online lesson / meeting is taking place and for what purpose  ▪ avoid one to one situations – request that a parent is present in the room for the duration, or ask a colleague to join the session  ▪ only record a lesson or online meeting with a student where this has been agreed with the manager, and the student and their parent have given explicit written consent to do so  ▪ be able to justify images of students in their possession  This means that adults should not:  ▪ contact students outside the operating times defined by senior leaders  ▪ take or record images of students for their personal use  ▪ record virtual lessons or meetings using personal equipment (unless agreed and risk assessed by senior staff)  ▪ engage online while students are in a state of undress or semi-undress |
| 1. **Exposure to inappropriate images**   Staff should take extreme care to ensure that students are not exposed, through any medium, to inappropriate or indecent images.  There are no circumstances that will justify adults: making, downloading, possessing or distributing indecent images or pseudo-images of children (child abuse images.) Accessing these images, whether using the college’s or personal equipment, on or off the premises, or making, storing or disseminating such material is illegal.  If indecent images of children are discovered at the college or on College equipment an immediate referral should be made to the Designated Officer and the police contact if relevant. The images/equipment should be secured and there should be no attempt to view or delete the images as this could jeopardise necessary criminal action. If the images are of children know to the college, a referral should also be made to children’s social care in line with local arrangements.  Under no circumstances should any adult use college ol or setting equipment to access pornography. Personal equipment containing pornography or links to it should never be brought into or used in the workplace. This will raise serious concerns about the suitability of the adult to continue working with children and young people.  Staff should keep their passwords confidential and not allow unauthorised access to equipment. In the event of any indecent images of children or unsuitable material being discovered on a device the equipment should not be tampered with in any way. It should be secured and isolated from the network and the Designated Officer contacted without delay. Adults should not attempt to investigate the matter or evaluate the material themselves as this may lead to a contamination of evidence and a possibility that they will be at risk of prosecution themselves. |  | *This means that staff should:*   * *Abide by the college’s acceptable use and e-safety policies* * *Ensure that students cannot be exposed to indecent or inappropriate images* * *Ensure that any films or material shown to children are age appropriate* |
| 1. **Personal living accommodation including on site provision**   Generally, staff should not invite any students into their living accommodation unless the reason to do so has been firmly established and agreed with their manager and the students’ parents/carers.  It is not appropriate for staff to be expected or requested to use their private living space for any activity, play or learning. This includes assessing students e.g. discussion of reports, academic reviews, tutorials, pastoral care or counselling. Managers should ensure that appropriate accommodation for college activities is found elsewhere.  Under no circumstance should students be asked to assist adults with jobs or tasks, either for or without reward, at or in their private accommodation.  This guidance should also apply to all other personas living in or visiting the private accommodation. |  | *This means that staff should:*   * *Be vigilant in maintaining their privacy, including when living on-site accommodation* * *Be mindful of the need to maintain appropriate personal; and professional boundaries* * *Not ask students to undertake jobs or errands for their personal benefit.* |
| 1. **Overnight supervision and examinations**   There are occasions during exam periods when timetables clash and arrangements need to be made to preserve the integrity of the examination process. In these circumstances examination boards may allow candidates to take an examination the following morning, including Saturdays,  The supervision of a candidate on journeys to and from the centre and overnight may be undertaken by the candidate’s parent/carer or college staff.  The examination board requires the college to determine a method of supervision which ensures the candidate’s well-being. As a result in some circumstances staff may be asked to volunteer to supervise students perhaps in their own homes.  The overriding consideration should be the safeguarding of both the student and staff, therefore many local authorities, professional associations and unions do not endorse the practice of staff supervising candidates overnight in their own homes. Some schools employ alternatives such as a ‘sleep-over’ on the school premises.  Where arrangements are made for a staff member to supervise a student overnight then all necessary safeguards should be in place. |  | *Where staff do supervise candidates overnight:*   * *A full health and safety risk assessment should have been undertaken* * *All members of the household should have had appropriate vetting including, where eligible DBS and barred list checks* * *All arrangements should be made in partnership and agreement with the student and parents/carers* * *Arrangements involving one to one supervision should be avoided wherever possible* * *As much choice, flexibility and contact with ‘the outside world’ should be incorporated into any arrangements so far as is consistent with appropriate supervision* * *Wherever possible, independent oversight of arrangements should be made* * *Any situation which gives rise to complaint, disagreement or misunderstanding should be reported* * *Staff should have regard to local and national guidance.* |
| 1. **Curriculum**   Many areas of the curriculum can include or raise matter which is sexually explicit or of a political or sensitive nature. Care should be taken to ensure that resource materials cannot be misinterpreted and clearly relate to the outcomes identified by the lesson plan. This can be supported by developing ground rules with students to ensure sensitive topics can be discussed in a safe learning environment. This plan should highlight particular areas of risk and sensitivity and care should especially be taken in those areas of the curriculum where usual boundaries or rules are less rigorously applied.  The curriculum can sometimes include or lead to unplanned discussion about subject matter of a sexually explicit, political or otherwise sensitive nature. Responding to student’s questions requires careful judgement and staff should take guidance in these circumstances from the line manager/designated safeguarding lead.  Care should be taken to comply with the college’s values in relation to spiritual, moral, social, cultural (SMSC) which should promote fundamental British values and be rigorously reviewed to ensure it is lawful and consistently employed. It should be noted that parents have the right to withdraw their children form all or part of any sex education provided. |  | *This means that staff should:*   * *Have clear written lesson plans* * *Take care when encouraging students to use self-expression, not to overstep personal and professional boundaries* * *Be able to justify all curriculum materials and relate these to clearly identifiable lesson plans*   *This means that adults should not:*   * *Enter into or encourage inappropriate discussions which may offend or harm others* * *Undermine fundamental British values* * *Express any prejudicial views* * *Attempt to influence, or impose their personal values, attitudes or beliefs on students.* |
| 1. **Whistleblowing**   Whistleblowing is the mechanism by which staff can voice their concerns, made in good faith, without fear or repercussion. The college has a policy that meets the terms of the Public Interest Disclosure Act 1998. Staff who use the whistleblowing procedures should have their employment rights protected.  Staff should recognise their individual responsibilities to bring matters of concern to the attention of senior management and/or relevant external agencies and that to not do so may result in charges of serious neglect on their part where the welfare of children may be at risk.  Staff should be reminded of the routes for raising concerns during College closure or part closure, including how to escalate their concern if the normal routes for whistleblowing are impeded by the absence / illness of senior managers. |  | *This means that staff should:*   * *Escalate their concerns if they believe a student is not being protected* * *Report any behaviour by colleagues that raises concern* * *Report allegations against staff and volunteers to their manager, or registered provider, or where they have concerns about the managers response report these directly to the designated officer* |
| 1. **Sharing concerns and recording incidents**   All staff should be aware of the college’s safeguarding procedures, including the procedures for dealing with allegations against staff and volunteers.  In the event of an allegation being made, by any person, or any incident being witnessed, the relevant information should be immediately recorded and report to the Senior Manager for Safeguarding.  Members of staff should feel able to discuss with their line manager any difficulties or problems that may affect their relationship with or behaviour towards students, so that appropriate support can be provide and/or action can be taken.  In order to safeguard and protect students and colleagues, where staff have any concerns about someone who works with children they should immediately report this to the senior manager with responsibility for safeguarding. |  | *This means that staff should:*   * *Be familiar with college’s arrangements for reporting and reporting concerns and allegations* * *Know how to contact eh LADO/designated officer and Ofsted/regulatory body directly if required* * *Take responsibility for recording any incident and passing on that information where they have concerns about any matter pertaining to the welfare of an individual in college.* |