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Are all opportunities to promote equality taken within the policy/procedure?	Yes ☒ No		
Refer Policy/Procedure to EDI Co-ordinator for further assessment	Yes No ☒		

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1. Aim

The guidelines for professional practice describe the standards of conduct and practice, which apply to all employees and volunteers at Treloar School and College.

They emphasize the principles embodied in the Children Acts 1989 and 2004, Working Together to Safeguard Children, the Mental Capacity Act 2005 and the Care Act 2014, in that the welfare of the child and vulnerable adult is paramount. Staff should also take heed of government guidance.

In addition, several staff groups will have their respective professional bodies' codes of practice they must adhere to. These Codes of Practice (as set out by the NMC, HCPC, TRA, GPhC and Social Work England along with other regulators) may well exceed the guidelines set out in Safer Working Practice, however where there is uncertainty or conflict between guidance, we would always ask for further discussion. Please contact your line manager or the Head of Safeguarding for further advice in these cases.

These guidelines offer advice to staff on how they should work in a professional and safe manner, to ensure both the safety and wellbeing of students as well as themselves and other staff. They seek to reassure staff of the support that Treloar's will give to professionals who sometimes work in difficult circumstances.

Staff who are unclear about how the guidance applies to an aspect of their own work, or their colleagues, should always discuss their concerns with their line manager. This is particularly important when they feel pressured into ignoring or deviating from the guidelines by colleagues, students, or parents/carers.

These guidelines have been produced with reference to "Guidance for safer working practice for those working with children and young people in education settings", produced by the Safer Recruitment Consortium and endorsed by the National Association for Special Schools (NASS) and the Department for Education.¹

This Policy refers specifically to working with students at the School and College. However, the principles and practices also apply to work with people who use or have contact with our services who are not students, such as residents in Campbell Court, and ongoing transition support provided to ex-students. This policy therefore also applies to these settings and activities.

2. Policy Details

¹ <https://www.saferrecruitmentconsortium.org/GSWP%20Sept%202019.pdf>

2.1 Key Responsibilities

- It is **everybody's** responsibility to protect all students from abuse and harm
- **All staff** have a responsibility to keep students safe and to protect them from abuse (sexual, physical and emotional), neglect and contextual 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 students' safety and well-being. This is in line with the Treloar's value of acting with Integrity and Respect. If at any time you have a suspicion or concern (however trivial) that a student has been the victim of some kind of abuse, or is at risk of harm, you **must** report it to the Safeguarding on-call manager (via 07825262418) or another senior manager. Failure to do so may be regarded as professional misconduct and could result in disciplinary action.
- **All staff** should always act, and be seen to act, in the best interests of students.
- **All staff** should take responsibility for their own actions and behaviour
- **All staff** should be prepared to identify and report behaviours by others (or by the organization as a whole) that could negatively impact upon students.

2.2 Underpinning Principles

- The welfare of the student (be they an adult or 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, including self-reporting if their conduct of behaviour falls short of these guiding standards
- Staff should acknowledge that deliberately invented/malicious allegations are extremely rare and that **all** concerns should be reported and recorded (even if felt to be false/incorrect)
- 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, or could be perceived by others as concerning
- Staff should apply the same professional standards regardless of culture, disability, gender, sex at birth, 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 students. If there is any uncertainty around this (e.g. regarding prescribed medication or a health condition) then staff have a duty to speak with their line manager, HR and/or occupational health to consider how to manage any risk
- 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) or other applicable professional regulatory body
- Staff and managers should continually monitor and review practice to ensure this guidance is followed
- Staff should be aware of and understand Treloar's Safeguarding Children and Vulnerable Adults policy, arrangements for managing allegations against staff, whistleblowing procedure and the procedures of the relevant Multi-agency Partnership (MAP)

Professional Judgement

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 must make decisions or act in the best interest of a student which could contravene this guidance or where no guidance exists. Individuals are expected to make judgements about their behaviour to secure the best interests and welfare of the students in their charge and, in so doing, will be seen to be acting reasonably. These judgments should always be recorded and shared with a manager.

Adults in a position of trust should always consider whether their actions are warranted, proportionate, safe and applied equitably. 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 Head of Safeguarding. 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 allegations with the Head of Safeguarding
- record discussions and actions taken with their justifications
- record any areas of disagreement and, if necessary, refer to another agency (e.g. professional body, Hampshire County Council)

3. Specific situations to consider

Power and Positions of Trust & Responsibility

As a result of skills, knowledge or role, all of those working or volunteering at Treloar's are in a "position of trust" in relation to students.

It is vital that all working in a position of trust understand that there is a power difference between employee/volunteer and student, and that the relationship therefore is not one of "equals".

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 families online have a responsibility to always model safe practice.

Where a person aged 18 or over is in a position of trust with a child under 18, it is a criminal 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.

Treloar's employees or volunteers **must 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 close friendship, co-dependent, romantic or sexual nature, or which may become so

Confidentiality and Data Protection

The storing and processing of personal information is governed by the General Data Protection Regulations (GDPR) and Data Protection Act 2018. For further information about this please see [ICT02 Data Protection Policy](#).

Staff may have access to special category personal data about students and their families which must always be kept confidential and only shared when legally permissible to do so and in the 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 or to statutory services.

If a student – or their parent / carer – makes a disclosure regarding abuse or neglect, the member of staff should follow Treloar's Safeguarding guidelines and inform the Head of Safeguarding (or safeguarding officer on call) on **07825 262418**. All concerns should be taken seriously and reported. The adult should not promise confidentiality to a student or parent but should give reassurance that the information will be treated sensitively.

Treloar employees and volunteers may also need to consider how their role interacts with other personal or professional roles that they may have. This could include if they are also parent to a Treloar student or if they work with a student in another capacity. As Treloar employees have access to sensitive data it is essential that any access or use of this is justified for the purposes of the work the person is doing, and that data is not accessed or shared where the person has no right to do so as part of their Treloar role. Access to data

by employees and volunteers may be audited and any concerns regarding access directed to the person's line manager.

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 Head of Safeguarding. Any media or legal enquiries should be passed to senior management.

Standards of Behaviour

All staff have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of students. They should adopt high standards of personal conduct in order to maintain confidence and respect of the public and those with whom they work.

It is important to note that standards of behaviour are as relevant in the online world as they are in the classroom; staff engaging with students and/or families or carers online have a responsibility to always model safe practice and behaviour.

Staff should not:

- *behave in a manner which would lead any reasonable person to question their suitability to work with children or adults with care and support needs, 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, discriminate or humiliate, or might be interpreted as such*

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 regarding 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 or adults with care and support needs, loss of trust and confidence, or bringing the employer into disrepute. Such behaviour may also result in prohibition from teaching by the Teaching Regulation Agency (TRA) a bar from engaging in regulated activity or action by another relevant regulatory body.

All staff should inform the Principal/CEO, Head of Safeguarding and their line manager of any cautions, convictions or relevant orders, or if they are charged with a criminal offence. Treloar's may further discuss this with the Local Authority Designated Officer (LADO) to ensure that any risk and support measures are considered. Treloar's would also expect that

all staff will discuss with their line manager or a senior manager any relationship or association (at Treloar's, externally, in person or online) that could impact on their work with students, or on student safety.

Staff should also inform the Principal and HR should they have had any previous name changes that have not been declared.

Clothing and appearance

Please see HR31 – Dress Code Policy for specific details.

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 contentious or provocative slogans
- Is not considered to be discriminatory
- Is compliant with professional standards
- Is safe and appropriate to the environment in which it is worn

This also applies to online or remote teaching and support. In these situations care should be taken to ensure that the visible environment is appropriate and that others (e.g. household members) are not visible or involved in sessions with students. Clothing worn in online sessions should be of the same nature of that which would be considered appropriate during in-person support.

Gifts, rewards, favouritism and exclusion

It is the policy of Treloar's that individual members of staff should not accept gifts. Please see policy [Gifts/Hospitality/Bequests to Staff](#)

The reason for this is that staff are always in an unequal relationship with students because of the power to give, withhold or attach conditions to care and other services. For example, students should not be allowed to feel that they might get more favourable care or attention in exchange for gifts.

However, it is accepted that in certain circumstances it may cause offence not to accept a small gift. There may be occasions when a gift is an expression of thanks for the contribution of an individual or a team to the quality of life of a student during their stay at Treloar's. This may, for example, be when a student leaves or dies, or may be in celebration of some outstanding achievement.

A gift offered to an individual with a value of less than £15 may be accepted by a member of staff but only as long as it is an occasional gift i.e. a box of chocolates at the end of term. Such gifts do not need line-management approval or require recording. (See HR29 – Gifts & Bequests Policy).

Similarly, it is inadvisable to give such personal gifts to students or their families. This could be interpreted as a gesture either to bribe or groom. It might 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, consistent with the school or setting's behaviour policy, recorded and not based on favouritism.

Adults should exercise care when selecting students for specific activities, jobs or privileges 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.

At Treloar's we have Student Governors, Student College Council Presidents and School Head Students, which supports students to have a role in promotion of Treloar's (including through interviewing senior members of staff) and advice should be sought from the Head of Quality if students are needed to be part of this.

Staff should also be mindful of the impact (both real and perceived) of making donations to charity appeals that may benefit a specific student (e.g. to fund treatment or a piece of equipment, as opposed to being towards a national charity). Treloar's advises staff against doing so on the basis that this could be construed as favouring a student over others, or lead to accusations of a conflict of interest.

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 (including non-romantic infatuation). This is particularly relevant in a setting where staff and students may potentially be of a very similar age. All staff 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 infatuations may carry a risk of their words or actions being misinterpreted.

Any member of staff who receives 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 the Head of Safeguarding². In this way appropriate early intervention can be taken which can prevent escalation and avoid hurt, embarrassment or distress for those concerned.

The Head of Safeguarding or relevant senior manager will 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. This plan should respond sensitively to the student and staff member and maintain the dignity of all. This plan should involve all parties, be proportionate and regularly monitored and reviewed.

Social contact with students or families outside of Treloar's

It is acknowledged that staff may have genuine friendships and social contact with parents of students, independent of their professional relationship – for example due to existing family relationships.

Staff should, however, also be aware that professionals who sexually harm children (or adults with care and support needs) often seek to establish relationships and contact outside of the workplace with both the student and their parents, in order to 'groom' the parent/carer and the student 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 setting 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 also applies to social contacts made through outside interests or the staff member's own family. We will typically advise staff to maintain appropriate professional boundaries, but will also consider where this would not be appropriate or realistic and make alternative arrangements (e.g. a former student in Treloar employment would not be expected to cease friendships with current students, but might be advised to work in a different area of the organisation to avoid difficulties due to the dual relationship, a parent of a current student in the college may work in the school).

Some staff may, as part of their professional role, be required to support a parent or carer, but only where agreed by their line manager. If that person comes to depend upon the staff

² If the Head of Safeguarding is concerned that a young person is becoming infatuated with them, they should report this to the Principal and/or Safeguarding Governor.

member or seeks support outside of their professional role this should be discussed with senior management and where necessary referrals made to the appropriate support agency.

Employees should not, during their Treloar's duties, offer or plan to provide their services privately to any third party, nor should they ask any other Treloar's employees to make such arrangements on their behalf. Where in the course of their duties an employee is approached by a parent or student and asked about the provision of private services, the employee should direct the enquirer to the Principal for consideration.³

Communication with Students (including the use of technology)

To make 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, and by those using it, than the technology itself.

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, chatrooms, forums, blogs, websites, gaming sites, digital cameras, videos, webcams 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, personal e-mail address, home or mobile telephone numbers, details of web-based identities. If students locate these by any 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. Further e-safety support for the student would be advisable at this point. This also applies with regards to former students, who should be redirected to our Alumni offer by Treloar's staff.

³ See "Employees taking a Second Job" Policy - <http://sps2013/info/policies/HR/HR%2017%20Employees%20taking%20a%20Second%20Job%20Policy.pdf>

Staff should not accept online “friend requests” from current or former students, as this can negatively impact upon professional boundaries, as well as creating a culture which others can use to groom or exploit those in their care.

Staff should, in any communication with students, also follow the guidance in section 7 ‘Standards of Behaviour’.

Mobile phones or other communication devices should not be used for personal matters whilst working with students, or whenever they interfere with normal duties. Mobile phones should not be carried by any staff member whilst supporting a student with intimate care. If there are situations where staff may need to be contacted urgently, e.g. a family member is known to be unwell, they should seek permission from their manager to carry their phone or give the departmental phone number.

Using mobile phones whilst driving Treloar’s vehicles is not permitted under any circumstances and breaches of this policy will be constitute a disciplinary offence. When driving a private vehicle on Treloar’s business calls should only be made where a hands-free system has been installed and then only if it is safe to do so, and if necessary.

Physical contact with students

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.

Treloar’s provides care and education to a wide range of students aged from young children to adults of 25 years of age, with a variety of physical disabilities. As such physical contact could be considered appropriate for a variety of reasons.

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, always use their professional judgement. If in any doubt, then guidance should be sought from a manager or the Head of Safeguarding straight away.

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 by them or a colleague could be misinterpreted, or if an action is observed which is possibly abusive, the incident

and circumstances must be immediately reported to the Head of Safeguarding⁴ (07825 262 418) and recorded. Where appropriate, the Head of Safeguarding should consult with the Local Authority Designated Officer (LADO).

Extra caution may be required where 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.

All staff should be prepared to explain their actions and accept that all physical contact is open to scrutiny in the interests of student welfare and safety.

Intimate Care

For further detail please see CG043 – [Intimate Care Procedures](#)

Many students with disabilities require assistance with personal and intimate care tasks, especially toileting. Students have the right to be safe, to be treated with courtesy, dignity, and respect.

There is a clear difference between personal and intimate assistance. ‘Intimate Care’ can be defined as care tasks of an intimate nature, associated with bodily functions, bodily products and personal hygiene, which demand direct or indirect contact with, or exposure of, the sexual parts of the body.

Staff must try to ensure that practice across a care team is as consistent as possible and must be particularly sensitive to a student’s needs and feelings.

Students often have views about the sex/gender of the person providing intimate care. It is not always possible to adhere to these preferences due to staff contingencies. Parents may also be sensitive if men provide intimate care for students because most abuse is perpetrated by men on women. Preventing men from providing intimate care to female students is not a strong protective factor as men are also known to abuse boys (and young men), while women may also abuse people of either sex. Treloar’s has clear safeguarding procedures that rely on not working in isolation, robust recruitment, training, supervision and incident reporting. However, we acknowledge the cultural underpinning concerns regarding gendered care of children, with the following being “standard” practice at Treloar’s:

⁴ Or if concerning the Head of Safeguarding, to the Principal.

- Intimate Care of female children (under 18) will usually be carried out by female staff⁵, although a male worker can assist (e.g. with hoisting prior to clothing being removed) where two people are required;
- Intimate Care of female adult students may be carried out by staff of either sex;
- Intimate Care of male students of any age may be carried out by staff of either sex.

Naturally student welfare would take precedence over priorities regarding gender, for example urgent healthcare would be carried out by the most suitable person irrespective of gender, albeit considering the student's own wishes or need for support and chaperoning as appropriate.

Students' views about the sex of the carer should be considered and followed if possible. Efforts should be taken if there are religious or cultural factors concerning the sex of the carer or if there is a history of abuse.

The following Treloar's guidelines will help to safeguard both students and staff:

- Intimate care should only be carried out by staff who have appropriate knowledge, skills, training and who have had appropriate checks (including Enhanced DBS and barred list checks where appropriate) completed.
- Always be open and transparent with your actions, including informing and seeking consent from students prior to performing any task.
- Staff must read and follow each individual student's Young Persons Plan (YPP) on Nourish. If there are any problems in following any part of it, the student's team leader or Residential Manager must be informed. It may be necessary to amend part of the YPP.
- Always follow the student's Moving and Handling Profile. Failure to do so may result in injury to the student and/or yourself. Be familiar and comply with Treloar's Health and Safety policies.
- Read and comply with risk assessments, both individual and general in your area of work.
- If an incident occurs an incident report must be completed and sent for processing. If it is a safeguarding concern safeguarding procedures must be followed. If you do not know how to do something first check the YPP; if still unsure ask a more senior or

⁵ A definition of a "female member of staff" is as their gender states on their birth certificate. Staff undergoing gender reassignment would not be considered as female until the birth certificate is changed.

experienced member of staff. If you need to be shown more than once, don't worry, just ask again.

- If your role means that you only occasionally care intimately for students, do not assume that one student's needs are the same as another just because the disability is similar. Always check first.
- One member of staff should carry out intimate care routines in private, unless the task requires the presence of two or more carers. This will be clearly stated in the YPP. When training additional staff may need to be present.
- Intimate personal care must be provided in students' bedrooms or designated areas, e.g., bathrooms, toilets changing rooms where privacy for the student is maintained. On occasions circumstances indicate that immediate intimate personal care is necessary, e.g. if a student has diarrhoea and it would be distressing, undignified, or unsafe to move them to a designated area. In such cases staff must do all they can to maximise privacy; this will be achieved by removing other students from the area and by screening and drawing window blinds, etc. to ensure dignity and privacy. If this is necessary, an incident report should be completed and documented in the daily care record (DCR)
- Staff should adhere to the Infection Prevention Control (IPC) Policy and Procedure concerning use of Personal Protection Equipment (PPE), hand hygiene and management of spillage.
- Involve the student as far as possible in their own care routines and ensure that any student who can be independent is supported to do so.
- Encourage students to take control both of their own care routines and of their own bodies and encourage them to make it clear if something is done that they do not like.
- Be responsive to a student's reactions, checking that your method or practice is acceptable to the student. Again, a consistent approach across the care team is essential.
- If you have any concerns, report them to a senior member of staff or the Head of Safeguarding. This is particularly important if you accidentally upset or hurt a student. If this happens, then you should follow safeguarding procedures immediately.
- You should also report to a senior member of staff if a student seems to be unusually sore or tender on any part of the body, or has a very emotional reaction, or appears to be sexually aroused by your actions. Please refer to the SAFE Policy and to the Safeguarding Policy

Behaviour Management

Corporal (physical) punishments and smacking are illegal in all schools, education settings and care homes. 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.

There may be times when physical intervention is necessary to keep a student or others safe. Under no circumstances should physical force be used as a form of punishment.

Staff should understand the importance of challenging inappropriate behaviours between peers, including peer on peer sexual violence and sexual harassment. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

All staff must follow Treloar’s [Behaviour & Emotional Support Policy](#) and the [Restraint Policy](#), whilst also having regard to any training or policies regarding School or College rules, including the School and College Student Charters.

Sexual Conduct

Any sexual behaviour by a member of staff with or towards a student (adult or child) 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 student of any age will 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 student and manipulate the relationship so sexual abuse can take place. All staff have a responsibility to always report to the Head of Safeguarding 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 school or setting
- not use any form of touch or comment which is, or may be construed to be, indecent
- not use any form of communication with a 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

Please also see [SAFE Policy](#)

One-to-one working

When promoting the dignity and privacy of our students and developing their independence, much one-to-one work must inevitably be done, and the School and College recognise the value and need for this. Equally however, we recognise that staff working in one-to-one situations with students at Treloar's, including visiting staff from external organisations can be more vulnerable to allegations or complaints and that students are more vulnerable where they are with a single person.

The risk to students and staff when working in one-to-one situations can be minimised in the following ways:

- Ensure that there is no suggestion of secrecy, even if there is privacy and/or confidentiality. Other staff should always be aware that you are or will be working in a one-to-one situation.
- In a teaching situation, ensure that you are working in a position that can be seen from a window or door panel.
- There should never be a one-to-one social situation, whether on Treloar's property or off-site.
- Students should never be entertained in a member of staff's private accommodation (either on-site or external to Treloar's). Arranging to meet with students away from the work premises should not be permitted unless the necessity for this is clear and approval is obtained from a senior member of staff, the student and their parents/carers. This equally applies to online contact, which should only occur within professional boundaries and within work time.
- Staff will often give students the support and stability they may need at certain times. However, staff must preserve a professional detachment in order to provide the best support and advice. It does not help a student if a member of staff becomes too emotionally involved in their problems. Staff should be prepared to notify a manager if they feel this is happening, as other support (e.g. counselling) is available at Treloar's.
- Always report (to a manager and via IRIS) if a student becomes distressed or angry.

Curriculum & learning

Many areas of the curriculum can include or raise subject matter, which is of a political or sensitive nature, or could include mature content. This is appropriate and important in terms of educating and preparing students for life beyond school and college.

Care should be taken to ensure that resource materials cannot be misinterpreted and clearly relate to the learning 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 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 e.g. drama, PSHE discussion.

The curriculum can sometimes include or lead to unplanned discussion about subject matter of a sexually explicit, political or otherwise sensitive nature. Responding to children's questions requires careful judgement and staff should take guidance in these circumstances from the Head of Safeguarding or another appropriate manager.

Care should be taken to ensure that all work is in line with Treloar's values of Integrity, Respect and Striving for Excellence, and is in line with British values of Democracy, Rule of Law, Respect and Tolerance, Individual Liberty.

Where part of the school curriculum allows for student led projects, staff should be mindful of safeguarding considerations in the topic chosen and the methodology used. For example, students often choose topics with which they have had personal experience; this may indicate a previously unknown safeguarding issue or may raise concerns about the traumatising of the student.

Student projects are often conducted using questionnaires with peers; these should be checked for appropriateness to ensure the student respondents are not distressed by the questions asked and that any disclosures received through these questionnaires are discussed promptly with the Head of Safeguarding. Other methodologies which might raise concerns include students visiting unknown adults, alone, to interview them; conducting social experiments on peers or young children without appropriate ethical oversight; or accessing age-inappropriate content online.

Photography, videos and other images/media

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. Regard needs to be given when images are taken of young or vulnerable students who may be unable to question why or how the activities are taking place.

Students who have been previously abused in a manner that involved images may feel particularly threatened using photography, filming etc. Staff should remain sensitive to any student who appears uncomfortable and should recognise the potential for misinterpretation.

Staff are forbidden to upload images of students to their social networking sites (including messaging to other staff or persons outside of Treloar's systems e.g. via WhatsApp, private email) or to take images of students using their personal mobile phones or camera equipment.

See [ICT04 ESafety Policy](#) for guidelines regarding the taking, storing and using images of students.

Exposure to inappropriate images

Staff should take extreme care to ensure that children and young people 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 Treloar'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 establishment or on the school or setting's equipment the Head of Safeguarding should be informed immediately, and an immediate referral should be made to the Designated Officer (LADO) and the police contacted if relevant. The images/equipment should be secured and there should be no attempt to view, print or delete the images as this could jeopardise necessary criminal action or constitute a crime (sharing or making indecent images). If the images are of children known to the school, a referral should also be made to children's social care.

Under no circumstances should any adult use school 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 by students or other staff 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 Police and LADO contacted without delay. Adults should not attempt to further 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.

Whistleblowing

Whistleblowing is the mechanism by which staff can voice their concerns, made in good faith, without fear of repercussion. Staff who use whistle blowing procedures have their employment rights protected.

There is a duty to report (including self-reporting) any incident in which any member of staff or volunteer has, or may have behaved in a way that is inconsistent with the organisation's staff code of conduct including inappropriate behaviours inside, outside of work or online.

Staff should recognise their individual responsibility to raise any concerns regarding behaviour or conduct (including low level concerns) that falls short of the principles outlined in this document and wider Treloar's policies. It is crucial that any such concerns, including those which do not meet the harm threshold (see KCSiE), are shared responsibly and with the right person, and recorded and dealt with appropriately.

Failure to report or respond to such concerns would constitute a failure in professional responsibilities to safeguard children and promote welfare.

Staff should recognise their individual responsibility 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 students may be at risk.

See [Whistleblowing Policy](#) for further information

Sharing concerns and reporting incidents

At Treloar's we actively encourage the reporting of incidents and sharing of concerns, whether serious or "low level". Concerns should be openly discussed whether relating to other staff members, or to yourself.

All incidents should be reported to a manager and recorded on IRIS.

Any concern relating to student welfare or safeguarding should be immediately reported to the on-call safeguarding manager on 07825 262 418.

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 provided and/or action can be taken.

Staff and managers should ensure that the Head of Safeguarding is aware of any “low level” concerns about staff behaviour, as this may indicate a pattern or a wider concern about practice. The Head of Safeguarding will routinely inform the Principal/CEO of any concerns raised in line with KCSIE

3.18 Children of members of staff at Treloar’s

Only those people with a legitimate role should come onto the Treloar’s campus. This involves a wide variety of people including staff, volunteers, emergency services, contractors, parents, pizza delivery people etc.

Unless they are fulfilling a legitimate role, children of staff members, governors, trustees, volunteers or contractors are not permitted on the site except in areas that are reserved for members of the public, such as the Jowett Centre.

Staff, governors, trustees and contractors must ensure that their role at Treloar’s is not compromised by also having responsibilities for members of their own family. Staff, governors, trustees and contractors should also not take their own children with them when engaged on Treloar’s business off site.

Nothing in the above should prevent the children of Treloar’s staff occupying houses or non-communal accommodation having free access to this accommodation. Nor does it restrict these members of staff inviting anyone they wish to their accommodation, unless specific restrictions have been applied and discussed with the relevant staff member.

Staff, governors, trustees and contractors must not engage their friends, relatives or anyone else in any Treloar’s activity without first seeking approval from the relevant member of the Senior Management Team, who will ensure the proper risk assessments and checks have been undertaken. This will usually mean engaging the person as an official Treloar’s volunteer.

Legal considerations

All Treloar’s employees are insured in respect of any injuries suffered by staff, students or any third party because of any action, error or omission by the employee acting reasonably during their professional duties.

No insurance can protect an employee from prosecution in the event of an action, error or omission, which is adjudged to amount to criminal negligence.

Inclusive Communications

If you require this document in an alternative format, such as large print, audio description or a colour background, please contact quality@treloar.org.uk

Training and Communication Requirements		
	Action	Responsibility
1	Ensure that all managers, employees and volunteers of Treloar's have access to the related procedures.	Treloar's Leadership Team
2	Ensure that all new employees, staff and volunteers are made aware of the policy, understand it, and know where to access a copy and where to access the related procedures.	Heads of Departments
3	Ensure that all managers, employees and volunteers of Treloar's have access to the related procedures.	All Managers
5	Ensure that all new employees, staff and volunteers know their responsibilities and receive training in carrying these out.	All Managers

Links to other related policies, procedures or documents (internal)

[ICT02 Data Protection Policy.](#)

[HS07 Dress Code Policy](#)

[Gifts/Hospitality/Bequests to Staff](#)

- ["Employees taking a Second Job" Policy](#)

[Intimate Care Procedures](#)

[Behaviour and Sanctions Policy](#)

[Restraint Policy.](#)

[Whistleblowing Policy](#)

[ICT04 ESafety Policy](#)

[SMT023 - Treloar's Escalation Procedure - May 2026.pdf](#)

Revision History

Listed below is a brief audit trail, detailing amendments made to this policy procedure in last 4 years

Page/para No.	Brief description of the change(s)	Change made by	Date
All	Comprehensive Rewrite	Ben Baxter	02/01/2020
3.3	Consideration of dress/environment when working online	Ben Baxter	11/1/21
3.17	Low level concerns procedure clarified in line with Treloar's reporting/KCSIE	Ben Baxter	11/1/21
3.14	Addition of messaging to inappropriate uses of student images	Ben Baxter	11/1/21
All	Minor clarifications based on situations that have arisen including: Clarification around posting images Clothing policy to apply to remote provision Review of guidance around gendered care Review following update of Safer Working Practice Consortium guidance	Ben Baxter	April 2022
Throughout	Review following updates to KCSIE/guidance, notably: - Advice regarding social media invites from students - Curriculum topics added - Consent noted within intimate care - Concept of "self-report" enhanced throughout	Ben Baxter	January 2023
Throughout	Review following updates to KCSIE/Working Together, notably: - Advice regarding intimate care refined	Ben Baxter	January 2023
	Minor updates throughout New links to other policies added	Ben Baxter	April 2025.
	Added link to new escalation policy SMT023. Fuller review planned in August 2026 to include more details on this policy	Ben Baxter	May 2026

IMPORTANT NOTES:

It is essential for those with designated responsibilities to familiarise themselves with the sources of information, referred to above.

Policy documents describe mandatory minimum standards and will be subject to audit and review. Line managers are required to ensure suitable and sufficient arrangements are in place to meet policy requirements, including the provision of information and instruction to staff

Equality Impact Assessment (EIA) - Stage 1

Name of Policy / Function/Decision	Safer Working Practice (Code of Conduct)				
Name of Assessor / Author /Lead					
Start Date	15 th April 2025				
This EIA is being undertaken because it is:	Policy update				
Screening					
Does the policy affect employees, students or other stakeholder groups? Could the impact be significant to that group of people?					N
Is it a major policy with a significant effect on how our core business is delivered?					N
Does it involve a significant commitment of resources?					N
Does it relate to an area where there are known inequalities (e.g. gender pay gap, hate crime, accessibility of IT)					N
If the answer to any of these questions is 'YES' then continue to complete Equality impact assessment. If you are unsure about the answer to any of these questions, please contact EDI Co-ordinator or Head of Quality for further support.					
Has the screening identified the policy as having relevance to the any of the following groups?					
Age	N	Disability	N	Sexual Orientation	N
Race	N	Sex/Gender	N	Religion or Belief	N
Gender Reassignment	N	Pregnancy or Maternity	N	Marriage or civil partnership	N
Have we shown due regard for the 9 protected characteristics within the policy/procedure/decision?				Yes	✓ No o
Are all opportunities to promote equality taken within the policy/procedure/decision?				Yes	✓ No o
Have we stated how we will monitor the implementation and impact of this policy/decision?				Yes	✓ No o
Date of Screening				15 th April 2025	
Approval by EDI				Lorna Woodcroft	
Refer Policy/Procedure to EDI Co-ordinator for further Stage 2 Assessment (if required)				Yes	o No ✓