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Are all opportunities to promote equality taken within the policy/procedure?	Yes <input checked="" type="checkbox"/> No		
Refer Policy/Procedure to EDI Co-ordinator for further assessment	Yes No <input checked="" type="checkbox"/>		

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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, 2015, 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 the government guidance. In addition a number of staff groups will have their respective professional bodies codes of practice they must adhere to.

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 the Trust 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 their parents.

These guidelines have been produced with reference to “Guidance for safer working practice for those working with children and young people in education settings, May 2019”, produced by the Safer Recruitment Consortium and endorsed by the National Association for Special Schools (NASS) and the Department for Education.<sup>1</sup>

## 2. Policy Details

### 2.1 Key Responsibilities

- **It is everybody's responsibility to protect all students from abuse and harm**
- **All staff** have a responsibility to keep pupils safe and to protect them from abuse (sexual, physical and emotional), neglect and contextual safeguarding concerns. Pupils 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. 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 Head of Safeguarding and your line 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.

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

## 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 pupils
- 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 students
- 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 Treloar's Safeguarding Children and Vulnerable Adults policy, arrangements for managing allegations against staff, whistle blowing procedure and the procedures of the relevant Multi-agency Partnership (MAP).

## 2.3 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 have to make decisions or take action in the best interest of a pupil which could contravene this guidance or where no guidance exists. Individuals are expected to make judgments about their behaviour in order to secure the best interests and welfare of the pupils 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 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**

#### **3.1 Power and Positions of Trust & Responsibility**

As a result of skills, knowledge or role, all of those working or volunteering at Treloar's are considered to be 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 pupils 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.

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 employees or volunteers should not:

- use their position to gain access to information for their own advantage and/or a pupil's or family's detriment
- use their power to intimidate, threaten, coerce or undermine pupils
- use their status and standing to form or promote relationships with pupils which are of a sexual nature, or which may become so

#### **3.2 Confidentiality and Data Protection**

The storing and processing of personal information is governed by the General Data Protection Regulations 2017 (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 pupils and their families which must be kept confidential at all times 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.

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Staff should never use confidential or personal information about a pupil 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 pupil'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 pupil, 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 child – 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 on 07825262418. The adult should not promise confidentiality to a student 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 Head of Safeguarding. Any media or legal enquiries should be passed to senior management.

### 3.3 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.

#### Staff should not:

- *behave in a manner which would lead any 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 pupils*
- *discuss their personal or sexual relationships with or in the presence of pupils*
- *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 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 from teaching by the Teaching Regulation Agency (TRA) a bar from engaging in regulated activity, or action by another relevant regulatory body.

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All staff should inform the principal 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) in order 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, externally, in person or online) that could impact on their work with students, or on student safety.

### **3.4 Clothing and appearance**

Please see [HS07 Dress Code Policy](#)

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

### **3.5 Gifts, rewards, favoritism 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 £10 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.

Similarly, it is inadvisable to give such personal gifts to pupils 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 pupil should be in accordance with agreed practice, consistent with the school or setting's behaviour policy, recorded and not based on favouritism.

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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 pupils are excluded from an activity. Methods of selection and exclusion should always be subject to clear, fair, agreed criteria.

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.

### **3.6 Infatuations and “crushes”**

All staff need to recognise that it is not uncommon for pupils 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 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 Safeguarding<sup>2</sup>. 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, pupil 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 child and staff member and maintain the dignity of all. This plan should involve all parties, be robust and regularly monitored and reviewed.

### **3.7 Social contact with pupils/families outside of Treloar's**

It is acknowledged that staff may have genuine friendships and social contact with parents of pupils, 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.

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<sup>2</sup> 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.

Staff should recognise that some types of social contact with pupils or their families could be perceived as harmful or exerting inappropriate influence on children, and may bring the setting into disrepute (e.g. attending a political protest, circulating propaganda).

If a pupil 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.

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 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, in the course of their Treloar's duties, offer or make arrangements 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.<sup>3</sup>

### **3.8 Communication with Children (including the use of technology)**

In order 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 children 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 children 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'

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

Staff should not give their personal contact details to children for example, e-mail address, home or mobile telephone numbers, details of web-based identities. If children 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. The child should be firmly and politely informed that this is not acceptable.

Staff should, in any communication with children, 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.

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

### **3.9 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 pupil's individual needs and any agreed care plan.

Treloar's provides care and education to a wide range of students aged between 2-25, 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, use their professional judgement at all times. 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 Safeguarding<sup>4</sup> (07825 262 418) and recorded. Where appropriate, the Head of Safeguarding should consult with the Local Authority Designated Officer (LADO).

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<sup>4</sup> Or if concerning the Head of Safeguarding, to the Principal.

Extra caution may be required where it is known that a child has suffered previous abuse or neglect. Staff need to be aware that the child may associate physical contact with such experiences. They also should recognise that these pupils may seek out inappropriate physical contact. In such circumstances staff should deter the child 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.

### 3.10 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:

- Intimate Care of female children (under 18) will usually be carried out by female staff<sup>5</sup>, although a male worker can assist where two people are required;

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<sup>5</sup> 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.

- 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.

Students' views about the sex of the carer should be taken into account and followed if possible. Particular 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 guidelines will help to safeguard both students and staff:

- Staff must read and follow each individual student's Young Persons Plan (YPP) on Caresys. 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 Trust 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 experienced member of staff. If you need to be shown more than once, don't worry just ask again.
- If your job 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 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. 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), and management of spillage.
- Involve the students 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.

### 3.11 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 children 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.

All staff must follow Treloar's [Behaviour and Sanctions Policy](#) and the [Restraint Policy](#).

### 3.12 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 pupil under 18 years of age and sexual activity with a student could be a matter for criminal and/or disciplinary procedures.

Pupils 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 pupils 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 have a responsibility to always report to the Head of Safeguarding any concerns about the behaviour of a colleague which could indicate that a pupil is being groomed.

This means that staff should:

- not have any form of sexual contact with a pupil from the school or setting
- avoid any form of touch or comment which is, or may be considered to be, indecent
- avoid any form of communication with a pupil 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 pupil

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- not discuss sexual matters with or in the presence of pupils other than within agreed curriculum content or as part of their recognised job role

### **3.13 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 pupils at the 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.

Department managers should complete a risk assessment in relation to any 1:1 or lone working situations that are identified.

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 and this is indicated in the students care plan.
- 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 Trust property or off-site.
- Students should never be entertained in a member of staff's private accommodation (either on-site or external to Treloar).
- 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. counseling) is available at Treloar.
- Always report (to a manager and via IRIS) if a student becomes distressed or angry

### **3.14 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. Particular regard needs to be given when images are taken of young or vulnerable children who may be unable to question why or how the activities are taking place.

Pupils 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 pupil who appears uncomfortable and should recognise the potential for misinterpretation.

***Staff are forbidden to upload images of students to their social networking sites 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.

### **3.15 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 in it's own right (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 LADO 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.

### **3.16 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.

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.

See [Whistleblowing Policy](#) for further information

### **3.17 Sharing concerns and reporting incidents**

Policy/Procedure Name: Safer Working Practice Guidelines

Policy/Procedure No: SMT056

Effective Date: January 2020

At Treloar's we actively encourage the reporting of incidents and sharing of concerns, however serious these may appear.

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 Head of Safeguarding 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 pupils, so that appropriate support can be provided and/or action can be taken.

### **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 Trust 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.

## **4. Legal considerations**

All Treloar Trust employees are insured in respect of any injuries suffered by staff, students or any third party as a result of any action, error or omission by the employee acting reasonably during the course of 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.

## **5. Inclusive Communications**

Policy/Procedure Name: Safer Working Practice Guidelines

Policy/Procedure No: SMT056

Effective Date: January 2020

If you require this document in an alternative format, such as large print, audio description or a colour background, please contact Jo Cox at [jo.cox@treloar.org.uk](mailto:jo.cox@treloar.org.uk)

### 5.1 Training and Communication Requirements

	Action	Responsibility
1	Ensure that all managers, employees and volunteers of Treloar Trust have access to the related procedures.	Treloar 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 Trust 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

### 6. 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](#)

### 7. Revision History

Policy/Procedure Name: Safer Working Practice Guidelines

Policy/Procedure No: SMT056

Effective Date: January 2020

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

**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.

