



Loreto
sixth form college

Guidance for Safer Working Practice for Adults who work with Children and Young People

Acknowledgments: Adapted and updated by the Safer Recruitment Consortium from an original IRSC / DfE document and with thanks to CAPE (Child Protection in Education) and NASS (National Association of Independent Schools and Non-Maintained Special Schools)

September 2023

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I. Definitions

References made to 'child/student' and 'children/students' refer to students under and over the age of 18 years. The principles of the document apply to professional behaviours towards all students, including those over the age of 18 years. 'Child/student' should therefore be read to mean **any student** at college.

References made to adults and staff refer to all those who work with students in college, in either a paid or unpaid capacity. This would also include, for example, those who are not directly employed by the college, e.g. local authority staff, sports coaches, governors or trustees.

The term 'allegation' means where it is alleged that a person who works with children/students has;

- behaved in a way that has harmed a child/student, or may have harmed a child/student;
- possibly committed a criminal offence against or related to a child/student;
- behaved towards a child/student or children/students in a way that indicates they may pose a risk of harm to children/students; or
- behaved or may have behaved in a way that indicates that they may not be suitable to work with children/students.

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wherever possible, such references have been removed in order that the document does not appear to quickly become out of date or to apply only to certain staff or settings.

II. Overview and purpose of guidance

This document seeks to assist staff to monitor their own standards and practice and reduce the risk of allegations being made against them. It is also recognised that not all people who work with children/students work as paid or contracted employees. The principles and guidance outlined in this document still apply and should be followed by any person whose work brings them into contact with children/students,

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

Creating a culture in which all concerns about adults (including allegations that do not meet the harms threshold – see KCSiE) are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. A culture of vigilance will help to ensure that adults working in college are clear

about professional boundaries and act within these boundaries, and in accordance with the ethos and values of Loreto College.

Any behaviours that fall short of the guiding principles outlines in this document must be shared responsibly and with the right person. All concerns that do not meet the harm threshold must be recorded and dealt with appropriately as a low level concern as referenced in *Keeping children safe in education*.

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

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

III. Underpinning principles

- The welfare of the student 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 or behaviour falls short of these guiding principles.
- 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 the College's Safeguarding and Child Protection policy, arrangements for managing allegations against staff, staff behaviour policy, whistle blowing procedure and the procedures of the relevant Multi-agency Partnership (MAP).

<p>1. Introduction</p> <p>Adults have a crucial role to play in the lives of students. This guidance has been produced to help them establish the safest possible learning and working environments which safeguard students and reduce the risk of them being falsely accused of improper or unprofessional conduct.</p>	<p><i>This means that these guidelines:</i></p> <ul style="list-style-type: none"> ▪ Apply to all adults working in Loreto College whatever their position, role or responsibilities.
<p>2. Status of document</p> <p>This document is based upon the publication endorsed and recommended by the Safer Recruitment Consortium. This is not statutory guidance.</p>	
<p>3. Responsibilities</p> <p>Staff are accountable for the way in which they: exercise authority; manage risk; use resources; and safeguard students.</p> <p>All staff have a responsibility to keep students safe and to protect them from abuse (sexual, physical and emotional), neglect and extra-familial harm. Students have a right to be safe and to be treated with respect and dignity. It follows that trusted adults are expected to take reasonable steps to ensure their safety and well-being. Failure to do so may be regarded as professional misconduct.</p> <p>The safeguarding culture of the College is, in part, exercised through the development of respectful, caring and professional relationships between adults and students and behaviour by the adult that demonstrates integrity, maturity and good judgement.</p> <p>The public, local authorities, employers and parents/carers will have expectations about the nature of professional involvement in the lives of students. When individuals accept a role working in an education setting they should understand and acknowledge the responsibilities and trust involved in that role.</p> <p>Employers have duties towards their employees and others under Health and Safety legislation which requires them to take steps to provide a safe working environment for staff.</p> <p>Legislation also imposes a duty on employees to take care of</p>	<p><i>This means that managers / governing body should:</i></p> <ul style="list-style-type: none"> ▪ ensure that appropriate safeguarding and child protection policies and procedures are distributed, adopted, implemented and monitored ▪ ensure that if there is no trained DSL on site¹, a senior member of staff is identified to lead on safeguarding issues <p><i>This means that staff should:</i></p> <ul style="list-style-type: none"> ▪ understand how to raise a concern and contact designated staff or partner agencies if they have a concern about a student, particularly if the normal arrangements have been amended ▪ always act, and be seen to act, in the student's best interests ▪ avoid any conduct which would lead any reasonable person to question their motivation and intentions ▪ take responsibility for their own actions and behaviour

¹ Working Together 2018 refers to the Designated Officer – some local authority arrangements continue to refer to the LADO. Whilst some local authorities may still be using the term LADO the acronym DO is used to denote the DO function as set out in Working Together to Safeguard Children 2018.

<p>themselves and anyone else who may be affected by their actions or failings. An employer's Health and Safety duties and the adults' responsibilities towards students should not conflict. Safe practice can be demonstrated through the use and implementation of these guidelines.</p>	<p><i>This means that employers should:</i></p> <ul style="list-style-type: none"> ▪ <i>promote a culture of openness and support</i> ▪ <i>ensure that systems are in place for concerns to be raised</i> ▪ <i>ensure that adults are not placed in situations which render them particularly vulnerable</i> ▪ <i>ensure that all adults are aware of expectations, policies and procedures</i>
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<p>4. Making professional judgements</p> <p>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 student which could contravene this guidance or where no guidance exists. Individuals are expected to make judgements about their behaviour in order to secure the best interests and welfare of the students in their charge and, in so doing, will be seen to be acting reasonably. These judgements should always be recorded and shared with a manager.</p> <p>Adults should always consider whether their actions are warranted, proportionate, safe and applied equitably.</p>	<p><i>This means that where no specific guidance exists staff should:</i></p> <ul style="list-style-type: none"> ▪ <i>discuss the circumstances that informed their action, or their proposed action, with their line manager or, where appropriate, the Designated Safeguarding Lead. This will help to ensure that the safest practices are employed and reduce the risk of actions being misinterpreted</i> ▪ <i>always discuss any misunderstanding, accidents or threats with the Principal or Designated Safeguarding Lead</i> ▪ <i>always record discussions and actions taken with their justifications</i> ▪ <i>record any areas of disagreement and, if necessary, refer to another agency / the LA / Ofsted / TRA / other Regulatory Body</i>
<p>5. Power and positions of trust and authority</p> <p>As a result of their knowledge, position and/or the authority invested in their role, all those working with students in college are in a position of trust in relation to all students on roll.</p> <p>The relationship between a person working with a student(s) is one in which the adult has a position of power or influence. It is vital for adults to understand this power; that the relationship cannot be one between equals and the responsibility they must exercise as a consequence.</p> <p>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.</p>	<p><i>This means that staff should not:</i></p> <ul style="list-style-type: none"> ▪ <i>use their position to gain access to information for their own advantage and/or a student's or family's detriment</i> ▪ <i>use their power to intimidate, threaten, coerce or undermine students</i> ▪ <i>use their status and standing to form or promote relationships with students which are of a sexual nature, or which may become so</i>

<p>Staff should always maintain appropriate professional boundaries, avoid behaviour which could be misinterpreted by others and report any such incident to a senior manager. This is as relevant in the online world as it is in the classroom; staff engaging with students and / or parents online have a responsibility to model safe practice at all times.</p> <p>Where a person aged 18 or over is in a position of trust with a child under 18, it is an offence² 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.</p>	
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<p>6. Confidentiality</p> <p>The storing and processing of personal information is governed by the General Data Protection Regulations UK (GDPR) and Data Protection Act 2018. Employers should provide clear advice to staff about their responsibilities under this legislation so that, when considering sharing confidential information, those principles should apply.</p> <p>Staff may have access to special category personal data about students and their families which must be kept confidential at all times and only shared when legally permissible to do so and in the interest of the student. Records should only be shared with those who have a legitimate professional need to see them.</p> <p>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.</p> <p>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.</p> <p>If a child/ student – or their parent / carer – makes a disclosure regarding abuse or neglect, the member of staff must always take any such concerns seriously and follow the College's procedures. The adult should not promise confidentiality to a</p>	<p><i>This means that college leaders should:</i></p> <ul style="list-style-type: none"> • <i>Ensure that all staff who need to share 'special category personal data' are aware that the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent, if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent or if to gain consent would place a student at risk</i> <p><i>This means that staff:</i></p> <ul style="list-style-type: none"> ▪ <i>need to know the name of their Designated Safeguarding Lead (Andrea Pritchard) and be familiar with child protection procedures and guidance:</i> ▪ <i>are expected to treat information they receive about students and families in a discreet and confidential manner</i> ▪ <i>should seek advice from a senior member of staff (designated safeguarding lead) if they are in any doubt about sharing information they hold or which has been requested of them</i> ▪ <i>need to be clear about when information can/must be shared and in what circumstances</i> ▪ <i>need to know the procedures for responding to allegations against staff and to whom any concerns or allegations should be reported</i> ▪ <i>need to ensure that where personal information is recorded electronically that systems and devices are kept secure.</i>
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² Sexual Offences Act 2023

<p>child/student or parent/carer but should give reassurance that the information will be treated sensitively.</p> <p>If a member of staff is in any doubt about whether to share information or keep it confidential, he or she should seek guidance from the Designated Safeguarding Lead. Any media or legal enquiries should be passed to senior management.</p>	
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<p>7. Standards of behaviour</p> <p>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 general public and those with whom they work.</p> <p>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.</p> <p>The Childcare (Disqualification) Regulations 2018 set out grounds for disqualification under the Childcare Act 2006 where the person meets certain criteria set out in the Regulations. For example, an individual will be disqualified where they have committed a relevant offence against a child; been subject to a specified order relating to the care of a child; committed certain serious sexual or physical offences against an adult; been included on the DBS children's barred list; been made subject to a disqualification order by the court; previously been refused registration as a childcare provider or provider or manager of a children's home or had such registration cancelled. A disqualified person is prohibited from providing relevant early or later years childcare as defined in the Childcare Act 2006 or being directly concerned in the management of such childcare. Schools and private childcare settings are also prohibited from employing a disqualified person in respect of relevant early or later years childcare.</p> <p><i>Keeping children safe in education</i> states that colleges should make clear their expectation that staff should disclose any</p>	<p><i>This means that staff should not:</i></p> <ul style="list-style-type: none"> ▪ <i>behave in a manner which would lead any reasonable person to question their suitability to work with students or to act as an appropriate role model</i> ▪ <i>make, or encourage others to make sexual remarks to, or about, a student</i> ▪ <i>use inappropriate language to or in the presence of students</i> ▪ <i>discuss their personal or sexual relationships with or in the presence of students</i> ▪ <i>make (or encourage others to make) unprofessional personal comments which scapegoat, demean, discriminate or humiliate or might be interpreted as such</i> <p><i>This means that staff should:</i></p> <ul style="list-style-type: none"> • <i>inform the Principal or specified person of any cautions, convictions, or relevant orders accrued during their employment, and / or if they are charged with a criminal offence</i> • <i>be aware that behaviour by themselves, those with whom they have a relationship or association, or others in their personal lives, may impact on their work with students</i> • <i>inform the Principal of any name changes that they have not previously declared.</i> <p><i>This means that college leaders should:</i></p> <ul style="list-style-type: none"> • <i>have a clear expectation that all staff will discuss with managers any relationship/association (in or out of college or online) that may have implications for the safeguarding of students in college</i> • <i>create a culture where staff feel able to raise these issues</i> • <i>safeguard their employees' welfare and contribute to their duty of care towards their staff</i>
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relationship or association (in the real world or online) that may impact on Loreto's ability to safeguard students. This applies to all staff in all schools/colleges, not just those in early or later years childcare.	<ul style="list-style-type: none"> • <i>identify whether arrangements are needed to support these staff</i> • <i>consider whether there are measures that need to be put in place to safeguard students (e.g., by putting arrangements in place to stop or restrict a person coming into college where a potential risk to has students been identified).</i>
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<p>8. Dress and appearance</p> <p>A person's dress and appearance are matters of personal choice and self-expression and some individuals will wish to exercise their own cultural customs. However, staff should select a manner of dress and appearance appropriate to their professional role and which may be necessarily different to that adopted in their personal life. Staff should ensure they are dressed decently, safely and appropriately for the tasks they undertake; this also applies to online or virtual teaching. Those who dress or appear in a manner which could be viewed as offensive or inappropriate will render themselves vulnerable to criticism or allegation.</p>	<p><i>This means that staff should wear clothing which:</i></p> <ul style="list-style-type: none"> ▪ <i>promotes a positive and professional image</i> ▪ <i>is appropriate to their role</i> ▪ <i>is not likely to be viewed as offensive, revealing or provocative</i> ▪ <i>does not distract, cause embarrassment or give rise to misunderstanding</i> ▪ <i>is absent of any political or otherwise contentious slogans</i> ▪ <i>is not considered to be discriminatory</i> ▪ <i>is compliant with professional standards</i> ▪ <i>in online engagement, is similar to the clothing they would wear on a normal college day</i>
<p>9. Gifts, rewards, favouritism and exclusion</p> <p>Settings should have policies in place regarding the giving of gifts or rewards to students and the receiving of gifts from them or their parents/carers and staff should be made aware of and understand what is expected of them.</p> <p>Staff need to take care that they do not accept any gift that might be construed as a bribe by others, or lead the giver to expect preferential treatment.</p> <p>There are occasions when students or parents wish to pass small tokens of appreciation to staff; e.g., at Christmas or as a thank-you and this is usually acceptable. However, it is unacceptable to receive gifts on a regular basis or of any significant value.</p> <p>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.</p> <p>Any reward given to a student should be in accordance with agreed practice, recorded and not based on favouritism.</p>	<p><i>This means that staff should:</i></p> <ul style="list-style-type: none"> ▪ <i>follow college procedures of reward points and praise notes, e.g., rewarding positive behaviour</i> ▪ <i>ensure that gifts received or given in situations which may be misconstrued are declared and recorded</i> ▪ <i>only give gifts to a student as part of an agreed reward system</i> ▪ <i>where giving gifts other than as above, ensure that these are of insignificant value and given to all students equally</i> ▪ <i>ensure that all selection processes of students are fair and these are undertaken and agreed by more than one member of staff</i> ▪ <i>ensure that they do not behave in a manner which is either favourable or unfavourable to individual students.</i>

Adults should exercise care when selecting students for specific activities, jobs or privileges in order to avoid perceptions of favouritism or injustice. Similar care should be exercised when students are excluded from an activity. Methods of selection and exclusion should always be subject to clear, fair, agreed criteria.	
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<p>10. Infatuations and ‘crushes’</p> <p>All staff need to recognise that it is not uncommon for students to be strongly attracted to a member of staff and/or develop a ‘crush’ or infatuation. They should make every effort to ensure that their own behaviour cannot be brought into question, does not appear to encourage this and be aware that such infatuations may carry a risk of their words or actions being misinterpreted.</p> <p>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 Principal or most senior manager³. In this way appropriate early intervention can be taken which can prevent escalation and avoid hurt, embarrassment or distress for those concerned.</p> <p>The Principal (or senior manager) should give careful thought to those circumstances where the staff member, student and their parents/carers should be spoken to and should ensure a plan to manage the situation is put in place. This plan should respond sensitively to the student and staff member and maintain the dignity of all. This plan should involve all parties, be robust and regularly monitored and reviewed.</p>	<p><i>This means that staff should:</i></p> <ul style="list-style-type: none"> ▪ <i>report any indications (verbal, written or physical) that suggest a student may be infatuated with a member of staff</i> ▪ <i>always maintain professional boundaries</i> <p><i>This means that senior managers should:</i></p> <ul style="list-style-type: none"> ▪ <i>put action plans in place where concerns are brought to their attention</i>
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³ If the Principal has a concern that a young person is becoming infatuated with them, they should report this to the Chair of Governors.

<p>11. Social contact outside of the workplace</p> <p>It is acknowledged that staff may have genuine friendships and social contact with parents of students, independent of the professional relationship. Staff should, however, also be aware that professionals who sexually harm children often seek to establish relationships and contact outside of the workplace with both the student and their parents, in order to ‘groom’ the adult and student the and/or create opportunities for sexual abuse.</p> <p>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.</p> <p>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).</p> <p>If a students or parent seeks to establish social contact, or if this occurs coincidentally, the member of staff should exercise her/his professional judgement in that moment and then inform the Principal/ senior manager as soon as possible. This also applies to social contacts made through outside interests or the staff member’s own family.</p> <p>Some staff may, as part of their professional role, be required to support a parent or carer. If that person comes to depend upon the staff member or seeks support outside of their professional role this should be discussed with senior management and where necessary referrals made to the appropriate support agency.</p>	<p><i>This means that staff should:</i></p> <ul style="list-style-type: none"> ▪ <i>always approve any planned social contact with students or parents with senior colleagues, for example when it is part of a reward scheme</i> ▪ <i>advise senior management of any regular social contact they have with a student which could give rise to concern</i> ▪ <i>refrain from sending personal communication to students or parents unless agreed with senior managers</i> ▪ <i>inform senior management of any relationship with a parent where this extends beyond the usual parent/professional relationship</i> ▪ <i>inform senior management of any requests or arrangements where parents wish to use their services outside of the workplace e.g., babysitting</i>
<p>12. Communication with Students (including the use of technology)</p> <p>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 than the technology itself.</p> <p>Staff should ensure that they establish safe and responsible online behaviours, working to local and national guidelines and acceptable use policies which detail how new and emerging technologies may be used.</p> <p>Communication with students both in the ‘real’ world and through web based and telecommunication interactions, such as when virtual or remote teaching, should take place within</p>	<p><i>This means that adults should:</i></p> <ul style="list-style-type: none"> ▪ <i>not seek to communicate/make contact or respond to contact with students outside of the purposes of their work</i> ▪ <i>not give out their personal details</i> ▪ <i>use only the equipment and internet services provided by the college, unless college policies state otherwise</i> ▪ <i>only use internet-enabled personal devices in line with college acceptable use policies</i> ▪ <i>follow Loreto’s acceptable use policy</i>

<p>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.)</p> <p>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'.</p> <p>Staff should not give their personal contact details to students for example, 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. The student should be firmly and politely informed that this is not acceptable.</p> <p>Staff should, in any communication with students, also follow the guidance in section 7 'Standards of Behaviour'.</p> <p>Staff should adhere to College policies, including those with regard to communication with parents and carers and the information they share when using the internet.</p>	<p><i>and online safety guidance</i></p> <ul style="list-style-type: none"> ▪ <i>ensure that their use of technologies could not bring their employer into disrepute</i> ▪ <i>not discuss or share data relating to students/ parents / carers in staff social media groups</i> <p><i>This means that College should:</i></p> <p><i>wherever possible, provide college devices such as cameras and mobile phones rather than expecting staff to use their own (e.g. on college trips, remote teaching, etc)</i></p>
<p>13. Physical contact</p> <p>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.</p> <p>Not all students feel comfortable about certain types of physical contact; this should be recognised and, wherever possible, adults should seek the student's permission before initiating contact and be sensitive to any signs that they may be uncomfortable or embarrassed. Staff should acknowledge that some students are more comfortable with touch than others and/or may be more comfortable with touch from some adults than others. Staff should listen, observe and take note of the student's reaction or feelings and, so far as is possible, use a level of contact and/or form of communication which is acceptable to the student.</p> <p>It is not possible to be specific about the appropriateness of each physical contact, since an action that is appropriate with one student, in one set of circumstances, may be inappropriate</p>	<p><i>This means that staff should:</i></p> <ul style="list-style-type: none"> ▪ <i>be aware that even well-intentioned physical contact may be misconstrued by the student, an observer or any person to whom this action is described</i> ▪ <i>never touch a student in a way which maybe considered indecent</i> ▪ <i>always be prepared to explain actions and accept that all physical contact be open to scrutiny</i> ▪ <i>never indulge in horseplay or fun fights</i> ▪ <i>always allow/encourage students, whereable, to undertake self-care tasks independently</i> ▪ <i>ensure the way they offer comfort to a distressed student is age appropriate</i> ▪ <i>always tell a colleague when and how they offered comfort to a distressed student</i>

<p>in another, or with a different student.</p> <p>Any physical contact should be in response to the students' 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.</p> <p>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 should be immediately reported to the manager and recorded. Where appropriate, the manager should consult with the Local Authority Designated Officer (the DO).</p> <p>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.</p> <p>A general culture of 'safe touch' should be adopted, where appropriate, to the individual requirements of each student. Students with special educational needs or disabilities may require more physical contact to assist their everyday learning. The arrangements should be understood and agreed by all concerned, justified in terms of the student's needs, consistently applied and open to scrutiny.</p>	<ul style="list-style-type: none"> ▪ <i>establish the preferences of students</i> ▪ <i>consider alternatives, where it is anticipated that a student might misinterpret or be uncomfortable with physical contact</i> ▪ <i>always explain to the student the reason why contact is necessary and what form that contact will take</i> ▪ <i>report and record situations which may give rise to concern</i> ▪ <i>be aware of cultural or religious views about touching and be sensitive to issues of gender</i> <p><i>This means that education settings should:</i></p> <ul style="list-style-type: none"> ▪ <i>ensure they have a system in place for recording incidents and the means by which information about incidents and outcomes can be easily accessed by senior management</i> ▪ <i>provide staff, on a 'need to know' basis, with relevant information about vulnerable students in their care</i>
<p>14. Other activities that require physical contact</p> <p>In certain curriculum areas, such as PE, drama or music, staff may need to initiate some physical contact with students, for example, to demonstrate technique in the use of a piece of equipment, adjust posture, or support a student so they can perform an activity safely or prevent injury.</p> <p>Physical contact should take place only when it is necessary in relation to a particular activity. It should take place in a safe and open environment i.e., one easily observed by others and last for the minimum time necessary. The extent of the contact should be made clear and undertaken with the permission of the student. Contact should be relevant to their age / understanding and adults should remain sensitive to any discomfort expressed verbally or non-verbally by the student. Guidance and protocols around safe and appropriate physical contact may be provided, for example, by sports governing bodies and should be understood and applied consistently.</p>	<p><i>This means that staff should:</i></p> <ul style="list-style-type: none"> ▪ <i>treat students with dignity and respect and avoid contact with intimate parts of the body</i> ▪ <i>always explain to a student the reason why contact is necessary and what form that contact will take</i> ▪ <i>seek consent of parents where a student is unable to give this; e.g., because of age or disability</i> ▪ <i>consider alternatives, where it is anticipated that a student might misinterpret any such contact</i> ▪ <i>be familiar with and follow recommended guidance and protocols</i> ▪ <i>conduct activities where they can be seen by others</i> ▪ <i>be aware of gender, cultural and</i>

<p>Any incidents of physical contact that cause concern or fall outside of these protocols and guidance should be reported to the senior manager and parent or carer.</p> <p>It is good practice that all parties clearly understand at the outset, what physical contact is necessary and appropriate in undertaking specific activities. Keeping parents/carers and students informed of the extent and nature of any physical contact may also prevent allegations of misconduct or abuse arising.</p>	<p><i>religious issues that may need to be considered prior to initiating physical contact</i></p> <p><i>This means College should:</i></p> <ul style="list-style-type: none"> ▪ <i>have in place up to date guidance and protocols on appropriate physical contact, that promote safe practice and include clear expectations of behaviour and conduct.</i> ▪ <i>ensure that staff are made aware of this guidance and that it is continually promoted</i>
<p>15 Intimate / personal care</p> <p>College should have clear nappy or pad changing and intimate / personal care policies which ensure that the health, safety, independence and welfare of students is promoted and their dignity and privacy are respected. Arrangements for intimate and personal care should be open and transparent and accompanied by robust recording systems.</p> <p>Students should be encouraged to act as independently as possible and to undertake as much of their own personal care as is possible and practicable. When assistance is required, this should normally be undertaken by two members of staff. Intimate or personal care procedures should not involve more than two members of staff unless the student's intimate care plan specifies the reason for this.</p> <p>A signed record should be kept of all intimate and personal care tasks undertaken and, where these have been carried out in another room, should include times left and returned.</p> <p>Any vulnerability, including those that may arise from a physical or learning difficulty should be considered when formulating the individual student's care plan. The views of parents, carers and the student, regardless of their age and understanding, should be actively sought in formulating the plan and in the necessary regular reviews of these arrangements. Any changes to the intimate care plan should be made in writing and without delay, even if the change in arrangements is temporary; e.g. staff shortages, changes to staff rotas.</p> <p>Intimate and personal care should not be carried out by an adult that the student does not know. Anyone undertaking intimate / personal care in an education setting is in regulated activity and must have been checked against the relevant DBS barred list, even if the activity only happens once; this includes volunteers. Volunteers and visiting staff from other schools / agencies</p>	<p><i>This means College should:</i></p> <ul style="list-style-type: none"> ▪ <i>have written care plans in place for any student who could be expected to require intimate care</i> ▪ <i>update intimate/personal care plans in writing where appropriate; e.g. because there are changes to staff rotas, etc.</i> ▪ <i>ensure that students are actively consulted about their own care plan</i> <ul style="list-style-type: none"> • <i>ensure that intimate / personal care is provided by staff known to the student</i> • <i>ensure that only individuals that have been checked against the relevant DBS barred list are permitted to engage in intimate or personal care</i> • <i>ensure that temporary or visiting staff have been trained in intimate and personal care procedures if it will be necessary to involve them in such activity</i> <p><i>This means that staff should:</i></p> <ul style="list-style-type: none"> ▪ <i>adhere to the College's intimate and personal care and nappy changing policies</i> ▪ <i>make other staff aware of the task being undertaken</i> ▪ <i>always explain to the student what is happening before a care procedure begins</i> ▪ <i>consult with colleagues where any variation from agreed procedure/care plan is necessary</i> ▪ <i>record the justification for any variations to the agreed procedure/care plan and share this information with the student and their parents/carers</i> ▪ <i>avoid any visually intrusive behaviour</i>

<p>should not undertake care procedures without appropriate training.</p> <p>Students are entitled to respect and privacy at all times and especially when in a state of undress, including, for example; when changing, toileting and showering. However, there needs to be an appropriate level of supervision in order to safeguard students, satisfy health and safety considerations and ensure that bullying or teasing does not occur. This supervision should be appropriate to the needs and age of the students concerned and sensitive to the potential for embarrassment.</p>	<ul style="list-style-type: none"> ▪ <i>where there are changing rooms announce their intention of entering</i> ▪ <i>always consider the supervision needs of the student and only remain in the room where their needs require this</i> <p><i>This means that adults should not:</i></p> <ul style="list-style-type: none"> ▪ <i>change or toilet in the presence or sight of students</i> ▪ <i>shower with students</i> ▪ <i>allow any adult to assist with intimate or personal care without confirmation from senior leaders that the individual is not barred from working in regulated activity</i> ▪ <i>assist with intimate or personal care tasks which the student is able to undertake independently</i>
<p>16 Behaviour management</p> <p>Corporal punishment and smacking are unlawful in all schools colleges and education settings.</p> <p>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.</p> <p>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 students and in worst case scenarios a culture that normalises abuse leading to students accepting it as normal and not coming forward to report it.</p> <p>Where students display difficult or challenging behaviour, adults should follow Loreto’s behaviour policy using strategies appropriate to the circumstance and situation.</p> <p>Where a student has specific needs in respect of particularly challenging behaviour, a positive handling plan, including assessment of risk, should be drawn up and agreed by all parties, including, for example, a medical officer where appropriate.</p>	<p><i>This means that staff should:</i></p> <ul style="list-style-type: none"> ▪ <i>not use force as a form of punishment try to defuse situations before they escalate e.g. by distraction</i> ▪ <i>keep parents informed of any sanctions or behaviour management techniques used</i> ▪ <i>be mindful of and sensitive to factors both inside and outside of College which may impact on a student’s behaviour</i> ▪ <i>follow Loreto’s behaviour management policy</i> ▪ <i>behave as a role model</i> ▪ <i>avoid shouting at students other than as a warning in an emergency/safety situation</i> ▪ <i>refer to national and local policy and guidance regarding Restrictive Physical Intervention (RPI)</i> ▪ <i>be aware of the legislation and potential risks associated with the use of isolation and seclusion</i> ▪ <i>comply with legislation and guidance in relation to human rights and restriction of liberty</i> ▪ <i>be clear as to Loreto’s policy and procedures with regard to peer-on-peer abuse</i> ▪ <i>be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.</i>

17. The use of control and physical intervention

Early years providers must take all reasonable steps to ensure that corporal punishment is not given by any person who cares for or is in regular contact with a child, or by any person living or working in the premises where care is provided. A person will not be taken to have used corporal punishment if the action was taken for reasons that include averting an immediate danger of personal injury to, or an immediate danger of death of, any person including the child.⁴

The law and guidance for college's states that adults may reasonably intervene to prevent a student from:

- committing a criminal offence
- injuring themselves or others
- causing damage to property
- engaging in behaviour prejudicial to good order and to maintain good order and discipline.

Care staff in residential special schools which are also registered as children's homes are not permitted to use physical intervention to maintain good order or discipline and should refer to the Children's Homes Regulations (England) 2015 for information.

Great care must be exercised in order that adults do not physically intervene in a manner which could be considered unlawful. Staff should also be mindful of the significant impact that a physical intervention may have on a student with special educational needs or disabilities.

Under no circumstances should physical force be used as a form of punishment. The use of unwarranted or disproportionate physical force is likely to constitute a criminal offence. Where the college judges that a student's behaviour presents a serious risk to themselves or others, they must always put in place a robust risk assessment which is reviewed regularly and, where relevant, a physical intervention plan.

In all cases where physical intervention has taken place, it would be good practice to record the incident and subsequent actions and report these to a manager and the student's parents. (In a children's home it is a legal requirement to record such incidents.)

This means that education settings should:

- ensure that they have a lawful physical intervention policy consistent with local and national guidance
- regularly acquaint staff with policy and guidance
- ensure that staff are provided with appropriate training and support
- have an agreed policy for when and how physical interventions should be recorded and reported

This means that staff should:

- adhere to the school or setting's physical intervention policy
- always seek to defuse situations and avoid the use of physical intervention wherever possible
- where physical intervention is necessary, only use minimum force and for the shortest time needed

This means that staff should not

- use physical intervention as a form of punishment

⁴ Para 3.54 Statutory framework for the early years foundation stage (DfE Sept 2021).

<p>Similarly, where it can be anticipated that physical intervention is likely to be required, a plan should be put in place which the student and parents/carers are aware of and have agreed to. Parental consent does not permit settings to use unlawful physical intervention or deprive a student of their liberty.</p>	
<p>18. Sexual conduct</p> <p>Any sexual behaviour by a member of staff with or towards a student is unacceptable. It is an offence for a member of staff in a position of trust to engage in sexual activity with a student under 18 years of age⁵ and sexual activity with a student could be a matter for criminal and/or disciplinary procedures.</p> <p>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 students by adults in a position of trust.</p> <p>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.</p> <p>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 that sexual abuse can take place. All staff should undertake appropriate training so they are fully aware of those behaviours that may constitute ‘grooming’ and of their responsibility to always report to a senior manager any concerns about the behaviour of a colleague which could indicate that a student is being groomed.</p>	<p><i>This means that staff should:</i></p> <ul style="list-style-type: none"> ▪ <i>not have any form of sexual contact with a student from the college setting</i> ▪ <i>avoid any form of touch or comment which is, or may be considered to be indecent</i> ▪ <i>avoid 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</i> ▪ <i>not make sexual remarks to or about a student</i> ▪ <i>not discuss sexual matters with or in the presence of students other than within agreed curriculum content or as part of their recognised job role</i>
<p>19. One to one situations</p> <p>Staff working in one to one situations with students at the college, including visiting staff from external organisations can be more vulnerable to allegations or complaints.</p> <p>To safeguard both students and adults, a risk assessment in relation to the specific nature and implications of one to one work should always be undertaken. Each assessment should take into account the individual needs of each student and should be reviewed regularly.</p> <p>Arranging to meet with student from the college or setting away from the work premises should not be permitted unless the necessity for this is clear and approval is obtained</p>	<p><i>This means that staff should:</i></p> <ul style="list-style-type: none"> • <i>work one to one with a student only when absolutely necessary (both in person or online) and with the knowledge and consent of senior leaders and parents/carers</i> • <i>be aware of relevant risk assessments, policies and procedures, including child protection, acceptable use policy and behaviour management.</i> ▪ <i>ensure that wherever possible there is visual access and/or an open door in one to one situations</i> ▪ <i>avoid use of ‘engaged’ or equivalent signs wherever possible. Such signs may create</i>

⁵ Sexual Offences Act 2003:abuse of a position of trust

<p>from a senior member of staff, the student and their parents/carers.</p> <p>Where staff are expected to work one to one with a student on a virtual platform, clear expectations should be set out for all of those involved that are reflective of the settings safeguarding policies and procedures.</p>	<p><i>an opportunity for secrecy or the interpretation of secrecy</i></p> <ul style="list-style-type: none"> ▪ <i>always report any situation where a student becomes distressed or angry</i> ▪ <i>consider the needs and circumstances of the student involved</i> ▪ <i>ensure prior to any online learning, there are clear expectations of behaviour and conduct of all parties that have been agreed in advance.</i>
<p>20. Home visits</p> <p>All work with students and parents should usually be undertaken in the college or other recognised workplace. There are however occasions, in response to an urgent, planned or specific situation or job role, where it is necessary to make one-off or regular home visits; e.g., to undertake a welfare visit during college closures.</p> <p>It is essential that appropriate policies and related risk assessments are in place to safeguard both staff and students, who can be more vulnerable in these situations. A risk assessment should be undertaken prior to any planned home visit taking place. The assessment should include an evaluation of any known factors regarding the student, parents/carers and any others living in the household. Consideration should be given to any circumstances which might render the staff member becoming more vulnerable to an allegation being made e.g. hostility, child protection concerns, complaints or grievances. Specific thought should be given to visits outside of 'office hours' or in remote or secluded locations.</p> <p>Following the assessment, appropriate risk management measures should be put in place, before the visit is undertaken. In the unlikely event that little or no information is available, visits should not be made alone.</p>	<p><i>This means that staff should:</i></p> <ul style="list-style-type: none"> ▪ <i>agree the purpose for any home visit with their manager</i> ▪ <i>have a clear understanding of the actions that should be taken if it is believed that a student or parent is at immediate risk of harm, including when to contact emergency services and /or partner agencies</i> ▪ <i>adhere to agreed risk assessments</i> ▪ <i>avoid unannounced visits wherever possible</i> ▪ <i>ensure there is visual access and/or an open door in one to one situations</i> ▪ <i>never enter a home without the parent or carer's consent or when the parent is absent, except in an emergency</i> ▪ <i>always make detailed records including times of arrival and departure</i> ▪ <i>ensure any behaviour or situation which gives rise to concern is discussed with their manager</i> ▪ <i>ensure that students are seen in open and observable spaces; for example; living rooms.</i> ▪ <i>Comply with data protection regulations in relation to any personal information carried or notes made about the student and/or family</i> <p><i>This means that college should:</i></p> <ul style="list-style-type: none"> ▪ <i>ensure that they have home visit and lone-working policies which all adults are made aware of.</i> ▪ <i>have robust arrangements for risk assessment and management to ensure staff are protected</i> ▪ <i>ensure that staff have access to a mobile telephone and an emergency contact</i> ▪ <i>ensure that policies reflect any procedures or guidance issued by the MAP in relation to undertaking home</i>

	<p><i>visits</i></p> <ul style="list-style-type: none"> ▪ <i>ensure that all visits are justified and recorded</i> ▪ <i>ensure that staff understand the purpose and limitations of welfare visits</i> ▪ <i>make clear to staff that, other than in an emergency they should not enter a home if the parent/carer is absent</i>
<p>21. Transporting students</p> <p>In certain situations, staff or volunteers may be required or offer to transport students as part of their work. As for any other activity undertaken at work, the employer has a duty to carry out a risk assessment covering the health and safety of their staff and to manage any known risks.⁶</p> <p>Consideration must be given to the potential distraction of the driver and the supervision of the passengers. A judgement should be made about the likely behaviour and individual needs of the student(s). If any of them may require close supervision, then another adult should travel in the vehicle so that the driver is not distracted or compromised.</p> <p>Staff should not offer lifts to students unless the need for this has been agreed by a manager. A designated member of staff should be appointed to plan and provide oversight of all transport arrangements and respond to any concerns that may arise.</p> <p>Wherever possible and practicable it is advisable that transport is undertaken other than in private vehicles and with at least one adult additional to the driver acting as an escort.</p> <p>It is a legal requirement that all passengers wear seatbelts and the driver should ensure that they do so. They should also be aware of and adhere to current legislation regarding the use of car seats / booster seats for younger children.</p> <p>Staff should ensure that their behaviour is safe and that the transport arrangements and the vehicle meet all legal requirements. They should ensure that the vehicle is roadworthy and appropriately insured and that the maximum carrying capacity is not exceeded.</p> <p>Staff should never offer to transport students outside of their normal working duties, other than in an emergency or where not doing so would mean the student may be at risk. In these</p>	<p><i>This means that staff should:</i></p> <ul style="list-style-type: none"> ▪ <i>plan and agree arrangements with all parties in advance</i> ▪ <i>respond sensitively and flexibly where any concerns arise</i> ▪ <i>take into account any specific or additional needs of the students</i> ▪ <i>have an appropriate licence/permit for the vehicle</i> ▪ <i>ensure they are fit to drive and free from any drugs, alcohol or medicine which is likely to impair judgement and/or ability to drive</i> ▪ <i>ensure that if they need to be alone with a student this is for the minimum time</i> ▪ <i>be aware that the safety and welfare of the student is their responsibility until this is safely passed over to a parent/carer</i> ▪ <i>report the nature of the journey, the route and expected time of arrival in accordance with agreed procedures</i> ▪ <i>ensure that their behaviour and all arrangements ensure vehicle, passenger and driver safety. This includes having proper and appropriate insurance for the type of vehicle being driven</i> ▪ <i>ensure that any impromptu or emergency arrangements of lifts are recorded and can be justified</i> ▪ <i>refer to Local and National guidance for Educational visits</i> <p><i>This means education settings should:</i></p> <ul style="list-style-type: none"> ▪ <i>ensure the vehicle is safe. This means that it holds a valid MOT certificate, where relevant, that the driver certifies it has been serviced in line with the manufacturer's schedule, and that the driver carries out any pre-use checks specified by the manufacturer.</i> ▪ <i>the driver is suitable. This means that they hold a valid licence for the type of vehicle and meet any employer requirements</i>

⁶ See also <https://www.gov.uk/government/publications/health-and-safety-advice-for-schools>

<p>circumstances the matter should be recorded and reported to both their manager and the student's parent(s). The College's health and safety policy and/or educational visits policy should set out the arrangements under which staff may use private vehicles to transport students.</p>	<ul style="list-style-type: none"> ▪ <i>there is a valid insurance policy covering the driver and the vehicle for the intended use. This may require that the driver has 'business use' cover.</i> ▪ <i>Retain evidence of the above with the risk assessment.</i>
<p>22. Educational visits</p> <p>Staff responsible for organising educational visits should be familiar with the Department for Education's advice on Health and Safety available at:</p> <p>https://www.gov.uk/government/publications/health-and-safety-on-educational-visits</p> <p>The duties in the Health and Safety at Work etc. Act 1974 and the supporting regulations apply to activities taking place on or off the college premises (including college visits) in Great Britain. All college employers must have a Health and Safety policy. This should include policy and procedures for off-site visits, including residential visits and any college-led adventure activities.</p> <p>The Management of Health and Safety at Work Regulations (1999) impose a duty on employers to produce suitable and sufficient risk assessments. This would include assessment of any risks to employees, students or others during an educational visit, and the measures that should be taken to minimise these risks. For regular activities, such as taking students to a local swimming pool, the risks should be considered under the College's general arrangements and a check to make sure that the precautions remain suitable is all that is required. For annual or infrequent activities, a review of an existing assessment may be all that is needed. For new higher-risk activities or trips, a specific assessment of the significant risks should be carried out.</p> <p>Staff should take particular care when supervising students in the less formal atmosphere of an educational visit where a more relaxed discipline or informal dress and language code may be acceptable. However, staff remain in a position of trust and need to ensure that their behaviour cannot be interpreted as seeking to establish an inappropriate relationship or friendship.</p> <p>Where out of college activities include overnight stays, careful consideration needs to be given to sleeping arrangements. Students, adults and parents should be informed of these prior to the start of the trip. In all circumstances, those organising trips and outings should pay careful attention to ensuring there is a safe staff/ student ratio and suitable gender mix of staff.</p>	<p><i>This means that staff should:</i></p> <ul style="list-style-type: none"> ▪ <i>adhere to their organisation's educational visits guidance</i> ▪ <i>always have another adult present on visits, unless otherwise agreed with senior staff</i> ▪ <i>undertake risk assessments</i> ▪ <i>have the appropriate consents in place (e.g. medical)</i> ▪ <i>ensure that their behaviour remains professional at all times</i> ▪ <i>never share beds with a student</i> ▪ <i>never share bedrooms</i> ▪ <i>refer to local and national guidance for educational visits, including exchange visits (both to the UK and abroad).</i>

23. First Aid and medication

All settings should have an adequate number of qualified first-aiders.

Any member of College staff may be asked to become a qualified first-aider or to provide support to students with medical conditions, including the administering of medicines, but they cannot be required to do so unless this forms part of their contract of employment.⁷

In emergency or exceptional circumstances if the college has no trained first aider, it is the responsibility of college leaders to identify a senior person on site each day to lead on any crisis or serious incident including the provision of first aid.

This decision should be supported by a risk assessment that takes into account the number of staff, students and / or other visitors on site, the proximity of emergency services, any particular risks presented, etc. Risks should be minimised as much as possible, for example by not undertaking high risk or adventurous activities.

Staff should receive sufficient and suitable training and achieve the necessary level of competency before they take on responsibility to support students with medical conditions.

Advice on managing medicines is included in the statutory guidance on supporting students at college with medical conditions. In circumstances where a student needs medication regularly, this would usually be recorded in their individual healthcare plan. This provides details of the level and type of support a student needs to manage effectively their medical condition in college and should include information about the medicine to be administered, the correct dosage and any storage requirements.

After discussion with parents, students who are competent should be encouraged to take responsibility for managing their own medicines and procedures. This could include for example, the application of any ointment or sun cream, or use of inhalers or EpiPens.

If a member of staff is concerned or uncertain about the amount or type of medication being given to a student this

This means that education settings should:

- *ensure there are trained and named individuals to undertake first aid responsibilities, including paediatric first aid if relevant*
- *if there is no member of staff available who has completed 'first aid at work' training, identify a senior person to be responsible each day*
- *review and update first aid, medicines in college and crisis / emergency policies and relevant risk assessments*
- *ensure training is regularly monitored and updated.*
- *Refer to local and national First Aid guidance and guidance on meeting the needs of children with medical conditions.*

This means that adults should:

- *adhere to the college's health and safety supporting students with medical conditions policies*
- *make other staff aware of the task being undertaken*
- *have regard to students' individual healthcare plans*
- *always ensure that an appropriate health/risk assessment is undertaken prior to undertaking certain activities*
- *explain to the student what is happening.*
- *always act and be seen to act in the student's best interest*
- *make a record of all medications administered*
- *not work with students whilst taking medication unless medical advice confirms that they are able to do so*

⁷ Teachers cannot be required to do these tasks but other members of staff, whose contracts are agreed locally, can be required to do so if their contracts provide for it.

<p>should be discussed with the Designated Safeguarding Lead.</p> <p>Adults taking medication which may affect their ability to care for students should seek medical advice regarding their suitability to do so and providers should ensure that they only work directly with students if that advice confirms that the medication is unlikely to impair their ability to look after students. Employers are also responsible for managing the performance of their employees and for ensuring they are suitable to work with students.</p> <p>Risk assessment is likely to recommend that staff medication on the premises must be securely stored and out of reach of students at all times.</p>	
<p>24. Photography, videos and other images / media</p> <p>Many educational activities involve recording images. These may be undertaken for displays, publicity, to celebrate achievement and to provide records of evidence of the activity. Under no circumstances should staff be expected or allowed to use their personal equipment to take images of students at or on behalf of the college.</p> <p>All settings should have arrangements with regard to the taking and use of images, which is linked to their safeguarding and child protection policy. This should cover the wide range of devices which can be used for taking/recording images e.g. cameras, mobile-phones, smart phones, tablets, web-cams etc. and arrangements for the use of these by both staff, parents and visitors.</p> <p>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.</p> <p>Students who have been previously abused in a manner that involved images may feel particularly threatened by the use of photography, filming etc. Staff should remain sensitive to any student who appears uncomfortable and should recognise the potential for misinterpretation.</p> <p>Making and using images of students will require the age appropriate consent of the individual concerned and their parents/carers. Images should not be displayed on websites, in publications or in a public place without such consent. The definition of a public place includes areas where visitors to the setting have access.</p>	<p><i>This means that staff should:</i></p> <ul style="list-style-type: none"> ▪ <i>adhere to their college's policy</i> ▪ <i>only publish images of students where they and their parent/carer have given explicit written consent to do so</i> • <i>only take images where the student is happy for them to do so</i> ▪ <i>only retain images when there is a clear and agreed purpose for doing so</i> ▪ <i>store images in an appropriate secure place in the college</i> ▪ <i>ensure that a senior member of staff is aware that the photography/image equipment is being used and for what purpose</i> ▪ <i>be able to justify images of students in their possession</i> ▪ <i>avoid making images in one to one situations</i> <p><i>This means that adults should not:</i></p> <ul style="list-style-type: none"> ▪ <i>take images of students for their personal use</i> ▪ <i>display or distribute images of students unless they are sure that they have parental consent to do so (and, where appropriate, consent from the student)</i> ▪ <i>take images of students using personal equipment</i> ▪ <i>take images of students in a state of undress or semi-undress</i> ▪ <i>take images of a student's injury, bruising or similar (e.g. following a disclosure of abuse) even if requested by children's social care</i> ▪ <i>make audio recordings of a student's disclosure</i>

<p>For the protection of students, it is recommended that when using images for publicity purposes that the following guidance should be followed:</p> <ul style="list-style-type: none"> • if the image is used, avoid naming the student, (or, as a minimum, use first names rather than surnames) • if the students is named, avoid using their image • college should establish whether the image will be retained for further use, where and for how long • images should be securely stored and used only by those authorised to do so. 	<ul style="list-style-type: none"> ▪ <i>take images of students which could be considered as indecent or sexual</i>
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<p>25. Use of technology for online/virtual teaching</p> <p>College will review it's online safety and acceptable use policies and amend these if necessary ensuring that all staff involved in virtual teaching or the use of technology to contact students are briefed on best practice and any temporary changes to policy / procedures.</p> <p>When selecting a platform for online / virtual teaching, college will satisfy itself that the provider has an appropriate level of security. Wherever possible, staff should use college devices and contact students only via the student college email address / log in. This ensures that Loreto's filtering and monitoring software is enabled.</p> <p>In deciding whether to provide virtual or online learning for students, senior leaders should take into account issues such as accessibility within the family home, the mental health and wellbeing of students, including screen time, the potential for inappropriate behaviour by staff or students, staff access to the technology required, etc. Virtual lessons should be timetabled and senior staff, DSL and / or heads of department should be able to drop in to any virtual lesson at any time – the online version of entering a classroom.</p> <p>Staff engaging in online learning should display the same standards of dress and conduct that they would in the real world; they should also role model this to students and parents. The following points should be considered:</p> <ul style="list-style-type: none"> ▪ think about the background; photos, artwork, identifying features, mirrors – ideally the backing should be nondescript ▪ staff and students should be in living / communal areas – no bedrooms 	<p><i>This means that senior leaders should:</i></p> <ul style="list-style-type: none"> ▪ <i>ensure that all relevant staff have been briefed and understand the policies and the standards of conduct expected of them</i> ▪ <i>have clearly defined operating times for virtual learning</i> ▪ <i>consider the impact that virtual teaching may have on students and their parents/carers / siblings</i> ▪ <i>determine whether there are alternatives to virtual teaching in 'realtime' – e.g., using audio only, pre- recorded lessons, existing online resources</i> ▪ <i>be aware of the virtual learning timetable and ensure they have the capacity to join a range of lessons</i> ▪ <i>take into account any advice published by the local authority, MAP or their online safety / monitoring software provider</i> <p><i>This means that staff should:</i></p> <ul style="list-style-type: none"> ▪ <i>adhere to their establishment's policy</i> ▪ <i>be appropriately dressed</i> ▪ <i>ensure that a senior member of staff is aware that the online lesson / meeting is taking place and for what purpose</i> ▪ <i>avoid one to one situations – request that a parent is present in the room for the duration, or ask a colleague or member of SLT to join the session</i> ▪ <i>only record a lesson or online meeting with a student where this has been agreed with the Principal or other senior staff</i>
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<ul style="list-style-type: none"> ▪ staff and students should be appropriately dressed ▪ filters at a student's home may be set at a threshold which is different to the college ▪ resources / videos must be age appropriate – the student may not have support immediately to hand at home if they feel distressed or anxious about content <p>It is the responsibility of the staff member to act as a moderator; raise any issues of suitability (of dress, setting, behaviour) with the student and / or parent immediately and end the online interaction if necessary. Recording lessons does not prevent abuse. If staff wish to record the lesson they are teaching, consideration should be given to data protection issues; e.g., whether parental/ student consent is needed and retention / storage. If a staff member believes that a student or parent is recording the interaction, the lesson should be brought to an end or that student should be logged out immediately.</p> <p>If staff need to contact a student or parent by phone and do not have access to a work phone, they should discuss this with a senior member of staff and, if there is no alternative, always use 'caller withheld' to ensure the student / parent is not able to identify the staff member's personal contact details.</p>	<ul style="list-style-type: none"> ▪ <i>be able to justify images of students in their possession</i> ▪ <i>This means that adults should not: contact students outside the operating times defined by senior leaders</i> ▪ <i>take or record images of students for their personal use</i> ▪ <i>record virtual lessons or meetings using personal equipment (unless agreed and risk assessed by senior staff)</i> ▪ <i>engage online while students are in a state of undress or semi-undress</i>
<p>26. Exposure to inappropriate images</p> <p>Staff should take extreme care to ensure that students and young people are not exposed, through any medium, to inappropriate or indecent images.</p> <p>There are no circumstances that will justify adults: making, downloading, possessing or distributing indecent images or pseudo-images of children (child abuse images). Accessing these images, whether using the Loreto's or personal equipment, on or off the premises, or making, storing or disseminating such material is illegal.</p> <p>If indecent images of children are discovered at the establishment or on the college's equipment an immediate referral should be made to the Designated Officer (DO) and the police contacted if relevant. The images/equipment should be secured and there should be no attempt to view or delete the images as this could jeopardise necessary criminal action. If the images are of students known to the college, a referral should also be made to children's social care in line with local arrangements.</p> <p>Under no circumstances should any adult use college</p>	<p><i>This means that staff should:</i></p> <ul style="list-style-type: none"> ▪ <i>abide by the college's acceptable use and online safety policies</i> ▪ <i>ensure that students cannot be exposed to indecent or inappropriate images</i> ▪ <i>ensure that any films or material shown to students are age appropriate</i>

<p>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 students and young people.</p> <p>Staff should keep their passwords confidential and not allow unauthorised access to equipment. In the event of any indecent images of children or unsuitable material being discovered on a device the equipment should not be tampered with in any way. It should be secured and isolated from the network, and the DO 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.</p>	
<p>27. Personal living accommodation including on-site provision</p> <p>Generally, staff should not invite any students into their living accommodation unless the reason to do so has been firmly established and agreed with their manager and the student's parents/carers.</p> <p>It is not appropriate for staff to be expected or requested to use their private living space for any activity, play or learning. This includes seeing students for e.g. discussion of reports, academic reviews, tutorials, pastoral care or counselling. Managers should ensure that appropriate accommodation for such activities is found elsewhere in the setting.</p> <p>Under no circumstances should students be asked to assist adults with jobs or tasks, either for or without reward, at or in their private accommodation.</p> <p>This guidance should also apply to all other persons living in or visiting the private accommodation.</p>	<p><i>This means that staff should:</i></p> <ul style="list-style-type: none"> ▪ <i>be vigilant in maintaining their privacy, including when living in on-site accommodation</i> ▪ <i>be mindful of the need to avoid placing themselves in vulnerable situations</i> ▪ <i>refuse any request for their accommodation to be used as an additional resource for the college</i> ▪ <i>be mindful of the need to maintain appropriate personal and professional boundaries</i> ▪ <i>not ask students to undertake jobs or errands for their personal benefit</i>
<p>28. Overnight supervision and examinations</p> <p>There are occasions during exam periods when timetables clash and arrangements need to be made to preserve the integrity of the examination process. In these circumstances, examination boards may allow candidates to take an examination the following morning, including Saturdays.</p> <p>The supervision of a candidate on journeys to and from the centre and overnight may be undertaken by the candidate's</p>	<p><i>This means that:</i></p> <ul style="list-style-type: none"> ▪ <i>College should ensure that all arrangements reflect a duty of care towards students and staff</i> ▪ <i>Where staff do supervise candidates overnight: a full health and safety risk assessment should have been undertaken</i> ▪ <i>all members of the household should have had appropriate vetting including, where eligible, DBS and barred list checks</i>

<p>parent/carer or centre staff.</p> <p>The examination board requires the centre to determine a method of supervision which ensures the candidate's wellbeing. As a result, in some circumstances staff may be asked to volunteer to supervise students perhaps in their own homes.</p> <p>The overriding consideration should be the safeguarding of both the student and staff; therefore, many local authorities, professional associations and unions do not endorse the practice of staff supervising candidates overnight in their own homes. Some schools employ alternatives such as a 'sleep-over' on the school premises.</p> <p>Where arrangements are made for a staff member to supervise a student overnight then all necessary safeguards should be in place.</p>	<ul style="list-style-type: none"> ▪ <i>all arrangements should be made in partnership and agreement with the student and parents/carers</i> ▪ <i>arrangements involving one to one supervision should be avoided wherever possible.</i> ▪ <i>as much choice, flexibility and contact with 'the outside world', should be incorporated into any arrangement so far as is consistent with appropriate supervision</i> ▪ <i>whenever possible, independent oversight of arrangements should be made</i> ▪ <i>any situation which gives rise to complaint, disagreement or misunderstanding should be reported</i> ▪ <i>staff should have regard to any local and national guidance</i>
<p>29. Curriculum</p> <p>Many areas of the curriculum can include or raise subject matter which is sexually explicit or of a political or sensitive nature. Care should be taken to ensure that resource materials cannot be misinterpreted and clearly relate to the 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 particular areas of risk and sensitivity and care should especially be taken in those areas of the curriculum where usual boundaries or rules are less rigorously applied e.g. drama.</p> <p>The curriculum can sometimes include or lead to unplanned discussion about subject matter of a sexually explicit, political or otherwise sensitive nature. Responding to student's questions requires careful judgement and staff should take guidance in these circumstances from the Designated Safeguarding Lead.</p> <p>Care should be taken to comply with the college's policy on spiritual, moral, social, cultural (SMSC) which should promote fundamental British values and be rigorously reviewed to ensure it is lawful and consistently applied. Staff should also comply at all times with the policy for relationships, sex and health education (RSHE) promoting healthy relationships inclusive of an understanding of consent. It should be noted that parents have the right to withdraw their children from all or part of any sex education provided but not from the National Curriculum for Science.</p>	<p><i>This means that staff should:</i></p> <ul style="list-style-type: none"> ▪ <i>have clear written lesson plans and ensure that content is appropriate to the student's age and cognitive development.</i> ▪ <i>take care, when encouraging students to use self-expression not to overstep personal and professional boundaries</i> ▪ <i>be able to justify all curriculum materials and relate these to clearly identifiable lessons plans.</i> <p><i>This means that adults should not:</i></p> <ul style="list-style-type: none"> ▪ <i>enter into or encourage inappropriate discussions which may offend or harm others</i> ▪ <i>undermine fundamental British values</i> ▪ <i>express any prejudicial views</i> ▪ <i>attempt to influence or impose their personal values, attitudes or beliefs on students</i>

<p>Where part of the college 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 re-traumatisation 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 picked up by the college's designated safeguarding lead. Other methodologies which might raise concerns include:</p> <p>Students visiting unknown adults, alone, to interview them; conducting social experiments on peers or students without parental consent; or accessing age-inappropriate content online.</p>	
<p>30. Duty to report concerns about an individual's suitability to work with students.</p> <p>There is a duty to report (including self-reporting) any incident in which an adult 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.</p> <p>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 the college's staff behaviour policy. 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.</p> <p>Failure to report or respond to such concerns would constitute a failure in professional responsibilities to safeguard students and promote welfare.</p> <p>Whistleblowing is a mechanism by which staff can voice their concerns, made in good faith, without fear of repercussion in circumstances where their concerns have not been dealt with or they do not feel able to follow usual reporting lines for some reason. Education settings should have a clear and accessible whistleblowing policy that meets the terms of the Public Interest Disclosure Act 1998. Staff who use whistle blowing procedures should have their employment rights protected.</p>	<p><i>This means that college should:</i></p> <ul style="list-style-type: none"> • <i>have clear systems in place for all reporting of adults' behaviour causing concern.</i> • <i>have clear systems in place for whistleblowing that are promoted to all staff.</i> • <i>promote an open and transparent culture where staff feel valued and are confident to report any concerns</i> • <i>ensure all concerns about adult conduct are listened to, received in a sensitive manner, taken seriously, actioned, recorded with clear outcomes.</i> • <i>ensure all concerns that do meet the harm threshold are reported to the DO within 24 hours.</i> <p><i>This means that staff should:</i></p> <ul style="list-style-type: none"> ▪ <i>escalate their concerns if they believe a student(s) are not being protected</i> ▪ <i>report any behaviour by colleagues that raises concern report allegations against staff and volunteers to the Principal or senior manager or where they have concerns about the principal/ manager's response, report these directly to the chair/ proprietor/DO.</i> ▪ <i>follow the organisation's whistleblowing procedures as appropriate.</i> ▪ <i>where a staff member feels unable to raise an issue with their employer or feels that their</i>

<p>The NSPCC ‘what you can do to report abuse’ dedicated helpline is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally, or have concerns about the way a concern is being handled by their school or college. Staff can call 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: help@nspcc.org.uk</p>	<p><i>genuine concerns are not being addressed, they should utilise other whistleblowing channels that are open to them as outlined in KCSiE.</i></p>
<p>31. Sharing concerns and recording incidents</p> <p>All staff should be aware of their establishment’s safeguarding procedures, including the procedures for dealing with allegations against staff, including agency staff and volunteers, and for reporting low level concerns.</p> <p>In the event of an allegation being made, by any person, or incident being witnessed, the relevant information should be immediately recorded and reported to the headteacher, senior manager or Designated Safeguarding Lead as appropriate.</p> <p>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.</p> <p>In order to safeguard and protect students and colleagues, where staff have any concerns about someone who works with students they should immediately report this to the principal or senior manager in line with the setting’s procedures.</p>	<p><i>This means that staff should:</i></p> <ul style="list-style-type: none"> • <i>be familiar with the college’s arrangements for reporting and recording concerns and allegations</i> • <i>know how to contact the DO and Ofsted/regulatory body directly if required</i> • <i>take responsibility for recording any incident, and passing on that information where they have concerns about any matter pertaining to the welfare of an individual in the college</i> <p><i>This means that education settings should:</i></p> <ul style="list-style-type: none"> ▪ <i>have an effective, confidential system for recording and managing concerns raised by any individual regarding adults’ conduct and any allegations against staff and volunteers</i>

NB:

- All staff need to be aware that the **College’s Designated Person for Safeguarding and Child Protection is Andrea Pritchard** and be conversant with the Safeguarding and Child Protection Policy.
- The Safeguarding and Child Protection Policy is available on MyLoreto.
- All Staff have a duty you report and safeguarding or child protection concerns to the designated Person for safeguarding and child protection. They must not investigate themselves.

Dealing with concerns and allegations about staff (teachers, other staff and supply teachers), visitors, volunteers and contractors.

The Safeguarding and Child Protection Policy clearly outlines the procedures in place at Loreto for dealing with concerns and allegations about staff (teachers, other staff and supply teachers), visitors, volunteers and contractors.

Keeping Children Safe in Education 2021 introduced new guidance as to how Schools and Colleges should deal with allegations/concerns that do not meet the safeguarding threshold (low level concerns).

The Safeguarding and Child Protection Policy clearly outlines the procedures in place at Loreto for dealing with allegations/concerns that do not meet the safeguarding threshold (low level concerns). These procedures are also set out below.

Dealing with low level concerns and allegations about staff (teachers, other staff and supply teachers), visitors, volunteers and contractors:

Concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a student, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken. The college has appropriate processes in place to manage and record any such concerns and take appropriate action to safeguard students.

Dealing with low level concerns and allegations about staff (teachers, other staff and supply teachers), visitors, volunteers and contractors:

Concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a student, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken. The college has appropriate processes in place to manage and record any such concerns and take appropriate action to safeguard students.

Low level concerns

As part of our whole college approach to safeguarding, we promote an open and transparent culture in which all concerns about all adults working in or on behalf of the college (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately. We acknowledge the critical importance of creating a culture in which all concerns about adults (including allegations that do not meet the harms threshold) are shared responsibly and with the right person, recorded and dealt with appropriately. Maintaining an open and transparent culture will enable the college to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the college are clear about professional boundaries and act within these boundaries, and in accordance with our ethos and values.

What is a low level concern?

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the harms threshold.

A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO. Examples of such behaviour could include, but are not limited to:
 - being over friendly with children/ students;
 - having favourites;
 - taking photographs of children/ students on their mobile phone;
 - engaging with a child on a one-to-one basis in a secluded area or behind a closed door;
 - or,
 - using inappropriate sexualised, intimidating or offensive language.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

It is crucial that any such concerns, including those which do not meet the harm threshold, are shared responsibly and with the right person, and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools and colleges from potential false allegations or misunderstandings.

Sharing low-level concerns

Low-level concerns about a member of staff, supply staff, volunteer or contractor should be reported to Andrea Pritchard, Designated Safeguarding Lead and Deputy Principal. Where concerns relate to supply staff and contractors the Designated Safeguarding lead will notify their employers, so any potential patterns of inappropriate behaviour can be identified. The Principal is the ultimate decision maker in respect of all low-level concerns.

Staff are encouraged to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

Recording low-level concerns

All low-level concerns should be recorded in writing and stored in individual staff files with HR. The record should include:

- details of the concern,
- the context in which the concern arose,
- action taken,
- the name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

Records are confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR)

Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour are identified. Where a pattern of such behaviour is identified, the college will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it will be referred to the LADO. Consideration will also be given to whether there are wider cultural issues within the college that enabled the behaviour to occur and where appropriate policies could be revised or extra training delivered to minimise the risk of it happening again. This information will be retained at least until the individual leaves their employment with the college.

References

Keeping Children Safe in Education is clear that schools and colleges should only provide substantiated safeguarding allegations in references. Low level concerns should not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should not be referred to in a reference. However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it should

be referred to in a reference.

Responding to low-level concerns

Following the report of a low level concern the Designated Safeguarding Lead will collect as much evidence as possible by speaking:

- directly to the person who raised the concern, unless it has been raised anonymously;
- to the individual involved and any witnesses.

The information collected will help them to categorise the type of behaviour and determine what further action may need to be taken. All of this will be recorded along with the rationale for their decision and action taken.

The Seven Principles of Public Life

Selflessness

Holders of public office should take decisions solely in terms of the public interest. They should not do so in order to gain financial or other material benefits for themselves, their family, or their friends.

Integrity

Holders of public office should not place themselves under any financial or other obligation to outside individuals or organisations that might influence them in the performance of their official duties.

Objectivity

In carrying out public business, including making public appointments, awarding contracts, or recommending individuals for rewards and benefits, holders of public office should make choices on merit.

Accountability

Holders of public office are accountable for their decisions and actions to the public and must submit themselves to whatever scrutiny is appropriate to their office.

Openness

Holders of public office should be as open as possible about all the decisions and actions that they take. They should give reasons for their decisions and restrict information only when the wider public interest clearly demands.

Honesty

Holders of public office have a duty to declare any private interests relating to their public duties and to take steps to resolve any conflicts arising in a way that protects the public interest.

Leadership

Holders of public office should promote and support these principles by leadership and example.

