



**TRAFFORD &  
STOCKPORT  
COLLEGE GROUP**

# **Staff Safeguarding Code of Conduct**

<b>Author:</b>	<b>Group Director of People and Culture</b>
<b>Consultation:</b>	<b>TSCG Senior Leadership Team</b>
<b>Approval:</b>	<b>Chief People Officer</b>
<b>Version Date:</b>	<b>August 2025</b>
<b>Approved Date:</b>	<b>August 2025</b>
<b>Next Review:</b>	<b>August 2026</b>

## Contents

<b>1. Introduction and Purpose</b> .....	4
<b>2. Scope</b> .....	4
<b>3. Standards of Personal Behaviour</b> .....	4
<b>3.1. General</b> .....	4
<b>3.2. Relationships between Staff and Students</b> .....	5
<b>3.2.1. Students under the age of 18</b> .....	5
<b>3.2.2. Students over the age of 18</b> .....	5
<b>3.2.3. Relationships with Learners who are Vulnerable Adults</b> .....	6
<b>3.2.4. Social Contact</b> .....	6
<b>3.2.5. Physical Contact / Intervention</b> .....	6
<b>3.2.6. One to One Situations</b> .....	7
<b>3.2.7. Transporting Students</b> .....	7
<b>3.3. Low Level Concerns</b> .....	8
<b>3.4. Relationships between Staff</b> .....	8
<b>4. Confidentiality</b> .....	9
<b>5. Dress and Appearance</b> .....	9
<b>6. Misuse of alcohol and drugs</b> .....	9
<b>7. Smoking</b> .....	9
<b>8. Conduct outside work</b> .....	9
<b>9. Contact with Students through Remote Learning</b> .....	10
<b>10. Related Policies and Procedures</b> .....	10
<b>11. Further Information</b> .....	10



## **1. Introduction and Purpose**

Student and public confidence in Trafford and Stockport College Group (the Group) depends on all staff demonstrating the highest level of personal and professional standards of conduct. This Code of Conduct seeks to provide a framework of acceptable standards. It is recognised that the actions and behaviour of staff members have an impact on the education and well-being of learners and colleagues, as well as other stakeholders, and the local community. Employees are expected to have regard for the impact of their personal behaviour to maintain and generate confidence in the Group and demonstrate high standards of probity and ethical behaviour. The Code takes into account relevant guidance such as Keeping Children Safe in Education September 2025 and expect staff to be aware of, and adhere to, this document.

Within this Code, reference to staff includes employees, Governors, volunteers and visitors. Reference to students includes young people and vulnerable adults.

There will always be occasions when staff need to make decisions or take action in the best interest of the students which could contravene the guidance within this Code, or where no guidance exists. In such circumstances colleagues will be expected to make professional judgements and in doing so will be seen to be acting reasonably.

## **2. Scope**

All staff are accountable for the way in which they exercise authority, manage risk, use resources and protect others from discrimination and avoidable harm. Staff should discuss and/or take advice promptly from their line manager or another senior member of staff over any incident which may give rise to concern.

This code of conduct applies to everyone we employ including volunteers, Governors and visitors.

## **3. Standards of Personal Behaviour**

Staff must always ensure that they conduct themselves in a professional manner towards learners, colleagues and others.

### **3.1. General**

Staff are expected at all times to:

- Behave in accordance with our Group values and carry out their duties with integrity, care, and diligence.
- Treat students, other employees and Group users with courtesy and respect.
- Complete and remain up to date with all mandatory training.
- Not to use inappropriate or offensive language or behaviour such as of an aggressive or sexual nature.
- Freedom of Expression – Acknowledge and protect academic freedom and free speech within legal limits. (Please refer to TSCG Code of Practice - Freedom of Speech- for more information)
- Promote and protect the good reputation of the Group.
- Be punctual to and make best use of working time.
- Comply with reasonable requirements or instructions given by Group management.
- Staff must not use personal mobile devices to photograph or record students. College-issued devices must be used, and any imagery must be stored in accordance with data protection policies
- Preserve the confidentiality of all Group information attained by them in the course of

Page 4 of 10

their work and avoid dealing with the media on any Group issue unless specifically authorised.

- Familiarise themselves with and adhere to the Group's policies and procedures.
- Comply with the Safeguarding and Prevent policies and procedures and make themselves aware of the content of Keeping Children Safe in Education Part 1, in particular:
  - Staff should demonstrate exemplary behaviour and be open and transparent when working with students in order to protect students from abuse and to protect themselves from false allegations.
  - Any incidents or behaviour which give rise to concern should be discussed immediately with the Designated Safeguarding Officer (DSO).
  - Any allegations or suspicions that a student is being abused should be reported immediately to the DSO.
  - Any allegations or concerns regarding another colleague must be reported immediately to the CEO, unless the CEO is the person against whom the allegation is made, in which case the report should be made to the senior colleague with Lead Responsibility or the Designated Governor.
  - Not to leave students unattended in a learning situation.
  - Always wear their Group identity badge on the appropriate Group lanyard.
  - All colleagues should know the name of the Designated Safeguarding Officers at the Group. A list of all DSOs, including contact details, is available on the Safeguarding Hub on the Staff Intranet.

### **3.2. Relationships between Staff and Students**

Staff should ensure that their relationship with students is appropriate to the student group. Care must be taken to ensure that attitudes, demeanour, language or conduct could not be construed as inappropriate.

Although it is recognised that some students will need more help/support it is important that staff do not favour any particular student, as favouritism might be construed as being part of a 'grooming process' which is an offence.

Staff must not give gifts/rewards to students unless the gift/reward is part of an open competition where all learners have been involved and have been made aware of the arrangements.

Anyone who feels that their relationship with a particular student is developing into one that would be deemed inappropriate should discuss the matter with their line manager immediately.

#### **3.2.1. Students under the age of 18**

Personal relationships, of any duration, with students under the age of 18 are strictly forbidden. Any such relationships will be dealt with under the Group's Disciplinary policy and any relevant external agencies will be informed as required. Such a situation could be deemed to be gross misconduct and subject to dismissal. In the case of a family member studying at the Group, please inform your line manager.

#### **3.2.2. Students over the age of 18**

Close personal relationships between staff and students, of any duration, are discouraged by the Group in recognition of difficulties that could arise. Staff should not enter into a personal relationship, of any duration, with an individual whilst undertaking their role for the Group or whilst the student concerned is studying at the

Group. If relationships, of any duration, already exist or develop outside of the Group with a student of 18 years or more the following procedure should be followed:

- It is the responsibility of the member of staff to inform the Director of People and Culture in confidence if they are in a close personal relationship with a learner. This applies to all members of staff regardless of whether they have a direct teaching relationship with the student. This arrangement applies to relationships that existed prior to employment or enrolment and to relationships that started away from Group premises either prior or during employment or enrolment.
- A member of staff who is in a pre-existing close personal relationship with a student over the age of 18 should ensure that their personal relationship is conducted entirely off campus.
- In the event that other members of staff need to know about this relationship, information will be shared on a need-to-know basis and handled sensitively. The member of staff concerned will be informed.
- Failure to disclose a personal relationship with a student may be dealt with under the Group Disciplinary Procedure.

If a learner declares a relationship with a member of staff the Group will follow the same procedures.

### **3.2.3. Relationships with Learners who are Vulnerable Adults**

Close personal relationships with learners who are vulnerable adults are prohibited. Any member of staff who enters into such a relationship may be subject to the Group's disciplinary procedure; this may constitute gross misconduct and an investigation into safeguarding under the Group's relevant policies and procedures will be carried out.

### **3.2.4. Social Contact**

Social contact with students, other than that which has been organised by the Group, should be positively avoided. It is recognised that there may be occasions when social contact may be unavoidable and in such circumstances staff should, at all times, be mindful that their relationship with the student is appropriate and professional.

Staff must not give their personal details to students e.g., home/mobile numbers, home email addresses or personal social media accounts.

The Group encourages the positive use of social media as part of the educational process. Social media is used by many people, particularly students to communicate with their peers and the public. Students may wish to form personal relationships with staff, however, to ensure professional boundaries are maintained; staff must not accept and/or invite the following individuals to be "friends" on personal social media accounts or other online services:

- Students, including vulnerable students who are adults or children.
- Ex-students under the age of 18, and
- Parents/Carers.

### **3.2.5. Physical Contact / Intervention**

As a general principle, staff should not have unnecessary physical contact with students. There may be rare occasions when a student needs comfort or reassurance which may include physical comforting.

In such circumstances it is necessary for staff to make sure that any comforting gestures are deemed as acceptable to the student. Staff need to be aware that even well-intentioned physical contact may be misconstrued by the student.

Physical intervention can be defined as “the reasonable application of the minimum necessary force to overpower a student with the intention of preventing them from harming themselves or others, or from causing serious damage to property.”

Staff should only use physical intervention where absolutely necessary. It should be used primarily for the benefit of the person/s and, though immediate, should be a considered response. In such circumstance staff should use the minimum force necessary. Where staff have been involved in incidents of physical intervention a written record of the incident and subsequent actions should be documented and reported.

Some members of staff, for example, those who teach on Sports Studies courses, will on occasion have to initiate physical contact with students in order to support the student in safely completing a task or to demonstrate the use of equipment. This should be done for the minimum amount of time required and with the student's agreement.

### **3.2.6. One to One Situations**

It is recognised that there will be occasions when staff are required to work in one-to-one situations with students. In such circumstances staff may be more vulnerable to allegations. To safeguard against any allegations staff should:

- Consider the needs and circumstances of the student involved.
- Avoid meeting students in remote/secluded areas of the Group.
- Ensure there is visual access and/or an open door in one-to-one situations.
- Ahead of the meeting taking place inform colleagues and assess whether it is appropriate to have a colleague either present or close by.
- If a student becomes distressed or angry, report it to a senior colleague.

Staff are not permitted to meet with students away from the Group sites unless prior approval has been obtained from the student's parent/carer and the CEO, or Group Principal.

### **3.2.7. Transporting Students**

Staff should not transport students in their own private vehicles and other transport should be arranged e.g., Group minibus or taxi. In the case of an extreme emergency and where no other options are immediately available then an exception may be made, and a second member of staff should accompany on the journey.

In the exceptional circumstance where staff are required to transport students, they must only do so if they have previously confirmed adequate personal car insurance, business insurance is not necessarily adequate. In addition, they must also follow the guidance as detailed in the Health and Safety Policy procedure for the use of Personal Vehicles on Group Business which explains how any risks should be mitigated.

### **3.3. Low Level Concerns**

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 Group may have acted in a way that:

- is inconsistent with the staff safeguarding code of conduct, including inappropriate conduct outside of work, and
- does not meet the harm threshold or is otherwise not 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
- having favourites
- taking photographs of children on their mobile phone, contrary to school policy
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
- humiliating children.

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.

Low-level concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

Low level concerns may arise as a result of naivety, be accidental or unintentional, be the result of misinformed action, a failure to follow procedures, a lack of training or, more rarely, deliberate abuse.

(KCSIE 2025)

If colleagues have any such concerns, then they should raise the concern using the Low-Level Concerns procedure.

### **3.4. Relationships between Staff**

It is the member of staff's responsibility to inform their manager, in confidence of any relationship with another member of staff.

If the relationship is:

- with a member of staff in the same team, and/or
- there is a line management relationship between the members of staff, or one is responsible for performance management decisions,

the relevant Assistant Principal, Director, Head, or manager will meet with the employees to discuss the potential impact of the relationship on the Group. It is possible that other members of staff may need to be informed of the relationship so that where there may be a conflict of interest, for example appraisals, alternative arrangements can be put in place. The Group may consider it necessary to move an employee to another department if a conflict of interest cannot be avoided and this will be discussed with the members of staff in question.

Failure to disclose the existence of a relationship, where the Code requires disclosure, may result in disciplinary action.

#### **4. Confidentiality**

Staff often have access to confidential information of a highly sensitive nature about staff, third parties, students and /or their families. Such confidential information should only be discussed or shared on a need-to-know basis and where the individual's identity does not need to be disclosed such information should be used anonymously.

Where a member of staff suspects that a student is being abused, they have a duty to pass such information on to the designated safeguarding officer without delay. If a member of staff is in any doubt about whether to share information or keep it confidential, they should seek guidance from a Designated Safeguarding Officer (DSO).

#### **5. Dress and Appearance**

The Group does not operate a formal dress code for employees, other than for those who are required to wear uniform and/or protective clothing.

As a general rule, smart casual attire is expected for day-to-day work wear. Employees are expected to make an appropriate interpretation of this dependent on their role and in particular on how they are expected to interact with current or potential students/staff or external stakeholders, this includes online and remote working. Examples of smart casual could include trousers, skirts, smart dresses, shirts/blouses and smart tops or sweaters.

All staff are expected to present a professional image and to present one that reflects sensitivity to customer perceptions. Clothing should not be provocative or cause offence to those with whom they have contact. Clothing which resembles beach wear is not acceptable; neither are clothes that display inappropriate slogans or images, reveal underwear or inappropriate bare flesh, or are dirty, holed or fraying. Footwear should be appropriate to the working environment, flip flops, sliders and backless shoes are not permitted due to the potential slip hazard.

Should you be unsure as to whether your clothing is appropriate for the situation in which you work, please discuss this with your line manager who will be able to discuss and provide advice and guidance.

#### **6. Misuse of alcohol and drugs**

It is a disciplinary offence to be on Group premises when under the influence of alcohol or drugs.

#### **7. Smoking**

Staff are reminded that smoking and or vaping are only permitted at designated smoking areas.

#### **8. Conduct outside work**

Unlawful, anti-social or other conduct by employees which may be deemed to be inappropriate for the member of staff's position or may jeopardize the Group's reputation or position may be managed through disciplinary procedures and staff are required to report any warning, caution, or conviction against them for a criminal offence to a manager.

Staff are required to notify their manager if they are currently subject to any criminal investigations or pending prosecutions by the police and/or subject to any fitness to practise investigations or proceedings by a regulatory, governing or licensing body in any country.

## **9. Contact with Students through Remote Learning**

Trafford and Stockport Group will apply the following principles to support on-line safety:

- Ensuring that colleagues only use appropriate, and TSCG sanctioned e-learning platforms to provide remote education, including adequate privacy settings.
- Ensuring colleagues do not use personal accounts on e-learning platforms, personal email addresses, or personal social media accounts.
- Ensuring that as far as possible, colleagues do not use personal phone numbers to contact students, and if required to do so then ensure use of blocking numbers (141).
- Ensuring that colleagues only contact students in normal college working hours.
- Ensuring that if colleagues provide recorded or live-streaming lessons, they are filmed in a neutral area where nothing personal or inappropriate can be visible.
- Ensuring colleagues use teaching and learning opportunities to provide students with clear advice and guidance about how to stay safe on-line, including discussion of the benefits and risks of the on-line world.
- Ensuring that colleagues are able to refer students to appropriate support if they have a concern or worry, including where necessary engaging the Pastoral Support Mentors (PSMs) or House Monitors.
- Ensuring that colleagues report any safeguarding concern or bullying instances through the reporting mechanisms.
- Ensuring that colleagues encourage students to take regular breaks from on-line activity to support mental health and wellbeing.
- Further guidance can be found in the document Teaching and Learning Effectively Online. A copy of this document will also be available on the Safeguarding Hub on the Staff Intranet.

## **10. Related Policies and Procedures**

There are a number of policies and procedures that are related to the Safeguarding Code of Conduct. They are accessible on SharePoint under Policies and Procedures.

- Whistleblowing Policy
- Bullying, Harassment and Sexual Misconduct
- Low Level Concerns Procedure
- Child Protection and Vulnerable Adults Policy
- Equality, Diversity and Inclusion Policy

## **11. Further Information**

Policies and Procedures related to this Code of Conduct can be accessed on SharePoint under the 'Policies and Procedures' tile.