



**TRAFFORD &
STOCKPORT**
COLLEGE GROUP

Staff Safeguarding Code of Conduct

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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 provides a framework of expected standards. It is recognised that the actions and behaviour of staff members have an impact on the education, safety 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 2026 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.

Within this Code, references to Designated Safeguarding Officers (DSOs) include colleagues undertaking designated safeguarding responsibilities across the Group, working under the oversight of the Group's designated safeguarding leadership arrangements.

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.

Managers engaging contractors, agency workers, consultants, volunteers or visitors must ensure they are made aware of relevant safeguarding and conduct expectations before they work with or around learners.

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:

Staff must report safeguarding concerns, low-level concerns or boundary concerns promptly, even where information is incomplete, unclear or appears minor. Staff must not investigate concerns themselves or delay reporting while seeking further evidence.

Staff have a responsibility to act where they witness, become aware of, or are told about conduct by another adult that may breach this Code, professional boundaries or safeguarding expectations. Silence, inaction or informal handling of such concerns may place learners and colleagues at risk.

Safeguarding concerns, allegations and low-level concerns must be recorded using the Group's approved safeguarding reporting arrangements and must be factual, timely and proportionate.

- 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

Where there is an exceptional and authorised reason to use a personal device, this must be agreed in advance wherever possible, recorded, and followed by immediate deletion or transfer of any information or image in line with Group policy.

- Preserve the confidentiality of all Group information attained by them in the course of 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 are expected to demonstrate professional curiosity where there are indicators that a learner may be at risk of abuse, neglect, exploitation, radicalisation, coercion, criminal exploitation, sexual exploitation or other forms of harm. Staff should not assume that another person has taken action and must report concerns promptly in accordance with safeguarding procedures.
 - 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.
 - Staff should not accept gifts, hospitality or favours from learners, parents, carers or other individuals where doing so could create a conflict of interest, an actual or perceived obligation, or compromise professional boundaries.
 - 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.
 - Allegations that may meet the harm threshold must be reported immediately to

the Chief Executive Officer or, where the allegation concerns the Chief Executive Officer, to the Chair of Governors. The Group will consider whether referral to the Local Authority Designated Officer (LADO), Disclosure and Barring Service (DBS), Teaching Regulation Agency (TRA) or other relevant body is required.

- 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. Personal Circumstances that may affect suitability.

Staff are expected to inform the Group where circumstances arise that may affect their suitability to work with children, young people or vulnerable adults, including relevant criminal investigations, barring decisions, regulatory sanctions or other matters which could impact safeguarding responsibilities.

3.3. Relationships between Staff and Students

Staff should be particularly mindful that learners aged 16–19 may legally be adults in some circumstances but remain children for safeguarding purposes. Professional boundaries must be maintained at all times regardless of the learner's age.

Staff must not engage in behaviour of a sexual nature towards learners, including sexual comments, sexualised language, inappropriate humour, electronic communications, sharing of images or any conduct that could reasonably be interpreted as sexualised or grooming behaviour.

Staff must recognise the inherent imbalance of power between adults working for the Group and learners. This applies regardless of the learner's age, apparent maturity, consent, vulnerability or whether contact takes place on or away from Group premises.

Staff must not use sarcasm, ridicule, humiliation, intimidation, favouritism, threats or unreasonable personal criticism in their interactions with learners.

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.

3.3.1. 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.

3.3.2. 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.

3.3.3. 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.

3.3.4. 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.

3.3.5. Personal Messaging, Social Media and Group Chats

Staff must maintain professional boundaries in all electronic communications with learners.

Staff must not use personal messaging applications, personal social media accounts or personal communication platforms to communicate with learners, parents/carers or former learners under the age of 18. This includes, but is not limited to, WhatsApp, Facebook Messenger, Snapchat, Instagram, Telegram, TikTok messaging, Discord, Signal, text messaging services and similar platforms.

Staff must not create, administer, moderate or participate in personal group chats, WhatsApp groups or similar messaging groups containing learners where communication is taking place through personal accounts, personal devices or non-approved systems.

Communication with learners must take place through approved Group systems and platforms wherever possible e.g. MS Teams.

Where there is a legitimate educational, enrichment, pastoral or operational reason for a group communication platform to be used, the arrangement must be authorised by the relevant manager, use an approved Group account or platform wherever possible, include more than one responsible adult where appropriate, be transparent and capable of oversight, be used solely for legitimate educational or operational purposes, and comply with safeguarding, data protection and record-keeping requirements.

Staff must not use electronic communications to establish, develop or encourage personal, social or inappropriate relationships with learners.

Any communication which causes concern, blurs professional boundaries or could be perceived as grooming, favouritism or inappropriate contact must be reported immediately through the Group's safeguarding procedures. Failure to maintain appropriate professional boundaries in electronic communications may be treated as a safeguarding matter and may result in disciplinary action.

Examples likely to be inappropriate

- A member of staff creates a WhatsApp group for a tutorial group using their personal mobile number.
- A lecturer joins a learner-created WhatsApp group to answer questions outside of approved systems.
- A member of staff exchanges direct WhatsApp messages with an individual learner about matters not related to an authorised activity.
- A member of staff communicates with learners through Snapchat, Instagram direct messages or other personal social media accounts.
- A staff member remains in a WhatsApp group with former learners who are still under 18.

Examples that may be appropriate with authorisation and oversight

- A Group-approved enrichment trip communication channel managed through an approved Group platform.

- An authorised enrichment, residential, Duke of Edinburgh, sports or overseas visit communication group where safeguarding controls, management oversight and multiple responsible adults are in place.
- Emergency communication arrangements authorised by the Group where other systems are temporarily unavailable.

3.3.6. 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.

3.3.7. 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. Wherever reasonably practicable, one-to-one meetings should take place in locations where they can be observed by others or where visibility can be maintained through appropriate means. 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.

3.3.8. Physical Contact in Vocational and Practical Learning Environments

The Group recognises that certain curriculum areas, including but not limited to Hairdressing, Beauty Therapy, Complementary Therapies, Sport, Public Services, Performing Arts,

Construction, Engineering and Inclusive Learning, may require appropriate physical contact as part of teaching, learning, assessment or health and safety activities.

Such contact may include:

- Demonstrating practical techniques.
- Correcting posture, positioning or body mechanics.
- Supporting students to complete practical tasks safely.
- Providing assistance where a student's disability, medical condition or learning need requires additional support.

Where physical contact is necessary, staff should:

- Explain the reason for the contact beforehand.
- Seek verbal agreement from the student where appropriate.
- Ensure contact is professional, proportionate and curriculum-related.
- Avoid any unnecessary physical contact.
- Be mindful of individual student vulnerabilities, cultural considerations and additional needs.
- Record and report any incident that they believe may be misinterpreted or result in concern.

The Group recognises that professional physical contact undertaken for legitimate educational purposes does not constitute misconduct where it is carried out appropriately and in accordance with this guidance.

3.3.8.1. Student-Initiated Physical Contact

Staff should not initiate hugs or other forms of affectionate physical contact with students. Where a student initiates such contact, staff should respond professionally and sensitively, taking account of the student's age, vulnerability, additional needs and circumstances. Where appropriate, staff should redirect students towards alternative forms of reassurance and support.

3.3.8.2. Vocational Learning Environments

For the purposes of this code of conduct, vocational learning environments may include salons, spas, reception areas, dispensaries, workshops, studios and other practical teaching spaces. Staff are not required to remain solely within one classroom location provided that:

- Appropriate supervision arrangements are maintained.
- Activities remain visible and transparent.
- Professional boundaries are maintained at all times.
- Staff can justify movements as part of their normal teaching, assessment or operational duties.

3.3.9. 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.

3.4. 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 college 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.

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If colleagues have any such concerns, then they should raise the concern using the Low-Level Concerns procedure. Concerns must be reported regardless of the seniority, position or status of the individual concerned. Staff should never assume that someone else has reported a concern.

Where a member of staff believes a safeguarding concern, allegation or low-level concern has not been acted upon appropriately, they must escalate the matter through the Group's safeguarding, whistleblowing or senior leadership routes.

Staff are encouraged to self-report where they believe their own conduct may have fallen below expected standards. Self-reporting will not automatically result in disciplinary action but enables concerns to be considered transparently and appropriately.

3.5. 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 jeopardise 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. Online Safety, Artificial Intelligence and Contact with Students through Remote Learning

Trafford and Stockport College Group will apply the following principles to support online safety:

- Staff must consider the safeguarding implications of emerging technologies, including artificial intelligence (AI), generative AI tools, social media platforms and digital communication technologies. Any use of AI systems involving learner information must comply with data protection requirements and Group policies.
- Staff must not upload personal, confidential or safeguarding information relating to learners into publicly accessible AI tools unless explicitly authorised and appropriate safeguards are in place.

Staff must not create, share, request, store or circulate AI-generated, altered or manipulated images, audio, video or text relating to learners or colleagues where this could be harmful, misleading, discriminatory, humiliating, sexualised, confidential or otherwise inappropriate.

- Staff must not upload personal, confidential or safeguarding information relating to learners into publicly accessible AI tools unless explicitly authorised and appropriate safeguards are in place.
- Staff must not use personal devices to communicate with learners, photograph, record, video call, message or otherwise engage with learners unless specifically authorised by the Group and appropriate safeguards are in place.
- 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 online 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
- Safeguarding 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.