

**Staff code of
Conduct and professional
behaviour**

Document Control	
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Document Number	4.0
Approved By	F&GP Committee with delegated authority from the Board July 2025 to make further adjustments to comply with OfS E6
Approval Date	March 2025
Review Date	March 2028

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STAFF CODE OF CONDUCT AND PROFESSIONAL BEHAVIOUR

The College seeks to create a happy, dynamic and productive working environment. Staff are at the cornerstone of delivery of our strategy 2024-2029. Their wellbeing, recognition, effectiveness at work, and continued professional development are critical to this strategy's success and to achieving positive student outcomes.

The relationship between the College and its staff is based upon mutual respect, trust and confidence. This staff code of conduct sets out some of the standards upon which this relationship is to be based.

The College is committed to promoting the wellbeing of staff and students and our wider community. The college is proud of its staff and their positive impact in the college and wider society. This code of conduct is in place to support staff to be their best at work and to protect themselves, others and the reputation of the College.

Where staff feel their own or another staff member's behaviour may constitute a breach of the code, they are encouraged to take an approach of 'if in doubt, notify' as potential issues can often be more easily resolved at an early stage and staff are sometimes unaware of the concern they may be causing.

Staff should report directly to HCA People or inform HCA People if another person raises a concern with them about a colleague. Where appropriate, HCA People will review concerns with another member of the Talent Management group in order to determine if action needs to be taken.

The College recognizes that staff behaviour at work may be influenced by factors outside work as well as in the working environment. Staff are encouraged to look out for each other and raise concerns, so that support can be signposted where necessary. This policy works alongside several other policies including but not limited to Health and Safety policies, Staff Disciplinary Policy, College Capability Procedure, Dignity at Work Policy, Safeguarding Policy, Freedom of Speech Policy, Low Levels Concerns Policy, and various IT Policies, including Acceptable Use.

The standards set out in this document are representative of the standards of performance and behaviour that are expected of the College's working community and are not intended as a complete listing of all the College rules, regulations and standards. If staff are uncertain about the interpretation of guidance, they are encouraged to seek advice. Staff are also invited to raise any areas where they would value further guidance. It is an expectation that staff read though this code of conduct and professional behaviour with an understanding that they will abide by the principles in the document. Staff are advised that breaching the sections outlined below may activate the disciplinary procedure and may in some cases constitute gross misconduct

Scope

Throughout this policy, references to staff includes all staff and volunteer workers.

Part 1: GENERAL STAFF GUIDANCE AND PROFESSIONAL BEHAVIOURS

1:1 Staff Identification

All staff are issued with ID badges and lanyards/clips. To promote visibility, staff are generally expected to wear their ID with designated staff lanyards around their necks. By exception, for example, health and safety in the workshops, or for medical reasons, ID may be worn elsewhere with a clip, but it is important that card is still visible, and the official lanyard, in whole or part.

ID should be worn visibly at all times while on the college campuses and when working off site with students.

1:2 Health and Safety

The College is committed to promoting and implementing all relevant health and safety legislation and best practice in order to protect staff, students, visitors and the wider community. The highest priority must be given to safe methods of work at all times. Staff must familiarise themselves with the College's health and safety policies and other relevant policies and procedures to ensure that all health and safety standards are met in accordance with those policies.

Staff must not, under any circumstances, behave in a way which could endanger their own health and safety or the health and safety of others. Staff must ensure that they promptly report 'near misses' by emailing nearmiss@hca.ac.uk to help the College mitigate risks.

Any breach of the College Health and Safety rules and regulations or its Health and Safety Policies will be viewed as extremely serious by the College and may constitute gross misconduct.

1:3 Use of Information Technology

All staff have an individual responsibility to uphold and apply in practice the College's Acceptable Use Policy and other related IT policies. Cyber security remains of the utmost importance to the College and staff must take every care to protect their own and others' data appropriately. Knowingly breaching cyber security regulations may constitute gross misconduct.

1:4 Confidentiality

All members of the College's working community have a personal responsibility to protect and maintain the confidentiality of both College, staff and student information. The disclosure of confidential information relating to the College and/or its internal staff and students or external colleagues is prohibited, except as authorised or required by the law or in accordance with an employee's duty under their contract of employment (including statements made between or to Trade Union Representatives) or when making a protected disclosure under the Public Interest Disclosure Act.

If staff are unsure as to whether they should disclose information which they consider to be, or might be, confidential, they should seek guidance from their manager. A breach in confidentiality may result in disciplinary action being taken against the employee/s

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responsible in accordance with the College Disciplinary Procedure. Staff should be aware of IT based policies, including Data Protection).

Staff should familiarise themselves with the Privacy Notice for Applicants and Staff.

1:5 Disclosure of Interest

In order to uphold fairness and consistency, and to comply with the College regulations (including but not limited to its financial regulations) members of the College's working community must disclose any interests and/or relationship(s) – whether direct or indirect – that they have with any person, college, company or other organisation involved with the College and/or its activities which may give rise to conflict/compromise.

All staff will be required to complete an annual declaration of interest in order to reference either/both the conflict of interest (academic relating to the Awarding Body) and/or the declaration of prior relationships. Where relevant, staff will be required to complete a financial declaration as directed by the Clerk to the Governors.

1:6 Standards of dress

Staff are expected to dress in a way which is appropriate to their role. Some roles necessitate that staff wear items of protective clothing in the interests of health and safety.

1:7 Attendance and Timekeeping

Staff are expected to be punctual and have good time keeping skills. Any instances of lateness should be explained by the member of staff concerned to their manager. Regular or prolonged issues of poor attendance/lateness will be monitored and where appropriate, action will be taken in accordance with the College Capability Procedure.

1:8 Alcohol and Substance Abuse

Staff must not attend work under the influence of any substance, including alcohol, illegal drugs and/or solvents. Staff may consume alcohol in moderation at some college events such as the Degree Show private view or when attending external events in a professional capacity but only when appropriate to their role at the event. Should a staff member find themselves, or notice a colleague, becoming reliant on any substance or 'self-medicating' then please contact the appropriate line manager, HCA People and the Staff helpline for further advice/guidance on 0344 8939012 at any time.

Staff who have been prescribed medications by a healthcare professional must inform their line manager immediately if that medication has, or could, have an adverse effect on their ability to carry out their duties.

1:9 Damage to property

Anyone suspected of, or caught, causing deliberate damage to College property, or third party

property on campus or on college business will be subject to disciplinary action in accordance with the College Disciplinary Procedure.

1:10 Theft

Anyone suspected of, or caught stealing the property or assets of the College, its staff or clients will be subject to disciplinary action in accordance with the College Disciplinary Procedure. The Police may be notified as appropriate.

1:11 Equality and Diversity

The College is committed to ensuring equality of opportunity for its staff and students alike. All staff have an individual responsibility to uphold and apply in practice the College's Equality and Diversity policies and procedures and to conduct themselves in a manner consistent with relevant legislation/best practice. Discrimination and prejudice will not be tolerated by the College and such conduct may result in disciplinary action being taken in accordance with the Colleges disciplinary procedure.

1:12 Bullying, Harassment and Sexual Harassment

The College recognises that all members of its working community (staff, students and visitors) have the right to be treated with consideration, respect and dignity. The College is committed to creating and maintaining a working environment free from discrimination, harassment, bullying, intimidation and victimisation. For further information about Bullying, Harassment and Sexual Harassment, please refer to the Colleges 'Bullying, Harassment and Sexual Misconduct Policy' (formally Dignity at Work Policy).

1:13 Conduct outside of work

The College does not seek to dictate how staff conduct themselves in their personal lives outside work. However, unlawful, anti-social or other conduct by staff, including an inappropriate use of their social media, which may jeopardise the College's reputation/position may be dealt with through relevant College policies and procedures and may lead to disciplinary action.

1:14 Bribery Act 2010

The Corporation is committed to maintaining a culture of openness and accountability within the College, where all individuals operate the highest standards of honesty, propriety and integrity in the exercise of their duties. Its aim, therefore, is to limit the College's exposure to bribery by:

- Encouraging staff to be vigilant and to report any suspicions of bribery, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately
- Rigorously investigating instances of alleged bribery and assisting Police and other appropriate authorities in any resultant prosecution
- Taking firm and clear action against any individual(s) involved in bribery.

The College prohibits the offering, the giving, the solicitation or the acceptance of any bribe,
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whether cash or other inducement to or from any person or company, wherever they are situated and whether they are a public official or body or private person or company by an individual employee, board member, agent or other person or body acting on the College's behalf in order to gain any commercial, contractual or regulatory advantage for the College in a way which is unethical or in order to gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual. Staff should discuss with their Line manager it at any time they are in doubt as to whether a potential act constitutes bribery. If necessary, guidance can be sought from The Finance Director.

Gifts and Hospitality

Staff must not accept any gifts, fees, or inducements for any service connected with their employment (including, for the avoidance of doubt, any such gifts received from students), with the exception of minor gifts such as flowers, inexpensive marketing materials and cards. Individuals should inform their manager if they are offered any substantial gifts (over the approximate value of £25) or if they require further clarification.

1:15 Finance Regulations

The College has established finance regulations which govern all activity associated with the College's approach to financial management and control. All staff have an individual responsibility to uphold and apply in practice these regulations and any breach of them will be addressed in accordance with the College Disciplinary Procedure.

1:16 Driving in pursuit of college activity

The College is committed to ensuring that staff are kept as safe as possible whilst undertaking any tasks on behalf of the College, including driving during the course of work or in pursuit of College business or activities. There may be occasions where staff are required to drive a company, hire or their own vehicle in pursuit of College business or activities, in these cases staff should refer to the Driving at Work Policy for more detailed information.

Staff must not drive on business without first registering their driver and insurance details as required in the Drive at Work Policy.

PART 2: PROFESSIONAL BEHAVIOURS WHEN WORKING WITH STUDENTS

2.0 INTRODUCTION

As an educational institution, staff are required to demonstrate high standards of behaviour in their management of risk, and in the active protection of students from discrimination and avoidable harm. Part 2 outlines the expected behaviours of staff in accordance with the latest 'Keeping Children Safe in Education' and also the Office for Students condition of regulation E6.

Staff should also understand their own responsibility and duty to challenge extremist and damaging views [Prevent duty guidance: Guidance for specified authorities in England and Wales](#)

These principles are intended to guide staff members and ensure that they give paramount consideration to the student's wellbeing by respecting and attempting to understand the following:

- The ascertainable wishes and feelings of the person concerned (considered in the light of their age and understanding)
- The student's physical, emotional and learning needs
- The likely effect on the student of any change in their circumstances
- The student's age, gender, ethnicity, sexuality, background and any other relevant characteristics including all the 'protected characteristics'
- Any harm or trauma that the student has suffered or is at risk of suffering.

Staff members are in a position of trust and must not abuse this. Staff should never seek gratification of their own emotional or physical needs in their relationships with students and relationships must always be professional, appropriate and justifiable.

The College's child protection procedures, which are detailed in the HCA Safeguarding Policy, have primacy over other requirements and this document attempts to be supportive and complementary to those procedures:

- [Keeping children safe in education 2025](#) and the Equality Act 2010
<https://www.gov.uk/guidance/equality-act-2010-guidance>
- Breach of the guidelines provided in this document may result in a full investigation in line with the College's disciplinary procedure.
- Staff need to be prudent about their own conduct and vigilant about the conduct of others, so that their relationships with students remain, and are seen to remain, entirely proper and professional. It is recognised that staff are vulnerable to the possible consequences of their close professional relationships with students and to

the potential for malicious and misplaced allegations being made by students, either deliberately or innocently, arising from the normal and appropriate associations that staff may have with them.

2:1 The duty of staff is to:

- Train, instruct, guide, educate and support the students assigned to them
- Meet the learning needs of those students
- Promote the general progress and wellbeing of individual students and of any class or group of students assigned to them
- Ensure the health & safety of students while they are in their care
- Provide advice and guidance to students on educational, personal and social matters including the provision of information about sources of more expert advice on specific questions
- Maintain good order and discipline among students and promote their development
- Ensure the highest level of student conduct and behaviour with a focus on professional expectations.

GUIDELINES FOR ALL STAFF

2:2 Physical contact

As a general principle, staff should not engage in any physical contact with their students. Any such contact should be only in response to an exceptional situation and be appropriate (see also 2.8). It is recognised that some disabled students may require physical assistance due to the nature of their disability; however, such contact must always be acceptable to the student and be within their agreed plan of care.

It is possible that some staff may come into physical contact with their students from time to time in the course of their training activities, for example when showing a student how to use a piece of apparatus or equipment. Staff should be aware of the limits within which such contact should properly take place and should consider the possibility of such contact being misinterpreted by the student. Physical contact during performance or dance should always be intended to meet the student's educational needs, not the staff member's needs.

The staff member should normally only use physical contact if their aim is to:

- Develop performance/dance skills or techniques;
- Ensure the safe and effective use of equipment.

The staff member should explain the reason for the physical contact to the student. Unless the situation is an emergency, the staff member should ask the student for permission and

physical contact should not take place in a 1-2-1 situation in secret or out of sight of others.

2:3 The practice of physical intervention

If a staff member feels seriously threatened by a student they should call the police. Very occasionally staff may consider direct physical intervention.

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”. Physical intervention should only be used exceptionally, when unavoidable and in keeping with the incident leading to it. It should be primarily for the benefit of the student and, though immediate, always be a considered response.

Physical intervention should not be used as a form of punishment or, in normal circumstances, to enforce compliance with instructions. It should not be attempted where the member of staff is thereby put at undue risk. Incidents of physical intervention should, in appropriate circumstances, be subject to debriefing for staff involved and lead to a review of strategies for managing the behaviour of students between relevant parties. All incidents should be recorded in writing including any written account made by other people present.

Where staff themselves are the subject of physical attack by students or their parents/carers, they should report the incident immediately to their manager. Where physical intervention is deemed necessary it is advised that ideally two staff be involved.

2:4 Sexual contact and intimate personal relationships with students

Staff should not develop sexual or other intimate relationships with students regardless of the student’s age or the staff member’s job role.

There is no acceptable behaviour that has either explicit sexual connotations or innuendo between a member of staff and a student regardless of the student’s age or maturity. Any such behaviour will always be treated as extremely serious and must be reported immediately to the Principal, or most senior member of SLT if the Principal is cannot be contacted.

All members of college staff operate within a position of trust with students; this is regardless of the department(s)/contexts they work in. It is a criminal offence for a person in a position of trust to engage in any sexual activity with a young person under 18 irrespective of the age of consent, even if the basis of their relationship is consensual. Moreover, all staff should be made aware that having a relationship with a student under 18 could be treated as a criminal offence that may result in imprisonment.

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The Sexual Offences Act 2003 Sexual Offences Act 2003 contains provisions that specifically deal with offences against children and sections 16 - 24 of the Act deal with the abuse of a position of trust, including sexual activity with a child under the age of 18.

The purpose of these provisions is to protect young people who are considered to be particularly vulnerable to exploitation by those who hold a position of trust or authority in their lives. In such cases, it is not relevant that the sexual activity was consensual, due to the particular relationship between the student and the abuser. These offences are designed to protect 16- and 17-year-olds from being persuaded to engage in sexual activity, which would not be criminal except for the member of staff's position of trust in relation to the student. Any behaviour that breaches this code will be treated seriously and must be reported to the Principal immediately.

Staff should not develop intimate relationships with students. Relationships between staff and students are not generally equal, as staff members will clearly have a higher hierarchical status at the college than the student. A relationship between a member of staff and a student poses risks to both parties: the student may become isolated from peers, particularly if other students perceive there to be favourable treatment from the member of staff, which could affect the student's work and general college experience. The member of staff may find relationships with colleagues strained, and may risk allegations of harassment from the student, particularly if the relationship were to break up. For these reasons amongst others, the College does not believe the development of any intimate relationship is acceptable.

2:5 Social Relationships between Staff and Students

Social contact with students, other than that based at College and at off-site events organised by the College or where the college is participating, is not appropriate and undermines the staff/student relationship. It also puts staff and students at risk of blurring professional boundaries and can bring confusion to the staff/student relationship.

Staff and students share a number of social areas on the HCA campuses, such as the cafés, however there are designated staff rooms at both Folly Lane and College Road Campus should staff want to take their break in a 'staff only' environment. Staff are recommended to avoid the smoking shelters on either campus as this can become a platform for informal conversation and socializing between staff and students. The College recommends staff not to smoke on campus.

It is recognised that there may be occasions when accidental or reasonable social contact between staff and students may be unavoidable e.g., meeting students at creative events, social venues open to the general public or even at private parties. In such circumstances,

staff

should be mindful at all times of their professional relationship with students.

If a member of staff finds themselves in a social situation with a student that makes them feel uncomfortable about being there, they should log this as a low-level concern (see section 2:19) in order to protect themselves against possible misinterpretation.

Staff should recognise their professional and ethical responsibility to protect the interests of students, to avoid conflicts of interest, to respect the trust involved in the staff/student relationship and to accept the constraints and obligations which are part of that responsibility.

All students are entitled to equality of treatment and it is important that this is maintained and also perceived to be maintained. The College and its staff have a professional responsibility to protect the interests of all students.

Whilst we expect staff to be 'friendly' towards students, we do not expect that staff will become 'friends' with students.

2:6 Relationships with alumni: If a staff member develops an intimate relationship with someone who is not enrolled as a student but has previously been enrolled at the college, it may raise questions and reputational risks concerning the timing of the start of the relationship. Staff members are advised to alert the College whenever this situation occurs and are required to do so if the student has been enrolled within the last three years so that college can consider any appropriate advice or other action. The level of risk will depend on a range of factors including the age of the former student when they were enrolled and whether the staff member had regular contact with them.

2:7 Existing personal relationships

Occasionally, personal relationships already exist before the member of staff and/or student join the College community. In this instance any staff member with a pre-existing relationship with a student (for example a family member enrolling as a student or a social friendship of a current student by a newly employed member of staff) must notify HCA People at the point at which the contact enrolls or as soon as they become aware of them having become a student. This applies to all courses including short course enrolment. The consequences of failure to disclose a relationship, which involves a conflict of interest, may be a breach of this policy which may lead to disciplinary action.

2:8 Professional conduct when working with students:

Staff should always be cautious when discussing personal information and opinions around students. The College welcomes staff feedback and challenge through appropriate channels. Staff should be advised that sharing personal disagreement about the College policies, procedures and or colleagues with students is deemed unprofessional and inappropriate and may result in disciplinary action. When staff disagree with College policies or procedures, they are expected to do this professionally and through the appropriate staff feedback channels.

Sharing incorrect or confidential information with students or communicating disrespectfully about other members of staff to students will be treated very seriously and may constitute gross misconduct.

Staff should ensure that their relationships with students are always appropriate and should be careful in their use of language/terminology. For example, disparaging or sarcastic comments such as those that refer to a student's body, intelligence, gender, religion or belief, sexual orientation or ethnicity in any way are unacceptable.

Staff should remain mindful of 'oversharing' their own personal experiences with students.

If a member of staff feels that a student is flirting or developing an infatuation it is their responsibility to discuss the situation with their manager, the best way to report this is to a line manager or by emailing lowlevelconcerns@hca.ac.uk

Please also see Section 2: 2:19

2:9 Meetings with students (This applies to all locations).

Staff should be aware of the potential risks which may arise from meeting or interviewing individual students in private. Therefore, interviews and meetings must take place in a room with visual access or with the door open, or in a room or area which is likely to be frequented by other people. Where such conditions cannot apply then staff must ensure that other staff members or their line manager know the meeting or interview is taking place and another person be present or nearby during the meeting or interview. Should a member of staff have a concern about a meeting with a student, then they can report this by emailing lowlevelconcerns@hca.ac.uk

2:10 Giving students lifts in private vehicles

A general expectation is that a staff member will not give lifts to students in private vehicles and never without being registered with the college for driving at work including the appropriate business insurance. Any exceptions must be approved in writing by a member of SLT in advance. An exception might include an agreement to take a student to an outreach event when there is another member of staff in the vehicle. In the case of a

medical emergency staff should call 999, or if advised by emergency services/ NHS 111 arrange for a taxi where the member of staff should accompany the student.

2:11 College Educational Visits

Staff undertaking trips away from College with students must ensure that the trip is properly organised in line with the College Educational Visits Policy.

There is no such thing as an unofficial trip and it is the responsibility of any staff member undertaking a trip with a student to ensure that appropriate authority has been obtained from the relevant manager and that there are sufficient members of staff to ensure proper supervision of the party at all times.

2:12 Caring/First Aid

If a student complains of injury or sickness, a judgement should be made as to whether they should be referred to a person qualified in first aid or advised to see their own doctor. The student's parents/carers/next of kin may also be informed, this decision will be based on the extent of the first aid issue/treatment given and level of student need.

Staff that have to administer first aid (normally a trained first aider) are advised that, wherever possible, another adult is present, if they are in any doubt as to whether necessary physical contact could be misconstrued. HCA staff are unable to provide personal care for students.

2:13 Toilets

As a general rule, other than the estates staff, male staff should not enter female only toilets, female staff should not enter male only toilets, except in extreme situations such as fire, or where there may be a threat to life or limb. There are gender neutral toilets on both campuses for staff and students to use if they prefer.

2:14 Provision of advice and guidance

Staff may from time to time be approached by students for advice. Students may also appear distressed and staff may feel the need to ask if all is well.

Staff are advised never to stop a free-flowing account/disclosure but to make sure that at an appropriate point they inform the student that they cannot keep such information confidential and need to share this information. Example: 'Thank you for telling me, I now need to tell (where possible give the name and position of who will be told) so that we can

get some help for you and younger siblings.’ Any student disclosure should be reported as soon as possible on the MyConcern system.

A student may ask a member of staff to ‘keep a secret’, or to promise not to tell other people what they are about to tell them. Where this happens the member of staff must explain that they are not able to promise confidentiality as they may need to tell someone else if they are to help the student.

Where a student is told by a member of staff that they cannot promise confidentiality the student may decide not to continue telling. If a student starts to say something and then stops, the member of staff needs to try to leave it open for the student to come back to the discussion; the member of staff must act, following the child protection procedures in the HCA Safeguarding Policy. It may be appropriate to refer the student to available counselling/medical services, for instance their GP or an available college-based service.

All student disclosures, no matter how small or partial should be recorded on MyConcern. If the disclosure relates to a member of staff then this must be reported directly to the Principal and HCA People and not through MyConcern.

2:15 Staff use of the College Road Campus bar

Staff should be careful to maintain professional boundaries at all times in the College Road Campus bar. Staff may use the bar for a meeting or immediately after a work event, for example a course group may have a drink with a visiting speaker.

The Duty Manager staff may stay later in the bar as part of their monitoring and engage in conversation with students, as may staff involved in supporting a college or SU event in the bar. Other staff should not normally stay late in the bar.

2:15 Telephone use

Staff are not to give out their personal phone numbers to students or communicate with students via their personal social media accounts except where these accounts are professionally used as part of their practice (see next section). The college recommends only the use of official College channels for communication with students:

- College landline telephones
- College mobile phones
- College emails
- College social network sites
- Microsoft Teams

2:16 Social Networking

Social networks are increasingly an integral part of professional and social life. The College fully understands the value of social networking in the creative industries.

However, when viewed from the perspective of working with young people, there may be serious and unexpected consequences that could arise from a lack of care and consideration in sharing personal information in these public domains.

Staff should be aware that when potentially compromising information is posted on social networking sites, there is a danger that it may be accessed by colleagues and/or students, and as a result seriously impact upon that colleague's professional standing. For example, if a member of staff posted information about an aspect of their private life relating to areas of sexual behaviour, alcohol, drug misuse, violence or anything that was illegal this would be considered inappropriate.

Therefore, staff should ensure that their privacy settings do not allow for unfamiliar persons to be able to view their profile and personal information.

Should any inappropriate information be posted by a member of staff and it became common knowledge, then professional relationships (those of mutual respect, professional distance, acting as a role model etc.) with students could be compromised. This would be considered as a serious disciplinary offence by the College. It would also be considered that such an incident would be deemed to have brought the profession and/or the College into disrepute.

Some areas of the College use social networking sites to allow for additional forms of communication and feedback with their students. The College has information on social media use in the HCA E-Safety Policy that offers further detail on the management of this.

2:17 Suitability to work with children and vulnerable adults

The College works in line with 'Keeping Children Safe in Education' and is committed to the the Disclosure and Barring Service Checks (DBS) and the DBS Code of Practice. All roles within the College are required to undertake an Enhanced Disclosure.

DBS checks are undertaken to ensure that the College upholds its duty of care to protect vulnerable groups who access the College. Failure to co-operate with a reasonable request on the part of the College to obtain a DBS check may result in disciplinary action being taken in accordance with the College Disciplinary Procedure.

Police enquiries of current staff - All staff have an obligation to inform the College if they are the subject of criminal investigations, charge, caution, warning or conviction. Failure to do so may result in disciplinary action. However, an employee will not face disciplinary action solely because he or she are the subject of criminal investigations, charge, caution, warning or conviction.

The question that the College needs to address in such cases is whether the conduct warrants disciplinary action because of the effect on the staff ability or suitability to undertake their job role and/or on the reputation of the College. In such circumstances, the facts of the matter should be investigated and if disciplinary action is considered appropriate the procedure should be followed. The College will not usually wait for the outcome of any prosecution before deciding what action, if any, to take.

2:18 Employing students

The college recognises there may be occasions when staff, within their college role, or externally, want to offer paid/unpaid work to students and this may give students valuable work experience. However, each occasion needs to be assessed to ensure it does not put either party at risk.

Staff shall not employ students to undertake work either internally or externally, without prior permission from a member of SLT. If a staff member wishes to employ a student, then they must put a request in writing to HCA People, stating the purpose of the employment and how long the employment will be for.

Issues to be considered before approval include (but are not limited to):

- Whether the staff have or will be involved in assessment of this student's work
- If employment will compromise the independence of assessment
- The location and the nature of employment
- Risks around access to staff personal data, health and safety Staff may be required to complete a written risk assessment.

2:19 Low level concerns and reporting of incidents

All staff must understand the importance of identifying and recording low level concerns

What is a low-level concern?

A low-level concern is any concern that an adult has acted in a way that is inconsistent with the staff code of conduct and professional behaviour, including

inappropriate conduct outside of work that doesn't meet the threshold of harm or is not considered serious enough for the College to refer to the local authority (LADO).

Low-level concerns are part of a spectrum of behaviour. This includes:

- Inadvertent or thoughtless behaviour by a member of staff
- Behaviour that might be considered inappropriate depending on the circumstances
- Behaviour which is intended to enable abuse

Examples of such behaviour could include:

- Being over friendly with students
- Demonstrating favouritism or preferential treatment to one student over another
- Engaging with students on a one-to-one basis in a secluded area or behind closed doors
- Embracing or touching a student
- Using inappropriate, sexualised, intimidating or offensive language.

Reporting

By having a clear procedure for responding to low-level concerns the College is encouraging a culture of openness and trust. Staff should be clear that low level concern reporting is also in place to protect staff from potential false allegations or misunderstandings. Low level concerns should be reported to the Principal or Designated Safeguarding Lead in person or through email lowlevelconcern@hca.ac.uk.

What is the purpose of sharing low-level concerns?

Sharing low level concerns should link to creating a culture of vigilance within The College It should also:

- encourage an open and transparent culture
- protect staff from unjustified allegation
- enable The College to identify inappropriate, problematic, or concerning behaviour early
- minimize the risk of abuse
- ensure that adults working in or on behalf of the school or college are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.

See also the separate Low Level Concerns Policy.

Key:

LADO: local Authority Designated Officer (Safeguarding)

KCSIE: Keeping Children Safe in Education

Updated 11/07/2025