

QAP	3.11
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Quality Assurance Policies & Procedures

SAFEGUARDING AND PREVENT POLICY

CHILD AND VULNERABLE ADULT PROTECTION

Appendix J

Professional boundaries and personal relationships between staff and learners:

A child is anyone under the age of 18. Staff must maintain clear professional boundaries with all learners. Sexual activity with a child may constitute a criminal offence where the staff member is in a statutory position of trust under the Sexual Offences Act 2003. Romantic, sexualised, grooming or otherwise inappropriate conduct involving a child is prohibited and will be managed as a safeguarding concern and, where appropriate, a disciplinary and criminal matter. Concerns relating to adults at risk will be managed separately under the College's adult safeguarding procedures.

A member of staff must not begin or pursue a romantic or sexual relationship with an adult learner for whom they teach, assess, supervise, support, safeguard or otherwise hold professional responsibility. Any pre-existing relationship or other potential conflict of interest must be declared immediately to the Principal or a senior member of Human Resources and must be formally risk assessed and managed. The concern is not removed because conduct takes place away from College premises or online. Failure to disclose or comply with agreed safeguards may be treated as a disciplinary matter.

1. A personal relationship of a sexual, romantic or other intimate nature between a member of staff and a learner with whom that member of staff has a professional connection creates an actual or apparent conflict of interest, may involve an imbalance of power or abuse of authority, and undermines the trust required in staff-learner relationships.
2. Members of staff must act with integrity, maintain professional boundaries and avoid actual or apparent conflicts. This includes in-person and online contact, social media, messaging, transport, enrichment, work placements, residential activity, secluded contact, favouritism, over-familiarity and access to confidential learner information.
3. In the event that:
 - a personal relationship, boundary concern or potential conflict arises between a member of staff and a learner with whom that member of staff has a professional connection; or
 - there is or has been a personal relationship or connection between a member of staff and a learner for whom that member of staff is due to have professional responsibility; the member of staff must disclose the matter immediately to the Principal or a senior member of Human Resources. Where the information indicates a safeguarding concern, it must also be reported immediately through the College's safeguarding and allegations-management procedure; informing Human Resources does not replace safeguarding action. A staff member who believes they may have inadvertently crossed a professional boundary should self-refer. If unsure, they should report the matter and seek advice. Staff who feel unable to report internally must use the College's whistleblowing or external escalation arrangements.

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4. On receipt of a disclosure or concern, the College will first consider the immediate safety and support needs of the child, learner or reporting person. Concerns or allegations that may meet the harm threshold must be reported immediately to the Principal; allegations concerning the Principal must be reported to the Chair of Governors. The Local Authority Designated Officer must be consulted before the College undertakes an internal investigation, where required. Children's social care and/or the police must be contacted where appropriate.
5. Concerns that do not meet the harm threshold must be managed under the College's low-level-concerns procedure. Examples include over-familiarity, favouritism, inappropriate communications or social-media contact, secluded contact and other conduct inconsistent with the Staff Code of Conduct. All concerns, decisions, actions, rationale and outcomes must be recorded securely and reviewed for patterns of behaviour. Information must be shared only on a need-to-know basis and in accordance with safeguarding and data-protection requirements.
6. Alternative staffing, teaching, assessment, supervision or support arrangements will be put in place where necessary to remove conflicts and protect the learner. Failure to comply with this appendix or agreed safeguards may be treated as a disciplinary matter. The College will make a referral to the Disclosure and Barring Service where the statutory referral conditions are met and will consider what relevant, substantiated information must be included in employment references. For the purposes of this appendix:
 - 'Member of staff' includes employees, workers, agency and supply staff, volunteers, contractors, governors, trainees and any other person working for or on behalf of the College.
 - 'Child' means any person under the age of 18. 'Learner' means any person enrolled on, applying for or otherwise participating in College education, training, support or activity, including adult learners. Adults at risk are also covered by the College's adult safeguarding procedures.
 - 'Professional connection' means any arrangement in which a member of staff has academic, pastoral, administrative, supervisory, safeguarding or similar responsibility for a learner, including teaching, tutoring, selecting, assessing, supporting, transporting, supervising enrichment, work placements or residential activity, protecting, safeguarding, managing confidential information or providing a reference.
 - 'Personal relationship' means any association, however brief, of a romantic, sexual or other intimate nature, whether in person or remotely, including through social media, email, messaging or other digital communication.

This appendix must be read alongside QAP 4.3.17 Code of Conduct, the College's Safeguarding and Prevent Policy, low-level-concerns procedure, allegations-management procedure, whistleblowing arrangements and adult safeguarding procedures. It has been reviewed against Keeping Children Safe in Education 2026.