

Royal Northern College of Music
Staff Code of Conduct (Working with Under 18s)
Policy & Procedure
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RNCM
ROYAL NORTHERN
COLLEGE of MUSIC

Staff Code of Conduct – Working with under 18's

1. Context

- 1.1 The RNCM is committed to the safety of the children and young people in our care, their safety is paramount and they have the right to be treated equally and respectfully. Participation in learning activities and courses, at RNCM should be a rewarding experience for participants, students and staff and, to this end, it is important for adults to recognise the particular responsibilities involved in working with children and young people.
- 1.2 This Code of Conduct applies to all staff and external practitioners who work with children and young people and including those who may be required to work away from the regular premises of RNCM e.g. on a project, an external event, a tour or a residential course. It is designed to ensure that staff and external practitioners are aware of those responsibilities and are confident in dealing with all participants.
- 1.3 All staff will receive a copy of RNCM's Child Protection Policy, which they should read carefully in conjunction with Physical Contact between College Staff and Students, and Social Media policies, and this Code of Conduct for working specifically with under 18s.

2. Responsibilities, Duty and Accountability

- 2.1 All RNCM Staff who work with children and young people are accountable for the way in which they exercise authority, manage risk, use resources and safeguard those in their care.
- 2.2 Breaches of the Code of Conduct (Working with Under 18s) may result in action being taken in accordance with RNCM Staff Disciplinary Procedures or Managing Safeguarding Allegations Against Staff Procedure.
- 2.3 A full breakdown of roles, responsibilities and key contacts for Safeguarding is included in the Safeguarding Policy.
- 2.4 All RNCM Staff have a duty to maintain a professional relationship with children, young people and students and to do nothing that would compromise their educational responsibilities. They should:
 - Ensure that they always behave in a friendly but professional manner and maintain the highest standards of personal conduct in their dealings with children and young people and students.
 - Ensure that their relationships with children, young people and students are appropriate to their student's age, gender and feelings, and take care to treat them with respect in all of their interactions with them.
 - Not favour or show interest in one child/young person/student in preference to another. Any comment on participant's performance should be constructive and supportive. At no time should children/young people/students be sworn at or otherwise verbally abused.
 - Not make derogatory remarks about others' appearance, race, religion, culture, sexuality, gender, or disability.
 - Staff should refrain from making comments about physical appearance, gender or sexuality as all of these can be misconstrued.

3. Confidentiality

- 3.1 Staff may have access to confidential information about children and young people in order to undertake their responsibilities. These details must be kept confidential at all times and only shared when it is in the interests of the child or young person to do so. Such information must not be used to intimidate, humiliate, or embarrass the children or young people and concerned.

4. Staff Visibility and One-to-One Situations

- 4.1 All RNCM Staff are advised to maintain their own 'visibility' when working with children and young people:
- Complying with RNCM Health and Safety procedures and by wearing their Staff ID Cards at all times according to specific site regulations
 - Keeping all blinds and curtains open in teaching rooms if possible;
 - Not locking any doors under any circumstances from the inside;
 - Avoiding going into storerooms or enclosed spaces that have limited visibility with a child or young person.
- 4.2 RNCM staff and Student Mentors will be issued with a lanyard which shows they have a current/ valid RNCM DBS check. It will be considered a breach of the Code of Conduct if staff wear the lanyard if they know their DBS is out of date.
- 4.3 CPLOs/ Activity Leads will issue and collect in 'DBS' lanyards for Student Mentors.

5. Transportation

- 5.1 It is not good practice to take children or young people alone in a car on journeys, however short. Where this is unavoidable, it should be with the full knowledge and consent of the parent and/or guardian, and their line manager. RNCM Staff should be able to state the purpose and anticipated length of the route. They should also note the following:
- Children and young people should sit in the back of the vehicle;
 - It is advisable not to carry an individual child or young person if the member of staff is alone;
 - Staff should check that their vehicle insurance includes business usage in order to carry children or young people and their instruments;
 - Staff should ensure they are fit to drive and free from any drugs, alcohol or medicine which is likely to impair judgment and /or the ability to drive;
 - Staff should ensure that any impromptu or emergency arrangements of lifts are recorded and can be justified if questioned.

6. Outings and Residential Trips

- 6.1 All RNCM Staff should take particular care when supervising children and young people on outings and residential trips, where the setting is often less formal than the usual situation. Adults remain in a position of trust and need to ensure that their behaviour remains professional at all times and stays within clearly defined professional boundaries.
- 6.2 All RNCM Staff should undertake a separate risk assessment for outings and residential trips.

7. Staff Propriety and Behaviour

- 7.1 All RNCM Staff working with children and young people are expected to adopt high standards of personal conduct at work (whether on site or away from RNCM). They should also be aware that safe practice also involves using judgment and integrity about behaviours in places other than the work setting. Misuse of drugs, alcohol or acts of violence would be examples of such behaviour.
- 7.2 When working with children and young people RNCM Staff must not drink alcohol in accordance with standards of professional conduct.
- 7.3 For their own protection, all RNCM Staff should be alert to situations and behaviour(s), which may be open to misinterpretation e.g. one to one contact with audition candidates out of sight of witnesses should be strictly avoided except in case of emergency. Furthermore, the use of, or response to any kind of sexual innuendo made by a child, young person or participant is inappropriate and must be avoided at all times.
- 7.4 All RNCM Staff should clearly understand the need to maintain appropriate boundaries in their contacts with children, young people and students. Under the Sexual Offences Act 2003 it is a criminal offence for a person aged 18 or over ('A') to engage in prescribed sexual activity (including touching) with someone under the age of 18 ('B') where A is in a position of trust in relation to B. For these purposes, a position of trust includes where A looks after (including having responsibility for) persons under 18 who are receiving education at an educational institution and B is receiving education at that institution. The College strictly prohibits any such activity.
- The College strictly prohibits Intimate Relationships between staff and students, under the age of 18.
- 7.5 Occasionally, a pupil may develop an infatuation with an adult who works with them. If this occurs, tutors should deal with these situations sensitively and appropriately to maintain the dignity and safety of all concerned. Tutors should remain aware, however, that such infatuations carry a huge risk of words or actions being misinterpreted and should therefore make every effort to ensure that their own behaviour is above reproach. A tutor who becomes aware that a pupil is developing an infatuation should discuss this at the earliest opportunity with the Designated Safeguarding Lead (DSL), Emma Hilton-Wood (Academic Registrar or Deputy Designated Safeguarding Lead (DDSL), Paul Hynes (Head of HR), Aled Tudor (Head of Junior Programmes) or the activity/ project Child Protection Liaison Officer (CPLO).
- 7.6 No RNCM Staff should meet with children, young people or students outside RNCM organised activities, unless it is with the knowledge and consent of parents/guardians and the line manager of the member of staff concerned. No RNCM teaching should take place in a staff members home or anyone else's home (**see Section 18 on Private Tuition**).
- 7.7 RNCM Staff who are involved in relationships with other staff, should ensure that their personal relationships do not affect their role within the organisation and when working with children, young people and students they must behave with the utmost propriety.
- 7.8 While the dress and appearance of all RNCM Staff is a matter of individual personal choice and expression, Staff should ensure that they dress appropriately for the tasks and work they undertake.

7.9 Staff should not smoke or vape in front of children or young people.

8. Gifts, Rewards and Favouritism

8.1 The giving of gifts and rewards to children, young people or students should be part of an agreed policy for supporting positive behaviour or recognising particular achievements.

8.2 Staff should ensure that all selection processes that concern children, young people and students are fair and that wherever practicable these are undertaken and agreed by more than one member of RNCM Staff.

8.3 When receiving gifts, staff should consider the guidance outlined in the Anti Bribery and Anti Fraud Policy. Small gifts of little intrinsic value are usually allowed and if in doubt speak to the CPLO/ Activity Lead for advice.

9. Communication

9.1 Communication with children, young people and students by staff, by whatever method, should take place within clear and explicit professional boundaries. Therefore, RNCM Staff should:

- Not give their personal contact details to children, young people and students, including their mobile phone number or personal email address;
- Normally, only use equipment (e.g. mobile phones) provided by RNCM and that in the case of children and young people, parents/guardians have given explicit permission for this form of communication to be used;
- Only make contact with parents for professional reasons and in accordance with RNCM policies.
- Not use social media to communicate with parents or children as communications should be recordable and auditable at all times.

9.2 **Safe Usage of Social Media** –All staff (including volunteers) need to ensure, both for RNCM's safety and their own, that activity on social networking sites: does not bring RNCM into disrepute, does not bring the teacher into disrepute, does not expose RNCM to legal liability, reflects 'safer internet' practices, minimises risks associated with the personal use of social media by professionals and reflects the RNCM's standard of behaviour and code(s) of conduct. There are some basic guidelines to follow in respect of social media and the internet which all staff should make themselves familiar with:

- Be professional on the internet - including Facebook, Twitter (X), Instagram and any other social media networks.
- Avoid interacting with, initiating contact with or "friending" current children and young people using your personal profile.
- Remember, there is potential for anything you post online to be copied and distributed. Bear this in mind every time you post.

9.3 RNCM's "Social Media Policy" is available on the Marketing and Student Recruitment intranet pages (Marketing and Communications Policy).

10. Physical Contact and ‘Safe Touch’

10.1 RNCM Staff and volunteers should not have unnecessary physical contact with children, young people or participants. There may however be occasions when physical contact may be professionally appropriate include (but are not limited to):

- Providing support and reassurance for a distressed young child (under 7), physical contact, with prior permission should be limited to hand holding, or an arm on or around shoulders.
- Where a member of staff needs to give tuition, advice or guidance on posture or technique in relation to playing/singing;
- Where a member of staff needs to demonstrate breathing techniques;
- Where a member of staff or a student has a disability which requires adaptive teaching styles that may require physical demonstration;
- Where a member of staff needs to give tuition, advice or guidance to modify a style of performance so as not to put excessive strain on a particular part of the body.
- Physical support or guidance in teaching movement (Dalcroze) or music, or when working with a disabled child/young person.

Demonstration on yourself should always be tried first and physical contact should only take place with the consent of the child or young person and the purpose of the contact should be clear.

10.2 All children and young people have the right:

- Not to be touched inappropriately: touch by a member of RNCM Staff should always be in response to the student or participant’s particular needs, and should take place in ways that minimise the chance of the student or participant misunderstanding the teacher’s intentions or motives;
- To inform RNCM Staff to be aware of gender, cultural or religious issues that may need to be considered prior to initiating physical contact;
- Not to be physically punished under any circumstances.

10.3 RNCM’s “Policy on Physical Contact between College Staff and Students” is available on the HR pages of the intranet (Safeguarding).

11. Inappropriate usage of the Internet

11.1 There are no circumstances that will justify RNCM Staff possessing indecent images of children, young people or adults. Any member of RNCM Staff that is found to access and store such images and possesses links to such websites will be viewed as a significant and potential threat to children and young people and will immediately be referred to Human Resources and the Police.

11.2 Accessing, making, storing and sharing indecent images of children and young people on the internet is illegal. This will lead to a criminal investigation and the individual being barred from working with children and young people.

11.3 It is strictly forbidden for any RNCM Staff to use RNCM equipment to access any kind of pornography, neither should personal equipment containing any such images or internet links to them be brought into the workplaces this will raise serious concerns about the suitability of the member of staff to continue to work with children and young people and the RNCM’s Staff Disciplinary Procedure will be invoked.

12. Photography, Filming and use of Mobile Cameras

- 12.1 We recognise that photographs and films can help us celebrate the achievements of the children and young people in our care but their safety must always be the priority.
- 12.2 Photos and films should not be made of the children in our care without permission from parents or carers and their consent is only meaningful when they understand how the images will be made, stored and disposed of.
- 12.3 All staff should seek permission from the CPLO/ Activity lead before taking photographs or making films and should not assume that permission immediately extends to everyone on the Project/ Activity team. Photos should only be taken on equipment approved by the CPLO/ Activity Lead and you should not assume you can take film or photos on your personal mobile phone.
- 12.4 CPLOs/ Activity Leads keep children and young people safe by:
- Always asking for written consent from a child and their parents or carers before taking and using a child's image.
 - Always get additional consent for any filming by an external broadcaster for film or television.
 - Always explaining what images will be used for, how they will be stored and what potential risk are associated with sharing images of children.
 - Making it clear that if a child or their family withdraw consent for an image to be shared, it may not be possible to delete images that have already been taken and shared or published.
 - Changing the names of children whose images are being used in our published material whenever possible (and only use first names if we do need to identify them)
 - Never publishing personal information about individual children and disguising any identifying information (for example the name of their school or a school uniform with a logo).
 - Making sure children, their parents and carers understand how images of children will be securely stored and how long (including how we will control access to the images and their associate information).
 - Reducing the risk of images being copied and used appropriately by:
 - Only using images of children in appropriate clothing (including safety wear if necessary)
 - Avoiding full face and body shots of children.
 - Using images that positively reflect young people's involvement in the activity.

13. Behaviour Management

- 13.1 All children, young people and participants have the right to be treated with respect and dignity even in those circumstances where they display difficult or challenging behaviour. RNCM Staff are not allowed to use any form of degrading treatment to punish a child, young person or participant and the use of sarcasm, demeaning or insensitive comments is also not acceptable in any situation.

- 13.2 Where a child, young person or participant has specific needs in respect of particularly challenging behaviour, a management plan may be drawn up to be agreed with all relevant parties.
- 13.3 The use of physical intervention should, wherever possible, be avoided. It should only be used to manage a child, young person or participant's behaviour if it is necessary to prevent personal injury to others, to prevent serious damage to property or in what would reasonably be regarded as exceptional circumstances.
- 13.4 In all cases where any form of physical intervention is employed the incident and subsequent actions should be documented and reported to the DSLs or CPLO. This should include written and signed accounts of all involved including children, young people or adults, as appropriate. The parent/guardians should also be informed as soon as possible.

14. Personal Care

- 14.1 Where a personal care plan to satisfy individual needs, is required, this must be drafted in co-operation with the parent or carer and signed by the parent / carer and the CPLO. The final version should be stored on the child/ young person's file.

15. Student and Graduate Mentors

- 15.1 It must be recognised that mentorship can be a most rewarding and positive experience for our undergraduates and graduates, they must also abide by the policies relating to Safeguarding children and young people under 18.
- 15.2 Student and Graduate Mentors must have adequate training, supervision and monitoring and should not be given responsibilities beyond their experience. All student and graduate mentors should have a proper induction and appropriate training, to ensure that they are clear who policies, procedures and codes of conduct can be fully disseminated and understood.
- 15.3 Student Mentors must return their DBS RNCM Lanyard, once the activity/ project has been completed.

16. Sharing Concerns and Recording Incidents

- 16.1 Following procedures outlined in RNCM Child Protection Policy, Section 6:

'If a member of staff has suspicions or is concerned that a child has been abused or is at risk of abuse they must immediately inform a CPLO (if there is a suspicion that a member of staff may be abusing a child this must be reported immediately via the Procedure for Handling Allegations against Staff).'
- 16.2 If you observe a breach of the code of conduct for working with under 18's you must report it to the CPLO for your activity/ project, immediately and the procedure as stated in Section 4 of the Child Protection Procedure, will be instigated. This includes reporting yourself if you make a mistake. You can also report breaches to the DSL and DDSL. If the breach is in relation to the DSL or DDSL you should report that to the Principal.
- 16.3 Outside the specified reporting procedures, strict confidence should apply to any suspicions or allegations raised by staff or students or participants.

- 16.4 Records pertaining to breaches of the Code of Conduct will be recorded by the CPLOs and a decision on whether to escalate to the Local Authority will be made by the DSL. Numbers of low level concerns will be reported annually by the DSL to Executive Committee and Board of Governors.
- 16.5 Records will be retained and destroyed in accordance with the RNCM Records Retention Schedule.
- 16.6 Any member of RNCM Staff who is unsure of the correct procedure for dealing with a safeguarding situation that arises in the workplace can seek advice and assistance from our any of our DSL or CPLOs as outlined in the Child Protection Procedure.

17. Low Level Concerns

- 17.1 Low level concerns should be reported to the CPLO who record the incident, to enable monitoring and to observe emerging patterns that might indicate something more severe. The sorts of concerns which should be reported to your CPLO include:
- **Changes in Mood or Temperament:** Notice any significant shifts in the child's demeanour, such as increased irritability, sadness, or anxiety.
 - **Social Interactions:** Observe how the child interacts with peers and adults, watching for frequent conflicts, withdrawal, or lack of interest in group activities.
 - **Activity Engagement:** If the child suddenly shows disinterest or struggles during activities, it could signal underlying concerns.
 - **Physical Indicators:** Unexplained bruises, sudden disinterest in personal hygiene, or visible signs of fatigue could indicate concerns needing attention.
 - **Boundary Testing:** Minor rule-breaking, inappropriate language, or disruptive behaviour could be an expression of underlying needs or stressors.

18. Private Tuition

- 18.1 The RNCM strongly discourages privately arrange tuition between RNCM tutors and any of our students. However, if you do undertake private tuition of RNCM junior students, you should report this to your Activity Lead (CPLO). Please consider the NSPCC guidance when considering any private music tuition:

<https://learning.nspcc.org.uk/safeguarding-child-protection/tutors>

19. Freedom of Speech, Academic Freedom and Professional Conduct in Safeguarding

- 19.1 This Code of Conduct shall be interpreted and applied consistently with the Royal Northern College of Music's statutory duties under the Freedom of Speech (Higher Education) Act 2023, and with the College's commitment to academic freedom, artistic freedom, and lawful freedom of expression.
- 19.2 Nothing in this Code is intended to restrict, discourage, or sanction lawful freedom of speech, academic inquiry, artistic expression, or lawful participation in public debate. This Code is concerned solely with professional conduct, safeguarding responsibilities, and the maintenance of appropriate boundaries where staff and others work with children and young people under the age of 18.
- 19.3 The existence of lawful teaching, artistic practice, research activity, creative expression, or the lawful expression of opinions—whether controversial, unpopular,

or critical—does not, of itself, constitute a breach of this Code and shall not give rise to action under safeguarding or conduct procedures unless there is credible evidence of conduct that places a child or young person at risk of harm, or otherwise breaches the specific safeguarding standards set out in this Code.

19.4 Decisions taken under this Code shall be evidence-based, proportionate, and guided solely by safeguarding considerations, statutory duties, and this Code's defined professional standards, and shall not be influenced by reputational considerations, public perception, media attention, or disagreement with lawful viewpoints or expressions.

19.5 This Code operates alongside, and does not diminish, the College's duty to secure and promote freedom of speech within the law.

20. Related Policies and monitoring and Review of the Code of Conduct

20.1 The College policies listed below are also relevant in seeking to ensure the safety and welfare of children:

- Safeguarding Policy
- Code of Conduct (General)
- Recruitment and Selection Policy
- Disclosure and Barring Service Policy
- Induction Policy
- Policy on relationships between College staff and students
- Policy on physical contact between College staff and students
- Public Interest Disclosure (Whistle Blowing)
- Managing Staff Allegations Procedure

20.2 The College's Executive Committee shall be responsible for reviewing this document to ensure that it meets legal requirements and reflects best practice.

ROYAL NORTHERN COLLEGE OF MUSIC

POLICY APPROVAL/REVIEW PROCESS

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AMENDMENTS SINCE DRAFT

ISSUE No	PAGE	DETAILS	DATE	ISSUED BY
1		First draft	June 2024	Emma Hilton-Wood
2		Final – ready for publication	27 November 2024	Emma Hilton-Wood
3		Minor updates in accordance with UNIAC internal Audit	May 2025	Emma Hilton-Wood
<u>4</u>		<u>Minor updates, relating to role changes and responsibilities clarity. FOS/E statement included.</u>	<u>May 2026</u>	<u>Emma Hilton-Wood</u>

Approvals

This document requires the following approvals.

Name/Committee	Date	Version
Executive Committee	July 2024	1
Board of Governors	27 November 2024	2
Executive Committee	June 2025	3
Board of Governors	July 2025	3
<u>Executive Committee</u>	<u>June 2026</u>	<u>4</u>
<u>Board of Governors</u>	<u>July 2026</u>	<u>4</u>