



Budmouth College

Code of Conduct and Guidelines for Safe Working Practices for the Protection of Children and Staff

Governors' Committee responsible:	The Curriculum and Student Welfare committee
Link Senior Leader responsible:	Zillah Rainback
Date reviewed:	November 2017
Next review date:	November 2018

Policies to be read in conjunction with this policy.	Documents
Searching and Confiscation	Section 175/157 of the Education Act 2002
Intimate Care	Keeping Children Safe in Education 2016
Safeguarding Policy and Child Protection Procedures	DfE advice in respect of physical contact with students and guidance about meeting the medical needs of children and young people in College
Use of Reasonable Force	Guidance for Safer Working Practice for Adults who Work with Children and Young People in Education Settings 2009
Trips and Visits	Getting changed for PE and College Sport LA Guidance
Dealing with Allegations of Abuse against Members of Staff and Volunteers	Education and Inspections Act 2006
Whistleblowing	Sexual Offences Act 2003
Getting changed for Sport	
Getting changed for Dance and Drama	
Use of Social Media	
E-Safety	
Alcohol and Substance Misuse	
Teachers' Pay and Conditions Document	
Equal Opportunities	
Supporting Children with Medical Conditions and Managing Medicines	
First Aid	
Drugs	

Working Together. Creating Opportunities

The Policy has been reviewed using the equality impact assessment initial screening record and a positive impact is explicitly intended and very likely.

All policies can be found on the College 'R' drive in the Policies folder.

Equality Impact Assessment – initial screening record

1. What area of work is being considered?

Code of Conduct and Guidelines for safer Working practice

2. Upon whom will this impact?

All Staff and Students

✓ 3. How would the work impact upon groups; are they included and considered?

The Equality Strands	Negative impact	Positive impact	No impact
Minority ethnic groups		✓	
Gender		✓	
Disability		✓	
Religion, Faith or belief		✓	
Sexual Orientation		✓	
Transgender		✓	
Age (N/A to pre-College and College children)		✓	
Rurality		✓	

4. Does data inform this work, research and/or consultation, and has it been broken down by the equality strands?

	NO	YES	Uncertain
Minority ethnic groups			✓
Gender			✓
Disability			✓
Religion, Faith or belief			✓
Sexual Orientation			✓
Transgender			✓
Age			✓
Rurality			✓

Does the initial screening highlight potential issues that may be illegal? YES / NO

Further comments:-

This policy applies to all staff and no equality strand prevents this. It makes reference to the Equal Opportunities Policy.

Do you consider that a full Equality Impact Assessment is required? YES / NO

Initial screening carried out by

Zillah Rainback

Signed

Date: November 2017

Comment by Headteacher:

Date.....

Budmouth College

Code of Conduct and Guidelines for Safe Working Practices for the Protection of Children and Staff

1. Introduction

- 1.1 The Governors of Budmouth College have a legal duty under section 175/157 of the Education Act 2002 to safeguard and promote the welfare of students by creating and maintaining a safe learning environment. A Code of Conduct is a mandatory requirement as described in 'Keeping Children Safe in Education'.
- 1.2 In this regard, all Budmouth College staff have a duty to keep children and young people safe and protect them from harm. Staff should ensure that they do not put themselves in situations in which allegations of abuse or inappropriate behaviour could be made.
- 1.3 The public are also entitled to expect the highest standards of conduct from College staff, governors and volunteers and to have trust and confidence in their integrity.
- 1.4 All adults working in Budmouth College must therefore act with the utmost good faith with regard to the business of the College and not do anything, which may adversely affect its reputation.
- 1.5 The following Code has been drawn up with a view to reducing the risk of staff being accused of improper or unprofessional conduct in all aspects of their work. It aims to help staff work safely and professionally and clarify what behaviour constitutes safe practice and what is unacceptable and/or illegal.
- 1.6 The Code refers closely to the national Guidance for Safer Working Practice for Adults who Work with Children and Young People in Education Settings 2009 and has been agreed following consultation with the recognised trades unions.

2. Scope

- 2.1 The Code applies to all adults working in Colleges whatever their position, roles or responsibilities and is therefore aimed at all College-based staff and volunteers.
- 2.2 The Code is predominantly geared towards safe working practices for the protection of children and in this connection should be read in conjunction with Budmouth College Safeguarding Policy and Child Protection Procedures, Dealing with Allegations of Abuse against Members of Staff and Volunteers Policy and Use of Social Media and E-Safety Policy. However, the Code also encompasses other general aspects of conduct expected within Budmouth College.
- 2.3 The Code cannot cover every eventuality. Its purpose is to show the standard expected of employees, but it does not replace the general requirements of the law.
- 2.4 In respect of teachers specifically, the Code supplements the Teachers' Standards as set out in the College Teachers' Pay and Conditions Document.
- 2.4 The Code is recommended to all College Governing Bodies for adoption. (In the case of College federations, it is recommended to the federation's Governing Body).
- 2.5 **The Local Authority will not accept liability for any actions, claims, costs or expenses arising out of a College's decision not to follow these recommended guidelines, where it is found that the College's Governing Body has been negligent or has acted in an unfair or discriminatory manner.**

3. General obligations

- Staff should understand the responsibilities that are an intrinsic part of their employment or role. They should make a professional judgement about their actions and behaviour and seek to avoid conduct, which would lead any reasonable person to question their motivation or intentions.
- If there is an incident where staff feel there may be a concern, they should discuss the circumstances that informed their action, or their proposed action with a senior colleague, to help ensure that the safest practices are employed and the risk of actions being misinterpreted reduced.
- Records should be made of any incidents and decisions made or further actions agreed, with their justifications, in accordance with College policy.
- All staff should know the Designated Safeguarding Lead, be familiar with local child protection arrangements and understand their responsibilities to safeguard and protect children and young people.
- Staff should understand their responsibility to voice any general concerns that they might have about practice within the College, in accordance with the Budmouth College Whistle Blowing policy.
- Staff should also be aware of and comply with Budmouth College financial and administrative regulations and any other procedure manuals such as the personnel handbook.
- Unlawful, unsafe or inappropriate behaviour may result in disciplinary action being taken.

4. Good practice guidelines

The following Code and guidelines set out specific areas of conduct and behaviour that constitute expected and safe practice.

If staff are in any doubt about any aspect of this guidance or need to seek further clarification about a particular situation in the absence of specific guidance, they are advised to speak to the Principal of Designated Safeguarding Lead within Budmouth College.

4.1. Propriety and Behaviour

- 4.1.1 All adults working with children and young people are in a position of trust in relation to the individuals in their care. Staff are expected to adopt high standards of personal integrity and conduct and behave in such a way that does not compromise their position both within or outside Budmouth College or the safety and welfare of children.
- 4.1.2 The Teaching Standards issued by the Department for Education also sets out the minimum professional standards for the teaching profession and states that a teacher is expected to demonstrate consistently high standards of personal and professional conduct.

Staff should not:

- behave in a manner, which would lead any reasonable person to question their suitability to work with children or act as a role model;
- use their power to intimidate, threaten, coerce or undermine students;
- make (or encourage others to make) unprofessional personal comments which scapegoat, demean or humiliate other individuals or might be interpreted as such.

4.2 Confidentiality and Information disclosure

- 4.2.1 Staff should not use any information obtained in the course of their duties to the detriment of Budmouth College or for personal gain or benefit or pass this information on to others who might use it in such a way.
- 4.2.2 Staff must also take all reasonable steps to ensure that the loss, destruction, inaccuracy or disclosure of information does not occur as a result of their actions, including information relating to College business and student data.
- 4.2.3 There are some circumstances in which staff may be expected to share information about a child, for example, when child protection issues arise. In such cases staff have a duty to pass information on without delay in line with the College policy/local procedures. If staff are in any doubt about whether to share information or keep it confidential they should seek guidance from the Designated Safeguarding Lead or Deputies.

- staff should not use their position to gain access to information for their own advantage or to intimidate, humiliate or embarrass a child;
- staff are expected to treat any information they receive about children and young people in a discreet and confidential manner;
- staff need to be cautious when passing on information to others about a child/young person and if in any doubt about sharing information, seek the advice of the Principal or Designated Safeguarding Lead.

4.3 Equality issues

- 4.3.1 All staff should adhere to the Budmouth College Equal Opportunities Policy, in addition to the requirements of the law.

- staff should not discriminate in recruitment and employment practices, nor in the delivery of services;
- staff should also ensure that in their dealings with parents and other members of the public, they ensure the provision of an efficient and impartial delivery to all individuals.

4.4 Employment matters

- 4.4.1 All staff involved in appointments and/or tendering process should ensure that these are made on the basis of merit.

- staff should not be involved in an appointment or decisions relating to discipline, promotion or pay adjustments for any individual who is a relative or with whom they are in a close personal relationship;
- all relationships of a business or private nature with external contractors, or potential contractors should be made known to the Principal.

4.5 Public duty and private interest

- 4.5.1 It is important that staff do not put themselves in a position where their duty to Budmouth College and their private interests conflict.

- Staff should not allow their own personal or political opinions to interfere with their work and the provision of a balanced and professional service, ensuring that they work to the professional standard required.

4.6 Other employment/private work

- 4.6.1 Any external work that staff undertake must not bring Budmouth College into disrepute or conflict with the College's interest.
- 4.6.2 Any copyright created by a member of staff during their employment with Budmouth College becomes the property of the College.

- staff should not set up a business or accept employment with a business that is engaged in work, which is in direct competition with Budmouth College.
- private work should not be undertaken in the College's time, or using the College's premises or equipment, without prior approval of the Principal;

4.7 Dress and Appearance

- 4.7.1 Staff should ensure that they are dressed decently, safely and appropriately for the tasks that they undertake and that they promote a positive and professional image.
- 4.7.2 Where dress codes exist in Colleges these should not discriminate in any way.

4.8 Financial inducements, gifts, hospitality and sponsorship

- 4.8.1 Staff should ensure that they use public funds entrusted to them in a responsible and lawful manner and that they do not give or receive any gift, loan, fee, reward or advantage, which might be misinterpreted.
- 4.8.2 Although staff should not give or receive gifts from students or parents on a regular basis or of any significant value, it is acceptable however for staff to receive small tokens of appreciation, such as at Christmas time.

- staff should not seek or receive preferential rates for themselves by virtue of their dealings on behalf of the College;
- staff should ensure that gifts are declared if they are received;
- staff should generally only give gifts to an individual young person as part of an agreed reward system;
- where staff do give gifts, they should ensure that they are of insignificant value and given to all children equally.

4.9 Use of College Time and Facilities

- 4.9.1 The College's property and facilities (e.g. stationery, computers, photocopiers, mobile phones) may only be used for College business unless permission for their private use has been granted.

4.10 Publication of Books/Articles

- 4.10.1 If staff want to publish books, articles, letters, dissertations etc that they have written in connection with their duties and in which they describe themselves as holding an appointment with the College they must consult the Principal.

- staff should speak to the Principal if they wish to publish books, articles, letters, dissertations etc, which have been written in connection with their duties and their role within Budmouth College

4.11 Infatuations

4.11.1 In cases where a young person develops an infatuation, there is a high risk of words or actions being misinterpreted and for allegations to be made against staff.

- staff should maintain professional boundaries at all times. They should report to the Principal any clear/apparent indications (whether they are verbal, written or physical), that suggest a student may be infatuated with them and respond sensitively to such situations in order to maintain the dignity of all parties.

4.12 Social contact

4.12.1 Staff should not establish or seek to establish social contact with students to secure or strengthen a friendship. This includes giving any personal details to a student such as a home/mobile phone number, home or email address. Only in exceptional circumstances can this be with the prior approval of the Principal.

- Do not give out personal details such as home/mobile numbers, home address or personal e-mail address to students.
- staff should always approve any planned social contact with students the Principal, for example, when it is part of a reward scheme or pastoral care programme;
- staff should advise the Principal of any regular social contact they have with a student, where it is apparent that it may give rise to a concern. This can also apply to social contacts made through outside interests or through the staff member's own family.

4.13 Physical contact

4.13.1 It is unrealistic to suggest that teachers should never touch students. There are occasions when it is entirely appropriate and proper for staff to have physical contact with students, such as when a distressed student needs comfort and reassurance or as an integral part of some lessons such as PE and music (see also behaviour management, section 4.15).

4.13.2 However, innocent actions and appropriate physical contact can sometimes be misconstrued – either by the child or an observer- and it is therefore crucial that staff only initiate physical contact for the minimum time necessary and in ways appropriate to their own role and the needs of the child.

4.13.3 Staff should use their professional judgement at all times. Where feasible, staff should seek the child's permission before initiating contact. Where a member of staff thinks that an incident could have been misinterpreted it should be reported to the Principal.

4.13.4 Any formally agreed plan for children with SEN or physical disabilities should be understood and agreed by all concerned, including parents/carers and staff should be provided with relevant information about vulnerable students in their care where it is relevant for this to be provided in order for staff to be able to undertake tasks appropriately. If a student requires assistance with intimate care needs, the Colleges' Intimate Care Policy should be followed. See 4.21 below.

4.13.5 Extra caution may also be required where it is known that a child has suffered previous abuse or neglect. Many such children are often needy and seek out inappropriate contact, thereby leading staff to be vulnerable to allegations of abuse.

In this regard, staff should:

- be aware that even well intentioned physical contact may be misconstrued by the child, an observer or by anyone to whom this action is described;
- never touch a child in a way which may be considered indecent;
- always explain to a student the reason why contact is necessary and what form that contact will take;
- look at alternatives, where it is anticipated that a student might misinterpret contact and consider involving another member of staff, or a less vulnerable student in a demonstration;
- never indulge in horseplay, tickling or fun fights;
- always tell a colleague when and how they offered comfort to a distressed child and record any situations, where they think they may give rise to concern;
- adhere to the College's policy regarding use of reasonable force and be acquainted with DfE advice in respect of physical contact with students and guidance about meeting the medical needs of children and young people in College.

4.14 Showers and Changing

4.14.1 Children are entitled to respect and privacy when changing clothes or taking a shower.

4.14.2 However, there does need to be an appropriate level of supervision to safeguard young people and satisfy health and safety considerations. Any supervision must therefore be appropriate to the needs and age of the young people concerned.

4.14.3 Staff who are regularly involved in supervising children in changing rooms should read and familiarise themselves with the LA document 'Getting changed for PE and College Sport'.

- *staff should avoid any physical contact when children are in a state of undress or any visually intrusive behaviour where there are changing rooms;
- *staff should announce their intention of entering a changing room and avoid remaining in the room unless student needs require it;
- *staff should not change in the same place as or shower with children.

4.15 Behaviour management and use of reasonable force

4.15.1 Corporal punishment is unlawful in all Colleges and physical force should never be used as a form of punishment; to do so is likely to constitute a criminal offence.

4.15.2 However in some circumstances, staff in Colleges have the right to use physical intervention/reasonable force for the shortest period necessary to control or restrain students. The Education and Inspections Act 2006 provides the legal power for College staff to use reasonable force to prevent students from committing a crime or causing injury, damage or disruption.

- staff should try to defuse situations before they escalate;
- staff should keep parents informed of any sanctions;
- staff should adhere to Budmouth College policies on Behaviour Management and Use of reasonable force;
- where it is identified that staff are likely to have to use physical intervention on a regular basis they should have received appropriate training.

4.16 Sexual contact with children and curriculum issues

4.16.1 It is a criminal offence for any adult in a position of trust to engage in any form of sexual activity with a young person under 18, even with their consent (Sexual Offences Act 2003). This also includes non-contact activities such as causing children to engage in or watch sexual activity. Where the young person is aged 18 or over, it is still inappropriate and will be dealt with under the disciplinary procedure.

4.16.2 There may be occasions when, as part of the curriculum, a teacher has to raise subject matter that is sexually explicit. In such situations, any lesson plan should highlight the areas of risk and sensitivity. Staff should respond to questions with careful judgement and avoid entering into inappropriate or offensive discussions about sexual activity.

In this regard, staff should not:

- use their status and standing to form or promote relationships with children, which are of a sexual nature;
- pursue sexual relationships with children and young people either in or out of College;
- enter into or encourage inappropriate, offensive or discriminatory discussion about sexual activity;
- make sexual remarks to a student (including by email, text messages, phone or letter), or use any communication which could be interpreted as sexually suggestive or provocative;
- discuss their own sexual relationships with, or in the presence of students;
- discuss a student's sexual relationships in inappropriate settings or contexts;
- confer special attention and favour upon a child which might be misconstrued as being part of a 'grooming' process.

4.17 One to one situations and overnight supervision

4.17.1 When staff work regularly on an individual basis with children, which also includes mentoring, they are generally more vulnerable to allegations.

4.17.2 To avoid such situations arising meetings should, wherever possible, be arranged so that staff are visible and/or audible and not in secluded areas of the College. Wherever possible meetings to be recorded on SIMS or students file and to include the purpose and outcome of the meeting.

4.17.3 Staff should not arrange to meet a student away from the College premises without good reason, but if this is necessary, only with the expressed approval of parents and the Principal.

4.17.4 However, where a College makes provision for overnight supervision during exam periods and it is necessary for a student to stay with a member of staff in their home, this should only be with the Principal and parent's permission and after a full risk assessment has been carried out.

Staff should:

- ensure there is visual access and/or an open door in one to one situations;
- inform other staff of the meeting beforehand, assessing the need to have them present or close by;
- avoid the use of 'engaged' or equivalent signs wherever possible, as they may create an opportunity for secrecy or the interpretation of secrecy;
- always report to the Principal any situation which gives rise to complaint, disagreement or misunderstanding or where a child becomes distressed or angry.

4.18 Transporting children

4.18.1 In such cases where children need to be transported between different locations, a designated member of staff should be appointed to be a part of, plan and provide oversight of all arrangements.

4.18.2 Wherever practicable, an adult additional to the driver should act as an escort and all arrangements agreed with relevant parties, including students, in advance.

All staff:

- should avoid using private vehicles wherever possible;
- must ensure that they have the appropriate insurance (for business use) where they do have to use their private vehicle;
- should ensure that they are alone with a child for the minimum time possible;
- should be aware that a lone student should ideally sit in the rear of the vehicle
- should be aware that the safety and welfare of the child is their responsibility until this is safely passed over to a parent/carer;
- should report the nature of the journey, the route and expected time of arrival in accordance with agreed procedures;
- should ensure that their behaviour and all arrangements ensure vehicle, passenger and driver safety, taking into account any specific needs that the child may have.

4.19 Educational visits and after College clubs

4.19.1 Staff should always take care to have another adult present during out of College activities, unless otherwise agreed with the Principal. Health and safety requirements should be strictly adhered to.

4.19.2 Staff should ensure that they display professional behaviour during activities that take place off the College site and ensure that their behaviour cannot be interpreted as seeking to establish an inappropriate relationship or friendship. Staff should therefore maintain a professional relationship with students at all times.

4.19.3 Where out of College activities include overnight stays, particular consideration should be given to sleeping arrangements, if applicable students, staff and parents to be informed of the arrangements in advance.

In this regard, staff should therefore:

- undertake risk assessments;
- have parental consent to the activity;
- ensure that their behaviour remains professional at all times.

4.20 First aid and administration of medication

4.20.1 In cases where first aid or medication needs to be administered, all staff should adhere to Budmouth College Health and Safety policy/Guidance for the Administrations of Medicines.

4.20.2 A health care plan should be drawn up in circumstances where the child needs to take regular medication and any such agreement between the child, parents/carers and the College must be negotiated, agreed and recorded (See Multi-agency guidance for the management of long term health conditions for children and young people).

4.20.3 Where possible, children should be encouraged to administer the medication themselves, with the permission of parents.

Staff should:

- make other staff aware of the task being undertaken;
- explain to the child what is happening.

4.21 Intimate Care

4.21.1 All children have a right to safety, privacy and dignity when contact of an intimate nature is required. A care plan should be drawn up and agreed with parents for all children, including those with special needs, who require intimate care on a regular basis.

In this regard staff should:

- adhere to the College's intimate care guidelines;
- make other staff aware of the task being undertaken;
- explain to the child what is happening;
- consult with colleagues where any variation from the agreed procedure or care plan is necessary and record the justification, sharing the information with parents.

4.21.2 A detailed Intimate Care Policy has been produced for Budmouth College which should be referred to for further detail.

4.22 Photography, videos and other creative arts

4.22.1 Many College activities involve recording images, but the use of such images needs careful consideration and handling. In particular, children who may have been abused in this way may feel threatened by the use of photography and filming.

4.22.2 The use of any images of children for publicity purposes will also require the appropriate consent of the individual concerned and their legal guardians.

Staff should therefore:

- familiarise themselves with the College's Social Media, E-Safety and IT Usage Policies
- be clear about the purpose of the activity and about what will happen to the photographs when the lesson or activity is concluded;
- ensure consent is gained from the student and their legal guardians where being used for publicity purposes;
- ensure that a senior member of staff is aware that the photography/image equipment is being used and for what purpose;
- ensure that all images are available for scrutiny in order to screen for acceptability;
- be able to justify images of children in their possession;
- never use personal equipment/mobile phones to take images;
- avoid making images in one to one situations;

4.23 Internet use

4.23.1 Accessing child pornography or indecent images of children on the computer is illegal. Under no circumstances should adults in Colleges access inappropriate images on the internet or access any other site which could call into question the member of staff's suitability to work with children. The same rule applies to the use of the College's equipment by members of staff at home, e.g. use of laptops.

- staff should follow the College policy on the use of IT equipment and E-Safety;
- staff should follow the College policy on Social Media.

4.24 Staff/Student relationships and social networking

- 4.24.1 Staff members must not have contact through any personal social media with any current students, whether from Budmouth College or any other school/college, unless the students are close family members.
- 4.24.2 Staff members must decline 'friend requests' and must not 'follow' students (or parents) in their personal social media accounts.
- 4.24.3 On leaving Budmouth College service, staff members must not contact Budmouth College students by means of personal social media sites. Similarly, staff members must not contact students from their former Colleges by means of personal social media.

- staff should follow the College policy on the use of Social Media
- staff should follow the College policy on E-Safety.

4.25 Responsibilities in relation to drug use (including alcohol) in College hours and on College trips

- 4.25.1 Please see the Alcohol and Substance Misuse Policy and the Trips and Visits Policy for guidance on these responsibilities.

Declaration of receipt

I confirm that I have read the Code of Conduct and Guidelines for Safe Working Practice and understand that any unlawful or unsafe behaviour could lead to appropriate legal or disciplinary action being taken.

Name: *(please print)*:

Signature:

Date:

Please return this slip to your Principal as soon as possible

Further reference documents

- **Guidance for Safe Working Practice for the Protection of Children and Staff in Education Settings**, produced by The National Network of Investigation and Referral Support Co-ordinators, February 2005
- **College Whistle-blowing Policy**
 - This policy provides the framework by which staff can voice their concerns in good faith about practice within the College, without fear of repercussion and in accordance with the Public Interest Disclosure Act 1998.
- **Dealing with allegations of abuse against members of staff and volunteers**
 - Aims to ensure that any allegations are dealt with fairly, consistently and quickly and in a way that provides protection for the child, whilst supporting the person who is the subject of the allegation.
- **Department for Education Guidance on Use of Reasonable Force – July 2013**

This is non-statutory advice which is intended to provide clarification on the use of force to help College staff feel more confident about using this power when they feel it is necessary and to make clear the responsibilities of College leaders and governing bodies in respect of this power
- **Education and Inspections Act 2006**
 - Forbids corporal punishment, but allows all teachers to use reasonable force to prevent a student from committing a criminal offence, injuring themselves or others, damaging property, acting in a way that is counter to maintaining good order and discipline at the College.
 - Also provides legal right to confiscate items such as mobile phones and music players.
- **Violent Crime Reduction Act 2006**
 - Allows headteachers/Principals (or other College staff who have been authorised by the headteacher/Principal) to undertake searches of students where they suspect they are carrying a knife or other offensive weapon).
- **Department for Education Teacher Standards**
 - Sets out the minimum standards for the regulation of the profession which are set out in the College Teachers' Pay and Conditions Document.
- **What to Do if you are Worried that a child is Being Abused**. Department of Health, December 2006.
- **College Policies - Behaviour Management, Physical Intervention, Intimate Care, Health and Safety, Getting Changed for PE and College Sport, IT Usage, Social Media Policy, E-Safety Policy and Guidance on the Administration of Medicines.**
- **Child Protection Policy**

Other legal considerations

Education Act 2002 (section 175/157)

Colleges should exercise their functions with a view to safeguarding and promoting the welfare of children.

Children Act 1989

Recognises that the identification and investigation of child abuse together with the protection and support of victims requires multi-agency collaboration

Children Act 2004

Duty on all agencies to make arrangements to safeguard and promote the welfare of children.

Public Interest Disclosure Act 1998

Gives legislative protection for 'whistle blowers' where there is a qualifying disclosure.

Sexual Offences Act 2003

A criminal offence for any adult in a position of trust to engage in any form of sexual activity with a young person under 18, even with their consent.