


Code of Conduct Policy (Staff)

Thomas Keble School



This is a statutory policy and was agreed upon by the Full Trust Board on (and supersedes all previous policies relating to this area):	07 th May 2025
Signed by The Chair of Trustees Mr Julian Wintle:	
Implemented:	May 2025
Review date:	May 2028
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Introduction

1.1 The purpose of the Code of Conduct

This Code sets out the professional standards expected for all Adults in working with pupils at Thomas Keble School. Following this Code will help Adults fulfil their duties to pupils and will safeguard Adults from being maliciously, falsely or mistakenly suspected or accused of misconduct in relation to pupils.

1.2 Duty of care

All Adults have a duty to keep pupils safe, promote their health and welfare and protect them from radicalisation (the Prevent Duty), abuse (sexual, physical and emotional), neglect and safeguarding concerns. This duty is, in part, exercised through the development of respectful, caring and professional relationships between Adults and pupils and behaviour by Adults that demonstrates integrity, maturity and good judgement.

1.3 Definitions and Structure

1.3.1 For the purposes of this Code the term and references to 'Adult' means the trust board and trust members, all teaching staff and associate staff (whether paid or unpaid, employed or self-employed and whether or not employed directly by the school), external contractors providing services to pupils on behalf of the school, teacher trainees and other trainees/apprentices, volunteers and any other individuals who work for or provide services on behalf of or for the school including, but not limited to, all those detailed in the school's single central record (as amended from time to time).

1.3.2 For the purposes of this Code 'young person/people', 'pupils' and 'child/ren' includes all those for whom the school provides education or other services.

1.3.3 At the end of each section, and at the end of the document, there are summary points which identify the key requirements of the Code. These points reflect the requirements in the main text of the document but are highlighted to support readability. They represent an integral part of the document and therefore should be considered alongside the main text as part of the requirements for adults.

1.4 Relevant statutory and non-statutory guidance

This Code takes account of the most recent versions of the following guidance (statutory and non-statutory):

- *Keeping Children Safe in Education* (Department of Education ('DfE') statutory guidance)
- *Working together to safeguard children* (DfE statutory guidance)

- *Guidance for safer working practice for those working with children and young people in education settings* (issued by the Safer Recruiting Consortium adapting and updating the original IRSC/DFE document, non-statutory).

This Code cannot provide an exhaustive list of what is, or is not, appropriate behaviour for Adults. However, it does highlight behaviour that is illegal, inappropriate or inadvisable in relation to the required professional standards. There will be occasions and circumstances in which Adults have to make decisions or act in the best interests of a pupil where no specific guidance has been given. Adults are expected to make responsible and informed judgements about their own behaviour in order to secure the best interests and welfare of the pupils.

1.5 Breaches of the Code of Conduct

Any behaviour in breach of this Code by employees may result in action under the school's Conduct Policy.

1.6 Safeguarding Children

Adults have a duty to act in accordance with the Safeguarding Policy which is available from the school website and to report any safeguarding, child protection, welfare or radicalisation concerns about a pupil to the Designated Safeguarding Lead (DSL). Employees must also be familiar with the procedures for managing allegations against staff which are outlined in the Allegations of Abuse against Staff Policy.

1.7 Whistleblowing

Workers may raise suspected wrongdoing or dangers in relation to the school's activities in line with the Whistleblowing Policy. An employee who "whistle blows" (known legally as a public interest disclosure) has legal protection from dismissal and detrimental treatment. The Whistleblowing Policy does not cover safeguarding or child protection concerns.

1.8 Concerns and Allegations Raised Against Staff

Where it is alleged that an Adult at the school may have:

- behaved in such a way that has harmed a child or children;
- committed a criminal offence against or related to a child; and/or,
- behaved towards a child or children in a way that indicates s/he would pose a risk of harm to children; and/or,
- behaved in a way that indicates they may not be suitable to work with children (including

behaviour outside of school)

1. The Headteacher will follow the school's **Allegations of Abuse Against Staff Policy** and the guidance set out in Part Four of the latest version of the DfE statutory guidance *Keeping Children Safe in Education*.

2. Where a concern is deemed to be 'low-level', the allegations process does not apply and the school will follow the process laid out in the **Conduct Policy** for employees and 'unattached staff'. For all other Adults, the school will take appropriate steps to resolve low-level concerns, including working with the Adult's employer or an appropriate authority. A low-level concern does not meet the threshold for harm against a child or children as set out above. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult working in or on behalf of the school may have acted in a way that:

- is inconsistent with the Code of Conduct, including inappropriate conduct outside of school; and,
- does not meet the allegations threshold or is otherwise not considered serious enough for referral to the Local Authority safeguarding Officer (LADO).

3. **1.9 Reporting concerns**

4. Concerns about the conduct of an Adult towards children must be reported immediately to the headteacher or to the chair of trustees, where the concern is about the headteacher, in each case via email.

5. **1.10 Self-reporting**

6. Where an adult knowingly breaches the Code of Conduct (deliberately or inadvertently) or finds themselves in a situation where they are vulnerable to an allegation being made against them, they should 'self-report' immediately to the Headteacher or Designated Safeguarding Lead. Self-reporting is an important part of creating an open culture around safeguarding.

2 Expected Professional Standards

2.1 All Adults as appropriate to the role and/or job description of the individual, must:

- place the well-being and learning of pupils at the centre of their professional practice;
- have high expectations for all pupils, be committed to addressing underachievement, and work to help pupils progress regardless of their background and personal circumstances;
- treat pupils fairly, with respect and dignity, take their knowledge, views, opinions and feelings

seriously, and value diversity and individuality;

- model the characteristics they are trying to inspire in pupils, including enthusiasm for learning, a spirit of enquiry, honesty, tolerance, social responsibility, patience, and a genuine concern for other people;
- respond sensitively to the differences in the home backgrounds and circumstances of pupils, recognising the key role that parents and carers play in pupils' education;
- seek to work in partnership with parents and carers, respecting their views and promoting understanding and cooperation to support the young person's learning and well-being in and out of school;
- reflect on their own practice, develop their skills, knowledge and expertise, and adapt appropriately to learn with and from colleagues;
- ensure that the same professional standards are always applied regardless of culture, disability, gender, language, racial origin, religious belief and/or sexual identity.

2.2 Teachers are required to comply with the latest version of the Teachers' Standards, in particular, Part 2 'Personal and Professional Standards', available from the DfE resource library.

- Part 2 states that "Teachers **must** have proper and professional regard for the ethos, policies and practices of the school in which they teach, and maintain high standards in their own attendance and punctuality." School documents set out the start time for members of staff and lateness to work without good reason can be deemed as misconduct and would be dealt with under the conduct policy.

2.3 All employees and volunteers who work in 'regulated activities' must be familiar with, and act in accordance with, the most recent versions of the following documents:

- The school's Safeguarding Policy;
- The school's Behaviour Policy;
- Part 1 and Annex A of *Keeping Children Safe in Education* (DfE statutory guidance);
- The Code of Conduct for Adults Working with Children at Thomas Keble School.

- 2.4 All employees must sign and declaration at the start of each academic year to confirm they have read the documents listed in 2.3.
- 2.5 All Adults are expected to take reasonable steps to ensure the safety and well-being of children and young people. Failure to do so may be regarded as neglect.
- 2.6 An employee who fails to bring a matter of concern to the attention of senior management and/or the relevant agencies is likely to be subject to disciplinary action under the school's Conduct Policy.

Adults must:

- Act in accordance with expectations set out with the school's policies and Code of Conduct, statutory requirements, and the Teachers' Standards.
- Must maintain high standards in their own attendance and punctuality.
- Report any concerns relating to the conduct of an Adult towards children, no matter how small, to the headteacher immediately.
- Self-report to the Headteacher or DSL if they knowingly breach the Code of Conduct (deliberately or inadvertently) or find themselves in a situation where they are vulnerable to an allegation being made

3 Confidentiality

- 3.1 As a data controller, the school is subject to the Data Protection Act 2008 and all Adults are expected to observe the school's Data Protection Policy In addition, teachers owe a common law duty of care to safeguard the welfare of their pupils. This duty is acknowledged in the provisions governing the disclosure of information about pupils.
- 3.2 The Data Handling and Protection Policy sets out the school's position in this area.
- 3.3 Adults may have access to confidential information about pupils to undertake their responsibilities. In some circumstances, the information may be sensitive data and/or confidential. Confidential or personal information about a pupil or her/his family must never be disclosed to anyone other than on a need-to-know basis and advice should be sought before disclosure to ensure such disclosure is per the Data Protection Act 2008, The Education (Pupil Information) Regulations 2005 (maintained schools), The ICO *Guide to Data Protection* and the ICO guide on *How to Disclose Information Safely'* In circumstances where the pupil's identity does not need to be disclosed the information should be used anonymously. Information must never be used to intimidate, humiliate, or embarrass the pupil. The information must never be used by anyone for their own or others' advantage (including that of

partners, friends' relatives or other organisations).

- 3.4 There are some circumstances in which an Adult may be expected to share information about a pupil, for example when abuse is alleged or suspected. In such cases, Adults have a duty to pass information on without delay to those with designated safeguarding responsibilities.
- 3.5 Confidential information about pupils must be held and shared securely. Confidential information about pupils must not be held by individual staff away from the school site other than on security-protected equipment and only with the permission of the school's Data Controller. Information must only be stored for the length of time necessary to discharge the task for which it is required. Confidential and sensitive data about a pupil should only be shared electronically with third parties via secure means (e.g. Egress). A third party means someone other than the parent/carer who does not work at the school (e.g. social worker).
- 3.6 Where a third party communicates personal or sensitive data about a pupil via a method which is not sufficiently secure (for example, by email), this should be pointed out to the sender along with a request to conduct further communication via a secure channel.
- 3.7 If a pupil or parent/carer makes a disclosure regarding abuse or neglect, the Adult must follow the procedures set out in the school's Safeguarding Policy and the guidance set out in the DfE's statutory guidance *'Keeping Children Safe in Education'*. Confidentiality must not be promised to the pupil or parent/carer, however, reassurance should be given that the information will be treated sensitively. Neither should an Adult request confidentiality from a child or young person under any circumstances.
- 3.8 If an Adult is in any doubt about the storage or sharing of information s/he must seek guidance from the Designated Safeguarding Lead or Data Controller. Any media or legal enquiries must be passed to a member of the school's senior leadership team.
- 3.9 Platforms, apps or devices not authorised by the school for work use (e.g. personal email accounts, personal mobile phones) must not be used to share pupils' or staff personal data or information about confidential or sensitive school business. The authorised electronic communication methods are school email, Egress secure email, SIMS, and school mobile phones.

Adults **must**:

- Ensure that any information shared is done so securely; for example, via Egress secure email or by password-protecting sensitive documents.
- Pass on information about alleged or suspected abuse immediately to the Designated Safeguarding Lead.
- Seek advice about data storage and data sharing from the Headteacher (Data Controller) if in doubt; e.g. hardcopy trip and visit packs are assumed to be held off-site with permission, pending safe return and disposal.
- **Adults must not:**
- Disclose confidential or personal information about a pupil or her/his family to anyone other than on a need to know basis.
- Take personal information about pupils away from the school site without permission and without appropriate encryption. Unprotected memory devices must not be used for carrying pupil or staff data; staff laptops are considered as secure as they are password protected.
- Store personal data for longer than is necessary.

4 Propriety, Behaviour and Appearance

- 4.1 All Adults working with children have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of pupils. They should adopt high standards of personal conduct in order to maintain the confidence and respect of their colleagues, pupils and the public in general. An Adult's behaviour or actions, either in or out of the workplace, must not compromise her/his position within the work setting, or bring the school into disrepute.
- 4.2 Adults are required to notify the school immediately of any allegation/s of misconduct that are of a safeguarding nature made against them (or implicating them), by a child or adult in relation to any outside work or interest (whether paid or unpaid) and of any arrest or criminal charge whether child related or not. Where employees fail to do so, this will be treated as a serious breach of this Code and dealt with under the school's Conduct Policy.
- 4.3 Adults are required to disclose any safeguarding concerns relating to a member of their household, including relevant convictions or pending prosecutions.
- 4.4 Individuals should not behave in a manner which would lead any reasonable person to question their suitability to work with children or to act as an appropriate role model; make, or encourage others to

make sexual remarks to, or about, a pupil; use inappropriate language to or in the presence of pupils; discuss their personal or sexual relationships with or in the presence of pupils; make, or encourage others to make, unprofessional personal comments which scapegoat, demean or humiliate, or might be interpreted as such. Behaving in an unsuitable way towards children may result in disqualification from childcare under the Childcare Act 2006, prohibition from teaching by the Teaching Regulation Authority, a bar from engaging in regulated activity or action by another relevant regulatory.

- 4.5 Adults participating in educational visits (school trips) must uphold the same standards of conduct as they are expected to uphold when in school. Adults on school trips are in 'loco parentis' (in the place of the parent) and must act to ensure the safety and welfare of children as a reasonable parent would.
- 4.6 When teaching or meeting with pupils or parents online (e.g. remote teaching, online parent evenings), staff must maintain the standards of propriety, behaviour and appearance that would be appropriate for in-person encounters.
- 4.7 A person's dress and appearance are matters of personal choice, self-expression, religious and cultural customs. However, Adults must maintain an appropriate standard of dress and personal appearance at work which promotes a positive, safe, and professional image. Clothing and footwear must be safe and clean and take account of health and safety considerations. Adults must ensure they are dressed in ways which are appropriate to their role and not likely to be viewed as offensive, revealing or sexually provocative and specifically should not distract, cause embarrassment or give rise to misunderstanding, should be religious and culturally sensitive and free of any political or otherwise contentious slogans, and not considered to be discriminatory. Adults who dress or appear in a manner which may be considered inappropriate could render themselves vulnerable to criticism or, where the Adult is an employee, allegations of misconduct that may lead to action under the school's Conduct Policy. Examples of dress and personal presentation that are deemed unacceptable include inappropriate visible tattoos or facial piercings beyond a simple nose piercing, the wearing of flip-flops or other 'casual' attire.
- 4.8 Personal property of a sexually explicit nature or property which might be regarded as promoting radicalisation or otherwise inappropriate such as books, magazines, CDs, DVDs or such material on any electronic media including links to such material must not be brought onto or stored on school premises or on any school equipment.

Adults **must**:

- Inform the school immediately of any allegation of misconduct against them in relation to safeguarding, in or out of the school setting, or any arrest or criminal charge in relation to any offence.
- Conduct themselves in a way that models appropriate behaviours to pupils. This includes conduct on social media and ensuring privacy settings ensure those outside of their social circle do not have access to personal information which may compromise their position as a role model to young people.
- Maintain an appropriate standard of dress and personal appearance at work which promotes a positive and professional image.

Adults **must not**:

- Behave or act, either in or out of the workplace, in a way which would compromise their position within the work setting, or bring the school into disrepute.
- Use inappropriate language or make sexual remarks about or to a pupil, discuss their own personal or sexual relationships, or use language which may demean or humiliate pupils.
- Bring material in any format onto the school premises which may be deemed inappropriate, including that stored on memory devices or mobile phones. It is safest to store personal electronic files separately from work files to avoid pupils accessing personal data or images, ensuring that the data is held securely (i.e password protected).

5 Sexual Contact with Children and Young People and Abuse of Trust

- 5.1 A relationship between an Adult and a child or young person is not a relationship between equals; the Adult has a position of power or influence. There is potential for exploitation and harm of children or vulnerable young people and all Adults have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification. Adults must not use their status or position to form or promote relationships with children (whether current pupils or not), that are of a sexual nature, or which may become so. Adults should maintain appropriate professional boundaries and avoid behaviour which might be misinterpreted by others. They should report, in accordance with paragraph 1.6, any incident with this potential.
- 5.2 Any sexual behaviour or activity by an adult with or towards a child/pupil or young person is illegal. Children and young people are protected by the same laws as adults in relation to non-consensual sexual behaviour. They are additionally protected by specific legal provisions regardless of whether there is consent or not. Where a person aged 18 or over is in a specified position of trust with a child

or young person under 18 years, the Sexual Offences Act 2003 makes it an offence for that person to engage in sexual activity with or in the presence of that child or to cause or incite that child to engage in or watch sexual activity.

- 5.3 Sexual behaviour includes non-contact activities, such as causing a child or young person to engage in or watch sexual activity or the production of indecent images of children. *Working Together to Safeguard Children Appendix A* includes in the definition of sexual abuse "...forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening..."
- 5.4 Adults must not have sexual relationships with pupils or have any form of communication with a child, which could be interpreted as sexually suggestive or provocative i.e. verbal comments, letters, notes, texts, electronic mail, phone calls, social networking contact or physical contact. Adults should not make sexual remarks to, or about, a child or discuss their own sexual relationships with or in the presence of pupils. Adults should take care that their language or conduct does not give rise to comment or speculations. Attitudes, demeanor and language all require care and thought.
- 5.5 There are occasions when Adults embark on a course of behaviour known as 'grooming' where the sole purpose is to gain the trust of a child or young person, and manipulate that relationship so that sexual abuse can take place. Adults should be aware that conferring special attention without good reason or favouring a pupil has the potential to be construed as being part of a 'grooming' process, which is a criminal offence.

Adults **must**:

- Maintain appropriate professional boundaries and avoid behaviour which might be misinterpreted by others. Report any incident with this potential.

Adults **must not**:

- Engage in any sexual relationship or behaviour which is classified as an offence under the Sexual Offences Act 2003.
- Show favour or confer special attention to a pupil, unless part of an agreed approach based on needs, as this may lead to accusations of 'grooming'.

6 Infatuations and Crushes

- 6.1 A child or young person may develop an infatuation with an Adult who works with them. An Adult, who becomes aware (may receive a report, overhear something, or otherwise notice any sign no matter how small or seemingly insignificant) that a pupil has become or may be becoming infatuated with him/herself or a colleague, must report this without delay to the Headteacher or the most senior

manager then in school so that appropriate action can be taken to avoid any hurt, distress or embarrassment. If the Headteacher is the subject of the pupil's infatuation he or she should report the matter to the Chair of Trustees. The situation will be taken seriously and the Adult should be careful to ensure that no encouragement of any kind is given to the pupil. It should also be recognised that careless and insensitive reactions may provoke false accusations. Adults should also report any concerns that another Adult is encouraging or entering into an inappropriate relationship with a young person.

6.2 Examples of situations which must be reported are given below:

- where an Adult is concerned that he or she might be developing a relationship with a pupil which could have the potential to represent an abuse of trust;
- where an Adult is concerned that a pupil is becoming attracted to him or her or that there is a developing attachment or dependency;
- where an Adult is concerned that actions or words have been misunderstood or misconstrued by a pupil such that an abuse of trust might be wrongly suspected by others; and
- where an Adult is concerned about the apparent development of a relationship by another adult or receives information about such a relationship.

Adults must:

- Report immediately to the DSL or Headteacher any sign, however small, that a pupil is developing a crush or infatuation with an Adult, or that an Adult is encouraging or entering into an inappropriate relationship with a young person.

7 Gifts, Rewards, Favouritism and Exclusion

7.1 It is against the law for public servants to take bribes. Adults need to take care that they do not accept any gift that might be construed by others as a bribe, or lead the giver to expect preferential treatment. There are occasions when pupils or parents/carers wish to pass small tokens of appreciation to Adults e.g. at Christmas or as a thank-you and this is acceptable. However, it is unacceptable to receive gifts on a regular basis or of any significant value. If in doubt, employees should check with a member of the senior leadership team before accepting the gift.

7.2 Personal gifts must not be given to pupils or their families/carers. This could be misinterpreted as a gesture either to bribe or groom. It might be perceived that a 'favour' of some kind is expected in

return. Any reward given to a pupil should be consistent with the school's behaviour or rewards policy, recorded, and not based on favouritism.

- 7.3 Care should be taken when selecting children for specific activities, jobs, privileges and when pupils are excluded from an activity in order to avoid perceptions of favouritism or injustice. Methods of selection and exclusion should be subject to clear, fair and agreed criteria.

Adults must:

- Ensure selection of children for activities is based on clear, fair and agreed criteria to avoid accusations of favouritism or injustice.

Adults must not:

- Accept gifts of any significant value or regularity; if in doubt check with a member of SMT.
- Give personal gifts to pupils or their families.

8 Social Contact and Social Networking

- 8.1 Communication between pupils and Adults, by whatever method, should take place within clear and explicit professional boundaries. This includes the wider use of technology such as mobile phones, tablets, text messages, emails, instant messages, websites, social media such as Facebook, X, Instagram, Snapchat, Discord, chat-rooms, forums, blogs, Apps such as WhatsApp, gaming sites, digital cameras, videos, web-cams and other hand-held devices. Adults should not share any personal information with pupils and they should not request, or respond to, any personal information from the child/young person, other than that which might be appropriate as part of their professional role.
- 8.2 Adults are advised that when they are participants in public community groups on social media platform, such as market place and noticeboard groups for the local community, it gives parents and pupils who are also participants an access point to online communication. Communication between pupils and Adults should be clear and purposeful and within professional boundaries. In addition, it is advised that Adults who play online games are confident they know if the other players under 18 and that their conduct is as if they are conducting face to face interactions. Adults should not play online games with a pupil at the school
- 8.3 Adults should ensure that all communications are transparent and avoid any communication that could be interpreted as 'grooming behaviour'. Adults must not give their personal contact details such as home/mobile phone number; home or personal e-mail address or social networking details to pupils. If, for example, a pupil attempts to locate an Adult's personal contact details and attempts to

contact or correspond with him/her, the Adult should not respond and must report the matter to the DSL.

- 8.4 It is recommended that Adults ensure that all possible privacy settings are activated to prevent pupils from making contact on personal profiles and to prevent pupils from accessing photo albums or other personal information which may appear on social networking sites.
- 8.5 It is recommended that Adults ensure that all possible privacy settings are activated to prevent pupils from making contact on personal profiles and to prevent pupils from accessing photo albums or other personal information which may appear on social networking sites.
- 8.6 Adults are personally responsible for what they communicate in social media and must bear in mind that what is published might be read by the school, pupils, parents and carers, the general public, future employers and friends and family for a long time. Adults must ensure that their on-line profiles are consistent with the professional image expected by us and must not post material which damages the reputation of the school or which causes concern about their suitability to work with children and young people. Those who post material which may be considered as inappropriate could render themselves vulnerable to criticism or, in the case of an employee, allegations of misconduct which may be dealt with under the Conduct Policy. Even where it is made clear that the writer's views on such topics do not represent those of the school, such comments are inappropriate.
- 8.7 Adults must obtain permission from the headteacher to set up social media accounts which are used as part of the fulfillment of their responsibility at work or for any school purposes e.g. sports teams, clubs, or subject-related purposes. Only approved social media accounts may be used. The account holder must ensure that the privacy settings are set up to protect all users from allegations of inappropriate conduct. Advice is available from the DSL if Adults are unsure what is and is not appropriate. Social media accounts must be accessible by more than one Adult employed by the school so that all communications are accessible.
- 8.8 Adults are advised not to have any online friendships with any young people under the age of 18, unless they are family members or close family friends. Adults are advised not to have online friendships with parents or carers of pupils, or members of the trust board or school trustees unless they are family members or close family friends. Where such online friendships exist, Adults must ensure that appropriate professional boundaries are maintained.
- 8.9 It is acknowledged that Adults may have friendships and social contact with parents or carers of pupils, independent of any professional relationship. This is particularly true for long-standing members of

staff, those who live locally and those who have or have had, children at the school. It is impractical to expect all Adults to inform the school of any relationship with parents/carers of children at the school which involves social or personal contact but Adults are expected to give the notification required by paragraph 12.4 regarding the possible presence of pupils in their family home. Adults should use their judgement in matters of social contact with parents and carers and inform the school where they believe a personal relationship outside school with a parent/carer of a child at the school may compromise their work or professional relationship, or present a potential conflict of interest. Adults should not use their position at the school to instigate personal relationships with parents/carers or use this contact as an introduction to offer services outside the workplace, such as babysitting or tutoring. If an Adult's services are requested by another means (e.g. through a tutoring agency or personal contact developed independently of the Adult's position in the school), the Adult must inform the school. At all times, Adults should exercise his or her professional judgment and should ensure that all communications are transparent and open to scrutiny.

- 8.10 Some employees may, as part of their professional role, be required to support a parent or carer. If that person comes to depend upon the employee or seeks support outside their professional role this should be discussed with senior management and where necessary referrals made to the appropriate support agency.

Adults **must**:

- Report immediately to either the DSL or Headteacher any attempt by a pupil to initiate communication outside the professional context.
- Ensure that students do not have access online to their personal information, including photographs, by setting privacy controls at an appropriate level.
- Take steps to control their online profile and act in ways that do not bring them or the school in to disrepute.
- Obtain permission to set up school-related social media accounts and take steps to protect users, including the account being accessible by more than one Adult.
- Avoid, if possible, online 'friendships' with parent/carers of pupils or members of the governing board, or take

9 Physical Contact, Personal Privacy and Personal Care

- 9.1 There are occasions when it is entirely appropriate and proper for employees to have physical contact with pupils, but it is crucial that they only do so in ways appropriate to their professional role and in relation to the pupil's individual needs and any agreed care plan. When physical contact is made with pupils this should be in response to their needs at the time, of limited duration and appropriate given their age, stage of development, gender, ethnicity, culture and background. Employees must use their professional judgement at all times. It is not possible to be specific about the appropriateness of each physical contact, since an action that is appropriate with one pupil in one set of circumstances may be inappropriate in another, or with a different pupil.
- 9.2 Physical contact should never be secretive or casual, or for the gratification of the Adult, or represent a misuse of authority. Adults should never touch a pupil in a way which may be considered indecent. If an Adult believes that an action could be misinterpreted, the incident and circumstances should be reported as soon as possible to a senior member of staff and recorded in the school's incident records and, if appropriate, a copy placed on the pupil's file.
- 9.3 Physical contact, which occurs regularly with a pupil or pupils, is likely to raise questions unless the justification for this is part of a formally agreed plan (for example in relation to pupils with special educational needs, medical conditions or physical disabilities). Any such contact should be the subject of an agreed and open school policy and subject to review. Where feasible, staff should seek the pupil's permission before initiating contact. Adults should listen, observe and take note of the pupil's

reaction or feelings and – so far as is possible - use a level of contact which is acceptable to the pupil for the minimum time necessary.

- 9.4 There may be occasions when a distressed pupil needs comfort and reassurance. This may include age-appropriate physical contact. Adults should remain self-aware at all times in order that their contact is not threatening, intrusive or subject to misinterpretation. Adults should always tell a colleague when and how they offered comfort to a distressed pupil.
- 9.5 Where an Adult has a particular concern about the need to provide this type of care and reassurance s/he should seek further advice from a senior manager.
- 9.6 Some employees, for example, those who teach PE and sport, or who provide music tuition will on occasions have to initiate physical contact with pupils in order to support a pupil so they can perform a task safely, to demonstrate the use of a particular piece of equipment/instrument or assist them with an exercise. This should be done with the pupil's agreement. Contact under these circumstances should be for the minimum time necessary to complete the activity and take place in a safe and open environment. Adults should remain sensitive to any discomfort expressed verbally or non-verbally by the pupil.
- 9.7 All parties should clearly understand from the outset what physical contact is necessary and appropriate in undertaking specific activities. Keeping parents/carers informed of the extent and nature of any physical contact may also prevent allegations of misconduct arising. Any incidents of physical contact that cause concern or fall outside these protocols and guidance should be reported to the senior manager and parent/carer.
- ~~9.8 Pupils are entitled to respect and privacy when changing clothes or taking a shower. However, there needs to be an appropriate level of supervision in order to safeguard pupils, satisfy health and safety considerations and ensure that bullying or teasing does not occur. This supervision should be appropriate to the needs and age of the pupils concerned and sensitive to the potential for embarrassment. Adults who are required as part of their role to attend changing rooms should announce their intention of entering any pupil changing rooms and only remain in the room where the pupil/s needs require this.~~
- 9.8 Staff need to feel safe in fulfilling the role of supervision. Pupils need to be safe while having privacy.

Pupils should be confident that adults know what is happening in the room and will enter if necessary, for example in response to a disturbance or bullying.

Gendered changing facilities can be a source of stress for some students and there may be a need for closer supervision when pupils have additional needs or protected characteristics.

Staff keep themselves safe and protect children's dignity by:

- no member staff supervising in isolation
- indicating that they are about to enter a changing room
- not being alone in a changing room with children without good reason
- For example:
 - supervising the collection of an inhaler
 - in response to a disturbance or bullying
- staff avoid entering changing rooms of opposite genders without good reason
- For example: one staff member available and two genders are getting changed.

Children are kept safe and their dignity is protected by:

- supervised entry to changing rooms
- behaviour expectations outlined at start of year and reiterated at regular intervals
- understanding the expectations about behaviour whilst not closely supervised
- staff being outside the door
- not being allowed re-entry to changing room during a lesson
- staff on hand to enter changing rooms if they feel a child's safety is at risk

There should be due consideration to the number of students who are using the changing. There must be appropriate supervision in relation to the cohort size. This may mean a flexibility in uniform expectations during house matches or sports day to reduce the number of students changing.

Employees with a job description which includes intimate care duties will have appropriate training and written guidance including a written care plan for any pupil who could be expected to require intimate care. No other Adult should be involved in intimate care duties except in an emergency. A signed record should be kept of all intimate and personal care tasks undertaken and, where these have been carried out in another room, include times left and returned. Employees should not assist with personal or intimate care tasks which the pupil is able to undertake independently.

Adults must:

- In general, avoid physical contact with pupils.
- Where physical contact is necessary, ensure that a relevant colleague is aware of this contact.
- Where a physical contact may have been misinterpreted by a pupil, report this immediately to a senior member of staff.
- Plan for any regular physical contact with a pupil, ensure it serves a particular purpose and that it is open to review.
- Obtain the pupils' consent for physical contact required as part of the teaching process, ensure it is for the minimum time and in a safe and open environment.

10 Behaviour Management and Physical Intervention

- 10.1 Adults must not use any form of degrading treatment to punish a pupil. Degrading treatment refers to actions or words that are intended to cause humiliation. The use of sarcasm and comments said to pupils to intentionally demean is not acceptable in any situation and should not be used as a means of control or power. Sarcasm is a form of verbal irony used to convey the opposite of what is actually spoken, especially to criticize or insult someone, show irritation, or be funny. It is a way of using words that are the opposite of what you mean in order to be unpleasant to somebody or to make fun of them. Derogatory language towards a pupil should not be used, no matter how 'mild' or commonly in use this language is (for example, calling a child an 'idiot' or 'moron'). Deliberately intimidating pupils or staff by shouting, hectoring or an overbearing physical presence is not acceptable in any situation. Hectoring is to talk and behave toward someone in a loud and unpleasantly forceful way, especially in order to get them to act or think as you want. All pupils and staff have a right to be treated politely and with consideration. Disrespect towards staff is also likely to lead to sanctions.
- 10.2 Physical intervention can only be justified in exceptional circumstances. Non-statutory guidance is available from the Department of Education website. See *Use of reasonable force - advice for headteachers, staff and governing bodies*. Adults may legitimately intervene to prevent a pupil from committing a criminal offence, injuring themselves or others, causing damage to property, engaging in behaviour prejudicial to good order and to maintain good order and discipline. Adults should have regard to the health and safety of themselves and others. It is always unlawful to use force as a punishment. The use of unwarranted physical force is likely to constitute a criminal offence. If in doubt, or if you are concerned for your own safety, do not physically intervene. Where this is necessary, use the minimum possible level of intervention and force. Blocking doors/exits should be avoided to avoid escalating situations.
- 10.3 Where a pupil has specific needs in respect of particularly challenging behaviour, a positive handling plan, including a risk assessment, should be put in place and agreed by all parties. Where it is judged that a pupil's behaviour presents a serious risk to themselves or others, a robust risk assessment that is regularly reviewed and a physical intervention plan, where relevant, must be put in place and agreed by the pupil, parents and carers. All incidents and subsequent actions should be recorded and reported to a manager and the pupil's parents/carers. Parental consent does not permit the use of unlawful physical intervention or deprive a pupil of their liberty. The School has separate policies on Behaviour with which all employees should be familiar.

Adults **must**:

- Always treat students with respect and dignity

Adults **must not**:

- Use sarcasm, make demeaning or insensitive comments or shout aggressively at students
- Use physical intervention unless absolutely necessary
- Block doors or exits to students as this can escalate situations, unless the circumstance is exceptional.

11 First Aid and Medication

11.1 The school has a separate policy on supporting pupils with a medical condition. Employees should have regard to the DfE's statutory guidance *Supporting pupils at school with medical conditions* issued in December 2015, as amended from time to time which includes advice on managing medicines. Employees must have had the appropriate training and achieved the necessary level of competency before administering first aid or medication, or taking on responsibility to support pupils with medical conditions. If an Adult is concerned or uncertain about the amount or type of medication being given to a pupil this should be discussed with the Designated Safeguarding Lead. Details of students with medical conditions is available from the IHP Co-ordinator.

11.2 Adults taking medication that may affect their ability to care for children should seek medical advice regarding their suitability to do so and should not work with pupils whilst taking medication unless medical advice confirms that they are able to do so. Adult medication on the premises must be securely stored out of the reach of children.

Adults **must**:

- Only administer First Aid or medication if they are a qualified and designated Adult
- Inform the Headteacher if medication you are taking may affect your ability to care for children
- Store personal medication securely and out of reach of children.
- Be mindful of the processes in place when handing back medication when on trips and visits.

12 One to One Situations and Meetings with Pupils

- 12.1 One to one situations have the potential to make children/young persons more vulnerable to harm by those who seek to exploit their position of trust. Adults working in one to one settings with pupils may also be more vulnerable to unjust or unfounded allegations being made against them. Adults must recognise this possibility and plan and conduct such meetings accordingly. Every attempt should be made to ensure that the safety and security needs of both Adults and pupils are met. Managers should undertake a risk assessment in relation to the specific nature and implications of one to one work for each Adult and pupil, which should be reviewed regularly. Where such a meeting is demonstrably unavoidable it is advisable to avoid remote or secluded areas and to ensure that the door of the room is left open and/or visual/auditory contact with others is maintained. Any arrangements should be reviewed on a regular basis.
- 12.2 When addressing a child's inappropriate conduct or in a situation where conflict may occur, do so in the presence of others, preferably adults. When removing a pupil from an audience of their peers in order to address their behaviour, do not take the student to an isolated place as this makes the Adult more vulnerable to an allegation against them.
- 12.3 Online one-to-one meetings between an Adult and a child should be generally avoided. Where these are permitted, it is with the agreement of a senior manager. Any such meetings will require a risk assessment and mitigations which are sufficient to protect both parties. The arrangements for regular one-to-one tutorials (such as music tuition) are agreed and apply across all sessions and do not require individual approval. Online one-to-one meetings should be thought of as equivalent to meeting in a room with no windows and behind a locked door. Without safeguards, such meetings place both parties at risk.
- 12.4 Pre-arranged meetings with pupils away from the premises or on the School site, when the School is not in session, are not permitted unless written approval is obtained from their parent/carer and the Headteacher or other senior colleague with delegated authority.

- 12.5 Adults must ensure a senior leader at the school knows of circumstances whereby students may be present in their family home e.g. where they are related to children at the school, where their own children are friends with children at the school or where they are friends with adults who have children at the school. Adults are advised to be mindful of circumstances whereby they are in close contact with children at the school other than their own and ensure appropriate safeguards are in place.
- 12.6 There are occasions during exam periods when timetables clash and arrangements needs to be made to preserve the integrity of the examination process and in these circumstances exam boards may allow candidates to take an exam the following morning, including Saturdays. The examination board requires the centre to determine a method of supervision on journeys to and from the centre and overnight, which ensures the candidate's wellbeing. This supervision may be undertaken by a parent/carer or, employees may be asked to volunteer to supervise pupils, which may with prior approval be in their own home.
- 12.7 Other than in an emergency, an Adult must not enter a pupil's home if the parent/carer is absent. Always make detailed records including times of arrival and departure and ensure any behaviour or situation that gives rise to concern is discussed with a senior manager/Headteacher. A risk assessment should be undertaken and appropriate risk management measures put in place prior to any planned home visit taking place. In the unlikely event that little or no information is available, home visits should not be made alone.

Adults **must**:

- If meeting one-to-one with a pupil, avoid remote or secluded areas, leave a door open or be within visual/auditory reach of others.
- Notify the Headteacher through their line manager if pupil/s at the school are relatives or close family friends who will, on occasion, enter your home.

Adults **must not**:

- Arrange to meet with pupils away from the school or outside of normal school hours without the permission of the headteacher or without good reason (such as a sporting fixture).
- Meet with pupils one-to-one online without agreement of a senior manager and without a risk assessment agreed.
- Enter a pupil's home if a parent/carer is not present except in an emergency. Ensure all home visits are reported and with a risk assessment authorised by the Headteacher.

13 Transporting Pupils

- 13.1 In certain situations e.g. out of school activities, Adults may agree to transport pupils. Transport arrangements should be made in advance by a designated employee who will be responsible for planning and overseeing all transport arrangements, obtaining parental/carers consent and responding to any concerns that may arise.
- 13.2 Wherever possible and practicable transport should be provided other than in private vehicles, with at least one Adult additional to the driver acting as an escort. However, there may be exceptions to these restrictions, for example where very small numbers of students require transport. In such circumstances, the designated employee must assure themselves that there is justification for the transport arrangements made, that appropriate safeguards are in place, and prior approval has been given by the EVC (Educational Visits Co-ordinator) or line manager, as appropriate. Considerations may include the age, gender and/or nature of the students and the status and authority of the Adult (e.g. employed, volunteer or parent). One-to-one situations must be avoided.
- 13.3 Adults should ensure that their behaviour is safe and that the transport arrangements and the vehicle meet all legal requirements. If using their own vehicle, they must ensure that the “Transport by private Vehicle Policy” is followed, that the vehicle is roadworthy and appropriately insured and that the maximum capacity is not exceeded. It is a legal requirement that all passengers wear seatbelts and the driver should ensure that they do so. The driver should be aware of the current legislation concerning the use of car seats for younger children where applicable. It is illegal to drive using hand-held phones or similar devices and the driver must ensure that they adhere to all driving regulations.
- 13.4 It is inappropriate for Adults to offer lifts to a pupil, unless the need has been agreed with a manager and, if this falls outside their normal working duties, has been agreed with parents/carers.
- 13.5 There may be occasions where a pupil requires transport in an emergency situation or where not to give a lift may place a pupil at risk. Such circumstances must always be recorded and reported to a senior manager and parents/carers.

Adults **must**:

- Avoid the use of private vehicles to transport pupils wherever possible. Where this occurs, an Adult additional to the driver should normally be present.
- Ensure that vehicles meet all the legal requirements and are roadworthy. Drive safely and adhere to the relevant laws and Highway Code.
- Students must only be transported in a private vehicle with parents’ permission and the permission and appropriate documentation approved by the Headteacher or their Deputy, except in an emergency.
- Avoid transporting students in one-to-one situations, unless where not doing so may place a pupil at risk (see 13.5).

14 Curriculum

- 14.1 Some areas of the curriculum can include or raise subject matter which is sexually explicit, of a political, cultural, religious or an otherwise sensitive nature. Care should be taken to ensure that resource materials cannot be misinterpreted and clearly relate to the learning outcomes identified by the lesson plan. This plan should highlight particular areas of risk and sensitivity.
- 14.2 Parents have the right to withdraw their child from some or all sex education lessons. Adults delivering the curriculum must ensure that arrangements are made for pupils to be withdrawn from specific PSHE lessons, as requested and authorised. Given parents' rights to withdraw children from sex education, it is important that the teaching of or discussion about sex is limited to carefully planned and delivered lessons. Adults should not shut down legitimate questions that pupils may ask outside of designated lessons, but should be sensitive to and aware of the risks of responding to such questions.
- 15.2 The curriculum can sometimes include or lead to unplanned discussion about subject matter of a sexually explicit, political, cultural, religious or otherwise sensitive nature. Responding to pupils' questions can require careful judgement and Adults must take guidance in these circumstances from the Designated Safeguarding Lead before teaching areas of the curriculum which are potentially sensitive. Adults must not enter into or encourage inappropriate discussion about sexual, political or religious activity or behaviour or, discussions which may offend or harm others. Adults should take care to protect children from the risk of radicalisation and should act in accordance with advice given under Part 1 of the DfE's statutory guidance *Keeping Children Safe in Education*. Adults should promote the school's Values and Vision, and must not express any views prejudicial to the school's Values and Vision or attempt to influence or impose personal values, attitudes or beliefs on pupils.
- 15.3 Please refer to the School's policy on sex and relationships education (SRE).

Adults **must**:

- Plan carefully the teaching of content which is sexually explicit, of a political, cultural, religious or an otherwise sensitive nature to avoid potential misinterpretation, sensitivity or risk.
- Exercise due caution when responding to pupils' questions or allowing discussion to deviate from the planned content.

Adults **must not**:

- Express any prejudicial views or attempt to influence or impose your personal values, attitudes or beliefs on pupils.

16 Photography, Videos and other Creative Arts

- 16.1 Please refer to the School's E-safety Policy, the use of images and the consent forms therein. Adults should have regard to the Information Commissioner's Office CCTV code of practice.
- 16.2 Many educational activities involve the taking or recording of images. This may be undertaken as part of the curriculum, extra school activities, for displays, publicity, to celebrate achievement or, to provide evidence of the activity. The Data Protection Act 2008 (DPA) affects the use of photography. An image of a child is personal data and it is, therefore, a requirement under the DPA that consent is obtained from the parent/carer of a child, or the child themselves, where they are of an appropriate age, before any images are made such as those used for school web sites, notice boards, productions or other purposes.
- 16.3 Adults need to be aware of the potential for such images to be taken and/or misused to create indecent images of children and/or for 'grooming' purposes. Careful consideration should be given as to how these activities are organised and undertaken. There should be an agreement as to whether the images will be destroyed or retained for further use, where these will be stored and who will have access to them.
- 16.4 Adults should remain sensitive to any pupil who appears uncomfortable and should recognise the potential for misinterpretation. It is also important to take into account the wishes of the child, remembering that some children do not wish to have their photograph taken.
- 16.5 Adults should only use equipment provided or authorised by the School to make/take images and should not use personal equipment, mobile telephones or any other similar devices to make/take images.
- 16.6 The following guidance should be followed:
- if a photograph is used, do not use the pupil's surname and year group;
 - if the pupils' full name is given, do not use the photograph;
 - photographs/images must be securely stored and used only by those authorised to do so and for the purpose for which they were taken;

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- be clear about the purpose of the activity and about what will happen to the photographs/images when the lesson/activity is concluded;
- only retain images when there is a clear and agreed purpose for doing so;
- ensure that a senior member of staff is aware that the photography/image equipment is being used and for what purpose;
- ensure that all photographs/images are available for scrutiny in order to screen for acceptability;
- be able to justify the photographs/images made;
- do not take images of pupils for personal use;
- only take images where the pupil consents to this;
- do not take photographs in one to one situations;
- do not display or distribute photographs/images of pupils unless there is consent to do so from the parent/carer;
- only publish images of pupils where they and their parent/carer have given consent to do so;
- do not take images of pupils in a state of undress or semi-undress;
- do not take images of pupils which could be considered as indecent or sexual;
- store images securely and in accordance with data protection legislation.

Adults **must**:

- Be aware of the potential of images of pupils to be taken and/or misused to create indecent images of children and/or for 'grooming' purposes.
- Ensure pupils are comfortable having their photographs taken and with how the image/s will be distributed and used.
- Only use images for the intended purpose and store images only for as long as necessary.
- Only take photographs of pupils with good reason, with consent, in the knowledge of others and that are appropriate.

Adults **must not**:

- Use personal equipment (e.g. mobile phones) to take or store images of pupils.
- Distribute photographs with pupils' full names attached.

17. Unacceptable Use of ICT Facilities and Monitoring

17.1 This section should be read in conjunction with the ICT Acceptable Use Policy. Posting, creating, accessing, transmitting, downloading, uploading or storing any of the following material (unless it is part of an authorised investigation) is likely to amount to gross misconduct and result (where the Adult is employed) in summary dismissal, criminal investigation and barring from working with children. This list is not exhaustive:

- a) Pseudo-images of children (child abuse images), pornographic or sexually suggestive material or images of children or Adults which may be construed as such in the circumstances (that is, writing, texting, pictures, films and video clips of a sexually explicit or arousing nature).
- b) Any other type of offensive, obscene or discriminatory material, criminal material or material which is liable to cause distress or embarrassment to the Academy or others.

17.2 If indecent images of children are discovered at the premises or on the School's equipment/devices an immediate referral should be made to the School Designated Safeguarding Lead and Headteacher (unless he or she is implicated) and the external Designated Officer (LADO) and if relevant, the police contacted. The images/equipment should be secured, should not be used by others and should be isolated from the network. There should be no attempt to view, tamper with or delete the images as this could jeopardise any necessary criminal investigation. The back-up files should be secured. If the images are of children are known to the School, a referral should also be made to children's social care in accordance with local arrangements.

17.3 The contents of the school's ICT resources and communications systems are school property. Therefore, Adults should have no expectation of privacy in any message, files, data, document, facsimile, telephone conversation, social media post, conversation or message, or any other kind of information or communications transmitted to, received or printed from, or stored or recorded on our electronic information and communications systems.

17.4 The school reserves the right to monitor, intercept and review, without prior notification or authorisation from Adults ICT resources and communications systems. Usage of the school's IT resources and communications systems, including but not limited to telephone, e-mail, messaging, voicemail, CCTV, internet and social media postings and activities is monitored to ensure that the school's rules are being complied with and for the following purposes:

- a) to monitor whether the use of the e-mail system or the internet is legitimate and in accordance with this Code;
- b) to assist in the investigation of alleged wrongful acts; or

c) to comply with any legal obligation.

17.5 Adults consent to monitoring by acknowledgement of this Code and the use of our resources and systems. The school may store copies of data or communications for a period of time after they are created and may delete such copies from time to time without notice. If necessary information may be handed to the police in connection with a criminal investigation.

17.6 A CCTV system monitors the school 24 hours a day. This data is recorded and may be used as evidence of any alleged wrongdoing.

17.7 Cyber-bullying can be experienced by Adults as well as pupils. Adults should notify the Headteacher if they are subject to cyber-bullying. The School will endeavour to protect Adults and stop any inappropriate conduct.

Adults **must not**:

- Use the school's ICT facilities for any purpose in relation to sexually explicit images or information, offensive, obscene, discriminatory or criminal material.
- Expect privacy over any information or communications on the school's electronic and communications systems, including files, data, documents, telephone conversations, social media posts, conversations or messages.

18 Rep

18.1 All Adults must report concerns and incidents in accordance with the guidance set out in the DfE's statutory guidance *Keeping Children Safe in Education*, the school's Safeguarding Policy and the school's Managing Allegations of Abuse Against Staff Policy. In the event of an allegation being made, or incident being witnessed, the relevant information should be immediately recorded and reported to the Headteacher, Senior Manager or Designated Safeguarding Lead as appropriate. Where the allegation is against the Headteacher, the Chair of Trustees must be informed. An employee who fails to bring a matter of concern to the attention of senior management and/or the relevant agencies will be subject to disciplinary action.

18.2 In addition to behaviours outlined elsewhere in this Code and the types of abuse and neglect set out in the DfE's statutory guidance *Keeping Children Safe in Education*, the following is a non-exhaustive list of some further behaviours which would be a cause for concern:

An Adult who:

- Allows a pupil/young person to be treated badly; and pretends not to know it is happening;
- Gossips/shares information inappropriately;

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- Demonstrates inappropriate discriminatory behaviour and/or uses inappropriate language;
- Demonstrates a lack of understanding about personal and professional boundaries;
- Uses his/her position of trust to intimidate, threaten, coerce or undermine;
- Appears to have an inappropriate social relationship with a pupil or pupils;
- Seems to seek out unnecessary opportunities to be alone with a pupil.

Adults **must**:

- Report all concerns and incidents in relation to safeguarding children to the Headteacher, a senior manager or the DSL immediately.
- Report any behaviour by another Adult which is in breach of this Code of Conduct, any school policy, any relevant statutory guidance or legislation to the Headteacher.

19 Monitoring and Review

- 19.1 The Headteacher is responsible for monitoring the implementation, use and effectiveness of this Code of Conduct.
- 19.2 This policy will be reviewed by Trustees alongside the Conduct Policy or as required due to changes to legislation, statutory or non-statutory guidance or recommendations made by the Headteacher to address conduct matters in the school.