ST GREGORY'S CATHOLIC PRIMARY SCHOOL

CODE OF CONDUCT FOR STAFF AND OTHER ADULTS

At the time of publishing the following roles were held:	
Executive Head teacher	**Sheryl Sack**
Head of School	**Antonella Fulton**
Designated Safeguarding Lead:	**Lucie Thornthwaite**
Allegations/low-level concerns against staff and other adults must be reported to:	**Sheryl Slack or Lucie Thornthwaite**
Allegations/low-level concerns against Head teacher must be reported to:	**Joy Byrne**

Approved by[2]			
Name:	Joy Byrne		
Position:	Chair of Governors		
Signed:	J Byrne		
Date:		**Version Number**	**17**
Review date[3]**:**	September 2027		

KAHSC v17 – September 2026

[1]Low level concerns can be reported to the DSL rather than the Head teacher if desired but where this is the case, the DSL must inform the Head teacher as soon as practically possible of any concerns raised.
[2]This Code of Conduct requires approval from the Governing body to determine the review period

REVIEW SHEET

Each entry in this table summarises the changes to these procedures made since the last review (if any).

Version Number	KAHSC Version Description	Date of Revision/Review
1	Original	Jan 2016
2	Updated to include changes in terminology as a result of revised 'Keeping Children Safe in Education' September 2016	Aug 2016
3	Revised to include section on staff and other adults use of Mobile Phones in school	March 2017
4	Revised to reflect recent updated guidance & legislation including Data protection Act/GDPR 2018 and The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendments) Regulations 2018)	Sept 2018
5	Revised to take into consideration changes made in Safer Recruitment Consortium document 'Guidance for safer working practice for those working with children and young people in education settings' issued May 2019.	May 2019
6	Updated to take account of Keeping Children Safe in Education 2019 and local suggestions.	Sept 2019
7	Reviewed in light of Keeping Children Safe in Education 2020 – minor addition	Sept 2020
8	Revised in line with 'Keeping Children Safe in Education' 2021 and included statement to take into account future pandemic situations	Sept 2021
9	Added model low-level concern record form	Oct 2021
10	Revised in accordance with Safer Recruitment Consortium document 'Guidance for safer working practice for those working with children and young people in education settings' revised February 2022.	April 2022
11	Updated to reflect changes in KCSiE 22 and to remove appendices and replace with links to supporting documents.	Sept 2022
12	Minor changes to content, links to KAHub and other external websites. Minor changes in relation to KCSiE 2023	Sept 2023
	Reviewed (minor formatting changes only)	Sept 2024
13	Updated to include information on changes to employment law in relation to sexual harassment and harassment at work introduced by the EHRC and Equality Act and other minor changes.	Nov 2024
14	Minor update to include change of name from Westmorland Safeguarding Hub to Westmorland and Furness Multi-agency Children's Hub (MACH)	April 2025
15	Minor changes to update links to local Safeguarding Children Partnerships and change of Cumberland Safeguarding Hub name.	Sept 2025
16	Minor changes to links, inclusion of information on the expression of extremist views. Addition of section on staff with children or other close relatives enrolled in school (section 11). Updated terminology in relation to restrictive interventions, including the use of reasonable force.	March 2026
17	Based on KAHSC v17 – Updated to take account of KCSiE 2026.Revised to take account of KCSiE 2026, the EYFS statutory framework for group and school based providers (from 09/26) and other minor amendments to formatting, paragraphs and links.	Sept 2026

The information provided in this Code of Conduct is taken and adapted from 'Guidance for safer working practice for those working with children and young people in education settings' Safer Recruitment Consortium (February 2022)

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KAHSC Managing low-level concerns raised in relation to teachers (including supply teachers), other staff, volunteers and contractors (flowchart)
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1. Definitions

References made to 'child' and 'children' refer to children and young people under the age of 18 years. However, the principles of this Code of Conduct apply to professional behaviours towards all pupils, including those over the age of 18 years. 'Child' should therefore be read to mean **any pupil** at the setting.

References made to employees, adults and staff refer to **all** those who work with pupils in this setting, in either a paid or unpaid capacity. This will also include, for example, volunteers and those who are not directly employed by the school e.g. Local Authority staff, sports coaches, independent supply staff and agency staff.

Wherever the term 'parent' is used, this includes any person with parental authority of the child concerned e.g. carers, legal guardians etc.

The term 'allegation' means where it is alleged that a person who works with children has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

These are collectively known as the 'harm thresholds'.

2. Objective and scope

It is a requirement of the DfE Statutory Guidance 'Keeping Children Safe in Education' (KCSiE) that schools have a Code of Conduct or staff Behaviour Policy. This Code of Conduct (which aligns closely with our Child Protection and Behaviour Policies and procedures) is designed to give clear guidance on the standards of behaviour all employees and other adults working with children in our school are expected to observe. School employees are role models and are in a unique position of influence and must adhere to behaviour that sets a good example to all the pupils within the school. As a member of a school community, each employee has an individual responsibility to maintain both their reputation and the reputation of the school, whether inside or outside working hours. The Code of Conduct will also assist staff to monitor their own standards and practice and reduce the risk of allegations being made against them.

It is recognised that not all people who work with children at this school are paid or contracted employees. The principles and guidance outlined in this document still apply and should be followed by any person whose work brings them into contact with children, including supply staff, volunteers and contractors. This Code of Conduct does not form part of any employee's contract of employment.

In addition to this Code of Conduct, all employees engaged to work under Teachers' Terms and Conditions of Employment have a statutory obligation to adhere to the 'Teachers' Standards' and in relation to this Code of Conduct, Part 2 of the Teachers' Standards - Personal and Professional Conduct.

All staff and regular volunteers have a responsibility to be aware of systems and practices in the school which support safeguarding and these are explained to them as part of their induction and in regular staff training/briefing sessions.

It is critical to create a culture in which all concerns about adults (including low-level concerns that do not meet the harm threshold) are shared responsibly and with the right person, recorded and dealt with appropriately. This is designed to encourage an open and transparent culture; allows us to identify inappropriate, problematic or concerning behaviour early and minimise the risk of abuse. A culture of vigilance will help to ensure that adults working in or on behalf of the school are clear about professional boundaries and act in accordance with the ethos and values of our school.

Any behaviours that fall short of the guiding principles outlined in this Code of Conduct must be shared responsibly and with the right person. All concerns that do not meet the harm threshold will be recorded and dealt with appropriately as a low-level concern as outlined in section 34. below.

It is recognised that the vast majority of adults who work with children act professionally and aim to provide a safe and supporting environment which secures the well-being and very best outcomes for

children in their care. Achieving these aims is not always straightforward, as much relies on child and staff interactions where tensions and misunderstandings can occur. This Code of Conduct aims to reduce this risk.

Unacceptable behaviour by adults in this school will not be tolerated and, where appropriate, legal or disciplinary action is likely to follow such behaviour. Once adopted, this Code of Conduct may be referred to in any disciplinary proceedings following unacceptable actions by staff or other adults.

3. Underpinning principles

- The welfare of the child is paramount.
- Staff must understand their responsibilities to safeguard and promote the welfare of pupils.
- Staff are responsible for their own actions and behaviour both within and outside the school and should avoid any conduct which would lead any reasonable person to question their motivation and intentions.
- Staff should work, and be seen to work, in an open and transparent way including self-reporting if their conduct or behaviour falls short of the principles outlined in this Code of Conduct.
- Staff should acknowledge that deliberately invented/malicious allegations are extremely rare and that **all** concerns should be reported and recorded.
- Staff should report to the Head teacher/DSL if they have low-level concerns or 'niggles' about the behaviour any member of staff, supply/agency staff, volunteer or contractor.
- Staff should discuss and/or take advice promptly from the Ex. Head, Head of School or DSL if they have acted in a way which may give rise to concern from others.
- Staff are encouraged to discuss with the Head teacher or other senior manager situations where their relationships and associations both within and outside of the workplace (including online) may have implications for the safeguarding of children in school.
- Staff must apply the same professional standards regardless of culture, disability, gender, language, racial origin, religious belief or sexual orientation.
- Staff must not consume or be under the influence of alcohol or any substance, including prescribed medication, which may affect their ability to care for children[1].
- Staff should be aware that breaches of the law and other professional guidelines may result in disciplinary action being taken against them, criminal action and/or other proceedings including barring by the Disclosure and Barring Service (DBS) from working in regulated activity or, in the case of teachers, for acts of serious misconduct, prohibition from teaching by the Teaching Regulation Agency (TRA).
- Staff and managers will continually monitor and review practice to ensure this guidance is followed.
- Staff must be aware of and understand the school's Child Protection Policy and procedures which includes child on child abuse, Child on child abuse Policy and procedures, Online Safety Policy and procedures, arrangements for managing allegations against staff, how to report low level concerns (Section 34 below), Whistleblowing procedure and how to access the Cumberland Safeguarding Children Partnership (CSCP) procedures

4. Setting an example

- All individuals who work or volunteer in school set examples of behaviour and conduct which can be copied by pupils. Staff must therefore, for example, always avoid using inappropriate, derogatory or offensive language.
- All staff must demonstrate high standards of conduct to encourage our pupils to do the same.
- All staff must avoid putting themselves at risk of allegations of abusive or unprofessional conduct.

[1] There may be specific events where alcohol may be consumed, but only where authorised or permitted by the Head teacher or Governors.

- This Code helps all staff and others to understand what behaviour is and is not acceptable; regard should also be given to the disciplinary rules set out in the School's Disciplinary Policy and Procedure.
- All staff are expected to familiarise themselves and comply with all school Policies and procedures.

5. Responsibilities

Staff and other adults are accountable for the way in which they exercise authority, manage risk, use resources and safeguard children.

All staff and other adults have a responsibility to keep pupils safe and protect them from abuse (sexual, physical and emotional), neglect and exploitation. Pupils have a right to be safe and to be treated with respect and dignity. It follows that trusted adults are expected to take reasonable steps to ensure their safety and wellbeing. Failure to do so may be regarded as professional misconduct.

The safeguarding culture of a school is, in part, exercised through the development of respectful, caring and professional relationships between adults and pupils and behaviour by the adult that demonstrates integrity, maturity and good judgement.

The public, local authorities, employers and parents will have expectations about the nature of professional involvement in the lives of children. When individuals accept a role (paid or unpaid) working in an education setting, they should understand and acknowledge the responsibilities and trust involved in that role.

Employers have duties towards their employees and others under Health, Safety and Welfare legislation which requires them to take steps to provide a safe working environment for both staff and others. Policies and procedures which include reference to these legal duties include:

- Health and Safety
- Child Protection
- Data Protection
- Online Safety (including IT acceptable use agreements)
- Allergy Safety
- Artificial Intelligence
- Anti-fraud, bribery and corruption
- Behaviour
- Domestic Abuse
- Equality Policy
- Various HR policies

There is a legal duty on employees to take care of themselves and anyone else who may be affected by their actions or failings. An employer's health and safety duties and the adults' responsibilities towards children should not conflict. Safe practice can be demonstrated through the use and implementation of this Code of Conduct.

The following responsibilities apply in our School.

5.1 Governing Body/Managers/Trustees **The Governing Body will:**

- ensure that appropriate safeguarding and child protection policies and procedures are developed, distributed, adopted, implemented and monitored;
- ensure that where, in exceptional circumstances, the DSL or Deputy DSL are not available in person during school hours, that person is contactable by email or a senior member of staff is identified to lead on safeguarding issues;
- promote a culture of openness, trust, transparency and support;
- ensure that systems are in place for safeguarding concerns (however minor) to be raised, by empowering staff to share those concerns at the earliest opportunity;
- take steps to ensure that procedures are in place to protect staff and others from unacceptable bullying, abuse, harassment and victimisation in the workplace paying specific attention to the guidance issued by the DfE '[Preventing and tackling the bullying and harassment of school staff]'.

5.2 Head of School/DSL

The Head of School/DSL will:

- ensure that all staff (at induction), supply/agency staff, volunteers and contractors, are made aware of this Code of Conduct and understand their role in promoting the welfare of children and keeping them safe. Any updates to the Code of Conduct will be discussed with staff and other adults (where relevant) as and when they occur;
- ensure that all adults are aware of expectations, and other related Policies and procedures;
- ensure that staff are aware of the mechanisms in place for reporting both allegations and low-level concerns to ensure there are no barriers to speaking up about concerns they may have;
- ensure that staff and other adults are aware that all low-level concerns and any follow-up actions are recorded in writing;
- ensure that they have an 'open door' culture in school where staff feel confident to speak out about concerns they may have about another adult's behaviour or conduct including where staff and others are experiencing bullying, abuse, harassment, unwanted, unwelcome or uninvited conduct (on or off-line) by a pupil or other adult in the school community;
- provide a responsible, sensitive and proportionate handling of low-level concerns when they are raised;
- consult with the Local Authority Designated Officer (LADO) if there is any doubt as to whether the information which has been shared about an adult as a low-level concern in fact meets the harm threshold;
- ensure that staff and other adults are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from inappropriate, problematic or concerning behaviour in themselves and others;
- create an environment where staff are encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards;
- address unprofessional behaviour and support the individual to correct it at an early stage;
- notify employers of supply/agency staff and contractors of any concerns which are shared, so that any potential patterns of inappropriate behaviour can be identified quickly;
- ensure that adults are not placed in situations which render them particularly vulnerable;

5.3 Staff and other adults (supply staff, volunteers and contractors)

Staff and other adults are expected to:

- read and understand their role as outlined in this Code of Conduct, the Child Protection Policy and procedures and other school safeguarding Policies;
- understand the responsibilities which are part of their employment or role, and be aware that sanctions will be applied if these provisions are breached;
- treat all adults and others with dignity, kindness and respect. Bullying, abuse, harassment and victimisation of any description (including unwanted, unwelcome or uninvited conduct against any member of the school community will not be tolerated. Where an individual becomes aware of any incident that either themselves, a colleague (paid or unpaid) or parent/carer might be experiencing, this must be reported to the Ex. Head, Head of School, DSL or other senior manager as soon as possible so that appropriate action can be taken.
- report any concerns, including low-level concerns, about a pupil or other adult to the Head of School or DSL or other senior manager, at the earliest opportunity. In situations where the staff member believes there may be a conflict of interest in reporting the concern to the Head teacher, the issue must be reported to the Chair of Governors. Concerns about the Head teacher must be referred to the Chair of the Governors in the first instance;
- always act, and be seen to act, in the child's best interests;
- avoid any conduct which would lead any reasonable person to question their motivation and intentions;

- ensure that any relationships and associations both within and outside of the workplace (including online) do not have implications for the safeguarding of children in school;
- take reasonable care of pupils under their supervision with the aim of ensuring, as far as is reasonable, their health, safety and welfare;
- take responsibility for their own actions and behaviour.

6. Making professional judgements

This Code of Conduct does not provide an exhaustive list of what is, or is not, appropriate behaviour for staff. It does, however, highlight behaviour which is illegal, inappropriate or inadvisable. There will be rare occasions and circumstances in which staff have to make decisions or act in the best interest of a pupil which could contravene this Code of Conduct or where no specific guidance exists. Individuals are expected to make judgements about their behaviour to secure the best interests and welfare of the pupils in their charge and, in so doing, will be seen to be acting reasonably. These judgements must be recorded and shared with a manager at the earliest opportunity.

Adults should always consider whether their actions are warranted, proportionate, safe and applied equitably.

Where no specific guidance exists, staff and other adults are expected to:

- **discuss the circumstances that informed their action, or their proposed action, with their line manager or, where appropriate, the Ex. Head, Head of School or DSL. This will help to ensure that the safest practices are employed and reduce the risk of actions being misinterpreted;**
- **always discuss any misunderstanding, accidents or threats with the Ex. Head, Head of School or DSL;**
- **always record discussions and rationale for actions taken;**
- **record any areas of disagreement and, if necessary, refer to another agency/LA/Ofsted/TRA/other regulatory body.**

7. Power and positions of trust and authority

All those working with children in our school are in a 'position of trust' in relation to all pupils on the roll.

The relationship between a person working with a child or children is one in which the adult has a position of power or influence. It is vital for adults to understand this power; that the relationship cannot be one between equals and the responsibility they must exercise as a consequence.

The potential for exploitation and harm of vulnerable pupils means that adults have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.

Staff should always maintain appropriate professional boundaries, avoid behaviour which could be misinterpreted by others and report any such incident to a senior manager. This is as relevant in the online world as it is in the classroom; staff engaging with pupils and/or parents online have a responsibility to model safe practice at all times.

Staff and other adults in this school must not:

- **use their position to gain access to information for their own advantage and/or a pupil's or family's detriment;**
- **use their power to intimidate, threaten, coerce or undermine pupils or others;**
- **use their status and standing to form or promote relationships with pupils which are of a sexual nature, or which may become so.**

8. Confidentiality

The storing and processing of personal information is governed by the Data Protection Act 2018 and the UK General Data Protection Regulations (UK GDPR). The Governors have a Data Protection Policy which contains details on confidentiality.

Staff who have access to special category information about pupils and their families must keep this confidential at all times and only share this when legally permissible to do so and in the best interest of the child. Records should only be shared with those who have a legitimate professional need to see them.

Staff must never use confidential or personal information about a colleague or other adult in school, pupil or their family for their own, or others' advantage (including that of partners, friends, relatives or other organisations). Information must never be used to intimidate, humiliate, or embarrass the child or another adult. Confidential information must never be used casually in conversation or shared with any person other than on a need to know basis. In circumstances where the pupil's identity does not need to be disclosed, the information will be used anonymously.

We will ensure that all staff who need to share 'special category personal data' are aware that the Data Protection Act 2018 and UK GDPR contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent, if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent or if to gain consent would place a child at risk of harm.

There are some circumstances in which a member of staff may be expected to share information about a pupil, for example when abuse is alleged or suspected. In such cases, individuals have a responsibility to pass information on without delay to the DSL.

If a child (or their parent) makes a disclosure regarding abuse, neglect or exploitation, the member of staff must always take any such concerns seriously and follow the school's child protection procedures. The adult must not promise confidentiality to a child or parent but should give reassurance that the information will be treated sensitively.

If a member of staff is in any doubt about whether to share information or keep it confidential, he/she should seek guidance from the DSL. Any media or legal enquiries will be passed to the Head teacher.

Staff and other adults in this school are expected to:

- **know the name of the Designated Safeguarding Lead (DSL) (or deputy in the absence of the DSL);**
- **know how to access/be familiar with the CSCP procedures and guidance**
- **treat information they receive about colleagues, pupils and families in a discreet and confidential manner;**
- **seek advice from a senior member of staff (DSL) if they are in any doubt about sharing information they hold or which has been requested of them;**
- **be clear about when information can/must be shared and in what circumstances;**
- **know the procedures for responding to allegations against staff and to whom any concerns or allegations should be reported;**
- **know the procedures for responding to allegations made against the Head teacher;**
- **ensure that where personal information is recorded using modern technologies that systems and devices are kept secure in accordance with the school Online Safety Policy and staff Acceptable Use Agreement.**

9. Standards of behaviour

All staff have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of children. Staff are expected to adopt high standards of personal conduct to maintain the confidence and respect of the general public and those with whom they work.

Staff must not engage in conduct outside work which could seriously damage the reputation and standing of the school or the employee's own reputation or the reputation of other members of the school community. In particular, criminal offences that involve violence or possession or use of illegal substances or sexual misconduct or harassment are likely to be regarded as unacceptable.

The Governors will not re-check DBS Criminal Record Disclosures as a matter of course. The Governors retain the right, however, to undertake a re-check of any member of staff or volunteer should information come to light which suggests that an individual may no longer be a suitable person to work with our pupils.

It is the responsibility of all adults working in this school to inform the Head of School or DSL of any Police investigation which may lead, or has led, to an arrest, charge, conviction, caution, court order, reprimand and/or warning (whether received before or during their employment at the school) which are not recorded on their current Disclosure Certificate (apart from those which are protected) or which will disqualify them from working with relevant child groups regardless of the seriousness. Failure to do this may lead to disciplinary action.

There is no place for extremist views of any kind in our school, whether from internal sources – pupils, staff, visiting adults, governors etc. or external sources – school community, external agencies or individuals.

Any prejudice, discrimination or extremist views, including derogatory language, displayed by pupils, staff, visitors or parents will always be challenged and, where appropriate, dealt with. Where misconduct by a teacher is proven, the matter will be referred to the Teaching Regulation Agency (TRA) for their consideration. Misconduct by other staff will be dealt with under normal school disciplinary procedures.

Staff may undertake work outside school, either paid or voluntary, provided that it does not conflict with the interest of the school nor be to a level which may contravene the Working Time Regulations or affect an individual's work performance in the school. *[Please check this statement as it applies to Contracts of Employment and delete/amend as necessary]*

There may be times where an individual's actions or relationships/associations in their personal life come under scrutiny from the community, the media or public authorities, including in relation to their own children, or children or adults in the community. Staff should be aware that their behaviour, either in or out of the workplace, could compromise their position within the school in relation to the protection of children, loss of trust and confidence, or bringing the employer into disrepute. Such behaviour may also result in prohibition from teaching by the Teaching Regulation Agency (TRA), a bar from engaging in regulated activity, or action by another relevant regulatory body.

The statutory guidance 'Disqualification under the Childcare Act 2006' sets out grounds for disqualification under the Childcare Act 2006 where the person meets certain criteria. A disqualified person is prohibited from providing relevant early or later years' childcare as defined in the Childcare Act 2006 or being directly concerned in the management of such childcare. Schools and childcare settings are also prohibited from employing a disqualified person in respect of relevant early or later years' childcare. Further information is available in the EYFS statutory framework for group and school-based providers.

Governors and senior leaders recognise that we must create a culture and environment where staff feel comfortable to discuss matters outside of work, which may have implications for both them and the safeguarding of children in the school. These discussions can assist Governors and senior leaders in safeguarding their employees' welfare and contribute to their duty of care towards their staff. Where appropriate, it will help managers identify whether arrangements are needed to support these staff. These discussions can also help with the management of children's safety, providing information that will help them consider whether there are measures that need to be put in place to safeguard children.

Staff and other adults in this school must 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 or other member of the school community;**
- **use inappropriate or offensive language to, or in the presence of, pupils or other members of the school community;**
- **express prejudicial, derogatory, discriminatory or extremist views of any kind in school;**
- **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;**
- **post activity online via social media, which would bring the school or professional role into disrepute;**
- **smoke or vape in or on the school site when children are present or about to be present.**

In addition to the above, staff and other adults are expected to:

- **inform the Head or other specified person of any arrest, charge, conviction, caution, court order, reprimand and/or warning accrued during their employment, and/or if they are under Police investigation;**
- **be aware that behaviour by themselves, those with whom they have a relationship or association, or others in their personal lives (in the real world or online), may impact their work with children and the school's ability to safeguard pupils. Staff are expected to disclose any such relationship or association issues with the DSL or other senior leader in the first instance;**
- **inform the Head teacher/Principal of any name changes that they have not previously declared.**

10. Dress and appearance

A person's dress and appearance are matters of personal choice and self-expression and some individuals will wish to exercise their own cultural customs. However, staff and others who work with children should select a manner of dress and appearance appropriate to their role and which may be necessarily different to that adopted in their personal life. Staff should ensure they are dressed decently, safely and appropriately for the tasks they undertake; this also applies to online or virtual teaching. Those who dress or appear in a manner which would be viewed as offensive or inappropriate will render themselves vulnerable to criticism or allegation.

Staff and other adults in our school are expected to wear clothing and accessories which:

- **promote a positive and professional image;**
- **do not create a risk to either the wearer or others in the school and is appropriate to their role;**
- **are not likely to be viewed as offensive, revealing, or sexually provocative;**
- **does not distract, cause embarrassment or give rise to misunderstanding;**
- **is absent of any political, extremist or otherwise contentious slogans;**
- **is not considered to be discriminatory;**
- **in online engagement, is similar to the clothing they would wear on a normal school day.**

11. Gifts, rewards, favouritism and exclusion

Staff must maintain high standards of honesty and integrity in their work. This includes the handling and claiming of money and the use of school property and facilities.

This school has a procedure in place regarding the giving of gifts or rewards to pupils and the receiving of gifts from them or their parents and staff are made aware of and understand what is expected of them.

Staff must take care that they do not accept any gift that might be construed as a bribe by others or lead the giver to expect preferential treatment.

There are occasions when pupils or parents wish to pass small tokens of appreciation to staff e.g. at Christmas or as a thank you and this is usually acceptable. It is, however, unacceptable to receive gifts on a regular basis or of any significant value.

It is also inadvisable to give personal gifts to pupils or their families. This could be interpreted as a bribing or grooming behaviour. It might also be perceived that a 'favour' of some kind is expected in return.

Any reward given to a pupil should be in accordance with our Behaviour Policy and procedures, recorded and not based on favouritism.

Adults in this school are advised to exercise care when selecting children for specific activities, jobs or privileges to avoid perceptions of favouritism or injustice. Similar care should be exercised when pupils are excluded from an activity. Methods of selection and exclusion will always be subject to clear, fair and agreed criteria.

Staff and other adults in this school are expected to:

- **be aware of and understand the school procedures on sanctions and rewards;**
- **ensure that gifts received or given in situations which may be misconstrued are declared and recorded, with the exception of 'one-off' token gifts from a pupil or parent;**

- **only give gifts to a pupil as part of an agreed reward system;**
- **where giving gifts other than as above, ensure that these are of insignificant value and given to all pupils equally.**
- **ensure that all selection processes of pupils are fair and these are undertaken and agreed by more than one member of staff;**
- **ensure that they do not behave in a manner which is either favourable or unfavourable to individual pupils.**

12. Staff with children or other close family members enrolled at the school

Some staff have children or other close family members who attend the school and it is recognised that in these cases the staff fulfil a dual role of relative and staff member. In these cases, staff should ensure that they uphold boundaries between the two roles and that their behaviour does not constitute a conflict of interest.

It is important that enrolling staff children or close family members does not have a negative impact on the standards of work provided and does not make other staff feel that they have to be concerned about enforcing expectations or sanctions as appropriate.

Before enrolling a child or hiring a close relative, a discussion will be held with the staff member outlining roles, responsibilities and expectations of behaviour. It is generally not appropriate for staff to care for their own child or those of a close relative whilst at work. It is, however, recognised that this may not always be possible.

The following principles are provided to prevent:

- embarrassment or awkwardness for co-workers;
- concerns of lack of objectivity in the event of disagreements within the workplace or in relation to any incidents/investigations;
- grievances due to perceived favouritism of family members of co-workers; and
- the risk for employees being accused of improper conduct towards any pupil they come into contact with during the course of their work.

Staff with children or other close family members in school are expected to:

- **at all times, fulfil the needs of their own role and adhere to their job description;**
- **uphold boundaries between the role of parent/relative and ensure that their behaviour does not constitute a conflict of interest. The staff member should discuss any inter-role conflict with the Head teacher in the first instance;**
- **remain neutral and treat all pupils the same;**
- **avoid making direct contact with their own child or close relative during the school day including breaks. Where a child arrives in school with a working parent, they may be supervised by the parent until the working day or school day (whichever is the earlier) begins;**
- **allow incidents during the school day to be dealt with through the normal pastoral mechanisms where alternative adults are to be the main point of contact;**
- **ensure they do not provide medical care, administer medicines or deliver educational support to their own child or close relative at school unless authorised to do so. In exceptional circumstances requiring immediate assistance, staff must notify the Head teacher and follow established safeguarding procedures;**
- **maintain strict confidentiality regarding information about their own child or close relative and must not share confidential information with other parents or staff members unless authorised;**

13. Infatuations and 'crushes'

All staff and other adults need to recognise that it is not uncommon for pupils to be strongly attracted to a member of staff and/or develop a 'crush' or infatuation. They should make every effort to ensure that their own behaviour cannot be brought into question, does not appear to encourage this and be aware that such infatuations may carry a risk of their words or actions being misinterpreted.

Any member of staff who receives a report, overhears something, or otherwise notices any sign, however small or insignificant that a young person has become or may be becoming infatuated with either themselves or a colleague, should immediately report this to the Head teacher or most senior manager[2]. In this way, appropriate early intervention can be taken which can prevent escalation and avoid hurt, embarrassment or distress for those concerned.

The Head teacher will give careful thought to those circumstances where the staff member, pupil and their parents should be spoken to and will ensure a plan to manage the situation is put in place. This plan will respond sensitively to the child and staff member to maintain the dignity of all. This plan will involve all parties, be robust and regularly monitored and reviewed.

Staff and other adults in this school are expected to:

- **report any indications (verbal, written or physical) that suggest a pupil may be infatuated with a member of staff;**
- **always maintain professional boundaries;**
- **in the case of senior managers, put an action plan in place to deal with any concerns which are brought to their attention.**

14. Social contact outside the workplace

It is acknowledged that staff may have genuine friendships and social contact with parents of pupils, independent of the professional relationship. Staff should, however, also be aware that professionals who seek to harm, exploit or radicalise children often attempt to establish relationships and contact outside the workplace with both the child and their parents, in order to 'groom' the adult and the child and/or create opportunities for abuse.

Staff should recognise that some types of social contact with pupils or their families could be perceived as harmful or exerting inappropriate influence on children and may bring the setting into disrepute (e.g. attending a political protest, circulating propaganda etc.).

If a pupil or parent seeks to establish social contact, or if this occurs coincidentally, the member of staff should exercise his/her professional judgement. Where any contact with staff refers to or discusses a concern about the school or the child, parents/carers must be asked to contact the school direct rather than through a social network site (e.g. parent groups). No response should be given by staff members. This also applies to social contacts made through outside interests or the staff member's own family.

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

Staff and other adults in this school are expected to:

- **advise senior management of any regular social contact they have with a pupil which could give rise to concern;**
- **advise parents to contact the school direct where they have concerns about the school, its staff or a child;**
- **not send personal communication to pupils or parents unless agreed with senior managers;**
- **ensure that where senior staff have agreed to an exchange of mobile phone numbers, for example for safety purposes on educational visits, the numbers MUST be deleted as soon as possible following the activity for which the agreement was gained;**
- **inform senior management of any relationship with a parent where this extends beyond the usual parent/professional relationship;**

[2] If the Head teacher has the concern that a young person is becoming infatuated with them, they should report this to the Chair of Governors

- **ensure that they report to senior staff immediately any unsolicited written or visual communications from pupils, parents or others;**
- **inform senior management of any requests or arrangements where parents wish to use their services outside of the workplace e.g. babysitting, tutoring etc.**

15. Communication with children (including the use of technology)

To make best use of the many educational and social benefits of new and emerging technologies, pupils need opportunities to use and explore the digital world. Online safety risks are posed more by behaviours and values than the technology itself.

Staff are expected to ensure that they establish safe and responsible online behaviours including the use of Artificial Intelligence (AI), working to local and national guidelines and acceptable use agreements which detail how new and emerging technologies may be used.

Communication with children both in the 'real' world and through web based and telecommunication interactions should take place within explicit professional boundaries. This includes the use of computers, tablets, phones, texts, emails, instant messages, social media such as Facebook and/or X, chatrooms, forums, blogs, websites, gaming sites, digital cameras, videos, webcams and other hand-held or wearable (meta-glasses) technology devices (this list gives examples only and is not exhaustive).

Staff must not request or respond to any personal information from children other than that which may be necessary in their professional role. They should ensure that their communications are open and transparent and avoid any communication which could be interpreted as 'grooming' behaviour.

Staff must not give their personal contact details to children for example, email address, home or mobile telephone numbers, details of web-based identities. If children locate these by any other means and attempt to contact or correspond with the staff member, the adult should not respond and must report the matter to their manager. The child should be firmly and politely informed that this is not acceptable.

In any communication with children, staff are also expected to follow the guidance in Section 9 'Standards of Behaviour'.

Staff at this school must adhere to the 'Acceptable Use Agreement' as outlined in the Online Safety Policy and procedures.

Staff and other adults in this school are expected to:

- **not seek to communicate/make contact or respond to contact with pupils outside of the purposes of their work;**
- **not give out their personal details;**
- **not discuss your professional role in any capacity when using social media;**
- **not put online any text, image, sound or video that could upset or offend any member of the whole school community or be incompatible with their professional role;**
- **treat all pupil issues and those of other adults in school with the highest standards of confidentiality;**
- **use IT appropriately and in accordance with the school's Online Safety Policy and procedures and staff acceptable use agreement;**
- **be aware of and consider the possible implications for the school, colleagues and themselves when posting on social media sites;**
- **use online technology appropriately and not compromise the professional integrity of colleagues or other adults in the school community;**
- **use only equipment and internet services provided by the school, unless school Policies state otherwise;**
- **only use internet-enabled personal devices in line with the school acceptable use agreement;**
- **ensure that their use of technology could not bring their employer into disrepute.**

16. Use of mobile phones and other mobile technology by staff and other adults in school

It is recognised that many mobile phones and other wearable mobile technology e.g. smart watches and meta glasses have inbuilt and enhanced features which could be misused and which also offer distractions and disruption to the working day in a school environment. Use of mobile technology by staff and other adults must be balanced against the protection against potential misuse. The paragraphs below relate to **all** mobile communication and smart technology devices (watches, meta glasses etc.) and as opposed to only mobile phones.

The following standards apply to all individuals who have access to personal mobile phones or other mobile communication devices on site.

The aim is to ensure that all adults:

- have a clear understanding of what constitutes misuse;
- know how to minimise the associated risks with the use of mobile and smart technology. The wearing of meta glasses is prohibited in school;
- avoid putting themselves into compromising situations which could be misinterpreted and lead to allegations;
- understand the need for professional boundaries and clear guidance regarding acceptable use;
- are responsible for self-moderation of their own behaviours;
- use social media applications with other colleagues in relation to school business considerately, with respect given to the timing of the message (including during the holidays and weekends) unless in an emergency;
- are aware of the importance of reporting concerns promptly.

Staff and other adults in this school:

- **are not permitted to make/receive calls/texts during contact time with children. Emergency contact should be made via the school office when appropriate but staff can have phones on vibrate and leave the classroom to take the call in the staffroom.**
- **must have their phones/smart watches on silent or switched off and out of sight (e.g. in a drawer, handbag or pocket) during class time;**
- **are not permitted to use mobile communication devices in a space where children are present (e.g. classroom, withdrawal area, playground etc.). This includes extended activities**
- **are advised to protect access to functions of their phone whilst it is on school premises (Bluetooth settings should be disabled);**
- **should inform the Head if there are exceptional circumstances (e.g. acutely sick relative) when permission will be granted to have their phone in the event of an emergency;**
- **are not permitted at any time to use recording equipment (images, video or voice) on their mobile or peripheral devices unless by prior agreement with the Head /other Senior Leader. Legitimate recordings and photographs should normally be captured using school equipment such as cameras and iPads;**
- **should report to the Head any usage of mobile devices/technology that causes them concern.**

17. Physical contact

This school does not have a 'no contact' policy. There are occasions when it is entirely appropriate and proper for staff to intervene, where reasonable in the circumstances, to fully protect pupils. It is, however, 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 or Behaviour Management plan.

Not all children feel comfortable about certain types of physical contact; this should be recognised and, wherever possible, adults should seek the pupil's permission before initiating contact and be sensitive to any signs that they may be uncomfortable or embarrassed. Staff should acknowledge that some pupils are more comfortable with touch than others and/or may be more comfortable with touch from some adults

than others. Staff should listen, observe and take note of the child's reaction or feelings and so far as is possible, use a level of contact and/or form of communication which is acceptable to the pupil.

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 child.

Any physical contact should be in response to the child's needs at the time, of limited duration and appropriate to their age, stage of development, gender, ethnicity and background. Adults should, therefore, use their professional judgement at all times.

Physical contact must never be secretive, for the gratification of the adult, or represent a misuse of authority. If a member of staff believes that an action by them or another adult could be misinterpreted, or if an action is observed which is possibly abusive, the incident and circumstances should be immediately reported to the Head teacher and recorded. Where appropriate, the Head teacher will consult with the LADO.

Extra caution may be required where it is known that a child has suffered previous abuse, neglect or exploitation. Staff need to be aware that the child may associate physical contact with such experiences. They should recognise that these pupils may seek out inappropriate physical contact. In such circumstances, staff should deter the child sensitively and help them to understand the importance of personal boundaries.

A general culture of 'safe touch' will be adopted, where appropriate, based on the individual requirements of each child. Pupils with disabilities may require more physical contact to assist their everyday learning and in relation to moving and handling to promote independence. The arrangements should be understood and agreed by all concerned (this may be explicit in the Education Health and Care Plan (EHCP)), justified in terms of the pupil's needs, consistently applied and open to scrutiny.

We will also ensure that we provide staff, on a 'need to know' basis, with relevant information about vulnerable children in their care.

Staff and other adults in this school are expected to:

- **be aware that even well-intentioned physical contact may be misconstrued by the pupil, and observer or any person to whom this action is described;**
- **never touch a pupil in a way which may be considered indecent;**
- **always be prepared to explain actions and accept that all physical contact is open to scrutiny;**
- **never indulge in horseplay or fun fights;**
- **always allow/encourage pupils, where able, to undertake self-care tasks independently;**
- **ensure the way they offer comfort to a distressed pupil is age appropriate;**
- **always tell a colleague when and how they offered comfort to a distressed pupil;**
- **establish the preferences of pupils;**
- **consider alternatives, where it is anticipated that a pupil might misinterpret or be uncomfortable with physical contact;**
- **always explain to the pupil the reason why contact is necessary and what form that contact will take;**
- **report and record situations which may give rise to concern;**
- **be aware of cultural or religious views about touching and be sensitive to issues of gender.**

17.1 Other activities that require physical contact

In certain curriculum areas, such as PE, drama or music, staff may need to initiate some physical contact with children, for example, to demonstrate technique in the use of a piece of equipment, adjust posture, or support a child so they can perform an activity safely or prevent injury.

Physical contact should take place only when it is necessary in relation to a particular activity. It should take place in a safe and open environment i.e. one easily observed by others and last for the minimum time necessary. The extent of the contact should be made clear and undertaken with the permission of the

pupil. Contact should be relevant to their age and understanding and adults should remain sensitive to any discomfort expressed verbally or non-verbally by the pupil.

Guidance and protocols around safe and appropriate physical contact may be provided, for example, by sports' national governing bodies (NGB) and should be understood and applied consistently. Any incidents of physical contact that cause concern must be reported to the Head and/or DSL and parent.

It is good practice if all parties clearly understand at the outset, what physical contact is necessary and appropriate in undertaking specific activities. Keeping parents and pupils informed of the extent and nature of any physical contact may also prevent allegations of misconduct or abuse arising.

Staff and other adults in this school are expected to:

- **treat pupils with dignity and respect and avoid contact with intimate parts of the body;**
- **always explain to a pupil the reason why contact is necessary and what form that contact will take;**
- **seek consent from parents where a pupil is unable to give this e.g. because of a disability;**
- **consider alternatives, where it is anticipated that a pupil might misinterpret any such contact;**
- **be familiar with and follow recommended NGB guidance and protocols;**
- **conduct activities where they can be seen by others;**
- **be aware of gender, cultural and religious issues that may need to be considered prior to initiating physical contact.**

18. Intimate/personal care

We have clear nappy and intimate care procedures which ensure that the health, safety, independence and welfare of children is promoted and their dignity and privacy are respected. Arrangements for intimate and personal care are open and transparent and accompanied by recording systems.

Anyone undertaking intimate/personal care in an education setting is in 'regulated activity' and must hold an appropriate DBS Certificate with a barred list check (children's barred list), even if the activity only happens once. Only individuals that hold the appropriate DBS Certificate and received instruction and training are permitted to undertake/assist with intimate or personal care.

Pupils are encouraged to act as independently as possible and to undertake as much of their own personal care as is possible and practicable. When assistance is required, this will normally be undertaken by one member of staff, however, they should try to ensure that another appropriate adult is in the vicinity who is aware of the task to be undertaken and that they are within sight or hearing distance. Students, volunteers or temporary/visiting staff will not be permitted to provide any form of intimate care unless it is absolutely necessary; the individual is appropriately trained; has the appropriate level of DBS certification and is authorised to do so by a senior member of staff. Intimate care procedures do not include the need for more than one member of staff unless the child's EHCP specifies this.

A signed record will be kept of all intimate and personal care tasks undertaken and, where these have been carried out in another room, will include times left and returned.

Any vulnerability, including those that may arise from a physical or learning difficulty will be considered when formulating the individual pupil's EHCP or Individual Healthcare Plan (IHCP). The views of parents and the pupil, regardless of their age and understanding, will be actively sought in formulating the plan and in the necessary regular reviews of these arrangements. Any changes to the intimate care plan will be made in writing and without delay, even if the change in arrangements is temporary e.g. staff shortages, changes to staff rotas etc.

Doors to areas where intimate care is taking place will never be secured to prevent other appropriate adults from entering. Pupils are, however, entitled to respect and privacy at all times and especially when in a state of undress, including, for example, when changing, toileting and showering. There does, however, need to be an appropriate level of supervision to safeguard pupils, satisfy health and safety considerations and ensure that bullying or teasing does not occur. The supervision will be appropriate to the needs and age of the young people concerned and sensitive to the potential for embarrassment.

We have a written IHCP in place for any pupil who could be expected to require intimate care. Wherever possible, we will ensure that pupils are actively consulted about their own healthcare plan. We will also ensure that intimate/personal care is provided by staff known to the child.

Staff and other adults in this school are expected to:

- **adhere to the school's intimate care procedures;**
- **make other staff aware of the task being undertaken;**
- **always explain to the child what is happening before a care procedure begins;**
- **consult with colleagues where any variation from the agreed procedure/healthcare plan is necessary;**
- **record the justification for any variations to the agreed procedure/health care plan and share this information with the child and their parent;**
- **avoid any visually intrusive behaviour;**
- **always consider the supervision needs of the children and only remain in the room where their needs require this.**

Staff and other adults will not:

- **change or toilet in the presence or sight of children;**
- **shower with or within sight of children;**
- **allow any adult to assist with intimate or personal care without confirmation from senior leaders that the individual is not barred from working in regulated activity;**
- **assist with intimate or personal care tasks which the child can undertake independently.**

19. Sexual conduct

Any sexual behaviour by a member of staff with or towards a pupil is unacceptable. It is an offence for a member of staff in a position of trust to engage in sexual activity with a pupil under 18 years of age[3] and sexual activity with a child could be a matter for criminal and/or disciplinary procedures.

Sexual activity involves physical contact including penetrative and non-penetrative acts, however, it also includes non-contact activities, such as causing a pupil to engage in, or watch, sexual activity or the production of pornographic material.

There are occasions when adults embark on a course of behaviour known as 'grooming' where the purpose is to gain the trust of a child and manipulate the relationship so sexual abuse can take place. All staff have attended appropriate training so they are fully aware of those behaviours that may constitute 'grooming' and of their responsibility to always report to the Head teacher any concerns about the behaviour of a colleague or other adult which could indicate that a pupil is being groomed.

Staff and other adults in this school are expected to:

- **not have any form of sexual contact with a pupil from the school;**
- **avoid any form of touch or comment which is, or may be considered to be, indecent;**
- **avoid any form of communication with a pupil which could be interpreted as sexually suggestive, provocative or give rise to speculation e.g. verbal comments, letters, notes, by email or on social media, phone calls, texts, physical contact;**
- **not make sexual remarks to or about a pupil;**
- **not discuss sexual matters with or in the presence of pupils other than within agreed curriculum content or as part of their recognised job role.**

[3] Sexual Offences Act 2003: abuse of a position of trust

20. Behaviour management

Corporal punishment and smacking are unlawful in all schools. Staff must not use any form of degrading or humiliating treatment to punish a child. The use of sarcasm, demeaning or insensitive comments towards children is completely unacceptable. See school Behaviour Policy and procedures for more information.

Staff should understand the importance of challenging inappropriate behaviours between children, including child on child sexual violence and sexual harassment. Downplaying certain behaviours, e.g. dismissing sexual harassment as "just banter", just having a laugh", "part of growing up" or "boys being boys", can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it. Any cases of perceived or actual child on child abuse, bullying or harassment must be referred to the DSL in the first instance. Further information is available in our Child Protection Policy and procedures | Child on child abuse Policy and procedures.

20.1 The use of restrictive interventions, including the use of reasonable force

The law and guidance for schools state that adults may reasonably intervene to prevent a child 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.

Great care must be exercised in order that adults do not physically intervene in a manner which could be considered unlawful. Under no circumstances will force be used as a form of punishment. The use of unwarranted or disproportionate force is likely to constitute a criminal offence.

The School has procedures for the use of restrictive interventions, including the use of reasonable force which is consistent with DfE statutory and non-statutory guidance. Staff are regularly acquainted with the Behaviour Policy and procedures which includes information on when and under what circumstances it is appropriate to use restrictive interventions, including use of reasonable force and what strategies to use appropriate to the circumstance and situation. Where required, staff are trained in appropriate restrictive intervention techniques.

Where we judge that a child's behaviour presents a serious risk to staff or others, we will put in place a robust risk assessment in the form of a Behaviour Management Plan (BMP) which will be reviewed regularly. Where relevant this BMP will include a restrictive interventions plan and will be agreed by all parties including the pupil (where he/she has the ability to understand the Plan), parents and others e.g. a medical professional. Parental consent does not permit settings to use unlawful restrictive interventions or deprive a pupil of their liberty.

The legislation on restrictive interventions, use of reasonable force, non-disciplinary seclusion and restraint strategies is complex and staff must take extreme care to avoid any practice that could be viewed as unlawful, a breach of the pupil's human rights and/or false imprisonment.

In all cases where restrictive interventions has taken place, a record will be made of the incident and subsequent actions. Information relating to the incident including where restrictive interventions have been used will be shared with parents (where possible on the same day). We have a restrictive intervention recording system in place which all staff have access to. The Head or other members of the senior leadership team will regularly review the records and the Governing body will monitor incidents that have been recorded.

Staff and other adults in this school are expected to:

- **not use force as a form of punishment;**
- **try to defuse situations before they escalate e.g. by distraction or diffusion;**
- **only use minimum force and for the shortest time needed where restrictive intervention, including the use of reasonable force is necessary.**

- **keep parents informed of any sanctions or behaviour management techniques used unless to do so would put the child at risk of harm;**
- **be mindful of, and sensitive to, factors both inside and outside of the school or setting which may impact on a pupil's behaviour;**
- **follow the school's Behaviour Policy and procedures**
- **avoid shouting at children other than as a warning in an emergency/safety situation;**
- **refer to national and local policy and guidance regarding restrictive interventions, including use of reasonable force;**
- **be aware of the legislation and potential risks associated with the use of non-disciplinary seclusion and restraint;**
- **comply with legislation and guidance in relation to human rights and restriction of liberty;**

21. One-to-one situations

Staff working in one-to-one situations with pupils at the school, including visiting staff from external organisations can be more vulnerable to allegations or complaints.

To safeguard both pupils and adults, a risk assessment in relation to the specific nature and implications of one-to-one work will be undertaken. Each assessment will consider the individual needs of each pupil and will be reviewed regularly.

Arranging to meet with pupils from the school away from the work premises is not permitted unless the necessity for this is clear and approval is obtained from the Head teacher, the pupil and their parent.

Where staff are expected to work one-to-one with a pupil on a virtual platform, clear expectations will be set out for all those involved that are reflective of the school's safeguarding policies and procedures.

Staff and other adults in this school are expected to:

- **work one-to-one with a child only when absolutely necessary (both in person or online) and with the knowledge and consent of a senior leader;**
- **be aware of relevant risk assessments, policies and procedures, including child protection, behaviour management and acceptable use agreements;**
- **ensure that wherever possible there is visual access and/or an open door in one-to-one situations;**
- **avoid use of 'engaged' or equivalent signs wherever possible. Such signs may create an opportunity for secrecy or the interpretation of secrecy;**
- **ensure, prior to any online learning, there are clear expectations of behaviour and conduct of all parties that have been agreed in advance;**
- **always report any situation where a pupil becomes distressed or angry;**
- **consider the needs and circumstances of the pupil involved.**

22. Home visits

All work with pupils and parents will usually be undertaken in the school or other recognised workplace. There are, however, occasions, in response to an urgent, planned or specific situation or job role, where it is necessary to make one-off or regular home visits. In any event, however, we will ensure that all visits are justified, that staff understand the purpose and limitations of a welfare visit and that they are recorded. We will also ensure that staff are not exposed to unacceptable risk.

We have a generic risk assessment for home visits which is in place to safeguard both staff and pupils, who may be more vulnerable in these situations. This risk assessment will reflect any procedures and guidance issued by the Cumberland SCP | Westmorland and Furness SCP in relation to undertaking home visits. Staff have access to a mobile telephone and an emergency contact for use when undertaking home visits.

The generic risk assessment will be used and amended accordingly prior to any planned home visit taking place. The assessment will include an evaluation of any known factors regarding the pupil, parent and any others living in the household. Consideration will be given to any circumstances which might render the staff member becoming more vulnerable to an allegation being made e.g. hostility, child protection concerns, complaints or grievances. Specific thought will be given to visits outside normal working hours or

in remote or secluded locations. Following the assessment, appropriate risk management measures are put in place before the visit is undertaken. In the unlikely event that little or no information is available, visits will not be made alone.

Staff and other adults in this school are expected to:

- **agree the purpose for any home visit with the Head teacher or other senior leader;**
- **have a clear understanding of the actions that should be taken if it is believed that a child or parent is at immediate risk of harm, including when to contact emergency services and/or partner agencies;**
- **adhere to agreed risk assessments;**
- **avoid unannounced visits wherever possible;**
- **understand that they should never enter a home without the parent's consent or when the parent is absent, except in an emergency;**
- **ensure there is visual access and/or an open door in one-to-one situations;**
- **always make detailed records including time of arrival and departure;**
- **ensure any behaviour or situation which gives rise to concern is discussed with the Head teacher/DSL;**
- **ensure that the child/children is/are seen in an open and observable space e.g. a living room. Where this is not possible, discuss the arrangements with a senior leader;**
- **comply with data protection regulations in relation to any personal information carried or notes made about the child and/or family.**

23. Transporting pupils

In certain situations, staff or volunteers may be required or offer to transport pupils as part of their work. As for any other activity undertaken at work, the employer has a duty to carry out a risk assessment covering the health and safety of their staff and to manage any known risks.

Staff should never offer lifts to pupils unless the need for this has been agreed by the Head teacher. A designated member of staff will be appointed to plan and provide oversight of all transport arrangements and respond to any concerns that may arise.

Consideration is given to the potential distraction of the driver and the supervision of the passengers. A judgement should be made about the likely behaviour and individual needs of the child/ren. If any of them may require close supervision, then another adult will travel in the vehicle so that the driver is not distracted or otherwise compromised. Further advice on this issue is available from https://oeapng.info/downloads/download-info/4-5c-transport-in-private-cars/.

Wherever possible and practicable, it is advisable that transport is undertaken other than in private vehicles and with, where necessary, at least one adult additional to the driver acting as an escort. The risk assessment will consider the need for additional members of staff taking account of the duration of the journey, the number and ages of passengers etc.

It is a legal requirement that all passengers wear seatbelts and the driver is responsible for ensuring that those passengers under the age of 14 do so. Drivers must also be aware of and adhere to current legislation regarding the use of car seats for younger children.

Staff should never offer to transport pupils outside of their normal working duties, other than in an emergency or where not doing so would mean the child may be at risk of harm. In these circumstances, the matter will be recorded and reported to both a senior manager and the child's parent(s). The school's Health and Safety Policy and educational visits procedures set out the arrangements under which staff may use private vehicles to transport pupils.

Staff and other adults in this school are expected to:

- **plan and agree arrangements with all parties in advance;**
- **respond sensitively and flexibly where any concerns arise;**
- **take account of any specific or additional needs of the pupil;**
- **have appropriate insurance, driving licence and, where required, permit for the vehicle;**

- **ensure they are fit to drive and free from any drugs, alcohol or medication which is likely to impair judgement and/or ability to drive;**
- **ensure that if they need to be alone with a pupil this is for the minimum time;**
- **be aware that the safety and welfare of the pupil is their responsibility until the child is safely passed over to a parent;**
- **report the nature of the journey, the route and expected time of arrival in accordance with agreed procedures;**
- **ensure that any impromptu or emergency arrangements of lifts are recorded and can be justified;**
- **refer to the School procedures and national guidance for Educational visits.**

24. Educational visits

Staff responsible for organising and leading educational visits are familiar with the School Health and Safety Policy and Educational Visits procedures.

Staff must take particular care when supervising pupils in the less formal atmosphere of an educational visit where a more relaxed discipline or informal dress and language code may be acceptable. However, staff remain in a position of trust and need to ensure that their behaviour cannot be interpreted as seeking to establish an inappropriate relationship or friendship.

Where out of school or setting activities include overnight stays, careful consideration will be given to sleeping arrangements taking account, where necessary of guidance issued in KCSiE (points 199-201 refer). Pupils, adults and parents will be informed of these arrangements prior to the start of the trip. In all circumstances, those organising trips and outings will pay careful attention to ensuring there is a safe staff/child ratio and, wherever possible, a suitable gender mix of staff.

Staff and other adults in this school are expected to:

- **adhere to the school's educational visits procedures and guidance;**
- **always have another adult present on visits, unless otherwise agreed with the Head teacher or other senior manager;**
- **undertake risk assessments where significant risks are identified or anticipated;**
- **have parental consent to the activity;**
- **ensure that their behaviour remains professional at all times;**
- **never share a bed with a pupil;**
- **never share a bedroom unless it involves a dormitory situation and the arrangements have been previously discussed with the Head teacher, parents and pupils;**
- **refer to local and national guidance for Educational visits including exchange visits (both to the UK and abroad).**

25. First aid and medication

The School has an adequate number of qualified first-aiders in accordance with our First Aid needs assessment and taking account of statutory guidance. We will regularly review and update our first aid procedures, medicines in school procedures, Emergency Plan and relevant risk assessments as necessary. Training of first aiders is updated regularly in line with statutory requirements. Where statutorily required, parents will be informed when first aid has been administered.

In an emergency or exceptional circumstances, if there is no member of staff available who has completed the relevant first aid training, we will identify a senior appointed person to be responsible each day. Any decision will be supported by a risk assessment that takes account of the number of staff, pupils and/or other visitors on site, the proximity of emergency services, any particular risks presented, etc.

Staff at our school have received sufficient and suitable training and have achieved the necessary level of competency prior to taking on responsibility to support children with specific medical conditions. Advice on managing medicines is included in the school 'Administration of medication procedures'. In circumstances where a pupil needs medication regularly, this would usually be recorded in their IHCP. These plans provide details of the level and type of support a child needs to effectively manage their

medical condition in school including medicine to be administered, the correct dosage and any storage requirements. A record is kept of all medicines administered to pupils.

Where a member of staff is concerned or uncertain about the amount or type of medication being given to a pupil, this must be discussed with the DSL.

Adults taking medication which may affect their ability to care for children should seek medical advice regarding their suitability to do so. The school will ensure that such individuals only work directly with children if the medical advice confirms that the medication is unlikely to impair their ability to look after children. All medication on the premises must be stored securely and out of reach of children at all times.

Staff and other adults in our school are expected to:

- **ensure they have read and understood the school First Aid, Supporting Pupils with Medical Conditions and Allergy Safety Policies and procedures;**
- **ensure they make themselves familiar with any individual healthcare plan which might impact on the administration procedures being undertaken;**
- **explain to the pupil what is happening and always act and be seen to act in the pupil's best interest;**
- **make a record of all medication administered with a witness, where necessary;**
- **not work with pupils whilst taking medication unless medical advice confirms that they are able to do so;**
- **ensure any personal medication is stored securely and out of the reach of children at all times.**

26. Use of technology for remote learning

At the outset we will consider the impact that remote learning may have on children and their parents/siblings and will only consider this provision where, in an emergency closure situation, any or all children cannot attend school in person. We will also consider alternatives to remote learning in 'real time' such as using audio only, pre-recorded lessons and/or existing online resources.

We will review our online safety and acceptable use agreements to ensure that all staff involved in remote learning or the use of technology to contact pupils are briefed on best practice, any temporary changes to Policy or procedures and the standards of conduct expected of them.

When selecting a platform for remote learning, we will satisfy ourselves that the provider has an appropriate level of security. Wherever possible, staff must use school devices and contact pupils only via the pupil school email address/log-in. This ensures that the school's filtering and monitoring software is enabled.

Staff engaging in remote learning should display the same standards of dress and conduct that they would in the real world; they should also role model this to pupils and parents. In relation to this, the following points should be considered:

- Think about the background: photos, artwork, identifying features, mirrors etc. ideally, the backing should be nondescript.
- Staff and pupils should be in living/communal areas – no bedrooms.
- Staff and pupils should be appropriately dressed.
- Filters at a child's home may be set at a threshold which is different to the school.
- Resources/ videos must be age appropriate – the child may not have support immediately to hand at home if they feel distressed or anxious about content.

It is the responsibility of the staff member to act as a moderator; raise any issues of suitability (of dress, setting, behaviour) with the child and/or parent immediately and end the online interaction if necessary.

Recording lessons does not prevent abuse. If staff wish to record the lesson they are teaching, consideration must be given to data protection issues; e.g. whether parental/pupil consent is needed and retention/storage. If a staff member believes that a child or parent is recording the interaction, the lesson should be ended or that child should be logged out immediately. Staff, and pupil Acceptable Use Agreements will clearly state the standards of conduct required.

If staff need to contact a pupil or parent by phone and do not have access to a work phone, they should discuss this with a senior member of staff and, if there is no alternative, always use 'caller withheld' to ensure the pupil / parent is not able to identify the staff member's personal contact details.

In deciding whether to provide remote learning for pupils, will take account of issues such as accessibility within the family home, the mental health and wellbeing of children, including screen time, the potential for inappropriate behaviour by staff or pupils, staff access to the technology required, etc.

Staff and other adults in our school are expected to:

- **adhere to the school's Online Safety Policy and procedures;**
- **be appropriately dressed;**
- **ensure that a senior member of staff is aware that the online lesson/meeting is taking place and for what purpose;**
- **avoid one-to-one situations – request that a parent is present in the room for the duration, or ask a colleague or member of SLT to join the session;**
- **only record a lesson or online meeting with a pupil where this has been agreed with the Head teacher or other senior staff, and the pupil and their parent/carer have given explicit written consent to do so;**
- **be able to justify images of pupils in their possession.**

Staff and other adults must not:

- **contact pupils outside the operating times defined by senior leaders;**
- **take or record images of pupils for their personal use;**
- **record virtual lessons or meetings using personal equipment (unless agreed and risk assessed by senior staff);**
- **engage online while children are in a state of undress or semi-undress.**

27. Photography, videos and other images

Many educational activities involve recording images. These may be undertaken for displays, publicity, to celebrate achievement and to provide records of evidence of the activity. Under no circumstances will staff be expected or allowed to use their personal equipment to take images of pupils at or on behalf of the school unless prior approval has been given.

The School has arrangements in place for the taking and use of images, which is linked to our Child Protection and Online Safety Policies and procedures. This includes the wide range of devices which can be used for taking/recording images e.g. cameras, mobile phones, smart phones, wearable technology, tablets, webcams etc. and the procedures for the use of these by both staff, parents and visitors.

Whilst images are regularly used for very positive purposes, adults need to be aware of the potential for these to be taken and/or misused or manipulated using generative AI for pornographic or 'grooming' purposes. Particular regard needs to be given when images are taken of young or vulnerable children who may be unable to question why or how the activities are taking place.

Pupils who have been previously abused in a manner that involved images may feel particularly threatened by the use of photography, filming etc. Staff should remain sensitive to any pupil who appears uncomfortable and should recognise the potential for misinterpretation.

Making and using images of pupils will require the age appropriate consent of the individual concerned and their parent. Images will not be displayed on websites, in publications or in a public place without such consent. The definition of a public place includes areas where visitors to the setting have access.

For the protection of children, when using images for publicity purposes, the following guidance is followed:

- If the image is used, we will avoid naming the child, (or, as a minimum, use first names rather than surnames).
- If the child is named, we will avoid using their image.

- Checks will always be made to ensure that the parent/carer has given permission for their child's image to be used on the school website, social media or other media.
- We have a retention period for images which are stored securely and only used by those authorised to do so.

Staff and other adults in our school are expected to:

- **adhere to the school's procedures on the 'Use of Images';**
- **only publish images of pupils where they and their parent have given explicit written consent to do so;**
- **only take images where the pupil is happy for them to do so;**
- **only retain images when there is a clear and agreed purpose for doing so;**
- **store images in an appropriate secure place in the school or securely on the school's IT system;**
- **ensure that the Head teacher or other senior member of staff is aware that the photography/image equipment is being used and for what purpose;**
- **be able to justify images of pupils in their possession;**
- **avoid making images in one-to-one situations.**

Staff and other adults must not:

- **take images of pupils for their personal use;**
- **take images of any individual in the school, unless they have permission to do so;**
- **display or distribute images of pupils unless they are sure that they have parental consent to do so (and, where appropriate, consent from the child);**
- **take images of children using personal equipment unless it is agreed by a senior manager;**
- **take images of children in a state of undress or semi-undress;**
- **take images of a child's injury, bruising or similar (e.g. following a disclosure of abuse) even if requested by children's social care;**
- **make audio recordings of a child's disclosure;**
- **take images of children which could be considered as indecent or sexual.**

27.1 Exposure to inappropriate images

Staff must take extreme care to ensure that children are not exposed, through any medium, to inappropriate or indecent images.

There are no circumstances that will justify adults: making, downloading, possessing or distributing indecent images or pseudo-images of children (child abuse images). Accessing these images, whether using the school or personal equipment, on or off the premises, or making, storing or disseminating such material is illegal.

If indecent images of children are discovered at the establishment or on the school or setting's equipment an immediate referral will be made to the LADO and, where necessary, the Police. The images/equipment will be secured and there must be no attempt to view or delete the images as this could jeopardise necessary criminal action. If the images are of children known to the school, a referral will also be made to the Cumberland Children Advice & Support Services (CASS) (See poster in school for contact details).

Under no circumstances must any adult use school equipment to access pornography. Personal equipment containing pornography or links to it must never be brought into or used in school. This will raise serious concerns about the suitability of the adult to continue working with children.

Staff are required to keep their passwords confidential and not allow unauthorised access to equipment. In the event of any indecent images of children or unsuitable material being discovered on a device, the equipment must not be tampered with in any way. It will be secured and isolated from the network, and the LADO contacted without delay.

Adults must not attempt to investigate the matter or evaluate the material themselves as this may lead to a contamination of evidence and a possibility that they will be at risk of prosecution themselves.

Staff and other adults in this school are expected to:

- **abide by the school's Acceptable Use Agreement, Online Safety and the Use of AI Policies and procedures;**
- **ensure that children cannot be exposed to indecent or inappropriate images by checking the content of external links prior to access by children;**
- **ensure that any films or material shown to children are age appropriate.**

28. Personal living accommodation

Staff or other adults should not invite any pupils into their living accommodation unless the reason to do so has been firmly established and agreed with the Head teacher and the pupil's parent.

It is not appropriate for staff to be expected or requested to use their private living space for any activity, play or learning. This includes seeing pupils for e.g. discussion of reports, academic reviews, tutorials, pastoral care or counselling. The Head teacher or other senior manager will ensure that appropriate accommodation for such activities is found elsewhere in the school.

Under no circumstances must pupils be asked to assist adults with jobs or tasks, either for or without reward, at or in their private accommodation.

The above applies to all other persons living in or visiting the private accommodation.

Staff and other adults in this school are expected to:

- **be vigilant in maintaining their privacy**
- **be mindful of the need to avoid placing themselves in vulnerable situations;**
- **refuse any request for their accommodation to be used as an additional resource for the school;**
- **be mindful of the need to maintain appropriate personal and professional boundaries;**
- **not ask pupils to undertake jobs or errands for their personal benefit.**

29. Curriculum

Many areas of the curriculum can include or raise subject matter which is sexually explicit or of a political or sensitive nature. Care will be taken to ensure that resource materials cannot be misinterpreted and clearly relate to the learning outcomes identified by the lesson plan. This will be supported by developing ground rules with pupils to ensure sensitive topics can be discussed in a safe learning environment. The lesson plan should highlight particular areas of risk and sensitivity and care must especially be taken in those areas of the curriculum where usual boundaries or rules are less rigorously applied e.g. drama.

The curriculum can sometimes include or lead to unplanned discussion about subject matter of a sexually explicit, political, extremist or otherwise sensitive nature. Responding to children's questions requires careful judgement and, in these circumstances, staff should take guidance from the DSL.

Care will be taken to comply with the school's guidance on the spiritual, moral, social and cultural development of pupils which includes the promotion of fundamental British values which will be rigorously reviewed to ensure it is lawful and consistently applied. Staff must also comply at all times with the Policy for Relationships and Sex Education (RSE) and Health Education. It is noted that parents have the right to withdraw their child from all or part of any sex education provided but not from the National Curriculum for Science.

Where part of the school curriculum allows for student led projects, staff should be mindful of safeguarding considerations in the topic chosen and the methodology used. For example, students often choose topics with which they have had personal experience; this may indicate a previously unknown safeguarding issue or may raise concerns about the re-traumatisation of the student. Student projects are often conducted using questionnaires with peers; these should be checked for appropriateness to ensure the student respondents are not distressed by the questions asked and that any disclosures received through these questionnaires are picked up by the school's DSL. Other methodologies which might raise concerns include:

- students visiting unknown adults, alone, to interview them;
- conducting social experiments on peers or young children without parental consent; or
- accessing age-inappropriate content online.

Staff and other adults in this school are expected to:

- **have clear written lesson plans;**
- **take care when encouraging pupils to use self-expression, not to overstep personal and professional boundaries;**
- **be able to justify all curriculum materials and relate these to clearly identifiable lesson plans.**

Staff and other adults in this school will not:

- **enter into, or encourage, inappropriate discussions which may offend or harm others;**
- **undermine fundamental British values;**
- **express any prejudicial views;**
- **attempt to influence or impose their personal values, attitudes or beliefs on pupils.**

30. Duty to report concerns about an individual's suitability to work with children

Staff and other adults have a duty to report (including self-reporting) any incident in which an adult has or may have behaved in a way that is inconsistent with this staff Code of Conduct including inappropriate behaviours inside and outside of work or online. Failure to report or respond to such concerns would constitute a failure in professional responsibilities to safeguard children and promote welfare.

All staff are aware of the school's safeguarding procedures including the procedures for dealing with allegations against staff and other adults. Allegations are those where the 'harm threshold' has been met. Further details of what constitutes behaviour which meets the 'harm threshold' is set out in the School's Child Protection Policy and procedures.

Not all incidents or concerns will meet the 'harm threshold' neither do all incidents of concern fit the concept of 'whistleblowing'. Our school has clear and accessible Whistleblowing procedures. Staff who use the Whistleblowing procedures will have their employment rights protected.

We encourage a culture which is open and transparent in which **all** concerns about adults are shared responsibly. This, in turn, allows us to identify inappropriate, problematic or concerning behaviour at an early stage and ensures that adults working in or on behalf of the school are clear about professional boundaries and act within these boundaries and in accordance with our ethos, values and the expected behaviour as set out in this Code of Conduct.

Although it is important that staff feel comfortable with, and are clear about, the concept of low-level concerns, and know what to do if they have such a concern. Once staff and other adults share what they **believe** to be a low-level concern, the decision on whether the concern is one which needs to be reported to the LADO will be made by the Head teacher or Chair of Governors.

All staff have an individual responsibility to bring matters of concern to the attention of the Head teacher or in his/her absence, a member of the Senior Leadership team or DSL. Not to do so may result in charges of serious neglect on their part where the welfare of a child is at risk. Where a staff member feels unable to raise an issue with their employer or feels that their genuine concerns are not being addressed, they should utilise other whistleblowing channels such as the NSPCC professional's helpline on 0800 028 0285 and/or email help@nspcc.org.uk.

30.1 What is a low-level concern?

The term 'low-level' concern does not mean that it is insignificant. 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 this staff Code of Conduct, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone, contrary to school policy;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating or offensive language; or,
- humiliating pupils.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

30.2 Sharing and recording a low-level concern

Low-level concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

Staff should recognise their individual responsibility to raise any concerns regarding behaviour or conduct (including low-level concerns) that falls short of the principles outlined in this staff Code of Conduct. It is crucial that any such concerns, are shared responsibly and with the right person, recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of the school from becoming the subject of potential false low-level concerns or misunderstandings. Concerns that meet the harm threshold will be reported to the LADO within 24 hours.

To safeguard and protect pupils and colleagues, where staff have any concerns about someone who works with children (member of staff, supply staff, trainee teacher, volunteer or contractor) they must report this as soon as reasonably possible and, in any event, within 24 hours of becoming aware of it, to the Head teacher or DSL. If the concern relates to the Head, or where the individual believes that reporting to the Head would result in a conflict of interest, the report should be made to the Chair of Governors. Remember, it is never too late to share a low-level concern.

All low-level concerns will be recorded in writing, The name of the individual sharing their concerns should also be noted. If the individual wishes to remain anonymous, this will be respected as far as reasonably possible. The following will be recorded:

- details of the concern;
- the context in which the concern arose; and
- details of the action taken.

If the concern has been raised via a third party, the Head teacher/Principal (or nominated deputy) will collect as much evidence as possible by speaking:

- directly to the person who raised the concern, unless it has been raised anonymously; and,
- to the individual involved and any witnesses.

All records will be kept confidential, held securely and comply with the Data Protection Act 2018 and UK GDPR. Records will be retained at least until the individual leaves our employment. A model low-level concern report form is available for schools to adapt and/or adopt.

Records will be regularly reviewed so that potential patterns of inappropriate, problematic or concerning behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on the correct course of action - disciplinary procedures or, where the behaviour meets the 'harm threshold', a referral to the LADO. Consideration will be given to whether there are wider cultural issues within the school that enabled the behaviour to occur and where appropriate Policies could be revised, or extra training delivered, to minimise the risk of it happening again.

In relation to references for future employment, we will only provide details of substantiated safeguarding allegations. Low-level concerns will not be included in references unless they relate to issues which would normally be included, for example, misconduct or poor performance.

Further information and reference can be found in Developing and implementing a low-level concerns policy: A guide for organisations which work with children (Farrer and Co).

Staff and other adults in this school are expected to:

- **escalate their concerns if they believe a child or children are not being protected;**
- **report to the Head teacher any behaviour by colleagues or any other adult in school that raises concern;**
- **take responsibility for recording any incident and passing on that information where they have concerns about their own behaviour or any matter pertaining to the welfare of an individual in the school or setting;**
- **follow the school's whistleblowing procedures as appropriate;**
- **report allegations against staff and volunteers to the Head teacher, or where there are concerns about the Head teacher's response, report these directly to the LADO;**
- **report allegations against the Head teacher directly to the Chair of Governors**