

# **Staff Code of Conduct Policy**

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**Brooke House College**

2024/26 Version

## Code of conduct for Staff

### Purpose and application

- 1 **Purpose:** Relationships with fellow staff, employees, directors, College Advisors, contractors, visitors, volunteers, pupils and their parents, guardians or carers should be reasonable and mutually respectful at all times. This Code has been produced to place the welfare of children at the centre of the College and its culture, and to ensure that all those who work in the College and may have contact with children are clear on the rules of conduct and the expectations of the College. Children place trust in those connected to the College creating obligations which we must all meet to ensure the successful outcomes achieved by the children in our care.
- 2 This Code has regard to the College's Child Protection and Safeguarding Policy and Procedures and the following (collectively referred to in this Code as the **Guidance**):
  - 2.1 *Keeping children safe in education* (September 2024) (**KCSIE**):
    - 2.1.1 KCSIE incorporates the additional statutory guidance;
    - 2.1.2 KCSIE also refers to the non-statutory advice for practitioners: *What to do if you're worried a child is being abused* (March 2015).
  - 2.2 *Working together to safeguard children* (July 2023 (**WT**):
    - 2.2.1 WT refers to the non-statutory advice: *Information sharing* (March 2015).
  - 2.3 *Prevent Duty Guidance: for England and Wales* (revised 2024) (**Prevent**). Prevent is supplemented by :
    - 2.3.1 *The Prevent duty: Departmental advice for schools and childminders* (June 2015);
    - 2.3.2 *Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism* (2015)
    - 2.3.3 *The use of social media for online radicalisation* (July 2015).
  - 2.4 Guidance on Female Genital Mutilation, to include:
    - 2.4.1 *Multi-agency statutory guidance on female genital mutilation* (revised July 2020)
    - 2.4.2 Home Office statutory guidance *Mandatory Reporting of Female Genital Mutilation: procedural information* (revised January 2020).
    - 2.4.3 Guidance published by the Department for Health which provides useful information and support for health professionals which will be taken into account by the College's medical staff.
- 3 The purpose of the Code is to:
  - 3.1 confirm and reinforce the professional responsibilities of all Staff;
  - 3.2 clarify the legal position in relation to sensitive aspects of Staff / pupil relationships and communication including the use of social media;

- 3.3 set out the expectations of standards and behaviour to be maintained within the College; and
- 3.4 to help adults establish safe practices and reduce the risk of false accusations or improper conduct.
- 4 **Application:** The Code of Conduct (**Code**) applies to all Staff working in the College (**College**), whether paid or unpaid, whatever their position, role or responsibilities and **Staff** includes employees, directors, members of the advisory board, contractors, work experience / placement students and volunteers.
- 5 **Your duty:** It is the contractual duty of every member of Staff to observe the rules and obligations in this Code. You should also follow the Guidance. The College also has a duty of care to its staff, parents, guardians or carers and pupils and the implementation of the practices in this Code will help to discharge that duty.
- 6 **Wrongdoing:** All staff are required to report their own wrongdoing, or any wrongdoing or proposed wrongdoing of any other member of staff or any conduct which they may suspect to be inappropriate to the Principal. The College operates a Whistleblowing Policy.
- 7 **Application with other policies:** The Code should be read in conjunction with the College's Child Protection and Safeguarding Policy and Procedures, Staff Handbook and Whistleblowing Policy.

## Guiding principles

### 8 Principles for all Staff

- 8.1 All Staff should put the wellbeing, development and progress of all pupils first by:
  - 8.1.1 taking all reasonable steps to ensure the safety and wellbeing of pupils under their supervision;
  - 8.1.2 using professional expertise and judgment for the best interests of pupils in their care;
  - 8.1.3 demonstrating self-awareness and taking responsibility for their own actions and for providing help and support to pupils;
  - 8.1.4 raising concerns about the practices of teachers or other professionals where these may have a negative impact on pupils' learning or progress, or may put pupils at risk;
  - 8.1.5 being familiar with the College's Child Protection and Safeguarding Policy and Procedures, attending the annual training for safeguarding and keeping up-to-date with all safeguarding and Health & Safety ;
  - 8.1.6 reading and understanding Part 1, and where appropriate Annex A, of KCSIE (September 2024) in addition to any other guidelines and policies issued by the College or government/local authorities, signing declarations of reading said documents where applicable;
  - 8.1.7 knowing the role, identity and contact details of the current Designated Safeguarding Lead and their Deputies;
  - 8.1.8 knowing the role, identity and contact details of the Nominated Safeguarding Director; and

- 8.1.9 being aware that they are in a position of trust (i.e. the adult is in a position of power or influence over the pupil due to his or her work); that the relationship is not a relationship between equals and that this position must never be used to intimidate, bully, humiliate, coerce or threaten pupils.
- 8.2 All Staff should demonstrate respect for diversity and take steps to promote equality by:
  - 8.2.1 acting appropriately and in accordance with this Code of Conduct, towards all pupils, parents, guardians or carers and colleagues;
  - 8.2.2 complying with the College's anti-bullying and Equal Opportunities policies and this Code of Conduct;
  - 8.2.3 addressing issues of discrimination and bullying whenever they arise; and
  - 8.2.4 helping to create a fair and inclusive College environment.
- 8.3 All Staff should work as part of a unified Staff body by:
  - 8.3.1 developing productive and supportive relationships with colleagues;
  - 8.3.2 exercising any management responsibilities in a respectful, inclusive and fair manner;
  - 8.3.3 complying with all College policies and procedures;
  - 8.3.4 participating in the College's development and improvement activities;
  - 8.3.5 recognising the role of the College in the life of the local community;
  - 8.3.6 upholding the College's reputation and standing within the local community and building trust and confidence in it.
- 8.4 All Staff should understand that the College has a legal duty to have regard to the need to prevent people from being drawn into terrorism, and consequently should be aware of:
  - 8.4.1 what extremism and radicalisation mean and why people - including pupils and fellow staff members - may be vulnerable to being drawn into terrorism as a consequence of it;
  - 8.4.2 what measures are available to prevent people from becoming drawn into terrorism and how to challenge the extremist ideology that can be associated with it; and
  - 8.4.3 how to obtain support for people who may be being exploited by radicalising influences.
  - 8.4.4 In addition to any other principles as outlined in the Staff Code of Conduct & Staff Handbook, all staff should promote values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs. This also means challenging opinions or behaviours in schools that are contrary to these values.

9 **Additional principles for teachers**

- 9.1 Teachers must report to the police cases where they discover (either through disclosure by the victim or visual evidence) that an act of female genital mutilation appears to have been carried out. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the Designated Safeguarding Lead and involve children's social care as appropriate. It will be rare for teachers to see visual evidence, and they should not be examining pupils.
- 9.2 Teachers should take responsibility for maintaining the quality of their teaching practice by:
- 9.2.1 meeting the professional standards for teaching applicable to their role and position within the College;
  - 9.2.2 reflecting on their current practice and seeking out opportunities to develop knowledge, understanding and skills;
  - 9.2.3 helping pupils to become confident and successful independent learners; and
  - 9.2.4 establishing productive relationships with parents, guardians or carers by:
    - (a) providing accessible and accurate information about their child's progress;
    - (b) involving them in important decisions about their child's education; and
    - (c) complying with this Code.
- 9.3 Teachers should maintain public trust and confidence in the College and in the profession by:
- 9.3.1 demonstrating honesty and integrity;
  - 9.3.2 understanding and upholding their duty to safeguard the welfare of children and young people;
  - 9.3.3 maintaining reasonable standards of behaviour whether inside or outside of normal College hours and whether on or off the College's site; and
  - 9.3.4 maintaining an effective learning environment.

**Guidance on Staff / pupil relationships**

- 10 **Application:** Allegations of unprofessional conduct or improper contact or words can arise at any time. Professionalism and vigilance are required so as to ensure the safety of children in our care, and to reduce the risk of an allegation of impropriety against a member of Staff. This guidance applies to all Staff.
- 11 **Sexual contact:** Staff must not:
- 11.1 have any type of sexual relationship with a pupil or pupils;
  - 11.2 have sexually suggestive or provocative communications with a pupil;
  - 11.3 make sexual remarks to or about a pupil; and

- 11.4 discuss their own sexual relationships in the presence of pupils.
- 12 **Abuse of a position of trust and inappropriate relationships with College pupils:** Sexual relationships or sexual contact with any pupils, or encouraging a relationship to develop in a way which might lead to a sexual relationship or any inappropriate relationship with any pupil at the College is a grave breach of trust that will usually lead to disciplinary action and may also lead to criminal prosecution. It is the criminal offence of an abuse of a position of trust to have any sexual relationship with any College pupil under the age of 18, and whilst not a criminal offence, it is a breach of this Code and considered to be gross misconduct to have a sexual relationship with any pupil of this College, even if over the age of 18.
- 13 **Inappropriate relationships with pupils at another school:** Forming relationships with children or young people who are pupils or students at another school will be a criminal offence if they are under 16 but may also be a criminal offence if under the age of 18 and will be regarded as gross misconduct. Such behaviour tends to bring the College into disrepute and gives rise to concern that the Staff involved cannot be trusted to maintain professional boundaries with pupils and students at the College. Whilst not necessarily a criminal offence, the College considers it inappropriate for Staff to form sexual relationships with a pupil of any school, irrespective of their age.
- 14 **General guidance:** You should be aware of the general guidance that will apply in all cases. In particular you:
- 14.1 need to exercise professional judgment but always act within the spirit of these guidelines. If you are involved in a situation where no specific guidance exists, you should discuss the circumstances with the Designated Safeguarding Lead. A written record should be kept that includes justification for any action taken;
- 14.2 must be aware of the risks of child on child abuse and be familiar with procedures for handling allegations against other children and bullying as set out in the College's Child Protection and Safeguarding Policy and Procedures;
- 14.3 must be familiar with procedures for reporting concerns in accordance with the College's Whistleblowing Policy and be aware that if Staff raise concerns about working practices at the College to the Designated Safeguarding Lead or an appropriate senior member of Staff that they will be protected from detriment under the Whistleblowing Policy;
- 14.4 must be familiar with the local reporting guidelines and the Local Safeguarding Children Partners reporting threshold document in respect of any concerns relating to children;
- 14.5 must be familiar with procedures for handling allegations against Staff as set out in the College's Child Protection and Safeguarding Policy and Procedures, including 'low level concerns as defined in the Child Protection & Safeguarding Policy;
- 14.6 must seek guidance from the Designated Safeguarding Lead if you are in any doubt about appropriate conduct; and
- 14.7 must report any actions which could be misinterpreted, any misunderstandings, accidents or threats involving you and a pupil or a group of pupils to the Designated Safeguarding Lead.
- 15 **Behaviour giving particular cause for concern:** You should take particular care when dealing with a pupil who:

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- 15.1 appears to be emotionally distressed, or generally vulnerable and / or who is seeking expressions of affection;
- 15.2 appears to hold a grudge against you;
- 15.3 acts in a sexually provocative way, or who is inclined to make exaggerated claims about themselves and others, or to fantasise, or one whose manner with adults is over-familiar; and
- 15.4 may have reason to make up an allegation to cover the fact that he or she has not worked hard enough for public examinations.
- 16 **Procedure to be followed in these cases:** Some of these behaviours may be indications that a child has been, or is currently being, abused and should therefore be reported to the Designated Safeguarding Lead under the College's Child Protection and Safeguarding Policy and Procedures.
- 17 **CPOMS** – The College uses CPOMS which is an application for monitoring child protection, safeguarding and a whole range of pastoral and welfare issues. Working alongside our school's existing safeguarding processes; CPOMS helps with the management of child protection, behavioural issues, bullying, special educational needs, domestic issues and much more. Using CPOMS, we can ensure that pupils are safe and fully supported, whilst school staff can focus on teaching and providing support, instead of administration. Every member of staff across the school has an obligation to report any concerns that they may have. CPOMS allows the college to record information in a central repository and have relevant people alerted immediately. SLT can build a chronology around a pupil and can produce reports for Case Conference Meetings, Trustees and ISI at the touch of a button.
- 18 **Dealing with "crushes":** Crushes, fixations or infatuations are part of normal adolescent development. However, they need sensitive handling to avoid allegations of exploitation. Such crushes carry a high risk of words, actions and expressions being misinterpreted; therefore, the highest levels of professionalism are required. If you suspect that a pupil has a crush on you or on another colleague, you should bring it to the attention of the Designated Safeguarding Lead at the earliest opportunity. Suggestions that a pupil may have developed a crush should be recorded. Staff should avoid being alone with pupils who have developed a crush on them and if the pupil sends personal communications to the member of Staff, this should be reported to the Principal and recorded.
- 19 **Record keeping:** Comprehensive records are essential. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing. Any incident involving children that could give cause for concern, must always be reported promptly to the Designated Safeguarding Lead in accordance with the College's Child Protection and Safeguarding Policy and Procedures. If there is any doubt about recording requirements this should be discussed with the Designated Safeguarding Lead.
- 20 **Good order and discipline:** Staff in charge or control of pupils must maintain good order and discipline at all times when pupils are present on College premises and whenever pupils are engaged in authorised College activities, whether on College premises or elsewhere.

### General conduct

- 21 **College property:** You must take proper care when using College property and you must not use College property for any unauthorised use or for private gain.

- 22 **Use of premises:** You must not carry out any work or activity on College premises other than pursuant to your terms and conditions of employment without the prior permission of the Principal.
- 23 **Behaviour of others:** You should be aware that the behaviour of your partner or other family members or any member of your household may raise concerns which affects the welfare of any member of the College community or a member of the public, or which brings the College into disrepute. Such concerns will be given careful consideration as to whether they constitute a potential risk to children at the College or its reputation.
- 24 **Behaviour of self:** Staff behaviour should always be consistent with the guiding principles of the Staff Handbook (section 44). You should be aware that you are a role model for the students in the College community.

### Meetings with pupils

- 25 **One-to-one meetings:** If you are teaching one pupil, or conducting a one-to-one meeting or teaching session with a pupil, you should take particular care in the following ways:
- 25.1 when working alone with a pupil is an integral part of your role, conduct and agree full risk assessments with the Principal;
  - 25.2 use a room that has sufficient windows onto a corridor so the occupants can be seen, or keep the door open, or inform a colleague that the lesson / meeting is taking place;
  - 25.3 arrange the meeting during normal school hours when there are plenty of other people about;
  - 25.4 do not continue the meeting for any longer than is necessary to achieve its purpose;
  - 25.5 avoid sitting or standing in close proximity to the pupil, except as necessary to check work;
  - 25.6 avoid using "engaged" or equivalent signs on doors or windows;
  - 25.7 avoid idle discussion;
  - 25.8 avoid all unnecessary physical contact and apologise straight away if there is accidental physical contact;
  - 25.9 avoid any conduct that could be taken as a sexual advance;
  - 25.10 report any incident that causes you concern to the Designated Safeguarding Lead under the College's Child Protection and Safeguarding Policy and Procedures, and make a written record (signed and dated); and
  - 25.11 report any situation where a pupil becomes distressed or angry to the Designated Safeguarding Lead.
- 26 **Meetings held outside of the College:** Pre-arranged meetings with pupils outside College should never take place unless approval is obtained from the Principal. The Principal will give consideration to whether the approval of parents / guardians or carers should also be sought. Staff with the necessary approval to hold such a meeting should inform colleagues before the meeting takes place.
- 27 **Home visits:** In very rare circumstances home visits are necessary. You should:



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- 27.1 discuss the purpose of any visit with the Designated Safeguarding Lead and adhere to any agreed work plan / contract;
  - 27.2 follow the risk management strategy and ensure appropriate risk assessments are in place. Where there is insufficient information to complete a risk assessment, ensure that you are accompanied by a colleague;
  - 27.3 not visit unannounced if this can be avoided;
  - 27.4 leave the door open where you will be alone with pupils;
  - 27.5 keep records detailing times of arrival and departure, and work undertaken;
  - 27.6 ensure that any behaviour or situation that gives rise to a concern is reported and action taken;
  - 27.7 discuss with the Designated Safeguarding Lead anything that gives cause for concern in accordance with the School's Child Protection and Safeguarding Policy and Procedures; and
  - 27.8 have a mobile telephone and an emergency contact.
- 28 **The use of personal living space:** Pupils should not be in or invited into the personal living space of any member of Staff, unless agreed with the parents, guardians or carers and the Principal . Pupils should not be asked to assist with chores or tasks in the personal living space. Personal living spaces should not be used as an additional resource for the College.

### Language and appearance

- 29 **Language:** You should use appropriate language at all times. You should:
- 29.1 avoid words or expressions that have any unnecessary sexual content or innuendo; avoid displays of affection either personally or in writing (e.g. messages in birthday cards, text messages, emails etc);
  - 29.2 avoid any form of aggressive or threatening words;
  - 29.3 avoid any words or actions that are over-familiar;
  - 29.4 not swear, blaspheme or use any sort of offensive language in front of pupils;
  - 29.5 avoid the use of sarcasm, discriminatory or derogatory words when punishing or disciplining pupils and avoid making unprofessional personal comments about anyone. Any sanctions should be in accordance with the College's behaviour and discipline policies; and
  - 29.6 be aware that some parts of the curriculum may raise sexually explicit subject matters. Care should be taken in subjects where rules / boundaries are relaxed (e.g. drama or art). Staff should have clear lesson plans and should take care to avoid overstepping personal and professional boundaries.
- 30 **Dress:** You should dress appropriately and in a professional manner and in accordance with the Brooke House College staff dress code.

### The use of force or physical restraint

- 31 **Physical restraint:** All forms of corporal punishment are unlawful, and the use of unwarranted physical force is likely to constitute a criminal offence. The use of physical intervention should be avoided if possible. However, by law, Staff who are authorised by

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the Principal to have control or charge of pupils, may use such force or physical contact as is reasonable and proportionate in the circumstances to prevent a pupil from doing, or continuing to do any of the following:

- 31.1 committing a criminal offence;
- 31.2 injuring themselves or others;
- 31.3 causing damage to property, including their own; or
- 31.4 engaging in any behaviour prejudicial to good order and discipline at the College or among any of its pupils, whether that behaviour occurs in a classroom or elsewhere.

32 **Application of code of restraint:** This applies when a teacher, or other authorised person, is on College premises and when he or she is in control or charge of the pupil elsewhere, for

33 example on a field trip or other authorised out of College activity. It only applies where no other form of control is available and where it is necessary to intervene. The section should be read alongside Appendix 4 of the Behaviour and Discipline Policy – Use of Reasonable Force.

34 **Before intervening:** Before intervening physically you should, wherever practicable, tell the pupil to stop and what will happen if he or she does not. You should continue attempting to communicate with the pupil throughout the incident and should make it clear that physical contact or restraint will stop as soon as it ceases to be necessary. You should always avoid touching or holding a pupil in a way that might be considered indecent. You should also avoid any form of aggressive contact such as holding, pushing, pulling or hitting which could amount to a criminal assault, nor act in a way that might reasonably be expected to cause injury.

35 **Inform senior staff:** You should inform the Principal immediately following an incident where force has been used. This is to help prevent any misunderstanding or misrepresentation of the incident, and it will be helpful in the event of a complaint. You should provide a written report as soon as possible afterwards. This should include written and signed accounts of those involved, including the pupil. The parents, guardians or carers of the pupil should be informed about serious incidents involving the use of force. The Principal will advise as to when parents should be contacted.

36 **Action taken in self-defence or in an emergency:** The law allows anyone to defend themselves against an attack provided they do not use more force than is necessary. Similarly, where a pupil is at risk of immediate injury or on the point of inflicting injury on someone else, any member of Staff (whether authorised or not) would be entitled to intervene.

37 **Using reasonable force:** There is no legal definition of "reasonable force". It will always depend on the circumstances. Note that:

- 37.1 any use of force should be proportionate to the behaviour of the pupil involved and the seriousness of the harm prevented;
- 37.2 physical force could not be justified to prevent a pupil from committing a trivial misdemeanour;
- 37.3 any force should always be the minimum needed to achieve the desired result; and

- 37.4 whether it is reasonable to use force and the degree of force that could be reasonably employed might also depend on the age, understanding and sex of the pupil.
- 37.5 Where use of reasonable force has been used, the member of staff should write a report of the incident, which the Principal will need to keep on file in adherence of ISSRs.

### Physical contact in other circumstances

- 38 **When physical contact may be appropriate:** Physical contact with a pupil may be necessary and beneficial in order to demonstrate a required action, or a correct technique in, for example, singing and other music lessons or during PE, sports and games. Therefore, this guidance is of particular importance to those responsible for coaching boys in the Football Academy. Any physical contact should be in response to the pupil's needs, of limited duration and appropriate to the pupil's age, stage of development, gender, ethnicity and background. Physical contact can be easily misinterpreted and should be limited. Staff should use professional judgement.
- 39 **Guidance on using physical contact:** You should observe the following guidelines (where applicable):
- 39.1 explain the intended action to the pupil;
- 39.2 do not proceed with the action if the pupil appears to be apprehensive or reluctant, or if you have other concerns about the pupil's likely reaction;
- 39.3 ensure that the door is open and if you are in any doubt, ask a colleague or another pupil to be present during the demonstration; and
- 39.4 consider alternatives if it appears likely that the pupil might misinterpret the contact.
- 40 **Report concerns:** If you are at all concerned about any instance of physical contact, inform the Principal without delay, and make a written record in the incident book and on the pupil's file if necessary.
- 41 **Offering comfort to distressed pupils:** Touching may be appropriate where a pupil is in distress and needs comforting. You should use your own professional judgement when you feel a pupil needs this kind of support and should be aware of any special circumstances relating to the pupil. For example, a child who has been abused may find physical contact particularly difficult. You should always notify the Principal when comfort has been offered, record the action and should seek guidance if unsure whether it would be appropriate in a particular case.
- 42 **Administering first aid:** When administering first aid you should explain to the child what is happening and ensure that another adult is present or is aware of the action being taken. The treatment must meet the College's health and safety at work rules and intimate care guidelines, and parents, guardians or carers should be informed. Staff should read this section alongside the applicable sections of the College's First Aid Policy. Staff should:
- 42.1 adhere to the College's policies on first aid and administering medication;
- 42.2 comply with the necessary reporting requirements;
- 42.3 make other adults aware of the task that is being undertaken;
- 42.4 explain what is happening;

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- 42.5 report and record the administration of first aid;
  - 42.6 have regard to any health plans; and
  - 42.7 ensure that an appropriate health / risk assessment is undertaken prior to undertaking certain activities.
- 43 **Pupils' entitlement to privacy:** Children are entitled to privacy when changing or showering. However there still must be an appropriate level of supervision to ensure safety. This section is of particular importance to those who are responsible for the management of boarding houses and Football Academy staff. You should:
- 43.1 avoid physical contact or visually intrusive behaviour when children are undressed;
  - 43.2 announce yourself when entering changing rooms and avoid remaining unless required;
  - 43.3 not shower or change in the same place as children; and
  - 43.4 not assist with any personal care task which a pupil can undertake themselves.
- 44 Staff should only use toilets labelled for use by staff. Members of staff should never use pupil toilet facilities.
- 45 **Where a child has been abused:** Where a child has previously been abused, Staff should be informed on a 'need to know' basis and should be extra cautious when considering the necessity of physical contact. Some children may seek inappropriate physical contact. Staff should sensitively deter the pupil and help them understand the importance of personal boundaries. Such incidents should be reported and discussed with the Designated Safeguarding Lead and where appropriate parents, guardians or carers.
- 46 **Children with special educational needs or disabilities:** Some children may need more physical contact to assist their everyday learning, which should be agreed and understood by all concerned, justified, openly applied and open to scrutiny. The Designated Safeguarding Lead and SENDCo will establish whether any reasonable adjustments are required for such pupils.

#### **Code of conduct for contact outside school**

- 47 **Contact outside school:** You should avoid unnecessary contact with pupils outside school. You should:
- 47.1 not give pupils your home address, home telephone number, mobile telephone number or email address;
  - 47.2 not send personal communications (such as birthday cards or faith cards, text messages etc) to children unless agreed with the Principal;
  - 47.3 not make arrangements to meet pupils, individually or in groups, outside school other than on school trips authorised by the Principal;
  - 47.4 avoid contacting pupils at home unless this is strictly necessary, and you should keep a record of any such occasion;
  - 47.5 not give a pupil a lift in your own vehicle other than on College business and with permission from the Principal;

- 47.6 avoid inviting pupils (groups or individuals) to your home unless there is a good reason and it has been approved by Principal. This prohibition also applies if you have on site accommodation;
- 47.7 report and record any situation which may place a child at risk or which may compromise the College's or your professional standing;
- 47.8 ensure that pupils do not see anything in your home that may cause embarrassment or that might become the subject of inappropriate gossip or rumour; and
- 47.9 never engage in secretive social contact with pupils or their parents, guardians or carers.
- 48 **Social contact:** You should be aware that where you meet children or parents, guardians or carers socially, such contact could be misinterpreted as inappropriate, an abuse of a position of trust or as grooming. Any social contact that could give rise to concern should be reported to the Principal.
- 49 **Friendships with parents, guardians or carers and pupils:** Members of Staff who are friends with parents, guardians or carers of pupils or who, for example, are voluntary workers in youth organisations attended by pupils, will of course have contact with those pupils outside school. However, members of Staff should still respect the above advice wherever possible and should keep the Principal informed of such relationships.
- 50 **Scope of application of code on contact outside school:** The same guidelines should be applied to after school clubs, school trips, and especially trips that involve an overnight stay away from the College. There are separate, more detailed guidelines for school trips in the Educational Visits Policy. The principles of this guidance also apply to contact with children or young people who are pupils at another school.
- 51 **Transporting pupils:** There may be some situations when Staff are required to transport pupils. You should:
- 51.1 ensure that you are fit to drive and free from any substances that may impair your judgement or ability to drive;
- 51.2 be aware that until the pupil is passed over to a parent / carer, you have responsibility for that pupil's health and safety;
- 51.3 record the details of the journey;
- 51.4 record, be able to justify impromptu or emergency lifts and notify the Principal;
- 51.5 ensure that there are proper arrangements in place to ensure vehicle, passenger and driver safety, including appropriate insurance, seat belts, adherence to maximum capacity guidelines etc; and
- 51.6 wherever practicable, you should avoid using private vehicles and should try and have one adult additional to the driver to act as an escort.
- 52 **Educational visits:** When taking part in educational visits, you should:
- 52.1 follow the College's Educational Visits Policy;
- 52.2 be accompanied by another adult unless otherwise agreed with the Principal;
- 52.3 undertake a risk assessment;

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- 52.4 never share bedrooms unless in a dormitory situation and arrangements have been discussed and agreed previously with the Principal / Principal and where appropriate parents, guardians or carers and pupils.
- 53 **Overnight supervision:** Where overnight supervision is required to preserve the integrity of the examination process:
- 53.1 you should ensure that a risk assessment has been undertaken and that all members of the household have had the appropriate checks;
- 53.2 arrangements should be made with and agreed by parents, guardians or carers and the pupil;
- 53.3 one to one supervision should be avoided where possible;
- 53.4 choice, flexibility and contact with "the outside world" should be incorporated, so far as it is consistent with appropriate supervision and the College's guidelines;
- 53.5 whenever possible, independent oversight of the arrangements should be made; and
- 53.6 any misinterpretation, misunderstanding or complaint should be reported.

#### **Communication with pupils (including the use of technology)**

- 54 **Communicating with children and parents, guardians or carers:** All communication with children or parents, guardians or carers should conform to College policy and be limited to professional matters. Except in an emergency communication should only be made using College property.
- 55 **Application:** These rules apply to any form of communication including new technologies (including 4G/5G technologies) such as mobile telephones, web-cameras, social networking websites and blogs. You should also ensure you comply with the more detailed IT Acceptable Use Policy, and the Social Media Policy contained in the Staff Handbook.
- 56 **Acceptable use:** Adults must establish safe and responsible online behaviours and must comply with the IT Acceptable Use Policy, Social Media Policy, and the mobile telephone protocol. Adults should report to senior colleagues, any new and emerging technologies which may have a bearing on College practices and on the review of the IT Acceptable Use Policy. Local and national guidelines on acceptable user policies should be followed. As Staff, you should also:
- 56.1 ensure that your own personal social networking sites are set as private and ensure that pupils are not approved contacts;
- 56.2 ensure that you do not use any website or application, whether on a College or personal device, which identifies your location while on College premises or otherwise in the course of your employment;
- 56.3 never use or access social networking sites of pupils and do not use internet or web-based communication channels to send personal messages to pupils;
- 56.4 do not use your own equipment (e.g. mobile telephones) to communicate with pupils - use equipment provided by the College and ensure that parents, guardians or carers have given permission;
- 56.5 only make contact with pupils for professional reasons; and

- 56.6 recognise that text messaging should only be used as part of an agreed protocol and only when other forms of communication are not possible.
- 57 **Personal details:** Adults should not give their personal contact details to pupils, including email addresses, home or mobile telephone numbers, unless the need to do so is agreed with Principal and parents, guardians or carers.
- 58 **Personal mobile telephones and electronic devices:** It is understood that staff may need to check text messages and/or personal emails in the case of an emergency or during break times. Personal use must not interfere with your work commitments (or those of others). It is a privilege and not a right. Staff shall set an example and shall never use their own mobile telephones or other electronic devices whilst they are on duty (whether in a classroom or otherwise) and any such mobile devices should be switched off except in the case of an emergency and be kept out of sight of parents or pupils.
- 59 **Communicating outside the agreed protocols:** Email or text communications between an adult and any pupil outside agreed protocols may lead to a report to external agencies in accordance with the College's Child Protection and Safeguarding Policy and Procedures, disciplinary action and / or criminal investigations. This also includes communications through internet based websites.

#### **Code of conduct for photographs and videos**

- 60 **Permission required:** You should seek permission from the Principal before taking photographs or video camera footage of any pupils in class, at any College events or on a trip. You should also seek permission before displaying these photographs. You must not use personal mobile telephones to take images of pupils.
- 61 **Consent:** Appropriate consents for taking and displaying photographs should be obtained from parents, guardians, carers or from the pupils themselves if sufficiently mature (pupils are seen as being sufficiently mature from the age of 13 years DPA 2018). Consent should be obtained where the use is more privacy intrusive. Where the use of a photograph or video is less privacy intrusive (e.g. used in an internal school display) it is sufficient for parents and pupils to have been informed about this in the College's Privacy Notice for Pupils and Parents. Please speak to the Bursar if you require guidance on whether consent should be obtained.
- 62 **Guidance where permission obtained:** Where permission and consent (if appropriate) has been obtained, the following should be considered:
- 62.1 the purpose of the activity should be clear as should what will happen to the photographs or videos. You must be able to justify images in your possession;
  - 62.2 all images should be made available to Principal in order to determine acceptability;
  - 62.3 images should not be made during one-to-one situations;
  - 62.4 ensure that the pupil is appropriately dressed;
  - 62.5 ensure that the pupil understands why the images are being taken and has agreed to the activity;
  - 62.6 only use equipment provided or authorised by the College;
  - 62.7 if a photograph or video is to be displayed in a place to which the public have access (e.g. on the College's website) it should not display the pupil's name unless consent has been obtained. If the use of a photograph or video is more privacy intrusive

consent may need to be obtained even if the pupil's name is not used (e.g. using an unnamed photograph of a pupil in an advertisement). Consent should be obtained from the pupil and/or their parents as appropriate. Please see paragraph 63 below for further guidance on consent.

- 62.8 all images of children should be stored securely and only accessed by those authorised to do so; and
- 62.9 images must not be taken secretly.
- 63 **Consent:** Children are deemed mature enough to exercise their own data protection rights when they are aged 13 years or older [DPA 2018]. Whether consent should be obtained from the parents, the pupil or both will depend on the age of the pupil. The College's policy is that when consent is required it should be obtained as follows:
- 63.1 where the pupil is aged 11 or 12 then consent should be sought from both the pupil and their parent, guardian or carer;
- 63.2 where the pupil is aged 13 or older then only the pupil's consent will need to be obtained.
- 64 **Appropriate material:** The College recognises that many children have unlimited and unrestricted access to the internet via 3G, 4G & now 5G. You must ensure children are not exposed to inappropriate or indecent images. Inappropriate material, such as pornography, should not be brought to work and you must not use College property or the College network to access such material. You should not allow unauthorised access to College equipment and should keep your computer passwords safe. If you discover material that is potentially illegal or inappropriate, you must isolate the equipment and contact the Designated Safeguarding Lead in accordance with the College's Child Protection and Safeguarding Policy and Procedures immediately. Pupils must not be exposed to unsuitable material on the internet and Staff should ensure that any film or material shown is age appropriate.

#### **Gifts and rewards**

- 65 **Anti-bribery and corruption policy:** Before accepting or giving any gifts or rewards, staff must familiarise themselves with the Anti-Bribery Policy contained in the Staff Handbook.
- 66 **If a gift is received:** If you receive a gift from a pupil or parent you should:
- 66.1 declare the gift where there is a possibility it could be misconstrued, or in any event where the gift is of a value of more than £100. The Principal may in their absolute discretion require you to decline the gift; and
- 66.2 decline outright gifts that could be perceived as a bribe or that have created an expectation of preferential treatment. Although it is accepted for parents, guardians or carers or children to make small gifts to show appreciation, you must not receive gifts on a regular basis or receive anything of significant value.
- 67 **Giving gifts and rewards:** Where you are thinking of giving a gift or reward:
- 67.1 it should only be provided as part of an agreed reward system;
- 67.2 in all cases except the above, the gift or reward should be of little monetary value and should be discussed and agreed with the Principal and where appropriate the parent, guardian or carer;



- 67.3 selection processes should be fair and where possible should be agreed by more than one member of Staff; and
- 67.4 gifts should be given openly and not based on favouritism.
- 68 **Allocation of gifts and rewards:** Decisions regarding entitlement to benefits or privileges such as admission to school trips, activities or classroom tasks must avoid perceptions of bias, grooming or favouritism. The selection process must be based on transparent criteria.

### Reporting Obligations

- 69 **The College's position:** It is a contractual requirement as well as in your interests to follow this Code so as to maintain appropriate standards of behaviour and your own professional reputation. A breach of this Code may be treated as misconduct and will render you liable to disciplinary action including in serious cases, dismissal.
- 70 **Exit interviews:** All staff are trained so that they understand they are expected and encouraged to raise concerns they have, whether related to the safeguarding and welfare of pupils, the conduct of staff or other matters, during the course of their employment in accordance with the College's policies (including the Whistleblowing Policy, the Child Protection and Safeguarding Policy and Procedures and this Code). Safeguarding children is at the centre of the College's culture and is accordingly considered formally during staff performance development reviews and appraisal and finally at exit interviews which are offered to all leavers.
- 71 **Termination of employment:** If the College ceases to use the services of a member of Staff because they are unsuitable to work with children, a settlement agreement (formerly known as a compromise agreement) will not be used and a referral to the Disclosure and Barring Service will be made promptly if the criteria for a referral are met. Any such incidents will be followed by a review of the safeguarding procedures within the College, with a report being presented to the Governors without delay.
- 72 **Resignation:** If a member of Staff tenders his or her resignation, or ceases to provide his or her services to the College at a time when child protection concerns exist in relation to that person, those concerns will still be investigated in full by the College and a referral to the Disclosure and Barring Service will be made promptly if the criteria for a referral are met.
- 73 **Teaching Regulation Agency (TRA) formerly National College for Teaching and Leadership:** Separate consideration will also be given to making a referral to TRA where a teacher has been dismissed (or would have been dismissed had he or she not resigned) because of unacceptable professional conduct, conduct that may bring the profession into disrepute, or a conviction at any time for a relevant offence.
- 74 Low-level Concerns**
- 74. Purpose**
- 74.1 This policy sets out a framework whereby staff are expected to report concerns, no matter how small, about their own behaviour or that of another member of staff, volunteer, supply teacher, contractor or other person working in school. Its purpose is to help create and embed a culture of openness, trust and transparency in which the clear values and expected behaviour set out in the "Guidance for safer working practice for those working with children and young people in education settings" (May 2019) (sometimes called the safeguarding code of conduct) are lived, monitored, and reinforced.
- 74.2 The policy should be read in conjunction with the current statutory guidance – "Keeping Children Safe in Education" Part 4, Section 2.

### 75.3 Who does the policy apply to?

75.3.1 This policy applies to all staff and other individuals who work or volunteer in school.

### 75.4 Definition of a low-level concern

76.4.1 A low-level concern is any concern, no matter how small, even if no more than causing a sense of unease or a 'nagging doubt', that a person working in or on behalf of the school may have acted in a way that:

- is inconsistent with the "Guidance for safer working practice" (May 2019), including inappropriate conduct outside of work, and
- does not meet the allegations threshold or is otherwise not considered serious enough to make a referral to the LADO

### 77.5 Reporting low-level concerns.

77.5.1 Where a low-level concern has been identified this will be reported as soon as possible to the **Principal**. However, it is never too late to share a low-level concern if this has not already happened.

77.5.2 Where the Principal is not available, the information will be reported to the Designated Safeguarding Lead or Vice Principal.

77.5.3 Low-level concerns about the Designated Safeguarding Lead will be reported to the Principal and those about the Principal will be reported to the designated safeguarding Director, Mrs Joan Williams.

77.5.4 Where the low-level concern has been reported to the Designated Safeguarding Lead, they will inform the Principal of the details as soon as possible.

### 78.6 Recording concerns

78.6.1 A summary of the low-level concern should be written down, signed, timed, dated and shared by the person bringing the information forward.

78.6.2 Where concerns are reported verbally to the Principal a record of the conversation will be made by the Principal which will be signed, timed, and dated.

### 78.7 Responding to low-level concerns.

78.7.1 Where a low-level concern has been raised this will be taken seriously and dealt with promptly. The Principal will:

- Speak to the person reporting the concern to gather all the relevant information.
- Speak to the individual about the concern raised to ascertain their response, unless advised not to do so by the LADO or Police (HR advice may also need to be taken).
- Where necessary further investigation will be carried out to gather all relevant information. This may involve speaking to any potential witnesses.
- The information reported and gathered will then be reviewed to determine whether the behaviour,

i) is consistent with the "Guidance for safer working practice for those working with children and young people in education settings" (May 2019): no further action will be required,

ii) constitutes a low-level concern: no further action is required, or additional training/guidance/support may be required to rectify the behaviour via normal day to day management processes. The employee should understand that failure to improve or a repeat of the behaviour may lead to further action being taken, e.g. either via the Performance Management Policy or Disciplinary Policy.

iii) is serious enough to consult with or refer to the LADO: a referral should be made to the LADO and advice taken from HR. In this case the school's Managing Allegations procedure within the Safeguarding Policy and Disciplinary Policy will be followed.

iv) when considered with any other low-level concerns that have previously been raised about the same individual, should be reclassified as an allegation and referred to the LADO or Police: a referral should be made to the LADO and advice taken from HR. In this case the school's Managing Allegations procedure within the Safeguarding Policy and Disciplinary Policy will be followed.

- Records will be made of, i) all internal conversations including any relevant witnesses, ii) all external conversations eg with the LADO iii) the decision and the rationale for it, iv) any action taken
- The timescale for reporting to the LADO with a complaint about a member of staff is 24 hours.

## **78.8 Can the reporting person remain anonymous?**

78.8.1 The person bringing forward the concern will be named in the written record. Where they request to remain, anonymous this will be respected as far as possible. However, there may be circumstances where this is not possible e.g., where a fair disciplinary investigation is needed or where a later criminal investigation is required.

## **79.9 Should staff report concerns about themselves (i.e., self-report)?**

79.9.1 It may be the case that a person finds themselves in a situation which could be misinterpreted or might appear compromising to others; or they may have behaved in a manner which on reflection they consider falls below the standard expected. In these circumstances they should self-report. This will enable a potentially difficult situation to be addressed at an early opportunity if necessary.

## **80 Where behaviour is consistent with the "Guidance for safer working practice" (May 2019)**

81.1 Feedback will be given to both parties to explain why the behaviour was consistent with the "Guidance for safer working practice".

## **82 Should the low-level concerns file be reviewed?**

83.1 The records will be reviewed periodically, and whenever a new low-level concern is added, so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and referred to the LADO if required. A record of these reviews will be retained.

## **84.0 References**

85.1 Low-level concerns will not be included in references unless a low-level concern, or group of concerns, has met the threshold for referral to the LADO and found to be substantiated.

## **86.0 What is the role of the Directors?**

- 87.1 The Principal will regularly inform the Directors about the implementation of the low-level concerns procedures, as laid out in this annex, including any evidence of its effectiveness eg with relevant data. The Safeguarding Director may also review an anonymised sample to ensure that these concerns have been handled appropriately.

<b>Authorised by</b>	resolution of the Board of Directors
<b>Signed</b> .....	
	On behalf of the Board of Directors
<b>Date</b>	December 2024

### Schedule of Updates

Date document updated	Document updated by	Summary update/comments	Location of saved file
October 2016	MCO / SD / MB / RP	Update as part of the Spring/Summer 2016 review of policies and compliance. Updated in line with KCSIE 2016.	Dropbox – SMT – Policies Final
May 2017	SD	8.4.4 Added	Dropbox – SMT – Policies Final
July 2018	MCO	Updated in response to NCTL changing to TRA & age of consent for data becoming 13 (DPA 2018) + KCSIE 2018 and related documents	Dropbox – SMT – Policies Final
July 2019	MCO	Updated in response to KCSIE 2019, change to school age limit and consistency with other college policies	Dropbox – SMT – Policies Final
April 2020	MCO	Updated in response to ISA compliance check March/April 2020	Dropbox – SMT – Policies Final
July 2021	MCO	Updated to reflect further safeguarding measures	Dropbox – SMT – Policies 2021-2022
July 2022	ML	Updated to reflect further safeguarding measures	SLT-General-Policies 2022/2023
December 2024	ML	KCSIE 2024 and FGM updates, Para 14.2 and Para 17.	TEAMS Policies 2024/2025

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**Schedule of Review**

<b>Date of document review</b>	<b>Reviewed by</b>	<b>Scheduled date of next review</b>
July 2017	MCO	July 2018
July 2018	MCO	July 2019
July 2019	MCO	July 2020
July 2020	MCO	July 2021
July 2021	MCO	July 2022
July 2022	ML	December 2024
December 2024	ML	December 2026