

CODE OF CONDUCT FOR STAFF

Rooted in Christ and Catholic tradition and under the guidance of its patron, St Edmund's aims to realise the God-given potential, in body, mind and spirit, of all members of its community through service and leadership.

Avita Pro Fide !

St Edmund's is committed to ensuring the welfare and protection of children in its care and this commitment is a fundamental part of the role of every person employed by St Edmund's.

As an individual working with students, or likely to come into contact with students, you have a responsibility to maintain public confidence in your ability to safeguard their welfare.

You must adopt a high standard of personal conduct in order to maintain the confidence and respect of your colleagues, students, public in general and all those with whom you work.

You should be mindful of the effects that your behaviour may have on students who look to adults as role models.

You should be aware that your behaviour in your personal life may come under scrutiny from local communities, the media or public authorities. You must therefore exercise judgement and integrity in your actions both inside and outside of the workplace. If you are in any doubt as to your responsibilities or the standards of conduct expected you should speak to your line manager.

Purpose and application

- 1 **Purpose:** Relationships with fellow staff, employees, governors, contractors, visitors, volunteers, pupils and their parents or guardians should be reasonable and mutually respectful at all times. This Code of Conduct (**Code**) has been formulated in order to maintain this balance. This Code has regard to the College's Safeguarding and Child Protection Policy and the following (collectively referred to in this Code as the **Guidance**):
 - 1.1 *Keeping Children Safe in Education* (September 2019) (**KCSIE**):
 - 1.1.1 KCSIE incorporates the additional statutory guidance, *Disqualification under the Childcare Act 2006* (September 2018);
 - 1.1.2 KCSIE also refers to the non-statutory advice for practitioners: *What to do if you're worried a child is being abused* (March 2015).
 - 1.2 *Working Together to Safeguard Children* (September 2018 – updated in 2019 but without changing the date in the published version) (**WT**):
 - 1.2.1 WT refers to the non-statutory, but important, advice: *Information sharing* (2018)
 - 1.3 *Prevent Duty Guidance: for England and Wales* (July 2015) (**Prevent**). Prevent is supplemented by non-statutory advice and a briefing note:



- 1.3.1 *The Prevent Duty: Departmental advice for schools and childminders* (June 2015);
- 1.3.2 *The use of social media for online radicalisation* (July 2015).

2 The purpose of the Code is to:

- 2.1 confirm and reinforce the professional responsibilities of all Staff
- 2.2 promote efficient and safe working and to safeguard the wellbeing of students
- 2.3 in conjunction with the College's Policy on Safeguarding and Child Protection, clarify the legal position in relation to sensitive aspects of Staff/pupil relationships and communication including the use of social media
- 2.4 set out the expectations of standards and behaviour to be maintained within the College and
- 2.5 to help adults establish safe practices and reduce the risk of false accusations or improper conduct

3 Any failure to comply with the Code will be taken seriously and therefore may be referred to the Local Authority Designated Officer (LADO) in accordance with the College's Safeguarding and Child Protection Policy or dealt with under the College's Disciplinary Policy and could lead to dismissal. The College's Disciplinary Policy lists examples or matters that will normally be regarded as gross misconduct.

4 **Application:** The Code applies to all Staff working in the College (**College**), whether paid or unpaid, whatever their position, role or responsibilities and "Staff" includes employees, governors, contractors, students and volunteers.

5 **Your duty:** It is the 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. The College operates a Whistleblowing Policy which is contained within the Staff Handbook.

7 **Application with other policies:** The Code should be read in conjunction with the College's Safeguarding and Child Protection Policy and Whistleblowing Policy. All Policies are available electronically on the College's shared drive.

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 Safeguarding and Child Protection Policy;
 - 8.1.6 knowing the role, identity and contact details of the current Designated Safeguarding Lead and their deputy, in both the Prep School and College;
 - 8.1.7 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, towards all pupils, parents, guardians or carers and colleagues;
 - 8.2.2 complying with the College's Equal Opportunities and Prevention of Bullying Policy and this Code;
 - 8.2.3 addressing issues of discrimination and bullying whenever they arise;
 - 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 acting, at all times, in good faith and in the best interests of the College, its students and staff;
 - 8.3.2 developing productive and supportive relationships with colleagues;
 - 8.3.3 exercising any management responsibilities in a respectful, inclusive and fair manner;
 - 8.3.4 complying with all College policies and procedures;
 - 8.3.5 participating in the College's development and improvement activities;
 - 8.3.6 recognising the role of the College in the life of the local community;
 - 8.3.7 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 means 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.

9 Additional principles for teachers

- 9.1 From October 2015, teachers must report to the police cases where they discover 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 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 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 adults working in this College, and not just teachers.
- 11 **Sexual contact:** Staff must not:
- 11.1 indulge in 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
 - 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 relationship is considered inappropriate and is a grave breach of trust that will likely 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 relationship, including a sexual relationship, with any pupil of the 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 College or 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 inappropriate relationships with a pupil of any College or 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 familiar with procedures for handling allegations against Staff
 - 14.3 must be aware of the College's Safeguarding and Child Protection Policy and Whistleblowing Policy
 - 14.4 must seek guidance from the Designated Safeguarding Lead if you are in any doubt about appropriate conduct



- 14.5 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:
- 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
 - 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 Safeguarding and Child Protection Policy.
- 17 **Record keeping:** Comprehensive records are essential. Any incident involving children that could give cause for concern, whether contemplated in these guidelines or not, must be recorded, with justifications for any action taken. In addition, any incident should be reported promptly to the Designated Safeguarding Lead.
- 18 **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

- 19 **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.
- 20 **Use of premises:** You must not carry out on College premises any work or activity other than pursuant to your terms and conditions of employment without the prior permission of the Headmaster.
- 21 **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. Such concerns will be given careful consideration as to whether they constitute a potential risk to children at the College.

Meetings with pupils

- 22 **One-to-one meetings:** If you are conducting a one-to-one meeting or teaching session with a pupil, you should take particular care in the following ways:
- 22.1 when working alone with a pupil is an integral part of your role, conduct and agree full risk assessments with the Deputy Head / Headmaster



- 22.2 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
 - 22.3 arrange the meeting during normal College hours when there are plenty of other people about
 - 22.4 do not continue the meeting for any longer than is necessary to achieve its purposes
 - 22.5 avoid sitting or standing in close proximity to the pupil, except as necessary to check work
 - 22.6 avoid using "engaged" or equivalent signs on doors or windows
 - 22.7 ensure that discussions are always appropriate
 - 22.8 avoid all unnecessary physical contact and apologise straight away if there is accidental physical contact
 - 22.9 avoid any conduct that could be taken as a sexual advance
 - 22.10 report any incident that causes you concern to the Designated Safeguarding Lead under the College's Safeguarding and Child Protection Policy and make a written record (signed and dated)
 - 22.11 report any situation where a pupil becomes distressed or angry to the Designated Safeguarding Lead.
- 23 ***Pre-arranged meetings:*** Pre-arranged meetings with pupils outside College should not be permitted unless approval is obtained from their parents, guardians or carers and the Deputy Head / Headmaster. If you are holding such a meeting, you should inform colleagues before the meeting.
- 24 ***Home visits:*** In some circumstances home visits are necessary. You should:
- 24.1 discuss the purpose of any visit with Designated Safeguarding Lead and adhere to any agreed work plan/contract;
 - 24.2 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;
 - 24.3 never visit when parents are not present;
 - 24.4 not visit unannounced if this can be avoided;
 - 24.5 leave the door open where you will be alone with pupils;
 - 24.6 keep records detailing times of arrival and departure, and work undertaken;
 - 24.7 ensure that any behaviour or situation that gives rise to a concern is reported and actioned



- 24.8 discuss with the Designated Safeguarding Lead anything that gives cause for concern in accordance with the College's Safeguarding and Child Protection Policy;
- 24.9 have an emergency contact.
- 25 ***The use of personal living space:*** Pupils should not be in or invited into the personal living space of any member of Staff under any circumstances.

Language and appearance

- 26 ***Language:*** You should use appropriate language at all times. You should:
- 26.1 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)
 - 26.2 avoid any form of aggressive or threatening words
 - 26.3 avoid any words or actions that are over-familiar
 - 26.4 not swear, blaspheme or use any sort of offensive language in front of pupils
 - 26.5 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.
 - 26.6 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.
- 27 ***Dress & Appearance:*** The College regularly receives visits from parents, potential parents and others, and naturally wish to convey an impression of efficiency and organisation. Therefore, whilst not wishing to impose unreasonable obligations on staff you are, nonetheless, required to look smart in appearance. You should dress appropriately and in a professional manner. We expect high standards of students and expect all staff to adopt those same standards. All staff must be mindful that adults are role models for students and, as the College enforces breaches of standards by students, students must witness all staff applying those standards to themselves. Such an approach will ease the enforcement of standards with students who should mirror the set example. Dress must not be offensive, distracting, revealing, or sexually provocative, embarrassing or discriminatory. Political or other contentious slogans or badges are not allowed.
- 28 ***Attendance and Time-Keeping:*** The College expects high standards of professionalism in relation to attendance and time keeping.
- 29 ***Substance Misuse:*** The College is committed to providing a safe, healthy and productive environment to all students and staff. This includes ensuring that all staff are fit to carry out their roles safely and effectively in an environment which is free from alcohol and drug misuse.



'Alcohol misuse' is defined as unauthorised possession of, or consumption of, alcohol during working hours, attending work under the influence of alcohol or being in the presence of others involved in alcohol misuse.

'Drug misuse' refers to the possession or use of illegal substances, the misuse of prescribed drugs and other substances such as solvents, being under the influence of any of the above or being in the presence of others involved in drug misuse.

'During working hours' includes during breaks, when on duty or on the way to work.

The College does not permit:

Being under the influence of any drug or other substance during working hours when such drug/s or substance/s may affect an individual's ability to suitably look after the children in their care;

Drug or alcohol misuse during working hours;

Being under the influence of non-prescribed drugs or alcohol while at work, on duty or at any time while having responsibility for the supervision and care of children (including any time while on College trips);

Encouraging others to misuse alcohol or drugs, and

Drug, alcohol or substance misuse out of working hours but which in the opinion of the College brings it into disrepute.

The College will treat any information regarding employees' problems with drugs or alcohol as confidential, subject to its legal obligations. The College can offer support to those experiencing problems by referring employees to an advisory service, for example. However, Staff are encouraged to seek help directly from a medical professional, particularly if they feel they have a problem (for example, if medication is affecting their ability to care for children or perform their role or they consider they are struggling with an addiction). The College endeavours to provide information to Staff about the effects of drugs on health and safety.

Notwithstanding the above, drug and alcohol misuse may become a matter for disciplinary action, particularly where help is refused and/or impaired performance continues. In cases of gross misconduct, dismissal may result from disciplinary proceedings. The College will report to the police any incidents of possession of or dealing in illegal substances.

Employees have a duty to report any incidents of Staff or students engaging in drug or alcohol misuse. Failure to do so may result in disciplinary sanctions up to and including dismissal.

Every member of Staff has a responsibility to securely store away from students, at all times, any medicines, substances, drugs or alcohol.

The use of force or physical restraint

29.1 Staff must always adhere to the Restraint Policy.



Physical contact in other circumstances

- 30 **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. 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.
- 31 **Guidance on using physical contact:** You should observe the following guidelines (where applicable):
- 31.1 explain the intended action to the pupil
 - 31.2 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
 - 31.3 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
 - 31.4 consider alternatives if it appears likely that the pupil might misinterpret the contact
- 32 **Report concerns:** If you are at all concerned about any instance of physical contact, inform the Designated Safeguarding Lead / Designated Senior Manager without delay, and make a written record in the incident book and on the pupil's file if necessary.
- 33 **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 Deputy Head/ Headmaster when comfort has been offered, record the action and should seek guidance if unsure whether it would be appropriate in a particular case.
- 34 **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 parents, guardians or carers should be informed. Staff should:
- 34.1 adhere to the College's policy on administering first aid/medication
 - 34.2 comply with the necessary reporting requirements
 - 34.3 make other adults aware of the task that is being undertaken
 - 34.4 explain what is happening
 - 34.5 report and record the administration of first aid or send an email to the Infirmary.
 - 34.6 have regard to any health plans
 - 34.7 ensure that an appropriate health/risk assessment is undertaken prior to undertaking certain activities



- 35 ***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. You should:
- 35.1 avoid physical contact or visually intrusive behaviour when children are undressed
 - 35.2 announce yourself when entering changing rooms and avoid remaining unless required
 - 35.3 not shower or change in the same place as children
 - 35.4 not assist with any personal care task which a pupil can undertake themselves
- 36 ***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 Deputy Head/ Headmaster and parents, guardians or carers where appropriate.
- 37 ***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 will establish whether any reasonable adjustments are required for such pupils, in conjunction with the appropriate Staff.

Code of conduct for contact outside College

- 38 ***Contact outside College:*** You should avoid unnecessary contact with pupils outside College. You should:
- 38.1 not give pupils your home address, home phone number, mobile phone number or e-mail address
 - 38.2 not send personal communications (such as birthday cards or faith cards, text messages etc) to children unless agreed with the Headmaster
 - 38.3 not make arrangements to meet pupils, individually or in groups, outside College other than on College trips authorised by the Head
 - 38.4 do not contact pupils at home except in an emergency and with the permission of the Senior Leadership Team. . A record should be kept giving details of the why the contact was required and what was communicated to the pupils.
 - 38.5 not give private tuition to current pupils of, or applicants to, the College
 - 38.6 not give a pupil a lift in your own vehicle other than on College business or in an emergency and with permission from the Headmaster or Deputy Head
 - 38.7 do not invite pupils (groups or individuals) to your home or boarding accommodation. This prohibition also applies if you have on site accommodation



- 38.8 report and record any situation which may place a child at risk or which may compromise the College's or your professional standing
- 38.9 never engage in secretive social contact with pupils or their parents, guardians or carers
- 38.10 do not contact or allow yourself to be contacted by students via social media. If a student contacts you, you must report it to the Designated Safeguarding Officer who will take the appropriate action.
- 39 **Social contact / Social media:** You should be aware that where you meet children or parents, guardians or carers socially, such contact could be misinterpreted as inappropriate, abuse of a position of trust or grooming. Any social contact that could give rise to concern should be reported to the Deputy Head/ Headmaster. In addition, all staff should be mindful that personal use of social media that impacts the College may result in disciplinary action, including dismissal.
- 40 **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 College. However, members of Staff should still respect the above advice wherever possible and should keep the Headmaster informed of such relationships.
- 41 **Scope of application of the Code on contact outside College:** The same guidelines should be applied to after College clubs, College trips, and especially trips that involve an overnight stay away from the College. Additional guidelines apply for College trips and reference should be made to the Educational Visits Coordinator of the College. The principles of this guidance also apply to contact with children or young people who are pupils at another College.
- 42 **Transporting Pupils:** There may be some situations when Staff are required to transport pupils but this will usually be by taxi with the member of staff accompanying a pupil. You should:
- 42.1 ensure that you are fit to drive and free from any substances that may impair your judgement or ability to drive
- 42.2 be aware that until the pupil is passed over to a parent/carer, you have responsibility for that pupil's health and safety
- 42.3 record the details of the journey
- 42.4 record and be able to justify impromptu or emergency lifts and notify the Headmaster
- 42.5 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
- 42.6 wherever practicable, you should avoid using private vehicles and should try and have one adult additional to the driver to act as an escort



- 43 **After College activities:** When taking part in after College activities, you should:
- 43.1 be accompanied by another adult unless otherwise agreed with the Deputy Head / Headmaster
 - 43.2 undertake a risk assessment
 - 43.3 obtain parental consent
- 44 **Educational visits:** When taking part in educational visits, you should:
- 44.1 follow the College's policy on Educational Visits
 - 44.2 be accompanied by another adult unless otherwise agreed with the Deputy Head/ Headmaster
 - 44.3 undertake a risk assessment
 - 44.4 obtain parental consent
 - 44.5 never share sleeping accommodation
- 45 **Overnight supervision:** Where overnight supervision is required, eg. to preserve the integrity of the examination process:
- 45.1 you should ensure that a risk assessment has been undertaken and that all members of the household have had the appropriate checks
 - 45.2 arrangements should be made with and agreed by parents, guardians or carers and the pupil
 - 45.3 one to one supervision should be avoided where possible
 - 45.4 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
 - 45.5 whenever possible, independent oversight of the arrangements should be made and
 - 45.6 any misinterpretation, misunderstanding or complaint should be reported

Communication with pupils (including the use of technology)

- 46 **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.
- 47 **Application:** These rules apply to any form of communication including new technologies such as mobile phones, web-cameras, social networking websites and blogs. You should also ensure you comply with the more detailed 'Use of Telephone, E-mail Systems and Internet' Policy.



- 48 **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 level of professionalism is 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 Headmaster 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 Deputy Head / Headmaster and recorded.
- 49 **Acceptable Use:** Adults must establish safe and responsible online behaviours and must be familiar with the 'Use of Telephone, Email Systems and Internet' Policy and, in relation to e-safety for students, paragraph B11 of the Safeguarding Child Protection Policy. Adults should report to senior colleagues, any new and emerging technologies which may have a bearing on College practices. Local and national guidelines on acceptable user policies should be followed. Staff should also:
- 49.1 ensure that your own personal social networking sites are set as private and ensure that pupils are not approved contacts.
 - 49.2 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
 - 49.3 do not use your own equipment (e.g. mobile 'phones) to communicate with pupils - use equipment provided by the College and ensure that parents, guardians and carers have given permission
 - 49.4 only make contact with pupils for professional reasons
 - 49.5 recognise that text messaging/social media should only be used as part of an agreed protocol and only when other forms of communication are not possible
 - 49.6 avoid any discussions about the College or pupils, parents or employees in online areas that may subsequently or inadvertently become available to others.
- 50 **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 the Headmaster and parents, guardians or carers.
- 51 **Communicating outside the agreed protocols:** Email or text communications between an adult and a pupil outside agreed protocols may lead to a report to external agencies in accordance with the College's Safeguarding and Child Protection Policy, disciplinary action and/or criminal investigations. This also includes communications through internet based websites.

Code of conduct for photographs and videos

- 52 **Permission required:** You should only take photographs or video footage, of pupils in class, or at a College event or on a trip, for strictly educational and College purposes. You must not take images of children using personal mobile telephones or other photographic device; you should use equipment provided by the College for this purpose. Appropriate consents for taking and displaying photographs should be obtained from parents, guardians or carers, where appropriate.



- 53 **Guidance where permission obtained:** Where permission has been obtained, the following should be considered:
- 53.1 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
 - 53.2 all images should be made available in order to determine acceptability
 - 53.3 images should not be made during one-to-one situations
 - 53.4 ensure that the pupil is appropriately dressed
 - 53.5 ensure that the pupil understands why the images are being taken and has agreed to the activity
 - 53.6 only use equipment provided or authorised by the College
 - 53.7 if an image is to be displayed in a place to which the public have access it should not display the pupil's name. Similarly where a pupil is named (in a College prospectus, for example) the name should not be accompanied by a photograph or video
 - 53.8 all images of children should be stored securely and only accessed by those authorised to do so
 - 53.9 images must not be taken secretly
- 54 **Appropriate material:** 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 under the College's Safeguarding and Child Protection Policy 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

- 55 **Anti-bribery and corruption:** The giving of gifts or rewards to children is generally prohibited, unless part of a policy approved by the Headmaster of supporting positive behaviour or recognising particular achievements. Any gifts should be given openly and not based on favouritism.
- 56 **If a gift is received:** There are occasions where students or parents/guardians wish to pass small tokens of appreciation to adults (for example on special occasions or as a thank you) and this is acceptable. You should take care not to accept any gift that might be construed as a bribe by others, or lead the giver to expect preferential treatment. It is unacceptable to receive gifts on a regular basis or of any significant value. If you receive a gift from a pupil or parent you should:
- 56.1 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 Bursar may in his absolute discretion require you to decline the gift



56.2 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

57 **Giving gifts and rewards:** Where you are thinking of giving a gift or reward:

57.1 it should only be provided as part of an agreed reward system

57.2 in all cases except the above, the gift or reward should be of little monetary value and should be discussed and agreed with the Headmaster, the Headmaster and, where appropriate, the parent, guardian or carer

57.3 selection processes should be fair and where possible should be agreed by more than one member of Staff

57.4 gifts should be given openly and not based on favouritism

58 **Allocation of gifts and rewards:** Decisions regarding entitlement to benefits or privileges such as admission to College trips, activities or classroom tasks must avoid perceptions of bias, grooming or favouritism. The selection process must be based on transparent criteria.

Childcare Disqualification

59 **Offence:** The Childcare Act 2006 and the Childcare (Disqualification) Regulations 2009 state that it is an offence for the College to employ anyone to provide childcare in connection with our early years provision (**EYP**) or later years provision (**LYP**) who is disqualified, or for a disqualified person to be directly involved in the management of EYP or LYP (a **Relevant Role**).

60 **EYP** includes usual College activities and any other supervised activity for a "young child" which takes place on the College premises during or outside of the normal College day (a child is a "young child" during the period between birth and up to 1 September following their fifth birthday).

61 **LYP** includes provision for children not in EYP and under the age of 8 which takes place on College premises outside of the normal College day, including, for example breakfast clubs, after College clubs and holiday clubs. It does not include extended College hours for co-curricular activities such as sports activities.

62 **"Childcare"** means any form of care for a child, which includes education and any other supervised activity for a "young child". "Childcare" in LYP does not include education during College hours but does cover before and after College clubs.

63 **Grounds for disqualification:** The grounds on which a person will be disqualified from working in connection with EYP or LYP are set out in the College's Recruitment, Selection and Disclosure Policy and Procedures. Staff are required to familiarise themselves with this document.

64 **Duty of disclosure:** Staff in a Relevant Role are under an on-going duty to immediately notify the College if their circumstances, or the circumstances of any member of their household, change so that they meet any of the criteria for



disqualification at any point during their employment with the College. Any failure to disclose relevant information will be treated as a serious disciplinary matter.

- 65 **Department for Education (DfE):** Where the College receives disqualification information about a member of staff working in a Relevant Role and is satisfied that the member of staff may be disqualified as a consequence, the College is under a duty to report the circumstances of the disqualification to the DfE.
- 66 **Waiver:** A member of staff who discloses information which appears to disqualify them from working in a Relevant Role may apply to the DfE for a waiver of the disqualification.

Consequences of breaching this policy

- 67 **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.
- 68 **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 as soon as possible 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.
- 69 **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 will be made to the Disclosure and Barring Service as soon as possible if the criteria for a referral are met.
- 70 **Teaching Regulation Agency (TRA):** Where a teacher has been dismissed, or would have been dismissed had he / she not resigned, separate consideration will be given as to whether a referral to the Teaching Regulation Agency (TRA), *formerly the National College for Teaching and Leadership (NCTL)*, should be made.

Frequency of review: Annual
Policy last reviewed: Michaelmas 2019
Next review date: Michaelmas 2020