



**RENDCOMB  
COLLEGE**  
NURSERY • JUNIOR • SENIOR

# **Safeguarding Code of Conduct for All Staff**

**(ISI: 7e)**

**Monitoring:**

Deputy Head (Pastoral) and DSL

**Reviewed:**

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## **Rendcomb College's Staff Code:**

A significant proportion of its content and, in some cases, the actual words used, have been taken from the document, 'Guidance for Safer Working Practice for adults who work with children and young people'.

The code should be seen as a supportive document which aims to clarify good practice in order to keep both pupils and staff safe. This policy has been written to support staff and pupils by being as clear as possible about safe conduct concerning the professional relationship between staff and pupils during term time. Inevitably, situations will arise that the policy does not cover, and staff should seek advice from members of the Senior Leadership Team.

### **Introduction:**

Rendcomb College, as a small rural school, has always enjoyed a relaxed and friendly working environment. It is important that we all work to retain this warm atmosphere but that we also ensure that we do not allow this atmosphere to be misinterpreted by staff and/or pupils.

### **The aims of this code are:**

- To provide staff with clear advice on appropriate and safe behaviours for all adults working with children in the school.
- To keep children safe by clarifying which behaviours constitutes safe practice and which should be avoided.
- To assist staff to work safely and responsibly and to monitor their own standards and practice.
- To support SLT and managers in setting clear expectations of behaviour and code of practice in the school.
- To support SLT and Governors in giving a clear message that unlawful or unsafe behaviour is unacceptable and that disciplinary or legal action will be taken.
- Support safer recruitment.
- Minimise the risk of misplaced or malicious allegations against staff.
- Reduce the incidence of positions of trust being abused or misused.

All staff have a duty to keep pupils safe and to protect them from physical and emotional harm. All staff have a responsibility to be aware of the school's Safeguarding Children Policy and procedures (Staff Handbook). It must be recognised that some allegations will be genuine as there are people who seek out, create or exploit opportunities to harm children. However, allegations may also be false or misplaced and may arise from differing perceptions of the same event. When they occur, they are inevitably distressing and difficult for all concerned. It is therefore essential that all possible steps are taken to safeguard children and ensure that the adults working with them do so safely.

### **Principles**

- The welfare of pupils is paramount.
- Staff should understand their responsibilities to safeguard and promote the welfare of pupils. This responsibility extends to a duty of care for those employed or contracted to work with pupils.
- Staff should work, and be seen to work, in an open and transparent way.

- Staff are responsible for their own actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motivation and intentions.
- Staff should acknowledge that deliberately invented/malicious allegations are extremely rare and that all concerns should be reported and recorded
- Staff should discuss and/or take advice promptly from their line manager if they have acted in a way which may give rise to concern
- Staff should apply the same professional standards regardless of culture, disability, gender, language, racial origin, religious belief and sexual orientation
- Staff should not consume or be under the influence of alcohol or any substance, including prescribed medication, which may affect their ability to care for children
- Staff should be aware that breaches of the law and other professional guidelines could result in disciplinary action being taken against them, criminal action and/or other proceedings including barring by the Disclosure & Barring Service (DBS) from working in regulated activity, or for acts of serious misconduct prohibition from teaching by the Teacher Referral Agency (TRA).
- Staff should be aware of and understand their establishment's child protection policy, arrangements for managing allegations against staff, staff Code of Conduct, whistle blowing procedure and Gloucestershire Safeguarding Children Board procedures.

### **Duty of Care**

- Staff need to be aware that when accepting a role which involves working with children, they need to understand and acknowledge the responsibility and trust inherent in that role.
- Staff have a duty to take care of themselves and be responsible for their own actions and behaviour.
- Staff are expected to take reasonable steps to ensure the safety and well-being of pupils. Failure to do so may be regarded as professional misconduct.
- The safeguarding culture of a school is, in part, exercised through the development of respectful, caring and professional relationships between adults and pupils and behaviour by the adult that demonstrates integrity, maturity and good judgement.
- Staff should always report to a senior member of staff anything of concern about a pupil's safety or their own.
- If child abuse is suspected, staff have a duty to pass information without delay to the DSL.

### **Making a professional judgement**

- Where no specific guidance exists, staff are expected to make professional judgments about their behaviour in order to secure the best interests and welfare of pupils and, in so doing, will be deemed to be acting reasonably.
- There will be rare occasions and circumstances in which staff have to make decisions or take action in the best interest of a pupil which could contravene this guidance or where no guidance exists.
- Such judgements should **always** be recorded and shared with the Deputy Head Pastoral or the Head in JS, and in undertaking such actions staff will be seen to be acting responsibly.
- Adults should always consider whether their actions are warranted, proportionate, safe and applied equitably.

### **Positions of power and trust:**

- The relationship between a person working with a child/ren is one in which the adult has a position of power or influence. It is vital for adults to understand this power; that relationship cannot be one between equals and the responsibility they must exercise as a consequence.
- Do not use your position to gain access to information for your own advantage or to a pupil's or family's detriment.
- Do not use your power to intimidate, bully, humiliate, threaten, coerce or undermine pupils.
- Do not engage in sexual activity with any pupil, of any age, or cause or invite a pupil to engage in or watch any kind of sexual activity. Their consent is irrelevant.
- Be aware how your action may be viewed by others. Do not be seen to be paying special attention to a particular pupil.
- Staff should always maintain appropriate professional boundaries, avoid behaviour which could be misinterpreted by others and report and record any such incident with DSL and/or Deputy Head Pastoral.

### **Confidentiality**

- Staff may have access to confidential information about pupils and their families which must be kept confidential at all times and only shared when legally permissible to do so and in the interest of the child. Records should only be shared with those who have a legitimate professional need to see them.
- Confidential information should never be used casually in conversation or shared with any person other than on a need-to-know basis. In circumstances where the pupil's identity does not need to be disclosed the information should be used anonymously.
- Whilst staff need to be aware of the need to listen to and support pupils, they must also understand the importance of not promising to keep secrets. Neither should staff request this of a pupil under any circumstances.
- Never promise complete confidentiality to a pupil prior to, during or after a disclosure. In such circumstances staff should always follow safeguarding procedures and refer to the DSL or their Deputy as soon as possible.
- Never pass on confidential information to anyone, including pupils, parents, press, police, social services, etc. without first seeking guidance from the DSL and/or a member of SLT.
- All data covered by the Data Protection Act (basically everything personal, be it academic, home background, etc.) should be treated in accordance with the Act, (i.e. with real care). If you are unsure of whether or not the data is covered, please see the Headmaster/Deputy Head Pastoral or DSL.

The safeguarding of children needs have priority over data protection, but consult DSL in such circumstances.

### **Standards of Behaviour**

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

- Do not behave in such a manner that would lead any reasonable person to question your suitability to work with children or to act as a role model. This includes the use of inappropriate language to or in the presence of pupils.
- Staff should ensure that their relationship with pupils clearly takes place within the boundaries of a respectful professional relationship.
- Do not make sexual remarks to a pupil (including email, text messages, phone and letter), or behave in any way which could be interpreted as sexually suggestive or provocative.
- Do not discuss your own sexual preferences or sexual relationships with or in the presence of pupils.
- Do not discuss a pupil's individual sexual relationships with anyone except a houseparent or school nurse, in class or in other inappropriate contexts or settings.
- Do not allow public discussion or criticism of colleagues by pupils.
- Do not make unprofessional personal comments which demean, humiliate or make a scapegoat of pupils.
- Staff need to be aware that behaviour by themselves, either in or out of the workplace, those with whom they share a household, or others in their personal lives, may impact on their work with children. The result could lead to prohibition from teaching, a bar from regulated activity, or action by another relevant regulatory body.
- Staff in the EYFS setting need to understand that they may be disqualified because of their “association” with a person living or employed in the same household who is disqualified.

### **Low-Level Concerns**

- As part of the College’s approach to safeguarding we promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school are dealt with promptly and appropriately, including all low-level concerns.
- The term low-level concern does not mean that it is insignificant and it means that behaviour towards a child does not meet the principles laid out at the start of this document and is inconsistent with the staff code of conduct.
- Examples of such low-level behaviour include:
  - Being over-friendly with children
  - Having favourites
  - Taking photographs of children on their phones for non-school usage
  - Engaging with children one-to-one in a secluded area
  - Using inappropriate sexualised, intimidating or offensive language
- Low-level concerns that staff have about an adult involved in the school should be shared with the Head of College or Head of Juniors (as applicable) to ensure the standards of expected behaviour are met. When the concern is regarding the Headmaster or the DSL then concerns should be raised with the Chair of Governors
- The Head of College is responsible for the overview of these low-level concerns to monitor for patterns of behaviour which do not meet the staff code of conduct requirements.

## **Dress and Appearance**

- A person's dress and appearance are matters of personal choice and self-expression and some individuals will wish to exercise their own cultural customs. However staff should select a manner of dress and appearance appropriate to their professional role and which may be necessarily different to that adopted in their personal life.
- Staff should wear clothing which promotes a positive and professional image and is appropriate to their role.
- Staff should dress decently, safely and appropriately for the tasks and the work they undertake.
- Staff should wear clothing which does not distract, cause embarrassment or give rise to misunderstanding.
- Staff should wear clothing which is not likely to be viewed as offensive, revealing, or sexually provocative and is absent from any political or otherwise contentious slogans.
- Staff should be aware that dressing in a manner which could be considered as inappropriate could render themselves vulnerable to criticism or allegations.

## **Gifts, Rewards, Favouritism and exclusion**

- Staff should be aware of the school policy on gifts (staff handbook) and ensure they declare to the Bursar any gift which exceeds the value which is stated in the policy.
- Staff need to take care that they do not accept any gift which might be construed by others as a bribe, or lead the giver to expect preferential treatment. Any such gift should be declared and recorded with SLT.
- There are occasions when pupils or parents wish to pass small tokens of appreciation to staff e.g. at Christmas or as a thank-you and this is usually acceptable. However, it is unacceptable to receive gifts on a regular basis or of any significant value.
- Similarly, it is inadvisable to give such personal gifts to pupils or their families. This could be interpreted as a gesture either to bribe or groom. It might also be perceived that a 'favour' of some kind is expected in return.
- Staff should exercise care when selecting children for specific activities, jobs or privileges in order to avoid perceptions of favouritism or injustice. Similar care should be exercised when pupils are excluded from an activity. Methods of selection and exclusion should always be subject to clear, fair, agreed criteria.
- Generally only give gifts to a pupil as part of our agreed reward systems. In any other context, ensure that any gifts given are of insignificant value and given to all children equally.

## **Crushes, Attachments and Infatuations**

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

- Any member of staff who receives a report, overhears something, or otherwise notices any sign, however small or seemingly insignificant, that a young person has become or may be becoming infatuated with either themselves or a colleague, should immediately report this to the Headmaster, Deputy Head Pastoral or DSL. In this way appropriate early intervention can be taken which can prevent escalation and avoid hurt, embarrassment or distress for those concerned.
- In such circumstances careful thought will be given to those circumstances where the staff member, pupil and their parents/carers should be spoken to and should ensure a plan to manage the situation is put in place. This plan should respond sensitively to the child and staff member and maintain the dignity of all. This plan should involve all parties, be robust and regularly monitored and reviewed.

### **Use of Personal Living Space**

- Staff should be vigilant in maintaining their privacy, including when living in on-site accommodation, and mindful of the need to avoid placing themselves in vulnerable situations. They should also be mindful of the need to maintain professional boundaries.
- However it is recognised that a member of staff may have their own children in the school and they may wish to have friends to visit and stay. This would be recognised as a private social arrangement which would not violate this advice.
- In other circumstances no pupil should be in or invited into the home of a member of staff by that member of staff unless the reason has been firmly established and agreed with the Deputy Head Pastoral or Headmaster.

### **Social Contact Outside of the Workplace**

- It is acknowledged that staff may have genuine friendships and social contact with parents of pupils, independent of the professional relationship. Staff should, however, also be aware that professionals who sexually harm children often seek to establish relationships and contact outside of the workplace with both the child and their parents, in order to 'groom' the adult and the child and/or create opportunities for sexual abuse.
- It is also important to recognise that social contact may provide opportunities for other types of grooming such as for the purpose of sexual exploitation or radicalisation.
- Staff should recognise that some types of social contact with pupils or their families could be perceived as harmful or exerting inappropriate influence on children, and may bring the setting into disrepute (e.g. attending a political protest, circulating propaganda).
- If a pupil or parent seeks to establish social contact, or if this occurs coincidentally, the member of staff should exercise her/his professional judgement. This also applies to social contacts made through outside interests or the staff member's own family.
- Some staff may, as part of their professional role, be required to support a parent or carer. If that person comes to depend upon the staff member or seeks support outside of their professional role this should be discussed with Deputy Head Pastoral or DSL and where necessary referrals made to the appropriate support agency.
- Do not try to establish secret social contact with pupils, or their parents for friendships or a relationship.

- Where social contact is an integral part of work duties, such as pastoral work, care should be taken to maintain appropriate personal and professional boundaries.
- Staff should always approve any planned social contact with children or parents ideally with the Deputy Head Pastoral. Staff should also advise the Deputy Head Pastoral of any social contact which may give rise to concern.
- Staff should always get approval from the Headmaster for requests or arrangements where parents wish to use their services outside of the workplace e.g. tutoring

### **Communication with children and parents (including use of technology)**

- In order to make best use of the many educational and social benefits of new and emerging technologies, pupils need opportunities to use and explore the digital world. E-safety risks are posed more by behaviours and values than the technology itself.
- Do not give personal details to pupils, e.g. home/mobile phone numbers, home or email address, web based identities. If children locate these by any other means and attempt to contact or correspond staff should not respond and must report the matter to the Deputy Head Pastoral.
- Whenever possible staff should only use the school phones or mobile phones/devices to contact pupils or their parents.
- Staff are expected to abide by the College's A.U.P. for I.T. and the advice given with respect to social networks in the staff handbook.
- Any email contact with parents or pupils must be by school email.
- Staff should only make contact with pupils for professional reasons.
- Staff should ensure that communications are open and transparent and avoid any communication which could be interpreted as 'grooming behaviour'.
- Staff should recognise that text messaging is rarely an appropriate response to a pupil in a crisis and should only be used as a last resort and then reported to the Deputy Head Pastoral.
- Any inappropriate communication with pupils by staff which is outside the agreed protocols may lead to disciplinary and/or criminal investigations.
- Any unwelcome communications to staff, be they written or visual, from pupils or parents should be reported immediately to the Deputy Head Pastoral.
- Pupils should be addressed by their first names and should use surnames when talking to staff.

### **Physical contact**

There are occasions when it is entirely appropriate and proper for staff to have physical contact with children, however, it is crucial that they only do so in ways appropriate to their professional role and in relation to the pupil's individual needs and any agreed care plan.

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



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

(Junior School teachers should also refer to the Intimate Care Policy)

It is not possible to be specific about the appropriateness of each physical contact, since an action that is appropriate with one pupil, in one set of circumstances, may be inappropriate in another, or with a different child.

A general culture of 'safe touch' should be adopted, where appropriate, to the individual requirements of each child. This is especially important if you are on your own with them.

- Physical contact should never be secretive or for personal gratification.
- Physical contact should never be of a type which may be considered indecent.
- Physical contact should be in response to a child's needs at the time, of limited duration, and appropriate given their age, stage of development, gender, ethnicity and background.
- Some staff (e.g. PE, music, drama and SEN staff) may need to initiate physical contact, e.g. in order to support a child so they can perform a task safely, to demonstrate a particular piece of equipment/ instrument or assist them with an exercise. This should be done with the pupil's understanding of the reason and their consent, and in an 'open' environment i.e. one easily observed by others and last for the minimum time necessary.
- Do not indulge in horseplay, tickling or fun fights.
- Use extra caution when it is known that a pupil has suffered previous abuse or neglect. Staff also should recognise that these pupils may seek out inappropriate physical contact. In such circumstances staff should deter the child sensitively and help them to understand the importance of personal boundaries.
- If a member of staff believes that an action by them or a colleague could be misinterpreted, or if an action is observed which is possibly abusive the incident and circumstances should be immediately reported to the Deputy Head Pastoral and DSL and recorded.

### **Pupils in Distress**

- There may be rare occasions when a distressed pupil needs comfort and reassurance, and this may involve physical contact, principally with our youngest pupils.
- Staff should use their professional judgement to comfort or reassure a pupil in an age-appropriate way, which might include physical contact, whilst maintaining professional boundaries.
- Staff should be self-aware, avoid any contact which may be intrusive or open to misinterpretation, and be circumspect in offering reassurance in one to one situations.
- Staff should record and report to a colleague if they have offered comfort to a distressed pupil.

### **Showers and Changing**

- Pupils are entitled to respect and privacy at all times and especially when in a state of undress, including, for example, when changing, toileting and showering.
- However, there needs to be an appropriate level of supervision in order to safeguard pupils, satisfy health and safety considerations and ensure that bullying or teasing does

not occur. This supervision should be appropriate to the needs and age of the young people concerned and sensitive to the potential for embarrassment

- Staff should announce their intention of entering the changing rooms.
- Avoid visually intrusive behaviour.
- Do not touch a pupil in a state of undress.
- Do not remain there unless pupil needs require it.
- Don't change or shower in the same place.
- Be particularly careful about gender issues.
- If staff are taking a trip overseas where it may not be possible to adhere to these guidelines, then staff must discuss this with the Deputy Head Pastoral prior to the trip. Also if an unexpected situation occurs on the trip then this should be reported to the Deputy Head Pastoral on return.

### **Control and Physical Intervention**

- Staff should always adhere to the Physical Restraint Policy in the staff handbook.
- Always try to defuse situations without physical intervention.
- We do not expect staff to put themselves at physical risk, but you may use physical intervention to prevent a pupil from injuring themselves or others or to prevent damage to property.
- When physical intervention is used it should proportionate and at the minimum level needed to prevent harm.
- If possible, enlist the help of another staff member.
- If physical intervention has been used, the incident and subsequent actions should be documented and reported to the Deputy Head Pastoral.
- Similarly, where it can be anticipated that physical intervention is likely to be required, a plan should be put in place which the pupil and parents/carers are aware of and have agreed to.

### **Behaviour Management**

- Corporal punishment and smacking is unlawful in all schools and Early Years' settings.
- All pupils have a right to be treated with respect and dignity even when they display difficult or challenging behaviour.
- Always try to remain calm and to defuse situations before they escalate.
- Staff should remember that they are a role model to the pupils.
- Where a pupils display difficult or challenging behaviour, Staff should adhere to the School's Behaviour Policy as set out in the staff handbook.
- Staff should be mindful of and sensitive to factors both inside and outside of the school or setting which may impact on a pupil's behaviour.
- Staff should not use any form of degrading or humiliating treatment to punish a child.
- Do not use physical intimidation or invade a pupil's space.
- Do not use force as a form of punishment.
- Where a pupil has specific needs in respect of particularly challenging behaviour, a positive handling plan, including assessment of risk, should be drawn up and agreed by all parties, including, for example, SEN where appropriate.
- Do not use sarcasm, demeaning or insensitive comments.

- Apply the system of rewards and sanctions fairly and consistently so as to minimise the risk of pupils perceiving injustice or victimisation.
- If an incident occurs which warrants reporting, make notes on anything that happened and what was said and inform the Tutor in the first incident and record it on iSams. If serious enough then either the member of staff or the tutor will inform the Head of Key Stage and Houseparent and of the pupil. In serious incidents inform the Deputy Head Pastoral.

### **Sexual Conduct**

- Any sexual behaviour by a member of staff with or towards a pupil is unacceptable. It is an offence for a member of staff in a position of trust to engage in sexual activity with a pupil regardless of age and sexual activity with a child could be a matter for criminal and/or disciplinary procedures.
- Pupils are protected by the same laws as adults in relation to non-consensual sexual behaviour. They are additionally protected by specific legal provisions depending on their age and understanding. This includes the prohibition of sexual activity with children by adults in a position of trust.
- Sexual activity involves physical contact including penetrative and non-penetrative acts, however it also includes non-contact activities, such as causing pupils to engage in or watch sexual activity or the production of pornographic material.
- There are occasions when adults embark on a course of behaviour known as 'grooming' where the purpose is to gain the trust of a child, and manipulate the relationship so sexual abuse can take place. All staff should be aware of the behaviours that may constitute 'grooming' and of their responsibility to always report to the Headmaster, Deputy Head Pastoral or DSL any concerns about the behaviour of a colleague which could indicate that a pupil is being groomed.

### **One-to-One Situations**

- Where staff work on a one to one situation with pupils on a regular basis, such as music lessons and Learning Support, to safeguard both pupils and adults, the staff should follow the agreed policy within their departments which should reflect the following guidelines.
- Avoid meeting in remote, secluded areas of the school.
- Ensure there is visual access and/or an open door wherever possible.
- Try to ensure that there are other staff around or at least aware of the meeting.
- Do not use 'engaged' or equivalent signs.
- If you have reason to be concerned about a one-to-one meeting in advance, because of a pupil's or parents' previous behaviour, arrange for a colleague to be present, especially where there is a gender difference. Always make notes during or soon after the meeting. Please see Visitor Policy for further guidance.
- Arranging to meet with pupils from the school or setting away from the work premises is not be permitted unless the necessity for this is clear and approval is obtained from the Headmaster or, in his absence, the Deputy Head Pastoral, the pupil and their parents/carers.

## **Home Visits**

- All work with pupils and parents should usually be undertaken in the school or setting or other recognised workplace. There are however occasions, in response to an urgent, planned or specific situation or job role, where it is necessary to make one-off or regular home visits.
- A risk assessment should be undertaken prior to any planned home visit taking place. The assessment should include an evaluation of any known factors regarding the pupil, parents/carers and any others living in the household. Consideration should be given to any circumstances which might render the staff becoming more vulnerable to an allegation being made e.g. hostility, child protection concerns, complaints or grievances. Specific thought should be given to visits outside of 'office hours' or in remote or secluded locations. Following the assessment, appropriate risk management measures should be put in place, before the visit is undertaken. In the unlikely event that little or no information is available, visits should not be made alone.

## **Overnight supervision during exams**

- This should never be undertaken without prior arrangement with the exam board, Examination Officer and with a member of SLT. Please see separate guidelines.
- Wherever possible the school will use the Medical Centre for overnight supervision.
- In exceptional circumstances other staff may be used but these would only be staff who had volunteered and they would be fully briefed about appropriate and safe practice.

## **Transport and pupils**

- In certain situations staff or volunteers may be required or offer to transport pupils as part of their work. As for any other activity undertaken at work, the School has a duty to carry out a risk assessment covering the health and safety of their staff and to manage any known risks.
- Wherever possible and practicable it is advisable that transport is undertaken other than in private vehicles and with at least one adult additional to the driver acting as an escort.
- Staff should not transport pupils in their own vehicle, especially one-to-one, without the consent of the pupil and, except in emergency situations, the consent of a parent and a member of SLT. However there may be occasions where the pupil requires transport and not to do so may place the child at risk. In these circumstances the member of staff should report to a member of SLT and parent as soon as possible after the event.
- Staff must always have valid business insurance for this purpose. (The School provides this but if in doubt check with the Bursar)
- Staff should not transport a pupil to hospital in their own vehicle following an accident without specific medical approval and in discussion with a member of SLT. Otherwise always call an ambulance.
- Staff are advised never to accept a lift from a pupil during term time. The school would also advise staff not to accept lifts outside of term time.

## **Educational visits and after school activities**

- Staff must observe all aspects of the school policy on educational visits (Staff Handbook). This includes ensuring the appropriate risk assessments have been undertaken and approval for the trip has been granted.
- Always have another adult present in out-of school activities away from the school site unless otherwise agreed by a member of SLT.
- Ensure there is the appropriate Parent/Guardian/Houseparent consent to the activity. (See arrangement of trips)
- Staff should take particular care when supervising pupils in the less formal atmosphere of an educational visit where a more relaxed discipline or informal dress and language code may be acceptable. However, staff remain in a position of trust and need to ensure that their behaviour cannot be interpreted as seeking to establish an inappropriate relationship or friendship.
- Where out of school or setting activities include overnight stays, careful consideration needs to be given to sleeping arrangements. Pupils, adults and parents should be informed of these prior to the start of the trip. In all circumstances, those organising trips and outings should pay careful attention to ensuring there is a safe staff/child ratio and suitable gender mix of staff
- Staff should never share bedrooms unless it involves a dormitory situation and the arrangements have been previously discussed with Headmaster, the Deputy Head Pastoral, parents and pupils.

### **First Aid and Medication**

- Staff should be fully aware of the First Aid Policy in the staff handbook and what medicine they can and cannot administer to pupils.
- In some situations, such as Boarding Houses and Trips, staff will be allowed to administer or to supervise the taking of medicines and will have been authorised to do so by the Medical Centre.
- Pupils needing medication regularly should have a health care plan drawn up by the school Sister and staff responsible for this pupil should be made aware of this plan. Staff will receive sufficient and suitable training from the medical centre before they take on responsibility to support children with medical conditions.
- If a member of staff is concerned or uncertain about the amount or type of medication being given to a pupil this should be discussed with the DSL.
- Wherever possible, first aid should only be given by trained volunteer staff and by staff of the same gender if possible. Try to ensure that another adult is present, or at least aware, when first aid is administered. In exceptional emergency circumstances it may be necessary for an untrained member of staff to intervene. If so, do the minimum required whilst awaiting specialist support.
- Always report any accident or first aid administration to the school Medical Centre as parents must be informed.
- A member of staff should always accompany a child taken to hospital by ambulance, and should stay until the parent arrives.

- Staff taking medication which may affect their ability to care for children should seek medical advice regarding their suitability to do so and the school will then ensure that they only work directly with children if that advice confirms that the medication is unlikely to impair their ability to look after children. Staff need to be aware that the school is also responsible for managing the performance of staff and for ensuring they are suitable to work with children.

## **Curriculum**

- Many areas of the curriculum can include or raise subject matter which is sexually explicit or of a political or sensitive nature. Care should be taken to ensure that resource materials cannot be misinterpreted and clearly relate to the learning outcomes identified by the lesson plan. This can be supported by developing ground rules with pupils to ensure sensitive topics can be discussed in a safe learning environment. This plan should highlight particular areas of risk and sensitivity and care should especially be taken in those areas of the curriculum where usual boundaries or rules are less rigorously applied e.g. drama
- The curriculum can sometimes include or lead to unplanned discussion about subject matter of a sexually explicit, political or otherwise sensitive nature. Responding to children's questions requires careful judgement and staff should take guidance in these circumstances from the DSL.
- Care should be taken to comply with the school's guidelines on spiritual, moral, social, cultural which is mainly covered by PSHEE and should promote fundamental British values and be regularly reviewed to ensure it is lawful. Staff should also comply at all times with the policy for sex and relationships education.
- It should be noted that parents have the right to withdraw their children from all or part of any sex education provided but not from the National Curriculum for Science.
- Care should be taken that resource materials are appropriate and relate to the planned learning objectives. Sensitive issues (e.g. relating to sex, race, religion, gender, disability) should be handled with care, especially where unplanned discussion arises. Seek advice from your HoD beforehand if you are unsure.
- Do not enter into or encourage inappropriate or offensive discussion about sexual activity.
- Do not show visual material which is inappropriate for the age of the pupils concerned, taking special care over the use of DVDs and Web based material, both in the classroom and in the boarding houses.

## **Photography, video and other images**

It is recognised that taking or recording of images of pupils is very good practice at times, or to allow pupils to record such images of each other, e.g. to assist teaching and learning, to celebrate achievement and for publicity. However, any such work should take place with due regard to the law and the need to safeguard the privacy, dignity, safety and well-being of pupils.

Because of the potential for images of children to be misused for pornographic or grooming purposes, staff should follow this code:

- When capturing images of school activities or events, staff are asked to use the Vidigami app when possible. When this is not possible and personal devices are used, the member

of staff is asked to inform the DSL for their record and to delete the image once it has been used or passed on for marketing/departmental purposes

- Only record images when there is a justifiable need.
- Be clear to pupils about why the images are being recorded and what will happen to them.
- Ensure that a more senior colleague is aware that you are recording images.
- Ensure that all images recorded are available for scrutiny, in order to screen for acceptability.
- Avoid making images in one to one situations.
- Do not take images of pupils for personal use.
- Do not take images 'in secret', or take images in situations that may be construed as being secretive.
- Images of pupils should not be displayed on websites, in publications or in a public place (away from the school site) without the consent of the pupil and parent. Check with the Headmaster if you have any doubts in this area. Existing parents are consulted to allow them to indicate that they do not wish their child to be photographed. Unless they so indicate, we will deem that it is acceptable to record images for legitimate purposes. Parents of new intakes/new admissions will routinely be asked to give such general consent.
- If a photo is published, ideally you should not name the pupil, (or, as a minimum, use first names rather than surnames) unless you have direct parental consent. Similarly if a pupil is named, you should not use the photo, unless you have direct parental consent.
- Where the school has decided that images should be retained for further use, they should be securely stored and used only by those authorised to do so.
- Staff should take extreme care to ensure that pupils are not exposed, through any medium, to inappropriate or indecent images.

## **Internet Use**

Staff should ensure that they establish safe and responsible online behaviours, working to national guidelines and the School's Acceptable Use Policy on the use of IT equipment and the internet, which detail how new and emerging technologies may be used.

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

If indecent images of children are discovered at the school site or on school equipment staff must contact the DSL or their Deputy immediately and a referral will be made by the DSL to LADO, and the police contacted. The images/equipment will be secured and there will be no attempt to view or delete the images as this could jeopardise necessary criminal action. If the images are of children known to the school, a referral will also be made to children's social care in line with GSCB.

Staff must not use school IT equipment to access adult pornography, on or off site. Neither should personal equipment containing images or links to them be brought into the school. This will raise serious concerns about the suitability of the adult to continue working with children and young people.

The school's Internet access is filtered but staff have an obligation to help ensure that pupils are not exposed to any inappropriate images or web links. When indecent images of children or other unsuitable material are found the DSL must be informed immediately, who in turn will inform the Police and LADO. If it is a web site the Network Manager should also be informed to ensure that the site is blocked as quickly as possible.

### **Social Networks**

Although the College has no wish to affect the lives of staff it is important for staff to realise the importance of sensible practice when setting up and using sites such as Facebook. As such we do recommend that staff consider very carefully what they put up on their site. To this end the College would like to recommend the following to ensure you do not find yourself being 'poked' by pupils or parents or finding things published around the College about yourself which you thought were private.

- Have a neutral picture of yourself as your profile image.
- Ensure your privacy settings are high enough to only allow your friends to see your site.
- Do not post embarrassing material.
- Check carefully before replying to 'pokes' or joining groups.
- Possibly use a pseudonym as a disguise
- Choose your Facebook friends carefully and ask about their privacy controls.
- Do not have pupils as Facebook friends, unless you are their parents.
- Remember that former pupils often have friends still at College.
- Best practice is to have a separate site for former pupils. LinkedIn is a good site to use particularly once the former pupil has been away from the school for at least a year.
- Do not publish any photos of pupils or school events.

Staff should also be aware that there are some concerns about identity theft from these sites despite security. There are also companies and educational institutions that use these sites to check to see if there is anything undesirable published about a potential employee.

It is for your safety as well as the pupils that the College is publishing these guidelines and we hope you will respond to them positively and ensure that you adhere to them.

In today's world pupils are normally ahead of us when it comes to technology so it is important that we do not inadvertently expose ourselves to criticism or worse from parents of pupils who have accessed information which we thought to be private.

### **Whistleblowing**



Whistleblowing is the mechanism by which staff can voice their concerns, made in good faith, without fear of repercussion. The school has a clear and accessible whistleblowing policy that meets the terms of the Public Interest Disclosure Act 1998. Staff who use whistle blowing procedures will have their employment rights protected.

Staff should recognise their individual responsibilities to bring matters of concern to the attention of SLT and/or relevant external agencies and that to not do so may result in charges of serious neglect on their part where the welfare of children may be at risk.

### **Sharing Concerns and Recording Incidents**

All staff should be aware of the Safeguarding Policy, including the procedures for dealing with allegations against staff and volunteers, as published in the staff handbook and on the school website.

Staff should report to the school's DSL any behaviour by colleagues which gives cause for concern in relation to safeguarding the wellbeing of pupils. The DSL may consult the Headmaster.

If any incident occurs which may result in an action being misinterpreted and/or an allegation being made against a member of staff, then the relevant information should be recorded promptly and reported to the Deputy Head Pastoral.

Staff should always feel able to talk with their line manger any difficulties or problems that may affect their relationship with pupils so that appropriate support can be provided or action can be taken.

Staff who are the subject of allegations, may find themselves suspended which is deemed as a neutral act and are advised to contact their professional association.