ST AMBROSE PREPARATORY SCHOOL

Reviewed: September 2026

To be reviewed: September 2027

This policy has been written in consultation with staff and governors of St. Ambrose Preparatory School and with due regard to the school's mission statement:

At St Ambrose we aim to provide an independent Catholic education for boys and girls of all faiths aged 3 to 11; St Ambrose is an inclusive school where the Gospel teachings and our school values are at the centre of everything that happens in our school family. At St Ambrose we strive to develop happy, fulfilled, well educated, confident and caring children who know and understand the love, joy and peace of Jesus; and to show our Faith by the way we live, showing care and consideration for each other, those around us and the environment.

Our Vision

Our Vision is to be an exemplar Edmund Rice School, with an enviable reputation amongst our peers, both as an organisation and for the services and facilities we provide, making us first choice for parents and pupils in our geographic area.

Our Ethos & Values

At St Ambrose we provide a Catholic school community in which pupils feel welcome, safe, recognised for their individuality – supported by a community of love, and affection. We strive to live the Gospel in all aspects of school life and policy, following Blessed Edmund's footsteps.

Staff Code of Conduct

Guidance for Safe Working Practices for the Protection of Children and Staff

The Governing Body of St. Ambrose Prep School understands its regulatory responsibilities and will maintain effective oversight of this Staff Code of Conduct, The Code is reviewed and updated annually as a minimum. It is also reviewed and updated as a result of any new legislation or if an issue emerges which requires the practice of the school to implement change.

This policy is written with reference to Keeping Children Safe in Education (2026), the Education Act 2002, the Education and Training (Welfare of Children) Act 2021, other relevant safeguarding legislation, and the non-statutory Guidance for Safer Working Practice for those working with children and young people in education settings (February 2022), published by the Safer Recruitment Consortium.

This code forms part of a group of policies related to safeguarding within the school. These include but are not limited to Safeguarding & Child Protection Policy, Whistleblowing Policy, Health & Safety Policy, First Aid Policy, Behaviour Management Policy, Online Safety Policy, Relationships & Sex Education Policy, Physical Intervention Policy, Safer Recruitment Policy, Mobile Phone Policy.

1. APPLICATION

a) This Code applies to all adults working in the school whatever their position, role or responsibility. When the word 'staff' is used this includes all members of staff including governors, self-employed staff, staff employed by a third party, trainee teachers, supply staff, contractors, volunteers, students and those on work experience. It applies to staff working with pupils of all ages including in the EYFS.

b) For teachers, this Code is additional to the Teachers' Standards.

2. INTRODUCTION

a) The Governors of St. Ambrose Prep School have a legal duty under Part Three of the Independent School Standards Regulations (2014) to safeguard and promote the welfare of pupils and that such arrangements have regard to any guidance issued by the Secretary of State.

b) All St. Ambrose School staff have a duty to keep its pupils safe and protect them from harm.
c) Parents are entitled to expect the highest standards of conduct from school staff, governors and volunteers and to have trust and confidence in their integrity.
d) All adults working in St. Ambrose School must therefore act with the utmost good faith and not do anything, which may adversely affect its reputation.

The following content has been drawn up with a view to reducing the risk of staff being accused of improper or unprofessional conduct in all aspects of their work. It aims to help staff work safely and professionally and clarify what behaviour constitutes safe practice and what is unacceptable and/or illegal.

3. KEY PRINCIPLES

a) The welfare of the child is always paramount and staff must always act in the best interests of the child.
b) All staff have a responsibility to ensure they understand the policies and procedures of the school, including those which support the safeguarding of pupils.
c) Staff must work, and be seen to work, in an open and transparent way.
d) Staff are responsible for their own actions and behaviour, and should understand the responsibilities that are an intrinsic part of their employment or role. They must seek to avoid conduct, which would lead any reasonable person to question their motivation or intentions.
e) All safeguarding concerns or allegations about the conduct of an adult working in or on behalf of the School, no matter how small, must be reported and recorded in accordance with section 26 and the Safeguarding and Child Protection Policy.
f) Staff should understand their responsibility to voice any concerns that they might have about practice within the school, in accordance with the school's Safeguarding Children Policy and Whistleblowing Policy.
g) All staff should know the identity of the Designated Safeguarding Lead (DSL), the Safeguarding Governor and the Chair of Governors.
h) All staff should understand the school's Safeguarding Children Policy, which includes arrangements for allegations and low-level concerns about staff and the procedures of the Local Safeguarding Children Partnership (LSCP).
i) Staff should not be under the influence of alcohol or any other substance, including prescribed medication, which may affect their ability to care for children.
j) Staff should apply the same professional standards regardless of culture, disability, gender, language, racial origin, religious belief and sexual orientation.

k) Staff should also be aware of and comply with the school's Financial and Administrative Regulations and any other procedure manuals such as the staff handbook.

l) Staff should be aware that failure to follow this code could result in disciplinary action being taken against them, including dismissal.

m) Failure to follow this code may also lead to criminal action and/or other proceedings including barring by the Disclosure & Barring Service (DBS) from working in regulated activity. For those engaged in teaching it could also lead to prohibition from teaching by the Teaching Regulation Agency (TRA).

n) This Code cannot cover every eventuality. Its purpose is to show the standard expected of employees and highlights behaviour which is illegal, inappropriate or inadvisable. There may be rare occasions and circumstances when staff have to make decisions or take action in the best interests of a pupil where no specific guidance exists. It is expected that in these circumstances staff will always advise senior colleagues of the justification for any such action already taken or proposed

If staff are in any doubt about any aspect of this guidance or need to seek further clarification about a particular situation in the absence of specific guidance, they are advised to speak to a senior manager within the school.

4. DUTY OF CARE

a) All staff have a responsibility to keep pupils safe and to protect them from abuse (sexual, physical and emotional), neglect and contextual safeguarding concerns.

b) Pupils have a right to be safe and to be treated with respect and dignity. It follows that trusted adults are expected to take reasonable steps to ensure their safety and well-being. Failure to do so may be regarded as professional misconduct.

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

d) The school has a duty of care towards its employees which requires the provision of a safe working environment for staff and guidance about safe working practices. There is also a duty on employees to take care of themselves and anyone else who may be affected by their actions or failings. In this respect, the duty of care towards both staff and children can be demonstrated through the use of these guidelines.

5. POWER AND POSITIONS OF TRUST AND AUTHORITY

a) All adults working with children and young people are in a position of trust in relation to the individuals in their care. Staff are expected to adopt high standards of personal integrity and conduct and behave in such a way that does not compromise their position both within or outside the school or the safety and welfare of children.

b) The Teaching Standards issued by the Department for Education also sets out the minimum professional standards for the teaching profession and states that a teacher is expected to demonstrate consistently high standards of personal and professional conduct.

c) The relationship between a person working with a child(ren) is one in which the adult has a position of power and influence. It is vital for adults to understand this power; that the relationship can never be one between equals and the responsibility they must exercise as a consequence.

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

e) Where a person aged 18 or over is in a position of trust with a child under 18, it is an offence for that person to engage in sexual activity with or in the presence of that child, or to cause or incite that child to engage in or watch sexual activity.

f) Staff must always maintain appropriate professional boundaries, in order to secure the best interests and welfare of the pupils in their charge and must avoid any behaviour which could be misinterpreted by pupils or others.

g) Staff must self-refer if they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or if on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards; this includes online behaviour. (See section 26)

6. PROFESSIONAL CONDUCT

All staff are expected to uphold high standards of personal and professional conduct both within and outside school. For teachers, standards are also laid down in the DfE Teachers' Standards.

This means staff must:

- safeguard pupils' well-being at all times
- treat pupils with dignity, building relationships rooted in mutual respect
- observe appropriate professional boundaries with pupils
- use clear and professional language when talking to pupils, parents and colleagues.
- not behave in a manner, which would lead any reasonable person to question their suitability to work with children or act as a role model
- not make (or encourage others to make) unprofessional personal comments which scapegoat, demean or humiliate other individuals or might be interpreted as such.
- not discriminate, bully, harass, intimidate, threaten, coerce or undermine pupils or other staff
- not swear, blaspheme or use any sort of offensive language
- not shout when reprimanding pupils
- show tolerance of and respect for the rights of others
- actively promote and not undermine fundamental British values, which are defined as: democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs
- not discriminate against pupils or other staff on the basis of protected characteristics, which includes: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex, sexual orientation.
- uphold the school's values and ethos and always challenge any attitudes or behaviours which undermine them e.g. the use of misogynistic or racist language.

7. CONFIDENTIALITY AND INFORMATION DISCLOSURE

a) Staff have access to information about pupils, families and the school, and may also be aware of additional sensitive information so they can discharge their duties effectively.

b) All information must be treated in a discreet and confidential manner and staff must not discuss or mention such information except to those colleagues who have a professional role in relation to the matter.

c) The storing and processing of personal information is governed by the Data Protection Act 2018, the UK General Data Protection Regulation and the Data (Use and Access) Act 2025 ("data protection laws") in line with guidance from the Information Commissioner's Office. To ensure online information is suitably protected, staff are expected to use strong passwords which are always kept private. If there is a possibility

a password may have been compromised, it must be changed immediately and the school's IT Service Provider must be notified.

d) Any mobile devices should be protected with a password or PIN, whether in or out of school, to protect access to content. Staff must report any loss or compromise of data (e.g. losing a laptop or phone, losing hard copy documents relating to the school, suspected hacking) immediately to the Head, and IT Service Provider.

e) Any online safety issues must also be reported to the DSL.

f) Staff should never use confidential or personal information about a pupil or her/his family for their own, or others advantage (including that of partners, friends, relatives or other organisations).

g) Information must never be used to intimidate, humiliate, or embarrass.

h) Staff must be aware that should they meet socially after school in public places, their conversations may be overheard and they must be extremely careful that confidential information about the school, the parents or the pupils does not leak in this way or otherwise inadvertently.

i) Staff must never make any statement, whether oral or written, to any representative of any newspaper, publisher, television, radio or film company nor write any article or other literary work for the press or otherwise for publication about the school, pupils or parents without the written consent of the Head.

j) The School's property and facilities (e.g. stationery, computers, photocopiers, mobile phones) may only be used for school business unless permission for their private use has been granted by the Head.

k) Staff must not discuss or comment on the school, pupils, colleagues or parents/carers on any social or professional networking websites or other similar media.

l) Staff must understand that if they discuss a problem of a personal nature with any other member of staff, the confidant(e) may in some instances have a professional duty to report what he/she has been told, e.g. where there are child protection, alcohol or drug abuse issues.

m) Members of staff are required to share information when there is a safeguarding concern about a pupil and/or if abuse is alleged or suspected. In such cases, staff must inform the DSL in accordance with the school's Safeguarding Children Policy.

n) Staff must never promise a child that they will keep a report of abuse, neglect or exploitation confidential. Information should be shared only with those who need to be involved, including the DSL or a deputy, but concerns must be passed on without delay.

o) Staff are expected to report any concern about the conduct of an adult by following the procedures outlined in the school's Safeguarding Children Policy and in paragraph 26.

p) There are instances when staff are required to share information about a child, for example, when child protection issues arise. In such cases staff have a duty to pass information on without delay in line with the school's Safeguarding Children Policy and the local procedures of Trafford Strategic Safeguarding Partnership.
q) If staff are in any doubt about whether information should be shared, they must seek guidance without delay from the DSL or a deputy. Concerns about data protection must not be allowed to prevent information being shared where this is necessary to safeguard and promote the welfare of a child.

The school follows the DfE guidance in Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers and the latest KCSIE

8. EQUALITY

a) All staff must adhere to the school's Equal Opportunities Policy, in addition to the requirements of the law.
b) Staff should apply the same professional standards regardless of culture, disability, gender, language, racial origin, religious belief and sexual orientation
c) Staff should not discriminate in recruitment and employment practices, nor in the delivery of services
d) Staff should also ensure that in their dealings with parents and other members of the public, they provide an efficient and impartial service to all individuals

9. DRESS AND APPEARANCE

Staff should ensure that they are dressed smartly, safely and appropriately for the tasks that they undertake.
Clothing should:

- promote a positive and professional image
- be appropriate to the role
- is not likely to be viewed as offensive revealing, or sexually provocative
- does not distract, cause embarrassment or give rise to misunderstanding
- is absent of any political or otherwise contentious slogans
- is not considered to be discriminatory
- is compliant with professional standards
- Wear staff ID

- No jeans/denim
- No leggings
- Footwear must be formal
- Footwear must have a back and be secure on the foot.

10. WORKING WITH PUPILS ONE TO ONE

Working or dealing with pupils one to one requires additional safeguards to be in place as staff are more vulnerable to unfounded or malicious allegations being made against them. One to one situations also have the potential to make the child more vulnerable to harm by those who seek to exploit their position of trust. Every attempt should be made to always ensure the safety and security needs of both pupils and staff.

Members of staff teaching one pupil or conducting a one-to-one meeting with a pupil for any reason should take particular care in the following ways: -

- Staff should be visible and/or audible and not working alone with pupils in secluded areas of the school.
- Use a room that has a viewing panel in the door so the occupants can be seen easily, and/or keep the door open.
- All window blinds should be up.
- ensure a colleague knows that the lesson/meeting is taking place
- arrange the meeting during normal school hours when there are plenty of other people about
- not continue the meeting for any longer than is necessary to achieve its purpose
- not sit or stand in very close proximity to the pupil, except as necessary to check work
- avoid all unnecessary physical contact and apologise immediately if there is accidental physical contact
- avoid any conduct, language or humour that could be interpreted as over familiar or a sexual advance
- avoid the use of 'engaged' or equivalent signs wherever possible, as they may create an opportunity for secrecy or the interpretation of secrecy;
- report immediately anything which causes concern, could be misinterpreted or any situation where a pupil becomes distressed, anxious or angry (See section 26)
- report any safeguarding concerns about a child to the DSL in accordance with the school's Safeguarding and Child Protection Policy.

11. PHYSICAL CONTACT

There are occasions when physical contact with a pupil may be proper and necessary such as:

- when comforting a distressed pupil;
- when a pupil is being congratulated or praised;
- to demonstrate how to use a musical instrument;
- to demonstrate exercises or techniques during PE lessons or sports coaching;
- to support learning in Dance or Ballet lessons;
- to give first aid;
- if pupils soil themselves.

However, innocent actions and appropriate physical contact can sometimes be misconstrued, either by the child or by an observer, and it is therefore crucial that staff only initiate physical contact for the minimum time necessary and in ways appropriate to their own role and and appropriate to the age, stage of development of the child.

Staff should remain self-aware at all times in order that their contact is not threatening, intrusive or subject to misinterpretation. Where a member of staff thinks that an incident could have been misinterpreted it should be reported to the Headteacher.

Members of staff should observe the following guidelines (where applicable).

- Explain the intended action to the pupil.
- Ask the pupil's permission if appropriate e.g. to examine an injury if sustained in school and for which medical treatment may be needed.
- 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.
- Ensure that the door is open and, if you are in any doubt, ask a colleague or another pupil to be present.
- Never indulge in horseplay, tickling or fun fights;
- Any formally agreed plan for children with SEN or physical disabilities should be understood and agreed by all concerned, including parents/carers and staff should be provided with relevant information about vulnerable pupils in their care where it is relevant for this to be provided in order for staff to be able to undertake tasks appropriately. If a pupil requires assistance with intimate care needs, the child's individual health plans will indicate these needs.
- Particular care must be taken in instances which involve the same pupil over a period of time.

Some children may seek out inappropriate physical contact. In such circumstances staff should deter the child sensitively by helping them to understand the importance of personal boundaries, and also make a report of the incident to the `Head. If the type of behaviour causes concern, or continues, the member of staff should inform the DSL, as this could be a sign the pupil is a victim of abuse.

12. BEHAVIOUR MANAGEMENT

a) Staff are responsible for managing children's behaviour in an appropriate way in accordance with the school's Behaviour Policy.
b) Rewards and sanctions must be appropriate to the age and understanding of the pupils and in line with the school's policy and procedures.
c) All forms of corporal punishment are unlawful and corporal punishment must never be threatened.
d) Staff must not use any form of degrading or humiliating treatment to punish a pupil.
e) The use of sarcasm, demeaning or insensitive comments towards pupils is completely unacceptable.
f) If the behaviour of a pupil(s) causes concern, staff must seek advice from a senior colleague and ensure the behaviour is brought to the attention of the Head teacher and/or Deputy Head

13. PHYSICAL INTERVENTION (use of reasonable force)

a) Teaching staff, and other staff who are authorised by the Head to have control or charge of pupils, may use such force or physical contact as is reasonable in the circumstances to prevent a pupil from doing, or continuing to do, any of the following:
    - Committing a criminal offence.
    - Injuring him/herself or others.
    - Causing damage to property, including their own.
    - Engaging in any behaviour prejudicial to good order and discipline at the school or among any of its pupils, whether that behaviour occurs in a classroom or elsewhere.
b) This applies when a teacher, or other authorised person, is on school premises and when he or she is in control or charge of the pupil elsewhere, for example on a field trip or other out of school activity.
c) Reasonable force may be used only where it is lawful, necessary and proportionate.

Staff should consider whether there is a more effective, less restrictive way of managing the situation and should use prevention and de-escalation wherever practicable.

d) Under no circumstances should physical force be used as a form of punishment. The use of unwarranted physical force is likely to constitute a criminal offence

e) There is no legal definition of “reasonable force”. It will always depend on the circumstances. Note that:
   - physical force could not be justified to prevent a pupil from committing a trivial misdemeanour;
   - Any force used must be the minimum necessary and used for the least amount of time. Staff must take account of the pupil’s age, size, understanding, medical conditions, SEND, other vulnerabilities and relevant equality considerations.

f) Reasonable force covers a wide range of actions which may be used by staff e.g. guiding a child to safety by the arm to more extreme circumstances such as breaking up a physical fight. Reasonable force is only appropriate where no other form of control or restraint is available.

g) Any force used must always be the minimum needed to achieve the desired result and must be appropriate for the age and understanding of the pupil and in keeping with the school's Behaviour Policy.

h) Before intervening physically, staff should always seek to defuse the situation and avoid the use of physical intervention wherever possible.

i) Staff should tell the pupil to desist and what will happen if they do not.

j) The member of staff 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.

k) Members of staff should never act in a way that might reasonably be expected to cause injury.

l) The member or members of staff involved must report the incident to the Head immediately and complete the School’s written incident record as soon as practicable, aiming to do so on the same day.

m) Every significant incident involving the use of force, and every incident of seclusion or restraint, including restraint without direct physical contact, must be recorded. The required information must be provided to parents in writing as soon as practicable, aiming to do so on the same day, unless the statutory serious-harm exception applies. The School’s Physical Intervention/Restrictive Interventions Policy must be followed.

14. FIRST AID AND ADMINISTRATION OF MEDICATION

a) In cases where first aid or medication needs to be administered, all staff should adhere to the school's First Aid and related policies.

b) A health care plan will be drawn up if any child needs to take regular medication. This will be agreed between the child, parents/carers and recorded in writing.

c) Under supervision, children will be encouraged to administer medication themselves, with the permission of parents.

15. INTIMATE CARE

a) Intimate care is one of the following:
   - Supporting a pupil with dressing/undressing (this may be necessary in Early Years but staff should always encourage children to dress and undress unaided).
   - Providing comfort or support for a distressed pupil.
   - Assisting a pupil requiring medical care, who is not able to carry this out unaided.
   - Cleaning a pupil who has soiled him/herself, has vomited or feels unwell.

b) When touching a child, staff must always be aware of the possibility of invading a child's privacy and must respect the child's wishes and feelings.

c) If a child needs to be cleaned, staff must make sure that:
   - protective gloves are worn
   - the procedure is discussed in a friendly and reassuring way with the child throughout the process
   - the child is encouraged to act as independently as possible and to undertake as much of their own personal care as is possible and practicable.
   - the child is encouraged to care for him/herself as far as possible
   - physical contact is kept to the minimum possible to carry out the necessary cleaning.
   - privacy is given appropriate to the child's age and the situation

d) Staff need to have regard to the danger of allegations being made against them and

take precautions to avoid this risk. These should include:

- gaining a verbal agreement from another member of staff that the action being taken is necessary
- allowing the child, wherever possible, to express a preference to choose his/her carer and encourage them to say if they find a carer to be unacceptable
- allowing the child a choice in the sequence of care
- being aware of and responsive to the child's reactions

e) Assistance should normally be undertaken by one member of staff, however he/she should try to ensure that another appropriate adult is in the vicinity who is aware of the task to be undertaken and that, wherever possible, they are visible and/or audible.

f) A record should be kept of all intimate and personal care tasks undertaken and parents informed the same day.

g) Volunteers must never carry out intimate care procedures.

16. EDUCATIONAL VISITS AND OFF-SITE ACTIVITIES (Also see the school's Educational Visits Policy

a) All educational visits and off-site activities must be risk assessed in line with the school's Educational Visits Policy.

b) Staff remain in a position of trust and must uphold the same professional standards of conduct as within school, following school policies and ensuring that their behaviour cannot be interpreted as seeking to establish an inappropriate relationship or friendship. Staff should therefore maintain a professional relationship with pupils at all times.

c) Where out of school activities include overnight stays, careful consideration must be given to sleeping arrangements. Pupils, adults and parents must be informed of these prior to the start of the trip. A child must not share overnight accommodation with a child of the opposite biological sex. If a child does not wish to share with a child of the same biological sex, suitable alternative arrangements should be considered where possible, without compromising the safety, privacy, comfort or dignity of any child.

d) Staff must always be accommodated in separate rooms to pupils, with access to separate washing and toilet facilities.

e) Staff must not allow a pupil or pupils to enter their own accommodation nor should pupils be able to witness a member of staff getting showered, dressed or changed.

f) Members of staff should refrain from being in bathrooms, changing rooms, showers or toilets when pupils are, or might be, in them in a state of undress and should follow the

guidance relating pupils changing or showering.

g) Staff should generally not enter beyond the doorway of a pupil's bedroom. Where there is a safety or welfare reason why the staff member must enter the room, the door must be kept open and the pupil/s within must have signalled that they are happy for the member of staff to enter. The member of staff must respect and bear in mind the privacy and personal space of the pupil/s concerned and should leave the room as soon as possible. Another member of staff should also be present if at all possible. Time spent with a pupil in a room in this way should be noted with the Trip Leader.

h) Members of staff involved in any school trip must abstain from alcohol.

i) Any residential trips need to have Governors approval on an annual basis at the first meeting in the Autumn Term.

17. TRANSPORT

In such cases where children need to be transported between different locations using the school minibus, a designated member of staff should be appointed to plan and provide oversight of all arrangements.

Wherever possible, an adult additional to the driver should act as an escort and all arrangements agreed with relevant parties, including parents and pupils, in advance.

Staff

- should avoid using private vehicles wherever possible, except in an emergency and then only with the express permission from the Head
- must ensure that they have the appropriate insurance (for business use) and their vehicle is roadworthy if they do have to use their private vehicle;
- should ensure that they are alone with a child for the minimum time possible
- should ensure pupil(s) sit in the rear of the vehicle and wear a seat belt
- should be aware that the safety and welfare of the child is their responsibility until safely passed over to a parent/carer;
- should report the nature of the journey, the route and expected time of arrival to a senior member of staff
- should ensure that their behaviour and all arrangements ensure passenger and driver safety, taking into account any specific needs that the child may have.

18. SHOWERS AND CHANGING AREAS

a) Pupils are entitled to respect and privacy at all times, and especially when in a state of

undress, including when changing, toileting and showering.

b) There also needs to be supervision which is appropriate to the needs and age of the pupils concerned to ensure health and safety and to ensure that poor behaviour does not occur.
c) General guidelines staff should observe
d) knock and announce the intention to enter the changing area if supervision is required
e) avoid any visually intrusive behaviour
f) consider the necessary level of supervision and only remain in the room when pupils' needs require this
g) only assist with intimate or personal care tasks which the pupil is unable to undertake independently
h) never change in the presence or sight of pupils
i) never use pupils' toilets or shower with pupils
j) when using external facilities for sport or other trips, time spent in shared public changing rooms or toilets should be kept to a minimum.
k) Staff-pupil use of such facilities should be deliberately staggered so as not to coincide.
l) For pupils in Reception to Year 2 staff may remain in changing areas as younger pupils need a greater level of supervision and it is more likely they will need some help to dress and/or undress. However, staff must still respect the privacy of pupils and only assist if a pupil is unable to complete a personal task independently.
m) For pupils in Years 3 to 6 staff should place themselves at the entrance to the changing area. If a member of staff needs to enter a changing room when pupils are changing for swimming or PE, this should only be to ensure safety or address a genuine concern about a pupil's welfare. Wherever possible there should be a minimum of two staff supervising.
n) In Years 7 and above, staff should place themselves outside the changing area and should only enter the changing rooms, toilets or shower areas in an emergency or when addressing genuine concerns about a child's safety or welfare, or where there is reasonable suspicion of a breach of school discipline. Wherever possible, there should be a minimum of two staff supervising.

19. COMMUNICATION & THE USE OF TECHNOLOGY (Online Safety Policy)

a) The Online Safety Policy must be followed at all times.
b) Staff must not take video footage or photographs of pupils except for school purposes.
c) Only school devices should be used to photograph or video images of pupils. Staff must not use a personal device to photograph or record pupils. Exceptionally, the Head or DSL may authorise use in a safeguarding emergency where no approved School

device is available. Any material must be transferred promptly to an approved School system and permanently deleted from the personal device once transfer has been confirmed. All other personal-device use must comply with the Online Safety and Mobile Technology policies.

d) Cameras, mobile phones or other devices are not allowed in any areas where pupils may be washing or changing, nor should photography be used in a manner that may offend or cause upset.

e) Staff should ensure that pupils are appropriately dressed and are comfortable that their image is being recorded.

f) Staff must not create demeaning, inappropriate or unnecessary images. If such an image is discovered, or an image may be relevant to a safeguarding, disciplinary or criminal matter, it must be reported immediately to the DSL and must not be deleted, forwarded or otherwise interfered with unless instructed under the School's safeguarding procedure.

g) The use of personal mobile devices is limited to emergency use, unless specific authorisation from the Head has been granted.

h) The use of any images of children for publicity purposes requires the appropriate consent of the parents/carers.

i) Staff must not take images of a child's injury, bruising or similar (e.g. following a disclosure of abuse or suspicion of abuse) or make audio recordings of a child's disclosure.

j) No photograph or film taken in school may be published (this includes on any social media platform such as Instagram, Facebook, Twitter or YouTube - regardless of privacy settings - or in any other way) without the explicit consent of the Head.

k) Staff should keep their passwords confidential and not allow unauthorised access to equipment.

l) There should be no communications between staff and pupils on personal social media. Electronic communications between staff and pupils must only be conducted on school systems, such as school email or designated school apps.

m) Any communication should be written carefully so it cannot be misinterpreted and must avoid any displays of affection or over familiarity.

n) Staff must be aware of the potential for a relationship with a pupil to be misunderstood or misrepresented by the pupil or misrepresented by the terminology or interface of an online platform.

o) Staff should ensure that they understand the IT tools they are using and utilise the highest privacy settings. They must be aware that pupils will be naturally curious about staff and their life outside the school. Staff should ensure their settings prohibit others

from tagging them in any photos or updates without their permission and be proactive in asking others to remove any undesirable content related to them.

p) A school email address should never be used for any personal use including on social media.

q) All staff are prohibited from accepting or requesting pupils to connect via social media (such as Facebook and Instagram). Email, messaging or use of social media between staff and pupils outside agreed protocols may lead to disciplinary action and/or criminal investigations.

r) Similarly, all staff are prohibited from accepting or requesting requests from the parents of current pupils and should limit contact to more formal channels.

s) Staff who have children who are pupils at the school will inevitably have social contact with parents through their child(ren). Such staff must be very aware of confidentiality and must ensure that neither the school nor themselves is brought into disrepute.

t) Staff must ensure they do not claim or appear to claim to represent or speak in the name of the school except where specific permission to do so has been given by the Head.

u) If staff have concerns about a pupil's behaviour online, including if they feel they are the victim of cyberbullying or have received inappropriate comments, photos or posts, they must contact the Head immediately. Any such posts should not be deleted and a record of them kept to facilitate any subsequent investigation.

v) Staff must not make, request, view, download, possess, alter, generate or distribute illegal sexual images of children, including pseudo-images, digitally altered images and images generated using artificial intelligence. Such conduct may constitute a criminal offence and may result in disciplinary action, dismissal and referral to the police, DBS and/or Teaching Regulation Agency, as applicable.

w) If staff become aware of an illegal image, or the making or sharing of a nude or semi-nude image involving a child, they must not view, copy, print, forward, delete or search for further images. They must report the matter immediately to the DSL and follow the Safeguarding and Child Protection Policy. Where appropriate, a device may be secured without examining its contents so that evidence is preserved. The DSL will determine the appropriate safeguarding response, including referral to children's social care or the police where required.

20. CONDUCT AND EMPLOYMENT OUTSIDE WORK

a) It is important that staff do not put themselves in a position where their duty to the school and their private interests conflict.

b) Staff must not allow their own personal or political opinions to interfere with their work and the provision of a balanced and professional service, ensuring that they work to the professional standard required.

c) Staff have a professional duty to set a responsible example. Staff should not put themselves in a position which may compromise their professional status.

d) Staff must exercise extreme caution when using information technology, including social networking sites, and be aware of the risks to themselves and others. Maximum privacy settings should always be utilised.

e) Staff must not engage in conduct outside work which could damage the reputation of the school or the member of staff's own reputation or the reputation of other members of the school community.

f) All tutoring arrangements, must be made known to the Head.

g) Private work must not be undertaken in the school's time, or using the schools premises or equipment, without prior approval of the Head.

h) Any other work must not conflict with the interests of the school nor be to a level which may affect an individual's work performance in the school.

i) Staff should not set up a business or accept employment with a business that is engaged in work, which is in direct competition with the school.

j) Any copyright created by a member of staff during their employment with the school becomes the property of the school.

k) Staff should not seek or receive preferential rates for themselves by virtue of their dealings on behalf of the school with businesses

l) All relationships of a business or private nature with external contractors, or potential contractors should be made known to the Head.

m) Staff must inform the Head immediately if they are arrested or subject to a criminal conviction or caution.

n) Staff are not permitted to be involved in an appointment or decisions relating to discipline, promotion or pay adjustments for any individual who is a relative or with whom they are in a close personal relationship.

21. SOCIAL CONTACT

a) Staff must not give pupils or parents their home address, home telephone number, mobile number or email address (other than the school internal email address).

b) School mobile phones, or a central school contact number, should be used in situations where staff/pupils may require an emergency contact number, such as during a school fixture, day trip or residential trip.

c) Members of staff should avoid all contact with pupils outside school.
d) Staff must not divulge personal information in their interactions with pupils and parents or during lessons.
e) Staff must decline any invitation to attend a pupil's home unless this has been specifically sanctioned in advance by the Head.
f) Staff should not make arrangements to meet pupils, individually or in groups, outside school other than on school trips or fixtures authorised by the Head.
g) Staff must not invite pupils (groups or individuals) to their home.
h) Staff should avoid forming 'out of school' friendships with parents, as it can cause issues with other parents and such relationships blur professional boundaries.
i) Members of staff who are already friends with parents of pupils; whose own children are pupils of the school; or staff who may work/volunteer in other organisations attended by pupils, will inevitably have contact outside school and pupils may visit their homes. However, such staff must still respect the advice within this code and should ensure that pupils do not see anything in their home that may cause embarrassment or that might become the subject of inappropriate gossip or rumour.
j) Staff who have such social contact with pupils out of school must inform the Head of the relationship.
k) Members of staff should not establish, or seek to establish, social contact with former pupils while they remain of school age. If a pupil seeks to establish social contact, or if this occurs coincidentally, the member of staff should exercise professional judgement in making a response and be aware that such social contact could be misconstrued.

22. FINANCIAL INDUCEMENTS, GIFTS AND FAVOURITISM

a) Staff should ensure that they use funds entrusted to them in a responsible and lawful manner and that they do not give or receive any gift, loan, fee, reward or advantage, which might be misinterpreted.
b) Members of staff need to take care that they do not accept any gift that might be construed as a bribe by others, or lead the giver to expect preferential treatment.
c) Although staff should not give or receive gifts from pupils or parents on a regular basis or of any significant value, it is acceptable, however, for staff to receive small tokens of appreciation, such as at Christmas time and at the end of year.
d) Staff should ensure that any individual gifts above a value of £50 are declared to the Head.
e) Any gifts to pupils must be of insignificant value and given to all pupils in the class equally. e.g. a small token to all the class at Christmas time and/or at the end of the academic year. Gifts to an individual pupil must always be as part of an agreed reward system.
f) All members of staff must ensure that they do not behave in a manner which is either

favourable or unfavourable to individual pupils

g) Staff must also exercise care when selecting children for specific activities, jobs or privileges in order to avoid perceptions of favouritism. Similar care should be exercised when pupils are excluded from an activity. Methods of selection and exclusion should always be subject to clear and fair criteria.

23. CURRICULUM AND RELATIONSHIPS AND SEX EDUCATION

There may be occasions when, as part of the curriculum, a teacher has to raise subject matter that is sexually explicit. In such situations, any lesson plan should highlight the areas of risk and sensitivity. Staff should respond to questions with careful judgement and avoid entering into inappropriate or potentially offensive discussions about sexual relationships. Staff will ensure they deliver a balanced approach in line with the school's schemes of work and values and British Values, ensuring they challenge inappropriate behaviour and attitudes.

24. SEXUAL CONTACT WITH YOUNG PEOPLE AND GROOMING

a) Any sexual behaviour by a member of staff with or towards a pupil is both inappropriate and illegal.

b) The Sexual Offences Act (2003) makes it an offence for any person aged 18 or over to have a sexual relationship with a child under 18, where that person is in a position of trust in respect of that child, even if the relationship is consensual. This applies, even if the person does not teach the child.

c) It is also an offence to involve children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet).

d) Staff must not enter into or encourage inappropriate, offensive or discriminatory discussion about sexual activity; make sexual remarks to a pupil (including by email, text messages, phone or letter), or use any communication which could be interpreted as sexually suggestive or provocative; nor discuss their own sexual relationships with, or in the presence of pupils;

e) Forming inappropriate relationships with pupils or young people who are pupils at another school will also be regarded as gross misconduct. Such behaviour gives rise to concern that the member of staff involved cannot be trusted to maintain appropriate boundaries with pupils or young people.

f) Grooming is the process by which an individual prepares a child, including significant

adults around the child and the environment, for abuse of that child.

g) All staff should be aware of grooming type behaviours.

h) All staff should try as far as possible not to do anything (such as conferring special attention and favour upon a child, gift giving, inappropriate social contact) which might be construed as being part of a grooming process.

i) Staff should also avoid any form of communication with a child which could be interpreted as sexually suggestive or provocative, either in verbal comments, letters, notes, electronic mail, phone calls, texts, social media, or through inappropriate physical contact.

j) Any concern that another adult may be engaging in grooming behaviour must be reported without delay to the Head. A concern about the Head must be reported to the Chair of Governors without informing the Head first. Where there is a conflict of interest in reporting to the Head, the concern must be reported directly to the LADO.

25. INFATUATIONS AND 'CRUSHES'

a) 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' or infatuation. They should make every effort to ensure that their own behaviour cannot be brought into question, does not appear to encourage this and be aware that such infatuations may carry a risk of their words or actions being misinterpreted.

b) Any member of staff who receives a report, overhears something, or otherwise notices any sign, however small or seemingly insignificant, that a pupil has become or may be becoming infatuated with either them or a colleague, should immediately report this to the Head. In this way, appropriate early intervention can be taken which can prevent escalation and avoid embarrassment or distress for those concerned. Any concern that another adult may be engaging in grooming behaviour must be reported without delay to the Head. A concern about the Head must be reported to the Chair of Governors without informing the Head first. Where there is a conflict of interest in reporting to the Head, the concern must be reported directly to the LADO.

c) The Head will ensure a plan to manage the situation is put in place. The plan will endeavour to respond sensitively to the child and staff member and maintain the dignity of all. The plan will involve all parties and be regularly monitored and reviewed.

26. ALLEGATIONS AGAINST STAFF, LOW LEVEL CONCERNS AND SELF-REFERRAL

(also see further detail in the school's Safeguarding Children Policy)

a) The school aims at all times to promote an open and transparent culture in which all concerns about staff are reported and dealt with promptly and appropriately.

b) An allegation which meets the harm threshold would mean an individual had:
   - behaved in a way that has harmed a child, or may have harmed a child and/or;
   - possibly committed a criminal offence against or related to a child and/or;
   - behaved towards a child or children in a way that indicates he or she may pose a risk of harm to
   - children; and/or
   - behaved or may have behaved in a way that indicates they may not be suitable to work with children.

c) A member of staff who receives an allegation or has a safeguarding concern about another adult working in or on behalf of the School must report it to the Head without delay.

d) A concern or allegation about the Head must be reported to the Chair of Governors without informing the Head first. Where there is a conflict of interest in reporting to the Head, the matter must be reported directly to the LADO. The Head or Chair will follow the Safeguarding and Child Protection Policy, including contacting the LADO without delay and within one working day where required. (All contact details are found in the Child Protection and Safeguarding Policy).

e) There may also be occasions when something occurs which causes a member of staff to have doubts about the behaviour of another adult towards a pupil, or another child, or concerns about how their own behaviour might be interpreted. This may be considered a low-level concern.

f) A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school may have acted in a way that:
   - is inconsistent with the staff code of conduct, including inappropriate conduct outside of work,
   - does not appear to meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

g) Examples of such behaviour could include, but are not limited to:
   - being over friendly with children;
   - having favourites;
   - taking photographs of children on a mobile phone or other device contrary to School policy;
   - engaging with a child on a 1:1 basis in a secluded area or behind a closed door;

- using inappropriate sexualised, intimidating or offensive language,
- behaviour that may look inappropriate, but may not be in specific circumstances,
- through to that which is ultimately intended to enable abuse.

h) Staff must report any such concerns to the Head (or direct to the Chair of Governors if it concerns the Head)

i) Staff are also encouraged, and to feel confident if the need arises, for them to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

j) Reporting of these types of concerns is a neutral act, and the Head will, on receipt of a report, determine how to best approach the issue. In the vast majority of cases, there will be a satisfactory explanation for what has occurred, and staff should not feel that making a report, or being the subject of a report, will cause them to suffer any detriment or stigma where this is the case.

k) All such concerns will be dealt with as outlined in school Safeguarding Children Policy.

l) The purpose of low-level reporting is to protect both pupils and the staff working with them, and allows a system for a simple record to be kept in case events are later referred to or any patterns emerge.

m) Low-level concerns relating to supply staff, trainee teachers, contractors or other staff supplied by a third party will be shared with their agency, teacher-training provider or employer, as applicable, so that possible patterns of behaviour can be identified. If there is any doubt about whether a concern meets the harm threshold, the School will consult the LADO.

n) No member of staff will suffer detriment for raising a genuine safeguarding concern or allegation. Where a disclosure meets the statutory requirements for a protected disclosure, the member of staff will have the protections described in the Whistleblowing Policy.

27. WHISTLEBLOWING (also see school's Whistleblowing Policy)

Whistleblowing is the raising by an individual of information which they reasonably believe tends to show specified wrongdoing and is in the public interest. Staff should follow the School's Whistleblowing Policy. Safeguarding concerns about the conduct of an adult must be reported through the routes in section 26.

28. SUPPORT FOR STAFF

The school recognises that staff who have become involved with a pupil who has suffered harm, or appears to be likely to suffer harm, and/or has raised a concern about a member of staff, may find the situation stressful and upsetting. The school will support such staff by providing an opportunity to talk through the matter and will be helped to seek further support as appropriate.

Where a member of staff feels unable to raise a safeguarding failure internally, or believes that a genuine concern is not being addressed, the NSPCC Whistleblowing Advice Line is available as an alternative route. Staff can call 0800 028 0285 between 8am and 8pm Monday to Friday or 9am and 6pm at weekends, or email help@nspcc.org.uk.