

INSPIRATIONAL
Box Hill School

BOX HILL SCHOOL
Staff Code of Conduct
2023-2024
Approved by the Headmaster

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Introduction

All adults who come into contact with children and young people in their work have a duty of care to safeguard and promote their welfare, both on and off-site. This applies to all those who work with pupils in an educational establishment, in either a paid or unpaid volunteering capacity. This Code of Conduct sets out the expected standard of behaviour at the School and applies to **all** employees, supply staff, contractors and volunteers in their work with the School. The principles of this document apply to professional behaviours towards all pupils, including those over the age of 18.

The Children Act 2004 places a duty on organisations to safeguard and promote the well-being of children and young people. This includes the need to ensure that all adults who work with or on behalf of children and young people in these organisations are competent, confident and safe to do so.

The aim of this Policy is to provide clear guidance about behaviour and actions so as not to place pupils or staff at risk of harm or allegations of harm to a pupil. Colleagues should be aware that their behaviour within their personal lives and also towards other colleagues may bring into question their professionalism and/or their suitability to work with children. Please note that staff behaviour outside School that may bring into question professionalism and/or suitability to work with children need not include a child. It could, for example, involve domestic abuse of a partner. The issue here is one of transferrable risk.

The purpose of this Policy is to create and embed a culture of openness, trust and transparency in which the School's values and expected behaviours (as outlined in this Policy) are constantly lived, monitored and reinforced by all staff.

Whilst all colleagues are expected to adhere to this guidance, it is recognised that not all of the guidance is equally relevant to all roles. Any colleague who has concerns or queries in this respect should raise them at the earliest opportunity with their line manager, or appropriate senior colleagues.

Whilst every attempt has been made to cover a wide range of situations in this guidance, it is recognised that it cannot cover all eventualities. The COVID-19 pandemic with its associated closure of schools to most children is one such example of a circumstance which had not been foreseen and where Government, local authorities, school leaders and staff have needed to review and amend guidance rapidly. Now more than ever before, there may be times when professional judgements are made in situations not covered by this document. It is expected that in these circumstances staff will always discuss with and advise their senior colleagues of the justification of any such action proposed (or potentially already undertaken).

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

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outcomes for the pupils in their care. Achieving these aims relies on positive pupil and staff interactions. Unfortunately, tensions and misunderstandings can occur in such interactions. This guidance aims to reduce the risk of such situations by assisting all staff to monitor their own standards and practice and reduce the risk of allegations being made. This document clearly outlines illegal, unsafe, unprofessional and unwise behaviour.

Creating a culture in which all concerns about adults (including allegations that do not meet the harm threshold) are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. This helps to encourage an open and transparent culture; enable the School to identify concerning, problematic or inappropriate behaviour early; and minimise the risk of abuse. A culture of vigilance will help to ensure that all adults working in or on behalf of the School are clear about professional boundaries and act within these boundaries, and in accordance with the School's ethos and values.

Any behaviours that fall short of the guiding principles outlined in this document must be shared responsibly and with the right person. All concerns that do not meet the harm threshold must be recorded and dealt with appropriately as a low level concern as referenced in *Keeping Children Safe in Education* (KCSiE).

The sections which follow are intended as a summary of the lengthier document *Guidance for safer working practice for those working with children and young people in education settings* (Safer Recruitment Consortium – February 2022).

All staff have a responsibility to be aware of the systems within the School which support safeguarding and of any temporary amendments to these brought about by situations such as the COVID-19 pandemic. The School will ensure that appropriate safeguarding and child protection policies and procedures are distributed, adopted, implemented and monitored. The School will also ensure that if there is no trained DSL on site, a senior member of staff is identified to lead on safeguarding issues.

This Policy is referred to as the Code of Conduct for staff as it lays out the School's expectations of the behaviour of all staff. It should be noted that unacceptable behaviour by staff will not be tolerated and where appropriate, legal or disciplinary action will follow. All colleagues who teach are also expected to be fully aware of the School's expectations of them as made explicit within the DfE Teachers' Standards document:

<https://www.gov.uk/government/publications/teachers-standards> .

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.

1. Underpinning principles

- The welfare of the child is paramount.
- All staff should:
 - Understand their responsibilities to safeguard and promote the welfare of pupils (**ALL** staff have a duty to keep pupils safe and protect them from harm).
 - Understand the School's Safeguarding Policy and the associated Multi-agency Partnership procedures (Surrey Safeguarding Children's Partnership procedures), arrangements for managing allegations against staff, staff Code of Conduct, Whistleblowing Policy, pupil Behaviour Policy, the safeguarding response to children who go missing from education; and the role of the Designated Safeguarding Lead (DSL) including the identity of the DSL and the deputies.
 - Understand necessary amendments made to any of the policies indicated above in the light of DfE guidance on safeguarding children for example, during the COVID-19 pandemic.
 - Understand necessary amendments made to the contact details for the DSL team for example, during the COVID-19 pandemic.
 - Always report;
 - i) any concerns about the safety, welfare and well-being of a child or young person, or personal safety;
 - ii) any concerns about the inappropriate actions of any other employee, contractor or volunteer that involves children or young people;
 - iii) behaviour that is inconsistent with the staff Code of Conduct and/or Keeping Children Safe in Education (Sept. 2022); including behaviour that may meet the harm threshold and those 'low level concerns' that do not meet the harm threshold. This may include inappropriate conduct outside of work.
 - Accept that they are responsible for their own actions and avoid any conduct which would lead any reasonable person to question their motivation and intentions.
 - Work, and be seen to work, in an open and transparent way including self-reporting if their conduct or behaviour falls short of these guiding principles.
 - Acknowledge that deliberately invented or malicious allegations are extremely rare and ensure that all concerns are reported and recorded.
 - Discuss promptly and/or take advice promptly with their line manager if they have acted in such a way which may give rise to concern.
 - Apply the same professional standards regardless of culture, disability, gender, age, language, racial origin, religious belief and sexual orientation.
 - Not consume or be under the influence of alcohol or any substance, including prescribed medication, which may affect the ability to care for children.
 - Ensure that they abide by the duty to take care of themselves whilst at work (Health and Safety at Work Act 1974).
 - Be aware that breaches of the law and other professional guidelines could result in criminal and/or disciplinary action being taken. Other action that could be taken includes barring by the Disclosure & Barring Service (DBS) from working in

regulated activity and prohibition from teaching by the Teaching Regulation Agency (TRA).

- Review and monitor practice to ensure that this guidance is followed.

2. Duty of care and associated responsibilities

All staff are accountable for the way in which they: exercise authority; manage risk; use resources; and safeguard children. All colleagues have a legal 'duty of care' towards children under their protection. This involves a duty to keep young people safe, to treat them with respect and dignity, and to protect them from abuse (sexual, physical, emotional or neglect) and contextual safeguarding concerns. This means that we must always act and be seen to act in the child's best interest, avoiding any conduct which would lead any reasonable person to question our actions.

In relation to the handling of risks, the law requires that prudent and reasonable precautions be taken in relation to foreseeable harm. The duty is to take all reasonable steps to protect pupils from risks of harm that can be reasonably predicted. For example, risks from known hazards and from foreseeable risk situations against which preventative measures can be taken. The standard of care that is required, for example the degree of supervision, needs to be commensurate with the pupils' maturity and ability. Risk assessments of all activities and functions conducted or arranged by the School are required of us in order to fulfil this obligation. The risks associated with any activity need to be assessed and managed before the activity is undertaken. Staff should seek guidance from a line manager if they have any questions regarding the completion of risk assessments.

The concept of what it is 'reasonable' to expect is important in any legal consideration of a duty of care. Failure to take reasonable steps to ensure the safety and well-being of pupils may be regarded as professional misconduct.

The School promotes a culture of openness and support, ensures that systems are in place for concerns to be raised, that staff are not placed in situations which render them particularly vulnerable and that staff are aware of expectations, policies and procedures.

The safeguarding culture of the School is, in part, exercised through the development of respectful, caring and professional relationships between staff and pupils and by behaviour by all staff that demonstrates integrity, maturity and good judgement. The public, local authorities, the School and parents/carers have expectations about the nature of professional involvement in the lives of children. By accepting a role working at Box Hill School all staff should understand and acknowledge the responsibilities and trust involved in that role.

This means that colleagues should:

- Always act, and be seen to act, in the child's best interests
- Understand the responsibilities which are part of their role, and be aware that sanctions will be applied if these provisions are breached
- Understand how to raise a concern and contact designated staff or partner agencies if they have a concern about a child, particularly if the normal arrangements have been amended

- Exercise respectful, caring and professional relationships that demonstrate integrity, maturity and good judgement
- Avoid any conduct which would lead any reasonable person to question their motivation and intentions
- Take responsibility for their own actions and behaviour

3. Professional judgements

This guidance cannot provide a complete checklist of what is, or is not, appropriate behaviour for staff. It does highlight however, behaviour which is illegal, inappropriate or inadvisable. There may be rare occasions in which colleagues have to make decisions or take action in the best interests of a pupil which could contravene this guidance or where no guidance exists. Colleagues are expected to make judgements about their behaviour in order to secure the best interests and welfare of pupils in their care and, in so doing, will be seen to be acting reasonably. These judgements must always be recorded and shared with a line manager at the earliest opportunity. Colleagues should always consider whether their actions are warranted, proportionate, safe and applied equitably.

This means that where no specific guidance exists colleagues should:

- Discuss the circumstances that informed their action, or proposed action, with their line manager or, where appropriate, the School's Designated Safeguarding Lead (DSL). This will help to ensure that the safest practices are employed and reduce the risk of actions being misinterpreted
- Always discuss any misunderstanding, accidents or threats with the Headmaster or the DSL
- Always record discussions and actions taken with their justifications
- Record any areas of disagreement and, if necessary, refer to another agency such as Surrey Social Care, the Teaching Regulation Agency or other relevant regulatory body

4. Work health and safety

The School will fulfil its duties towards their employees and others under Health and Safety legislation which requires steps to be taken to provide a safe working environment for staff. All staff have a responsibility under work health and safety legislation to take care of their own health and safety at work. It is also the responsibility of all staff to ensure that our activities do not place at risk the health and safety of our co-workers, pupils or other persons that we may come into contact with at work. Considerations of safety relate to both physical and psychological wellbeing of individuals.

All staff should ensure that they are aware of the School's Work Health & Safety policies.

During the COVID-19 pandemic it is vital that all staff adhere to the relevant measures (and any associated amendments) put into place by the School to protect the whole School community and to mitigate the risk of transmission. These measures are outlined in the relevant School risk assessment shared with staff and in the staff training put in place regarding the reopening of the physical campus. It is particularly important that all staff act as role models for the necessary

behaviours expected within the community. Hence, it is expected that staff will pay particular attention to hand and respiratory hygiene by following Government guidelines surrounding handwashing, the wearing of face masks where appropriate and the use of tissues (catch it, bin it, kill it) to assist in infection prevention. In addition, it is important that all staff respect the social distancing requirements.

5. Position of trust

All adults working with children and young people in a School are in positions of trust in relation to all pupils and must maintain appropriate professional boundaries. The relationship between a person working in the School is one in which the adult has a position of power or influence. It is vital for all staff to understand that the relationship with pupils cannot be one between equals and the responsibility they must exercise as a consequence.

The potential for exploitation and harm of vulnerable pupils means that all staff have a responsibility to ensure that they do not use their position of authority either for their own personal advantage or gratification, or to intimidate, coerce or undermine children. For instance, under the Sexual Offences Act 2003, where a person aged 18 or over is in a position of trust with a child under 18, it is a criminal offence not only for that person to engage in sexual activity with or in the presence of that child, but also to cause or incite that child to engage in or watch sexual activity. This applies, even if, in the case of those over 16, the relationship appears consensual. A position of trust could arise where the child is in full time education and the person looks after children under 18 in the same establishment as the child, even if s/he does not teach the child.

An overly familiar relationship with any pupil (including any adult pupil) that you are responsible for teaching, tutoring, advising, assessing, or for whom you provide pastoral or welfare support raises serious questions of conflict of interest, trust, confidence, dependency, and of equality of treatment. Such relationships may also have a negative impact on the teaching and learning environment for other pupils and colleagues and may carry a serious reputational risk for the School.

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

This means that colleagues must not:

- Use their position to gain access to information for their own advantage and/or a pupil's or family's detriment
- Use their power to intimidate, threaten, coerce or undermine pupils
- Use their status and standing to form or promote relationships with pupils which are of a romantic or sexual nature, or which may become so. It is irrelevant whether the relationship is homosexual or heterosexual, appears consensual (the law does not allow for 'consent' in this respect), or condoned by parents or caregivers
- Develop a relationship with any pupil that is, or that can be interpreted as having, a personal rather than a professional interest in a pupil

6. Infatuations

Occasionally, a pupil can develop an infatuation with a colleague. Colleagues should deal with these situations sensitively and appropriately to maintain the dignity and safety of all concerned. They should remain aware, however, that such infatuations carry a high risk of words or actions being misinterpreted and should therefore make every effort to ensure that their own behaviour is above reproach.

If you consider that a pupil is being overly familiar, seeking to establish a personal relationship with you or has developed a 'crush' on you, you should report your concerns to your immediate line manager and the DSL as soon as possible so that a plan can be developed to manage the situation effectively and sensitively. It is vital that any indication (verbal, written or physical) that suggest a pupil may be infatuated with you or a colleague is reported immediately for the safeguarding of all concerned.

An appropriate plan to manage the situation will be put into place and will be regularly monitored and reviewed. The plan will seek to establish the most appropriate course of action to prevent escalation, hurt, embarrassment or distress for those concerned.

This means that colleagues should:

- Report any indications (verbal, written or physical) that suggest that a pupil may be infatuated with a member of staff
- Always maintain professional boundaries
- Expect an appropriate plan to be put into place where necessary

7. Confidentiality

All data covered by the Data Protection Act 2018 and General Data Protection Regulations (GDPR) 2017 (essentially the storing and processing of all personal data, be it academic, social, etc.) should be treated in accordance with these Acts. The School also pays due regard to the Department for Education publication 'Data protection: a toolkit for schools' (August 2018).

If you are unsure of whether or not the data is covered you should speak to a member of the Senior Leadership Team (SLT).

Colleagues may have access to confidential information about the School, its pupils and their families (special category personal data) 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. This might include personal details of parents, pupils, and staff or financial information and marketing plans. Such confidential or personal information about a pupil or their family should not be used for personal advantage or the advantage of partners, friends, relatives or other organisations. Information must never be used to intimidate, humiliate, or embarrass the pupil.

Confidential information should never be used casually in conversation or shared with any person other than on a need-to-know basis. Colleagues should always exercise caution and sound

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judgment in discussing the personal information of pupils, parents, staff and other people with other School employees. Normally information should be limited to those who need to know in order to conduct their duties, or to those who can assist in carrying out the School's work because of their expertise. In circumstances where the pupil's identity does not need to be disclosed the information should be used anonymously.

There are some circumstances in which a member of staff may be expected to share information about a pupil, for example when abuse is alleged or suspected. In such cases, individuals have a responsibility to pass information on without delay, but only to those with designated safeguarding responsibilities or to statutory services.

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

Colleagues should also take care that any electronically stored confidential information which is taken off the School premises is kept safe and secure at all times. Colleagues should seek advice from a senior member of staff if they are in any doubt about sharing information they hold or which has been requested of them.

There are some circumstances in which a colleague may be expected to share information about a pupil, for example when abuse is alleged or suspected. In such cases, colleagues should not promise confidentiality but should give reassurance that the information will be treated sensitively before passing the information on without delay to the DSL.

The 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner but it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.

Hence, child protection has priority over data protection, but staff must consult the DSL in such circumstances (as the information should only be passed to those with designated safeguarding responsibilities or to statutory services).

It is vital that pupils' personal data is not provided where the serious harm test under the legislation is met. For example, in a situation where a child is in a refuge or another form of emergency accommodation, and the serious harm test is met, the School must withhold providing the data in compliance with its obligations under the Data Protection Act 2018 and the GDPR. In such circumstances, it is vital that members of staff seek advice from the DSL. The School will seek independent legal advice where necessary.

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Press or other media enquiries concerning School business or information should be passed on to the Headmaster, the Head of Communications and Development or another member of SLT. All enquiries from the Police, Social Care or other such external agencies should be passed to the DSL or a Deputy DSL.

This means that colleagues should not:

- Provide a guarantee of confidentiality if the matter under discussion requires mandatory reporting
- Disclose personal information about another staff member to pupils or parents or discuss their work performance, except if authorised by the Headmaster in the context of grievance resolution
- Allow the media access to pupils or to the School without the express permission of the Headmaster
- Make any comments to the media about the School, pupils or parents without the express permission of the Headmaster

This means that colleagues should:

- Know who the Designated Safeguarding Lead and Deputies in the School are in addition to being familiar with Multi-agency Partnership (MAP) child protection procedures and guidance
- Treat information they receive about pupils and families in a discreet and confidential manner
- Only use confidential information for the work-related purpose it was intended
- Be mindful of confidentiality when in discussions with parents
- Ensure that all matters discussed in staff meetings and staff memos are to be treated confidentially and not discussed with pupils, members of the School community, or the public
- Ensure that confidential information, in any form, cannot be accessed by unauthorised people.
- Seek advice from a senior member of staff (Headmaster, Chief Operating Officer or Deputy Head Pastoral) if they are in any doubt about sharing information they hold or which has been requested of them. This is particularly important for those staff who need to share 'special category personal data' as the Data Protection Act 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent, if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent or if to gain consent would place a child at risk
- Be clear about when information can and must be shared and in what circumstances
- Know the procedures for responding to allegations against staff
- Ensure that personal information (electronically stored or not) is kept secure
- Ensure that where personal information is recorded electronically that systems and devices are kept secure

8. IT and Data Security

School IT equipment and software is provided for School work purposes. All School desktop computers, laptops and iPads are actively monitored, to ensure the devices are optimised for best work performance and compliant to mitigate risks of cyber security crime. Internet usage activity is also monitored by the IT Support team and members of SLT for compliance and data security purposes, when in School and working from home. Staff should be aware that therefore all use of School equipment is monitored at all times from all locations.

Reasonable use of School desktop computers, laptops and iPads for personal use is permitted, with the understanding that personal usage will not breach any of the School policies and will not impact on work performance. If you require clarification of reasonable personal use, then please contact the COO, Deputy Head Pastoral, Deputy Head Academic or the Head of IT services. All websites visited and activity for personal use is logged and monitored by the IT Support team and members of SLT. It is advised that a School device should not normally be used for personal banking, online payment transactions, connecting to personal emails or storing personal documents. If they are used for this, then this is at staff member's own risk since our security monitoring systems will capture this information; the School is not liable for any personal financial loss or any other personal data loss that are not work related.

9. Propriety and behaviour

Colleagues should adopt high standards of personal conduct in order to maintain the confidence and respect of their peers, pupils and parents. An individual's behaviour, either in or out of School, should not compromise his or her position within the School in relation to the protection of children, loss of trust and confidence, or bringing the School into disrepute. Where the behaviour of colleagues does compromise his or her position within the School such behaviour may also result in prohibition from teaching by the Teaching Regulation Agency (TRA) a bar from engaging in regulated activity, or action by another relevant regulatory body.

This means that colleagues should not behave in a manner which would lead any reasonable person to question their suitability to work with children or to act as an appropriate role model. 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.

It is the responsibility of colleagues to update the School if they have received any driving endorsements, convictions, cautions, reprimands, or warnings regardless of the nature of the offence.

The Disqualification under the Childcare Act 2006 (Regulations 2018) requires that staff should disclose any relationship or association (in the real world or online) that may impact on the school's ability to safeguard pupils.

In addition, colleagues must be even-handed, consistent and unambiguous in the way they treat pupils, avoiding any actions that would be considered 'unprofessional'. For instance the verbal

slighting in public of a pupil (or another member of staff), whether intended or unintended, would be regarded as unprofessional.

You should be aware of, and sensitive to, children with culturally diverse or indigenous backgrounds and cultural practices that may influence the interpretation of your behaviour. Colleagues should report to the Deputy Head Pastoral or another member of SLT and record any incident where their behaviour has been such that it might be misinterpreted by others.

You may, as part of your pastoral care role, engage in discussion with pupils. This is entirely appropriate. However, you must be cautious about making personal comments about a pupil or asking questions that probe your own or a pupil's sexuality or relationships. You must not hold conversations with a pupil of an intimately personal nature where you disclose information about yourself.

10. Low level concerns

As with all allegations that meet the harm threshold (referred to the Local Authority), it is important that all concerns about adults including allegations that do not meet the harm threshold are shared with the Headmaster (unless the allegation concerns the Headmaster, in which case it must be shared with the Chair of Governors).

A low-level concern is one that does not meet the harm threshold as stated in the School's Safeguarding Policy.

The harm threshold is met when anyone working in a school (including volunteers, supply staff and contractors) has:

- 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 (which includes behaviour that may have happened **outside** school posing a transferable risk to children).

Responses and actions to behaviours that may meet the harm threshold are contained specifically within the School's Safeguarding Policy. These should be reported to the Headmaster without delay.

The School believes that creating a culture in which all concerns about adults (including allegations that do not meet the harm threshold) are shared responsibly and with the right person, and recorded and dealt with appropriately, is crucial. The purpose of this is to create and embed a culture of openness, trust and transparency in which the clear values and expected behaviour which are set out in this Code of Conduct are constantly lived, monitored and reinforced by all staff. This enables the School to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; maintain appropriate professional boundaries and the ethos and values of the School.

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The School deals with all concerns about adults working in or behalf of the School appropriately and promptly. If the allegation concerns supply staff or contractors the Headmaster will ensure that their employers are notified so that any potential patterns of inappropriate behaviour can be identified.

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

In order to protect pupils and staff, all colleagues must be aware of the School's safeguarding procedures, including the procedures for dealing with allegations against staff and volunteers for concerns that meet the harm threshold and those that don't (known as low level concerns) outlined in the Box Hill School Safeguarding Policy.

The term low-level concern does not mean that it is insignificant, but that the behaviour does not meet the harm threshold. The term low level concern is used as a clear and comprehensible term to neutralise the act of sharing a concern which neither meets the allegation threshold set out below, nor is otherwise serious enough to consider a referral to the LADO – but may merit consulting with and seeking advice from the LADO.

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' (i.e. they believe it could be a concern)- 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; and
- does not meet the harm (allegations) threshold or is otherwise not considered serious enough to consider a referral to the LADO.

The School recognises that such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse. Example behaviours include, but are not limited to:

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

It is crucial that any such concerns are shared to allow them to be dealt with appropriately as outlined in part four of Keeping Children Safe in Education and the School's Safeguarding Policy. It is crucial that any such concerns, including those which do not meet the harm threshold are shared responsibly and with the right person, and recorded and dealt with appropriately.

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Ensuring that the School is able to deal with such concerns effectively will help to protect from the potential of false allegations or misunderstandings.

Therefore, if staff have ANY safeguarding concerns (including low level concerns) or an allegation is made about another member of staff (including supply staff, volunteers, and contractors) posing a risk of harm to children, then:

- this should be referred to the Headmaster
- where there are concerns/allegations about the Headmaster, this should be referred to the Chair of Governors

Staff should feel confident to self-refer to the Headmaster, where, for example, they have found themselves in a situation where they are concerned about how their behaviour may have been interpreted (e.g. might appear compromising to others), and/or on reflection they believe they have behaved in such a way that they consider is contrary to (falls below) the School's Code of Conduct and expectations.

Low level concerns about someone who is employed by a supply agency or contractor should be shared with the Headmaster, the concern recorded, and their employer notified so that potential patterns of inappropriate behaviour can be identified.

All low-level concerns may be shared verbally with the Headmaster in the first instance, but must then be recorded in writing. The record should include:

- details of the concern
- the context in which the concern arose
- action taken

The name of the individual sharing their concerns should also be noted, but if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

If the concern has been raised via a third party, the Headmaster will collect as much evidence as possible by speaking directly to the person who raised the concern, unless it has been raised anonymously, and to the individual involved and any witnesses. The information collected will help to categorise the type of behaviour and determine what further action may need to be taken. This will be recorded along with the rationale for the decisions and action taken.

Records of low-level concerns will be kept confidential, held securely and comply with GDPR and the Data Protection Act 2018. The School has the right to decide how long such information is retained, but it is recommended that it is retained at least until the individual leaves their employment. The School will follow the guidance contained within KCSiE as to when a low level concern should be referred to in a reference.

The Headmaster will in the first instance satisfy himself that it is a low-level concern and should not be reclassified as a higher level concern/allegation. The circumstances in which a low-level concern might be reclassified are where:

- (a) the harm threshold is met for a higher-level concern/allegation

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(b) there is a pattern of low-level concerns which collectively amount to a higher-level concern/allegation (collectively meets the threshold of an allegation) or
(c) there is other information which when taken into account leads to a higher-level concern/allegation. Where the Headmaster is in any doubt whatsoever, advice will be sought from the LADO.

In dealing with a low-level concern with a member of staff, this will be approached in a sensitive and proportionate way. The actions required will be considered on a case by case basis and advice may be sought from the LADO. Any investigation of low-level concerns will be done discreetly and on a need-to-know basis.

In many cases, the low-level concerns by their very nature are likely to be minor. Some will not give rise to any ongoing concern and, accordingly, will not require any further action. Others may be most appropriately dealt with by means of management guidance and/or training. In many cases, it may be that a low-level concern will simply require a conversation with the individual about whom the concern has been raised. If this is the case, the conversation will include being clear with the individual as to why their behaviour is concerning, problematic or inappropriate, what change is required in their behaviour, enquiring what, if any, support they might need in order to achieve and maintain that, and being clear about the consequences if they fail to reach the required standard or repeat the behaviour in question. Ongoing and transparent monitoring of the individual's behaviour may be appropriate. An action plan or risk assessment may be required.

Some low-level concerns may also raise issues of misconduct or poor performance. Hence, some concerns may trigger the School's disciplinary, grievance or whistleblowing procedures, which will be followed where appropriate and involve HR.

The records held will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. A central log will be shared and monitored by the School's SLT on a monthly basis to ensure that all such concerns are being dealt with promptly and appropriately, and that any potential patterns of concerning, problematic or inappropriate behaviour are identified. A record will be kept of this review within the minutes of the SLT meeting.

Where a pattern of concerning, problematic or inappropriate behaviour is identified, the School will decide on an appropriate course of action. This will either be through the disciplinary procedure or will be referred to the LADO where a pattern of behaviour moves from a low level concern to a higher level concern meeting the harm threshold.

This means that colleagues should not:

- Behave in a manner which would lead any reasonable person to question their suitability to work with children or to act as an appropriate role model
- Make, or encourage others to make sexual remarks to (including via e-mail, other electronic media, text messages, phone or by letter) or about, a pupil
- Behave in any way which could be interpreted as sexually suggestive or provocative

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- Use inappropriate language to or in the presence of pupils
- Discuss their personal relationships or sexual relationships with or in the presence of pupils or in other inappropriate contexts or settings
- Discuss the sexual preferences or sexual relationships of others with or in the presence of pupils or in other inappropriate contexts or settings
- Make, or encourage others to make, unprofessional personal comments which scapegoat, demean, discriminate or humiliate or might be interpreted as such
- Ask intrusive questions of colleagues regarding those they live with or have relationships/associations with

This means that colleagues should:

- Act in line with the staff Code of Conduct
- Report to the Headmaster, instances of 'low level' concerns
- Self-refer where they believe that they have found themselves in a situation that might appear to be considered a 'low level' concern
- Be aware that behaviour by themselves, those with whom they have a relationship or association, or others in their personal lives, may impact on their work with children. If staff have concerns regarding any relationship/association (in or out of School or online) that may have implications for the safeguarding of children in School they should speak to the Headmaster, the Deputy Head Pastoral or Human Resources (HR). The School encourages a culture of openness enabling staff to raise such issues
- Inform the Headmaster and HR of any name changes that have not previously been declared
- Ensure that HR are updated when colleague's medical or personal details change
- Inform the Headmaster or HR of any cautions, convictions, or relevant orders accrued during their employment, and/or if they are charged with a criminal offence. This includes any driving endorsements, convictions, cautions, reprimands, or warnings regardless of the nature of the offence
- Be aware that the School will act to safeguard their employees' welfare and fulfill the duty of care towards staff. This will include identifying whether arrangements are needed to support staff who raise such issues
- Be aware that the School will consider whether there are measures that need to be put in place to safeguard children (e.g. by putting arrangements in place to stop or restrict a person coming into School where a potential risk to children has been identified)

11. Dress and appearance

Colleagues are role models for pupils and as such, should ensure that their appearance is decent, promotes a positive and professional image, and is appropriate to their role and status. All colleagues should ensure they are dressed decently, safely and appropriately for the tasks and the work they undertake. Business attire is expected except where sporting attire is more suitable or for areas where other clothing is expected, such as Art or Expeditions. The requirements for dress and appearance also apply to any members of staff who are undertaking online or virtual teaching. Appropriate dress is also required by those staff who work with any small groups of pupils on site during a lockdown (for example, vulnerable children or the children of key workers).

Those who dress or appear in a manner which could be considered as inappropriate could render themselves vulnerable to criticism or allegation.

This means that colleagues should wear clothing which:

- promotes a positive and professional image
- is appropriate to their 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 and is culturally sensitive
- is not likely to give rise to health and safety concerns
- is compliant with professional standards
- in online engagement, is similar to the clothing they would wear on a normal School day

12. Rewards, gifts, favouritism and exclusion

Rewards should be given in line with accepted practice and anything that might be considered to fall outside the norm should be discussed in advance with a member of the SLT. Colleagues should ensure that gifts received or given in situations which may be misconstrued are declared and generally, only give gifts to an individual young person as part of an agreed reward system. Where giving gifts other than as above, you are to ensure that these are of insignificant value and given to all pupils equally. This guidance is designed to protect colleagues, as far as possible, from the interpretation that the gift is intended either to bribe or groom or the perception that 'a favour' of some kind is expected in return.

Colleagues should exercise care when selecting pupils for specific activities or privileges, in order to avoid perceptions of favouritism or unfairness. Similar care should be exercised when pupils are excluded from an activity. Methods of selection and exclusion should always be subject to clear, fair and agreed criteria.

Colleagues are able to receive tokens of appreciation from pupils or parents e.g. at Christmas or the end of an academic year, but they should not accept any gift that might be construed as a bribe or lead to an expectation of preferential treatment. Small 'thank yous' are acceptable but do not receive gifts on a regular basis or of any significant value (defined as over £100).

Accepting gifts and other benefits has the potential to compromise the position of a member of staff by creating a sense of obligation and undermining impartiality. It may also affect the reputation of the School and its staff. No one must be allowed to create the impression that any person or organisation is influencing the School or the decisions or actions of any of its employees.

If a colleague is offered a gift or benefit, the value and purpose of a gift or benefit must be considered before making any decision about accepting it. A gift that has more than a nominal value must not become personal property. Such a gift should either be politely refused or the contributor advised that the gift will be accepted on behalf of the School. When such a gift is

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accepted, the Headmaster must be advised. He will determine how it should be treated and make a record of its receipt. Depending on the nature and value of the gift, it may be appropriate to record the gift in the asset register as a donation or other such record established for that purpose.

If any colleague is offered a bribe (i.e. anything given in order to persuade a member of staff to act improperly), it must be refused, an explanation given as to why it is not appropriate, and the matter immediately reported to the Headmaster.

Sometimes employees might, in the course of their work, win a prize of significant monetary value e.g. a computer, from another organisation. Prizes are usually considered the property of the School. If such a prize is won, colleagues must advise their line manager or the Headmaster who will determine how the prize should be treated and recorded.

13. Social contact outside of School

It is acknowledged that staff may have genuine friendships and social contact with the parents of pupils (often established prior to the children becoming pupils at the School or when the children of staff are also pupils). Colleagues should maintain appropriate personal and professional boundaries in any social contact with pupils or their families. Any concerns should be discussed with the Deputy Head Pastoral.

Colleagues 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 School into disrepute (e.g. attending a political protest, circulating propaganda).

If a 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.

It is acknowledged that some staff also have children who attend the School. It is recognised that in these cases the staff fulfil a dual role of parent and employee. Parents as employees should ensure that they uphold boundaries between the two roles and that their behaviour does not constitute a conflict of interest. For example, they must maintain the same level of confidentiality despite social expectations. Parent-staff should discuss any inter-role conflict with a member of SLT.

Colleagues should have no secret social contact with pupils or their parents and should always approve any planned social contact with children with senior colleagues (the Deputy Head Pastoral or another member of SLT). Colleagues should report and record any situation, which may place a child at risk or which may compromise the School or their own professional standing.

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 a member of SLT and where necessary referrals made to the appropriate support agency.

This means that colleagues should:

- Inform senior colleagues of any relationship with a parent where this extends beyond the usual professional relationship
- Always approve any planned social contact with children with senior colleagues
- Advise senior colleagues of any regular social contact they have with a pupil which could give rise to concern

14. Communication with pupils and parents

Colleagues should be circumspect in their use of technology when communicating with pupils and parents, so that there is no room for misinterpretation. Any communications should be transparent, open to scrutiny, be for professional purposes only and avoid any communication which could be interpreted as 'grooming behaviour'. You must not use any personal device to communicate with pupils and parents and all email contact must be by School email. You must not give personal details e.g. phone numbers or email addresses to pupils or parents.

Colleagues should ensure that they establish safe and responsible online behaviours. Communication with children both in the 'real' world and through web based and telecommunication interactions should take place within the expected professional boundaries. This includes the use of computers, tablets, phones, texts, e-mails, instant messages, social media such as Facebook and Twitter, chat-rooms, forums, blogs, websites, gaming sites, digital cameras, videos, web-cams and other hand-held devices. (Given the ever-changing world of technology it should be noted that this list gives examples only and is not exhaustive.)

Colleagues should ensure that personal social networking sites are set with maximum privacy settings and pupils are never listed as approved contacts. They should never inappropriately use or access social networking sites of pupils. Colleagues must not try to establish any kind of social contacts with pupils for friendships or a relationship. This includes all forms of electronic communication. They should not give their personal information including personal contact details to pupils or parents, including their private mobile telephone number or email address, and details of any blogs or personal websites. Except in an emergency, they should only use equipment e.g. mobile phones, provided by the School to communicate with children and their parents. Colleagues must not use their personal mobile, internet or web-based communication channels to send personal messages to current pupils and should be circumspect about doing so with those who have left School within the last few years.

If pupils or parents locate your personal contact details by other means and attempt to contact or correspond with you do not respond and report this to the Headmaster or Deputy Head Pastoral. The pupil/parents should be firmly and politely informed that this is not acceptable.

All colleagues must comply with the School's Information Technology, Computer, Telephone and Equipment Codes of Use/e policies and Social Networking Policies. This applies to communication with pupils, parents and other colleagues and includes:

- (a) exercising good judgment when using electronic mail, following the principles of ethical behaviour;

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- (b) using appropriate and professional language in electronic mail messages;
- (c) being aware that if an issue addressed in an email becomes the subject of a legal dispute, then those emails would be discoverable: that is, the court and all parties to the dispute would be entitled to see them;
- (d) not sending messages that are harassing, discriminatory, defamatory, threatening, abusive or obscene;
- (e) not inviting pupils into your personal social networking site or accept an invitation to theirs;
- (f) not using social networking sites to email or contact pupils;
- (g) remembering transmission, storage, promotion or display of offensive, defamatory, or harassing material is strictly forbidden; and
- (h) reporting any situations where you become aware of the inappropriate use of electronic communication and social networking sites.

This means that colleagues should:

- Not make contact or respond to contact with pupils outside of the purposes of their work
- Not engage in inappropriate electronic communication with a pupil
- Not give out their personal details
- Follow the School's e-safety policies
- Ensure that their use of technology does not bring the School into disrepute
- Not discuss or share data relating to children, parents or carers in staff social media groups

15. Physical contact

There are occasions when it is entirely appropriate for colleagues to have physical contact with pupils, but it is crucial that it should be appropriate to their professional role. You should touch only when it is appropriate and proper to do so in your professional judgement. It is not possible to be specific about all situations, since it varies according to the particular set of circumstances, but a general culture of 'limited safe touch' should be adopted. Physical contact should always be in response to a child's needs at the time, in line with any agreed care plan, of limited duration and appropriate given their age, gender, ethnicity and stage of development. Colleagues should therefore, always use their professional judgement.

Not all pupils feel comfortable about certain types of physical contact; this should be recognised and, wherever possible, colleagues should seek the pupil's permission before initiating contact and be sensitive to any signs that they may be uncomfortable or embarrassed. Staff should acknowledge that some pupils are more comfortable with touch than others and/or may be more comfortable with touch from some adults than others. Staff should listen, observe and take note of the child's reaction or feelings and, so far as is possible, use a level of contact and/or form of communication which is acceptable to the pupil.

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

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There may be rare occasions when a distressed pupil needs comfort and reassurance including limited age-appropriate physical contact, principally with our younger pupils. Colleagues must be self-aware and avoid any contact which may be intrusive or open to misinterpretation. Always tell a senior colleague, most usually a member of SLT, if you have offered comfort to a distressed pupil.

When congratulating a pupil, a handshake is the most appropriate conduct as long as the pupil is comfortable with this action. Kissing and hugging of pupils is not acceptable.

Colleagues should be aware that even well-intentioned physical contact may be misconstrued, for example because of differing cultural or religious views about touching. Children should never be touched in a way that could be viewed as indecent, colleagues should never indulge in horseplay, tickling or 'play fights' with children and all physical contact will be open to scrutiny. Physical contact should never be secretive, for the gratification of the adult, of a type which could be considered indecent, or represent a misuse of authority.

In certain curriculum areas, such as sport, drama, music, performing arts and outdoor activities, staff may need to initiate some physical contact with pupils, for example, to demonstrate technique in the use of a piece of equipment, adjust posture or to support a pupil so they can perform an activity safely or prevent injury. Physical contact should take place only when absolutely necessary in relation to a particular activity. Such contact should be carried out in accordance with existing codes of conduct (such as those provided by national sporting bodies), regulations and best practice. Physical contact should be done with the pupil's consent, take place in a safe and open environment (i.e. one that is easily observed by others) and last for the minimum time necessary. The extent of the contact should always be made clear in advance and undertaken with the permission of the pupil. Contact should be relevant to the pupil's age and understanding.

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

Colleagues must remain sensitive to any discomfort expressed verbally or non-verbally by the pupil. Extra caution should always be used when it is known that a child has suffered previously from abuse or neglect; staff will be provided with such information on a 'need to know' basis where relevant. Colleagues need to be aware that the child may associate physical contact with such experiences. They also should recognise that these pupils may seek out inappropriate physical contact. In such circumstances staff should deter the child sensitively, help them to understand the importance of personal boundaries and report the matter to the Designated Safeguarding Lead. Any incidents of physical contact that cause concern or fall outside of the guidance given in this document should be reported to the Headmaster and/or the Deputy Head Pastoral.

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It is vitally important that colleagues report to the Headmaster or Deputy Head Pastoral and record any incident which has the potential to be misconstrued or if an action is observed which is possibly abusive. Where appropriate, the School will contact the Local Authority Designated Officer (LADO).

Assessing a pupil who is injured or ill may necessitate touching the pupil. Always advise the pupil of what you intend doing and seek their consent.

Pupils with special educational needs or disabilities may require more physical contact to assist their everyday learning. In such cases the Head of Learning Support or the Deputy Head Pastoral will clearly identify those individual pupils concerned and the associated arrangements. The arrangements should be understood and agreed by all concerned, justified in terms of the pupil's needs, consistently applied and open to scrutiny.

The School's policy on the physical restraint of pupils is published as a separate document. Colleagues should always try to defuse situations without physical intervention first. Colleagues may reasonably intervene to prevent a child from committing a criminal offence, injuring themselves or others, causing damage to property or engaging in behaviour prejudicial to good order. However, great care must be exercised in order that colleagues do not physically intervene in a manner which could be considered unlawful. Colleagues may only use reasonable force. There is no legal definition of reasonable force, but you must be sure that any physical intervention is warranted by the circumstances (i.e. not in response to a trivial incident) and that the degree of force used is in proportion to the seriousness of the behaviour or the consequences it is intended to prevent. Any force used should be minimum to achieve the desired result.

In addition, the School does not expect staff to put themselves at risk. It would always be preferable to call a member of the SLT to deal with any such incidents. If physical intervention is necessary, it is critical that colleagues report to the Headmaster or Deputy Head Pastoral and record any incident of physical intervention as soon as possible after the incident.

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

This means that colleagues should:

- Be aware that even well-intentioned physical contact may be misconstrued by the pupil, an observer or any person to whom this action is described
- Treat pupils with dignity and respect and avoid contact with intimate parts of the body
- Never touch a pupil in a way which may be considered indecent
- Always be prepared to explain actions and accept that all physical contact be open to scrutiny
- Never indulge in horseplay or fun fights
- Consider alternatives to physical contact
- Always allow pupils, where able, to undertake self-care tasks independently
- Ensure that comfort offered to a distressed pupil is age appropriate and inform an appropriate senior colleague

- Establish the preferences of pupils
- consider alternatives, where it is anticipated that a pupil might misinterpret or be uncomfortable with physical contact
- Always explain to the pupil the reason why contact is necessary and what form that contact will take
- Report and record situations which may give rise to concern
- Be aware of cultural or religious views about touching and be sensitive to issues of gender

16. Privacy

All pupils have a right to respect and personal privacy, 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 children concerned and sensitive to the potential for embarrassment.

Always knock before entering a pupil's room, announce your presence before going into any area where pupils might be changing, toileting and showering, allow pupils to make private phone calls and do not read any personal correspondence. Avoid going into areas where pupils are changing, toileting or showering unless there is an urgent need in order to safeguard pupils and to ensure that bullying is not occurring. Colleagues should announce their intention of entering, only remain in the room when essential and avoid visually intrusive behaviour. Colleagues should not touch a pupil who is in a state of undress.

Colleagues should not change or shower in the same place as pupils. On expeditions and camping trips, changing and showering facilities should be carefully risk assessed and a suitable assessed plan followed. Colleagues should be particularly careful when gender differs.

Staff should not be undertaking intimate or personal care for pupils. It is expected that our pupils are able to undertake such tasks independently.

This means that colleagues should:

- Make other staff aware of the task being undertaken e.g. entering a bathroom. If this is not possible because you are responding to an emergency, a member of SLT must be informed immediately afterwards
- Always explain to the pupil what is happening
- Consult with colleagues where any variation from agreed procedure/care plan is necessary
- Record the justification for any variations to the agreed procedure/care plan and share this information with the pupil and their parents/carers
- Avoid any visually intrusive behaviour
- Where there are changing rooms, toilets or bedrooms announce your presence before entering

- Always consider the supervision needs of the pupils and only remain in the room where their needs require this

This means that colleagues should not:

- Change or toilet in the presence or sight of pupils
- Shower or change with pupils
- Allow any adult to assist with intimate or personal care without confirmation from senior leaders that the individual is not barred from working in regulated activity
- Assist with intimate or personal care tasks which the pupil is able to undertake independently

17. Behaviour management

Praise and encouragement should be used to reward good behaviour and achievement. Poor behaviour needs to be treated appropriately and according to the published guidelines. Staff should not use any form of degrading or humiliating treatment to punish a child. The use of sarcasm, demeaning or insensitive comments, racist, sexist or homophobic remarks is unacceptable in any situation.

Colleagues should understand the importance of challenging inappropriate behaviours between peers, including child on child (peer on peer) sexual violence and sexual harassment. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Under no circumstances should corporal punishment and smacking be used as it is illegal. Furthermore, the use of unwarranted or disproportionate physical force is likely to constitute a criminal offence

Colleagues should also be clear about the different levels of sanctions and their responsibilities in this context. The promotion of good behaviour and discouragement of bad behaviour are the general responsibility of all members of staff.

Colleagues must use physical intervention only in accordance with the School’s guidance published separately. You must not use physical intimidation or invade a pupil’s space.

Never try to bar a pupil’s way or to physically prevent a pupil from leaving the room or a situation unless they constitute a threat to themselves or others. Calmly advise them that leaving against your instructions constitutes defiance and that it must be reported to the Headmaster or another member of SLT.

This means that colleagues should:

- Apply appropriate boundaries
- Not use force as a form of punishment
- Remain calm and try to defuse situations before they escalate e.g. by distraction

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- Always strive to minimise the risk of pupils perceiving injustice or victimisation
- Follow the School's policies for behaviour management
- Keep parents informed of any sanctions or behaviour management techniques used
- Be mindful of and sensitive to factors both inside and outside of the school or setting which may impact on a pupil's behaviour
- Behave as a role model
- Avoid shouting at pupils other than as a warning in an emergency/safety situation
- Comply with legislation in relation to human rights
- be clear as to the School's policy and procedures with regard to child on child (peer on peer) abuse
- be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

18. Sexual conduct

Sexual activity between a colleague and a pupil represents the abuse of a position of trust which is a criminal offence and will always be a matter for disciplinary/criminal action. Sexual activity involves physical contact including penetrative and non-penetrative acts and non-contact activities including causing pupils to engage in or watch sexual activity or the production of pornographic material.

Grooming children so allowing or encouraging a relationship to develop in a way which might lead to a sexual relationship is unacceptable. For example, colleagues should not have any form of communication with a child or young person which could be interpreted as being sexually suggestive or provocative, make sexual remarks to, or about, a child/young person or discuss their own sexual relationships with or in the presence of pupils.

All concerns about the behaviour of a colleague should be reported to the Headmaster without delay.

This means that colleagues should:

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

19. Alcohol

A lack of consideration of alcohol consumption and alcohol problems can affect safety issues in School, or an individual's health and wellbeing, and cause a wide range of social problems. This

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policy is concerned primarily with guidance on the consumption of alcohol in and around School hours, and the effects of alcohol on the job performance and career prospects of Box Hill School employees.

Alcohol consumption may result in a threat to the safety of children. In addition, it can also lead to reduced work performance, damaged customer relations, and resentment among employees who have to 'carry' colleagues whose work declines because of their drinking. There are no precise figures on the number of workplace accidents where alcohol is a factor, but alcohol is known to affect judgement and physical co-ordination. Drinking even small amounts of alcohol before or while carrying out work that is 'safety sensitive' such as the care of young people can increase the risk of an accident.

Box Hill School is not a teetotal environment. Alcohol consumption is part of society and, in moderation and with due exercise of control and safe practice, can be enjoyable for those who wish to partake. Moreover, Box Hill School considers the example of sensible alcohol consumption amongst adults to be a legitimate educational example for young people.

The following stipulations exist to help employees understand the Box Hill School rules surrounding the consumption of alcohol at work, or directly before working. (A separate policy exists for the pupils.) Where the stipulations refer to one or two drinks, it should not be inferred that anything over two drinks is an 'alcohol problem'. At all times staff are expected to uphold the code of practice set out in this document:

- a) No member of staff will be encouraged or expected to drink alcohol, even if the option to consume alcohol exists.
- b) It is expected that no member of staff will consume more than one 'drink' (a glass of wine, a pint of beer, etc) at any function where pupils are present or where staff are or will be on duty in the following five hours. (For the purposes of this document 'a drink' is classed as 3.3 units of alcohol, (a large glass of wine). (A standard bottle of lager is assumed at 2.2 units of alcohol)).
- c) Only alcohol provided by the School at functions on site may be consumed by staff. Where alternative alcohol is available (e.g. a hotel bar at a function off-site etc.), and children are present, staff may consume one drink (such as a beer/glass of wine) from the bar instead of alcohol provided by the School.
- d) At functions on site where children are not present, such as the end of term party on the lawn etc, the School may provide alcohol based on the principle that staff may drink up to a maximum of two drinks each.
- e) In any environment where safety concerns are more acute, such as on residential school trips, the consumption of alcohol by staff is to be determined by the trip leader (but will not exceed the guidelines for consumption on school premises.) In the event that alcohol is consumed, at least two members of staff should not be consuming alcohol, one of whom should be able to drive the minibus (if the minibus is part of the trip) and the same or another person have competent knowledge of first aid.
- f) In the privacy of the home environment of a member of House staff or senior staff on campus, it is advised that alcohol can be consumed provided that the member of staff is

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not on official (scheduled) duty in the next five hours and does not consume in such a way that their ability to respond to an emergency is impaired.

Box Hill School recognises that alcohol problems are primarily health and social concerns and therefore, employees with such problems require help and treatment. Alcohol related problems in the context of this Policy are defined as any misuse of alcohol, either intermittent or continual, which interferes with an employee's work performance in the areas of efficiency, productivity, safety or attendance at work.

When through observed conduct it becomes possible that an employee has an alcohol problem affecting work or work performance, that employee may be asked to discuss the matter with a person designated by the School. The employee concerned will have the right to be accompanied by a Trade Union representative or colleague.

When discussing these problems with employees the desire of Box Hill School to assist the employee will at all times be uppermost in the mind of the designated person. (The safety of pupils in the School setting is always considered paramount.) As a result of this discussion, the designated person will offer the employee the opportunity to seek an outside assessment of the problem and, if necessary, treatment from an appropriate agency. The designated person will make clear to the employee that during any period of treatment all benefits and rights laid down in the contract of employment will be safeguarded. Should the employee not be satisfied with the arrangements being offered, the matter will be referred to the Grievance Procedure. If treatment is refused by the employee because he/she does not feel that he/she has a problem, then any future issues of conduct, capability or performance will be dealt with in the usual manner according to policy in these areas. The employee will be made aware that support is available should they require it. The employee may request a meeting if they feel that there is a problem; it is not only the prerogative of the School to trigger the Policy.

The procedure established by this agreement for assisting an employee with alcohol related problems is quite distinct from the Disciplinary Procedure. An employee with an identified problem, which affects conduct at work, or which prevents the achievement of a satisfactory level of work performance and who refuses the opportunity to receive help, may have the matter referred to the Disciplinary Procedure. Equally, if an employee denies the existence of an alcohol related problem or discontinues a course of treatment and then reverts to the previous unsatisfactory levels of conduct or performance, the matter may be referred to the Disciplinary Procedure.

An employee who accepts the opportunity to receive help, but whose conduct or work performance afterwards reverts to the problem level, will have the new situation considered on its merits. If appropriate a further opportunity to accept and co-operate with help and treatment will be offered.

The application of this Policy is limited to those instances of alcohol related problems which affect the health and/or work performance or conduct of the employee. The Policy does not apply to employees who, because of indulgence in alcohol behave in a manner contrary to the standard of

safety and conduct required by Box Hill School. Such instances will be dealt with in accordance with the normal recognised Disciplinary Procedures. Given that the safety of children is our primary concern, employees are expected to be aware that inappropriate consumption of alcohol may be considered to be a disciplinary matter immediately.

All discussions with an employee in connection with this Policy will be strictly confidential. This will equally be the case with any counselling or other treatment undertaken by the employee. While appropriate personnel records will be kept it is accepted that any record of treatment will be the property of the person administering that treatment. No discussion about the employee will take place with another party without the permission of that employee.

This means that colleagues should:

- Ensure that the safety of the children in our care is our primary concern. Hence, it is vital that we do not consume or be under the influence of alcohol or any substance, including prescribed medication, which may affect our ability to care for children.
- Always adhere to the reasonable expectations regarding alcohol outlined above and maintain appropriate professionalism.
- Seek appropriate help from HR for an alcohol problem.

20. One to one situations

Colleagues working in one-to-one situations with pupils are potentially more vulnerable to allegations or complaints and must always refer to the School's One-to-One Policy. Such one-to-one situations may arise for a variety of reasons including academic support and scheduled lessons such as Music lessons. It therefore makes sense to plan and conduct such meetings to ensure that the security of both pupils and colleagues is met. It is recommended that such meetings be pre-planned with other colleagues aware of their occurrence and that they should take place where there is visual access and/or an open door. It is also strongly recommended that notes are kept of any meeting likely to be difficult, and consideration given to having another member of staff in the room or close by. Certainly, colleagues would be advised to have informed their line manager in advance of such a meeting. If any pupil becomes distressed or angry in any such meeting, this should be reported to a senior colleague.

Arranging to meet with pupils from the School away from the School's campus is not permitted unless the necessity for this is clear and approval is obtained from a senior member of staff (the Headmaster, Deputy Head Pastoral or Deputy Head Academic), the pupil and their parents/carers in advance.

Any member of staff who is engaged in the delivery of online remote learning must understand that no one-to-one teaching can be undertaken without prior approval from a member of the Senior Leadership Team (most usually the Headmaster, Deputy Head Pastoral or Deputy Head Academic). Sufficient notice must be given for proper consideration of the request to be undertaken. It is particularly vital for one-to-one situations that staff only use School approved IT solutions, packages or apps for the delivery of online learning. Staff must ensure that they work with the IT department to have the appropriate technical solutions in place.

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If online one-to-one teaching is approved by SLT it will require that the parents of all of the pupils that it is intended receive one-to-one teaching are emailed to gain permission. Parental permission is required for this way of working as it is on a one-to-one basis. The parents must also be advised that they should be on hand during these sessions to provide a safeguard and assistance to the pupil if needed. All parties should be informed that the sessions will be recorded for safeguarding reasons. The relevant meeting invite will need to be emailed to the pupil, parent and appropriate Head of Department or member of the SLT; a record of the invite should be maintained in the member of staff's Outlook calendar. It is a requirement that the Head of Department or member of SLT be able to join the one-to-one meeting at any point.

This means that colleagues should:

- Follow the protocol for one-to-one working
- Ensure that wherever possible there is visual access and/or an open door in one to one situations
- Avoid use of 'engaged' or equivalent signs wherever possible. Such signs may create an opportunity for secrecy or the interpretation of secrecy
- Follow the protocol for online one-to-one working as outlined in this policy
- Ensure prior to any online learning, there are clear expectations of behaviour and conduct of all parties that have been agreed in advance
- Be aware of relevant risk assessments, policies and procedures, including child protection, acceptable use policy and behaviour management
- Always report any situation where a pupil becomes distressed, anxious or angry
- Consider the needs and circumstances of the pupil involved

21. Remote schooling

The School will use remote learning in those situations where it is felt to be of benefit to the pupils. In deciding whether to provide remote learning for pupils, SLT will take into account issues such as accessibility within the family home, potential impact on parents/carers/siblings, the mental health and wellbeing of children, including screen time, the potential for inappropriate behaviour by staff or pupils, appropriate lesson length, staff access to the technology required, online safety, appropriate filtering and monitoring systems etc. The School will also consider whether a range of alternatives such as the use of pre-recorded lessons could be used to achieve the same desired objective.

It is vital that all staff involved in this follow the associated protocols for remote learning. Where remote learning is used, the School will select an appropriate platform for its delivery ensuring a suitable level of security. All staff must use the selected platform and ensure installation with the support of the IT department. Wherever possible, staff should use School devices. If it is not possible to use School devices, staff must take all reasonable steps to ensure the security of the devices used.

Pupils should only be contacted using the pupil School email address. Staff must also use School email addresses for communication. Where a pupil uses a private email address they must be informed of the need to use their School email address. All such correspondence should be

flagged to the Pastoral Team and the relevant communication cc-ed to esafety@boxhillschool.com.

Remote lessons should be timetabled; SLT and Heads of Department should be able to drop into any virtual lesson at any time – the online version of entering a classroom. Hence, the relevant details will need to be emailed to the pupil, parent (for one-to-one situations) and appropriate Head of Department or member of the SLT; a record of the invite should be maintained in the member of staff's Outlook calendar. It is a requirement that the Head of Department or member of SLT be able to join remote lessons at any point. It is expected that remote lessons are undertaken within the times of the working day. It is also important that parents are aware of what their children are being asked to do online, including the sites they will be asked to access and who will be interacting with their child online. Hence, the School will remain in regular communication with parents and carers. This allows the reinforcement of the importance of children being safe online.

Staff delivering online learning should display the same standards of dress and conduct that they would in the real world; they should also role model this to pupils and parents. The following points must be taken into account:

- the background used; photos, artwork, identifying features, very personal items, mirrors. Staff should ensure that no inappropriate or overly personal items are on screen and that the background used is either a School approved image or entirely neutral. All concerns about this area should be raised with the Deputy Head Academic or Deputy Head Pastoral.
- remote schooling should take place in appropriate communal areas and not in unsuitable areas such as bedrooms.
- Remote schooling should take place during School working hours.
- staff should avoid members of their family also appearing on the screen and warn them that they could be heard whilst remote schooling is being undertaken.
- the language used must be professional and appropriate, including any family members in the background.
- staff must continue to take care to protect the personal data and information of all children whilst teaching online.
- at the moment, the School uses Zoom for the delivery of remote schooling (this may be subject to change). Staff must ensure that all relevant protocols for the chosen method of delivery are followed. This includes, for example, the use of features such as a waiting room or annotations, when a pupil should be removed from a remote session and the recording of such sessions. Staff should be aware that the pupils will need to consent to any recording (this is currently done via an automatic notification) and that the recordings are automatically deleted after a suitable time period to ensure that personal data is not held unnecessarily.
- everyone must wear suitable clothing. Please terminate the lesson letting the parents and the Pastoral Team know if the pupils are behaving inappropriately or are dressed inappropriately (for example, wearing pyjamas or dressing gowns).
- any behavioural problems should be reported to the Pastoral Team.

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- as is usually the case, all resources and videos used must be age appropriate. We must be particularly alert to this when remote schooling as pupils may not have support immediately to hand at home if they feel distressed or anxious about any content.
- if you have any behavioural or safeguarding concerns about the pupils, please ensure that you use the normal channels for reporting.

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

If staff need to contact a pupil or parent by phone and do not have access to a work phone, they must discuss this with a member of SLT prior to contact being made. If contact is considered to be appropriate, always use 'caller withheld' to ensure the pupil/parent is not able to identify the staff member's personal contact details.

This means that colleagues should:

- adhere to the School's protocols for remote learning at all times
- ensure that remote teaching is only delivered via the online systems approved by the School
- be fully and appropriately dressed
- ensure that the protocol for any one-to-one teaching is fully adhered to and has the relevant permission from SLT

This means that colleagues should not:

- take or record images of pupils for their personal use
- engage online while children are in a state of undress or semi-undress

22. Home visits

All work with pupils and parents should usually be undertaken within the School. There are however occasions, in response to an urgent, planned or specific situation or job role, where it may be necessary to make home visits. Such visits should not be made alone.

During the COVID-19 pandemic, it is possible that some staff may need to undertake welfare visits. If this is the case, the School will take into account the advice of the local authority relevant to that pupil when deciding whether these home visits are proportionate and desirable. The decision as to whether a home visit is necessary will be made by the Headmaster, Deputy Head Pastoral or Deputy Head Academic.

Staff will normally undertake home visits with a colleague. Staff undertaking welfare visits should always try to give parents/carers advance warning unless there is good reason not to; e.g. because the visit has been prompted by safeguarding concerns and/or is at the request of Children's Social Care. In these cases, one of the members of staff undertaking the visit will be the Deputy Head Pastoral or Assistant Head Pastoral. The purpose of the visit will be clarified, and staff should be aware of the circumstances in which emergency services or partner agencies should be contacted.

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A risk assessment should be undertaken prior to any planned home visit taking place and so it is essential that such visits are discussed with the Headmaster and Deputy Head Pastoral sufficiently far in advance.

The risk 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 member 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.

This means that colleagues should:

- Not undertake a home visit without the prior agreement of the Headmaster. All visits must have a justifiable purpose. Colleagues should understand that welfare visits also have limitations
- Have a clear understanding of the actions that should be taken if it is believed that a child or parent is at immediate risk of harm, including when to contact emergency services and or partner agencies
- Adhere to agreed risk management strategies
- Avoid unannounced visits wherever possible
- Ensure there is visual access and/or an open door in a one to one situation
- Never enter a home without the parent or carer's consent or when the parent is absent, except in an emergency
- Not enter a home if the parent or carer is absent unless it is an emergency situation
- Ensure access to a mobile phone and an emergency contact during the visit
- Always make detailed records including times of arrival and departure
- Ensure any behaviour or situation which gives rise to concern is discussed with the Headmaster or Deputy Head Pastoral
- Ensure that children are seen in open and observable spaces; for example, living rooms
- Comply with data protection regulations in relation to any personal information carried or notes made about the child and/or family
- Report back to the Headmaster or the Deputy Head Pastoral upon return to the School

23. Transporting pupils

There are occasions when colleagues transport pupils either in School or hired minibuses. The rules governing minibus use are dealt with separately, but there are certain important steps which we all need to take in relation to transporting pupils.

The first is that no alcohol or drugs (whether recreational or medicinal) should be consumed prior to driving. If you are faced with a sudden emergency, and you have drunk any alcohol at all you should use a taxi. The same rule applies to any drugs/medication that might impair judgement or driving ability. Taxi companies may only be used for transporting pupils, if they have been authorised to do so by the School. For the most up to date list, please consult the HR department.

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.

It is a legal requirement that all passengers wear seatbelts and the driver should ensure that they do so. They should also be aware of and adhere to current legislation regarding the use of car seats/booster seats for younger children.

Staff should ensure that their behaviour is safe and that the transport arrangements and the vehicle meet all legal requirements. They should ensure that the vehicle is roadworthy and appropriately insured and that the maximum carrying capacity is not exceeded.

Staff should not offer lifts to pupils unless the need for this has been agreed by a senior member of staff. There are some circumstances when it might be permissible for staff to use their own cars to transport pupils. In such circumstances the individual staff member should seek permission from a senior member of staff; pupil and written parental consent will also be required. If a single pupil is to be transported, they must sit in the back of the vehicle. Any member of staff using their own car to transport pupils must complete the relevant form available from the Bursary, have a valid driving license, up to date insurance and a vehicle that is safe and which meets all legal requirements. It is the driver's responsibility to ensure that seatbelts are worn. Never exceed the maximum capacity of the vehicle, drive for hours longer than are reasonably considered safe and ensure that you are adequately insured for such journeys.

Staff should never offer to transport pupils outside of their normal working duties, other than in an emergency or where not doing so would mean the child may be at risk. In these circumstances the matter should be recorded and reported to a senior member of staff who will communicate with the child's parent(s).

This means that colleagues should:

- Plan and agree arrangements with all parties in advance
- Respond sensitively and flexibly where any concerns arise
- Take into account any specific or additional needs of the pupil
- Have an appropriate license and insurance for the vehicle
- Ensure that the vehicle is safe to use
- Ensure they are fit to drive and free from any drugs, alcohol or medicine which is likely to impair judgement and/or the ability to drive
- Ensure that if they need to be alone with a pupil this is for the minimum time
- Be aware that the safety and welfare of the pupil is their responsibility
- Report the nature of the journey, the route and expected time of arrival in accordance with agreed procedures
- Ensure that any impromptu or emergency arrangements of lifts are recorded and can be justified

24. Educational visits and after school activities

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All staff undertaking educational visits must adhere to the School's educational visits policy which is available separately to this document. Staff should also ensure that there are at least two members of staff present for such activities, that parental consent has been given in writing and that professional behaviour boundaries continue to apply.

Colleagues should take particular care when supervising pupils in the less formal atmosphere of an educational visit (or activity) 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. As a consequence, staff need to ensure that the same safeguarding standards are maintained for educational visits and activities as they would be for a normal School day. For visits and activities that take place away from the School site, staff should ensure that they do not arrange to meet ex-colleagues or friends during those trips. This is because the usual safeguarding checks will not have been completed.

Where out of School 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.

This means that colleagues should:

- Adhere to the School's educational visits guidance
- Always have another adult present on visits, unless otherwise agreed with senior staff
- Undertake risk assessments
- Have the appropriate consents in place (e.g. medical)
- Ensure that their behaviour remains professional at all times
- Not arrange to meet friends or ex-colleagues whilst on an educational visit
- Never share beds with a child/pupil
- Never share bedrooms unless it involves a dormitory situation and the arrangements have been previously discussed and agreed with the Headmaster, parents and pupils
- Not arrange host family stays without prior agreement from the Headmaster and DSL

25. First aid and administration of medication

It is expected that adults working with children and young people should be aware of basic first aid techniques. Colleagues undertaking such tasks should be suitably trained and qualified before administering first aid. Wherever possible first aid should only be given by trained staff and preferably by someone of the same gender as the injured party. Colleagues should try to ensure that another adult is present when first aid is administered.

Colleagues should always report any accident, or any first aid administered as parents need to be informed. If an injury necessitates a hospital visit, a member of staff should always accompany a child taken to hospital by ambulance and wait there until a parent or carer arrives.

Colleagues administering medication should also be authorized to do so, suitably trained and adhere to the guidelines published separately in the School's Medication Policy. No medicine will

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be given by the School without written parental consent and those pupils who need medication on a regular basis will have a Health Care Plan drawn up in association with the family concerned and the Medical Centre. This provides details of the level and type of support a child needs to manage effectively their medical condition in School and should include information about the medicine to be administered, the correct dosage and any storage requirements.

There are some pupils who are able to take responsibility for managing their own medicines and procedures. The Medical Centre will liaise with House Parents regarding those pupils who are able to self-medicate.

Where staff have medication on the School's premises they must be securely stored and out of reach of children at all time.

Colleagues taking medication which may affect their ability to care for children should seek medical advice regarding their suitability to do so and inform HR.

The School will regularly review and update first aid, medicines in School, crisis/emergency policies and relevant risk assessments. Colleagues are expected to abide by these policies.

In emergency/exceptional circumstances if the School has no trained first aider, it is the responsibility of the Headmaster (or the Deputy Head Pastoral/Deputy Head Academic) to identify a senior person on site each day to lead on any crisis or serious incident including the provision of first aid. This decision should be supported by a risk assessment that takes into account the number of staff, children and/or other visitors on site, the proximity of emergency services, any particular risks presented, etc. Risks should be minimised as much as possible, for example by not undertaking high risk or adventurous activities.

This means that colleagues should:

- Ensure that School policies regarding first aid and the administration of medication are followed including those associated with record keeping
- Have regard to pupils' individual Health Care Plans and associated risk assessment where appropriate
- Always act and be seen to act in the pupil's best interests
- Explain to the pupil what is happening
- Not work with pupils whilst taking medication unless medical advice confirms that they are able to do so

26. Photographs, video and other images/media

Given the rights of privacy and data protection which any individual should enjoy and the potential misuse of images of children, any such image-recording activity needs to have a clear professional purpose. Whilst images are regularly used for very positive purposes by the School, all colleagues need to be aware of the potential for these to be taken and/or misused or manipulated for pornographic or 'grooming' purposes. It is not appropriate for colleagues to take photographs of pupils for their personal use.

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It should be noted that all devices which can be used for the taking and/or recording of images fall under the remit of this policy. Staff must be using School equipment and not their personal equipment to take images of pupils on behalf of the School. Consideration must be given to what will happen to the images when the activity finishes and if the images are to be published, care should be taken to ensure that images do not include those children whose parents have requested that the School does not use their images. For the protection of children, when using images for publicity purposes the child should not be named in full.

Ensure that all images recorded are available for scrutiny for acceptability. Storage of images should be either on School-owned devices or as part of the School network. Where it is decided that photos or images are to be kept for future use they should be stored securely and used only by those authorised to do so.

Colleagues should always be clear to pupils about why the images are being recorded and what will happen to them. Pupils who have been previously abused in a manner that involved images may feel particularly threatened by the use of photography, filming etc. Colleagues should be particularly sensitive to pupils who are clearly uncomfortable with being filmed or photographed and realise the potential for misinterpretation of their activity. The use of any image recording device to take images of pupils or colleagues where the School has been requested not to, is forbidden by the School.

A senior colleague should always be aware that images are to be recorded and the reasons for this. Images should not be displayed on websites, in publications or in a public place (those areas to which visitors have access) unless care has been taken to exclude those pupils whose parents have requested that they are not included. When using images for such publicity purposes do not name the pupil in full.

Please refer to the School's Policy on the Taking, Storing and Using Images of Children for details of the guidelines for parents on the taking of images/video at School events or activities.

This means that colleagues should:

- Abide by the School's policies regarding e-safety.
- Only publish images of pupils where care has been taken to exclude those pupils whose parents have requested that they are not included
- Only take images where the pupil is happy for them to do so
- Only retain images where there is a clear and agreed purpose for doing so
- Store images in an appropriate secure place in the School
- Ensure that a senior member of staff is aware that the photography/video equipment is being used and for what purpose
- Be able to justify images of pupils in their possession
- Avoid making images in one to one situations

This means that colleagues should not:

- Take images of pupils for their personal use

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- Display or distribute images of pupils unless they are sure that they do not include any children whose parents have requested that they not be included
- Take images of children using personal equipment
- Take images of children in a state of undress or semi-undress
- Take images of a child's injury, bruising or similar (e.g. following a disclosure of abuse) even if requested by Children's Social Care
- Make audio recordings of a child's disclosure
- Take images of children that could be considered as indecent or sexual

27. Exposure to inappropriate images

Staff should take extreme care to ensure that pupils are not exposed, through any medium, to inappropriate or indecent images. Staff have a responsibility to keep their passwords confidential and not to allow unauthorised access by others to equipment.

There is no circumstance that justifies colleagues having indecent images or pseudo-images of children, because accessing, making, downloading, storing or distributing such images is illegal. Accessing these images, whether on School or personal equipment, on or off the premises, or making, storing or disseminating such material is illegal. All such illegal behaviour can lead to a bar from teaching and working with children.

If indecent images of children are discovered at School then an immediate referral must be made to the DSL, the Headmaster, the LADO and the Police contacted if relevant. If the images are of children known to the School, a referral will also be made to Children's Social Care.

If indecent images of children are discovered at School then the images and equipment should be secured and isolated from the network and there should be no attempt to view or delete the images as this could jeopardise necessary criminal action. It is critical that colleagues do not attempt to investigate the matter or evaluate the material themselves as this may lead to a contamination of evidence and a possibility that they will be at risk of prosecution themselves.

Colleagues must not use School equipment to access pornography either on or off site, nor must they have in School any personal equipment containing such images or links to them. Such behaviour will raise serious concerns about the suitability of the adult to continue working with children.

In addition, colleagues must never use the School's networks to view, upload, download or circulate any of the following materials:

- (a) sexually related or pornographic messages or material;
- (b) violent or hate-related messages or material;
- (c) racist or other offensive messages aimed at a particular group or individual;
- (d) malicious, libellous or slanderous messages or material; or
- (e) subversive or other messages or material related to illegal activities.

This means that colleagues should:

- Abide by the School's policies regarding the use of IT equipment, the internet and e-safety

- Ensure that pupils cannot be exposed to indecent or inappropriate images
- Ensure that all films or material shown to pupils are age appropriate
- Keep their passwords confidential and not allow unauthorised access to equipment

28. Personal living accommodation including on-site provision

You must not invite pupils to your home, visit pupils at their home or attend private parties or socialise with pupils.

Where a member of staff has a child at the School and this child invites over School friends to the house privately this will be considered acceptable as long as the member of staff acts always in a way consistent with the expectations placed on School staff regarding conduct. Similarly, parent to parent friendships are permitted with parents of School friends of a member of staff's child, as long as the member of staff acts always in a way consistent with the expectations placed on School staff regarding conduct.

No boarders are to access staff residential accommodation (other than in exceptional circumstances. Where this occurs a one to one situation should be avoided with pupils with another adult always present).

All staff living in boarding houses that have visitors to stay must abide by the Visitor Policy and ensure that visitors are kept under sufficient staff supervision to prevent them gaining unsupervised access to boarders or their accommodation. Please note that swipe cards will not ordinarily be issued to visitors. Different arrangements are in place for resident family members or family members who are non-resident but frequently stay overnight.

For all members of staff households who are aged 16 and over (not on the roll of, nor employed by, the School) and who live on the same premises as boarders, an Enhanced certificate with a check of the Children's Barred List will be obtained from the Disclosure and Barring service (DBS).

This means that colleagues should:

- Be vigilant in maintaining their privacy, including when living in on-site accommodation
- Be mindful of the need to avoid placing themselves in vulnerable situation
- Be mindful of the need to maintain personal and professional boundaries
- Not ask pupils to undertake jobs or errands for their personal benefit

29. Access to pupil accommodation

In line with the National Minimum Boarding Standards and other guidance staff are reminded that boarding houses are where pupils live and that they have a right to privacy. Boarding colleagues must always knock on the door of a study bedroom before going in. It is not appropriate to remain in the room if a pupil is changing.

Any member of staff wishing to speak to/meet with a boarder in a boarding house must report to the member of staff on duty. They must not under any circumstances go to the room of the pupil.

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It is vital that boarding accommodation is reserved for the use of those children designated to use it and is protected from access by unauthorised persons. Any member of staff who is organising any use of School facilities by individuals and/or groups must not allow members of the public unsupervised access to boarders, or to boarding accommodation while occupied by boarders.

Within a School context, the risks of and opportunities for abuse by staff are evidently greater within a boarding setting. Boarding pupils should be seen as vulnerable pupils in this context. There is a designated Independent Listener and the Childline, ISI and LADO numbers are all advertised clearly in the boarding house.

Colleagues are not expected to routinely patrol bathrooms, unless there is a particular need (arising perhaps from the suspected misuse of such rooms). Colleagues should announce their intention of entering and only remain in the room when essential.

There are times when it might be considered appropriate to engage in physical contact, in order to give emotional support, for example when a pupil is upset. In such cases, it is recommended that contact be restricted to a gentle pat on the shoulders, back, upper or lower arm. This sort of physical contact should not be long lasting or open to sexual misinterpretation. At other times, physical contact might be reasonable for greeting (shaking hands, a gentle pat on the shoulders, back or upper arm), or for encouragement (a gentle pat on the shoulder, back or upper arm).

Boarding House staff must particularly avoid spending unequal amounts of time with a given child or group of children and be wary of forming 'special' relationships with particular children's families that might compromise them professionally.

Staff must ensure that there are no initiation ceremonies carried out by the boarders on new pupils, intended to cause pain, anxiety or humiliation.

Staff must follow the procedures for searching for and reporting a missing child (Missing Child Procedure). The incident should be recorded with the action taken and the reasons given by the child for being missing.

Staff supervising should carry a House mobile phone.

30. Overnight supervision and exams

There are occasions during exam periods when timetables clash and arrangements need to be made to preserve the integrity of the examination process. Such arrangements may include the overnight supervision of a pupil. Where arrangements are made for a staff member to supervise a pupil overnight then all necessary safeguards should be in place. Such arrangements should never be undertaken without prior arrangement with the exam board and senior staff. In such circumstances, the School will use staff volunteers who would be fully briefed about appropriate and safe practice.

This means that where colleagues do supervise candidates overnight:

- A full health and safety risk assessment should be in place

- All members of the household should have had appropriate vetting including, where eligible, DBS and barred list checks
- Parents should be made aware of, and agree with, the arrangements
- Arrangements involving one-to-one supervision should be avoided wherever possible
- As much choice, flexibility and contact with 'the outside world' should be incorporated into any arrangement so far as is consistent with appropriate supervision
- Whenever possible, independent oversight of arrangements should be made
- Any situation which gives rise to complaint, disagreement or misunderstanding should be reported

31. 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 are appropriate, cannot be misinterpreted and clearly relate to the planned 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 be especially taken in those areas of the curriculum where usual rules or boundaries are potentially less rigorously applied e.g. a drama production.

Colleagues must not show visual material which is inappropriate for the age of the pupils concerned; taking special care over the use of videos and DVDs by following PEGI age appropriate ratings (e.g. '12A').

At all times when speaking with pupils care must be taken to use appropriate language. You must always treat pupils with respect and without favouritism. There is no place for sarcasm, derogatory remarks, inappropriate familiarity or offensive comments. Swearing is not permitted.

The curriculum can sometimes include or lead to unplanned discussion about subject matter of a sexually explicit, political or otherwise sensitive nature. Responding to pupil questions requires careful judgement; colleagues should not engage in offensive or inappropriate discussion about sexual activity. It should also be noted that under the provisions of the Equality Act (2010), it is unlawful to discriminate either directly or indirectly on grounds of gender, sex or sexual orientation. The School must use non-discriminatory practices and procedures, and colleagues must also ensure in their teaching and pastoral work that they do not display discrimination or extremism.

Colleagues should take care to comply with the School's policy on spiritual, moral, social, cultural (SMSC) which also promotes fundamental British values. Staff should also comply at all times with the policy for relationships and sex education (RSE). Parents have a legal right to withdraw children from all or any part of the sex education programme but not the biological aspects of human growth and reproduction integral to the science curriculum. Further guidance is available for colleagues in the Sex and Relationships Policy, the PSHE Policy and PSHE Handbook.

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Where part of the School curriculum allows for pupil led projects, staff should be mindful of safeguarding considerations in the topic chosen and the methodology used. For example, pupils often choose topics with which they have had personal experience; this may indicate a previously unknown safeguarding issue or may raise concerns about the retraumatisation of the pupil. Pupil projects are often conducted using questionnaires with peers; these should be checked for appropriateness to ensure the pupil respondents are not distressed by the questions asked and that any disclosures received through these questionnaires are passed on to the Deputy Head Pastoral or a Deputy DSL. Other methodologies which might raise concerns include: pupils visiting unknown adults, alone, to interview them; conducting social experiments on peers or young children without parental consent; or accessing age inappropriate content online.

This means that teaching colleagues should:

- Have planned sufficiently far in advance to allow reasonable steps, such as consulting the relevant pastoral concerns documents, speaking to the DSL, Head of Year/House Parent and others in a relevant pastoral role, to be undertaken
- Have clear written lesson plans and ensure that content is appropriate to the children's age and cognitive development
- Take care when encouraging pupils to use self-expression, not to overstep personal and professional boundaries
- Be able to justify all curriculum materials and relate these to clearly identifiable lesson plans

This means that colleagues should not:

- Enter into or encourage inappropriate discussions which may offend or harm others
- Undermine fundamental British values
- Express any prejudicial views
- Attempt to influence or impose their personal values, attitudes or beliefs on pupils

32. Tutoring

You must not engage in tutoring or coaching pupils from the School without the express permission of the Headmaster. Further information is available in the School's Tutor Policy. The Tutor Policy must also be followed if you become aware of a pupil who is receiving tutoring via a third party either in person or remotely.

33. Whistleblowing

There is a duty to report (including self-reporting) any incident in which an adult has or may have behaved in a way that is inconsistent with the School's staff code of conduct (this particular policy) including inappropriate behaviours inside, outside of work or online.

Colleagues should recognise their individual responsibility to raise any concerns regarding behaviour or conduct (including low level concerns) that falls short of the principles outlined in this document. It is crucial that any such concerns, including those which do not meet the harm threshold (see KCSiE), are shared responsibly and with the right person (the Headmaster), and recorded and dealt with appropriately.

Failure to report or respond to such concerns would constitute a failure in professional responsibilities to safeguard children and promote welfare.

The School will ensure that all concerns about adult conduct are listened to, received in a sensitive manner, taken seriously, actioned, and recorded with clear outcomes. For those concerns which meet the harm threshold the School will ensure that they are reported to the LADO within 24 hours.

Whistleblowing is the mechanism by which staff can voice their concerns, made in good faith, without fear of repercussion. The School places a great deal of value upon having a culture of safety and of raising concerns, valuing staff and allowing reflective practice. Further guidance for colleagues is available in the Whistleblowing Policy. Box Hill School has adopted this policy and the accompanying procedure on whistleblowing to enable members of staff to raise concerns internally and in a confidential fashion about child protection and safeguarding issues, fraud, malpractice, health and safety, criminal offences, miscarriages of justice, and failure to comply with legal obligations, inappropriate behaviour or unethical conduct.

In accordance with Lord Nolan's Second Report of the Committee on Standards in Public Life, the School's policy on whistleblowing is intended to demonstrate that the School:-

- Will not tolerate malpractice
- Respects the confidentiality of staff raising concerns and will provide procedures to maintain confidentiality so far as is consistent with progressing the issues effectively
- Will provide the opportunity to raise concerns outside of the normal line management structure where this is appropriate
- Will invoke the School's disciplinary policy and procedure in the case of false, malicious, vexatious or frivolous allegations
- Will provide a clear and simple procedure for raising concerns, which is accessible to all members of staff

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

If an 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 senior staff. Staff who are the subject of allegations are advised to contact their professional association.

In addition, if you have concerns over how child protection issues are being handled in this or another organisation, you can talk to the NSPCC anonymously, 0800 028 0285 (8am to 8pm Monday to Friday) or help@nspcc.org.uk. This advice line is not intended to replace any current practices or responsibilities of organisations working with children. Colleagues are encouraged to raise any concerns about a child to the DSLs and about a colleague with the Headmaster in the first instance.

The Whistleblowing Policy may be used by anyone employed by Box Hill School in a paid or voluntary capacity who believes they have reason to suspect that the conduct of an employee towards a child (any person under the age of 18) is inappropriate. Such conduct may include:

- Bullying or humiliation
- Contravening Health and Safety guidelines
- Breaches of this Code of Conduct
- Professional practice which falls short of that normally expected.

During the current pandemic, the usual whistleblowing procedures will remain in place if the School is required to adhere to a lockdown or return to remote learning. Where necessary, staff will be informed of how to escalate their concern if the normal routes for whistleblowing are impeded by the absence or illness of senior managers.

This means that colleagues should:

- Escalate their concerns if they believe a child or children are not being protected
- Report any behaviour by colleagues that raises concerns
- Report any behaviour by colleagues, including volunteers, that raises concern
- Report allegations against staff and volunteers to the Headmaster, or where there are concerns about the Headmaster's response, report these directly to the chair/ proprietor/DO
- Have read the Whistleblowing Policy and be aware of any adjustments (for example a return to remote learning) that may be put in place due to the COVID-19 pandemic.
- Follow the School's Whistleblowing Policy.
- Where a colleague feels unable to raise an issue or feels that their genuine concerns are not being addressed, they should utilise other whistleblowing channels that are open to them as outlined in KCSiE.
- Be aware how your actions may be viewed by others. Do not be seen to be paying special attention to a particular pupil. Always ask yourself 'Are my actions fair, reasonable, warranted, proportionate, measured, safe, and applied equitably?'

34. Sharing concerns and recording incidents

Members of staff should feel able to discuss with their line manager any difficulties or problems that may affect their relationship with or behaviour towards pupils, so that appropriate support can be provided and/or action taken.

In order to protect pupils and staff, all colleagues must be aware of the School's safeguarding procedures, including the procedures for dealing with allegations against staff and volunteers. It is vital that these are always followed.

This means that colleagues should:

- Be familiar with the School's arrangements for reporting and recording concerns and allegations
- Know how to contact the LADO and other relevant external agencies if required

- Take responsibility for recording any incident, and passing on that information where they have concerns about any matter concerning the welfare of an individual in the School

35. Confiscating the property of pupils

It is acceptable to confiscate the property of pupils (for instance a mobile device) as long as the confiscation is on School premises or elsewhere where the pupil was under the School's duty of care, and where the confiscation is 'reasonable'. 'Reasonableness' is defined as any clear breach of the School rules or where there is a clear concern about pupil safety. The confiscation must also be proportionate to the offence. For instance, any pupil using a mobile phone in class should expect to have it confiscated. It would also, for example, be reasonable to confiscate a device where a pupil was using it when crossing the road and was oblivious to any dangers it posed.

Any colleague who confiscates an item in School must give it to the pupil's Head of Year/House Parent as soon as possible with a written explanation of the reason and circumstances. The Head of Year/House Parent will be responsible for giving the item back to the pupil. Confiscation may also be accompanied by another disciplinary action where appropriate.

36. Knowledge of School policies

The School is required by law to have certain policies, and others have been produced in response to issues over time. These policies are published in full on the School's website (where relevant) and on the School's computer network. Staff are expected to know what is covered in the School's policies, to know which policies to reference/look up in specific circumstances and to apply all policies appropriately. There are some policies which need to be particularly well known by all members of staff. Of these the most important are the Safeguarding Policy, the Antibullying Policy, the pupil Behaviour Policy and this particular Policy.

CLO and HLR
August 2023
To be reviewed August 2024