



HOLMEWOOD HOUSE SCHOOL

'Kindness, aspiration & self-belief'

STAFF CODE OF CONDUCT

Policy Holder	The Bursar
Date Approved	December 2025
Approval	SLT
Date for next review	September 2026

A copy of the Code of Conduct is provided to all staff as part of the Staff Handbook during the induction process.

This policy applies to **all** staff, volunteers, and contractors, paid and unpaid, working in Holmewood House School including governors. All School Policies referred to in this document are available on the school website and/or Sharepoint.

This Code of Conduct should be read in conjunction with the following policies:

- Acceptable Use of Technology Policy (AUP) including guidelines for using digital devices
- Anti-bullying
- Behaviour & Sanctions
- Boarding Staff Handbook
- Cyberbullying
- Data Protection and GDPR Privacy Notice
- Equality, Diversity and Inclusion
- First Aid & Healthcare
- Health and Safety
- Intimate Care – EYFS
- Low-level concern policy
- Physical Restraint and Use of Reasonable Force
- Preventing Radicalisation
- Safeguarding and Child Protection
- Safer Recruitment
- Searching and Confiscation
- Staying Safe Guidance for Staff and Children on Overnight or Extended Trips and Tours
- Use of Personal Smart Technology Including Mobile Phones
- Using Images Policy
- Whistleblowing Policy

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

Creating a culture in which all concerns about adults (including allegations that do not meet the harms threshold - see Keeping Children Safe In Education "KCSIE") are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. When implemented correctly, this should 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 adults working in or on behalf of the school or college are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.

Any behaviours that fall short of the guiding principles outlined in this Code of Conduct 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.

Principles

- The welfare of the child is paramount (Children Act 1989).
- Staff should understand their responsibilities to safeguard and promote the welfare of children.
- Staff should be aware of and understand the school's safeguarding and child protection policy, arrangements for managing allegations against staff, and whistleblowing procedure.
- Staff should actively promote and recognise the significance of diversity and equality in the workplace. All staff should be intentionally inclusive and aim to provide equity for colleagues and pupils.
- The same professional standards should be applied, regardless of any of the protected characteristics.
- Staff should actively promote the school values which underpin all our communication, education and positive relationships: aspiration, self-belief and kindness.
- Staff should not undermine fundamental British values and actively support pupils in understanding their place in British society.
- Staff are responsible for their own actions and behaviour and should avoid any conduct which could lead any reasonable person to question their motivation and intentions.
- Staff should 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.
- Staff should behave professionally, treat all pupils with respect and ensure that their behaviour does not inadvertently lay them open to allegations of abuse.
- Staff and managers should continually monitor and review practice to ensure this guidance is followed

Responsibilities

- Staff are accountable for the way in which they: exercise authority, manage risk, use resources, and safeguard children.
- They must understand the responsibilities which are part of their employment or role, and be aware that sanctions will be applied if these responsibilities are breached.
- Staff must always act, and be seen to act, in the child's best interests.
- All staff have a responsibility to keep pupils safe and to protect them from abuse (sexual, physical and emotional), neglect and extra-familial harm.

- Pupils have a right to be safe and to be treated with respect and dignity. It follows that trusted adults are expected to take reasonable steps to ensure their safety and well-being. Failure to do so may be regarded as professional misconduct.
- Staff must understand and acknowledge the responsibilities and trust involved in their role in an educational setting.
- They must take responsibility for their own actions and behaviour and avoid any conduct which would lead any reasonable person to question their motivation and intentions.
- They must understand how to raise a concern and contact the DSL or local agencies if they have a concern about a child.
- Teaching staff are expected to undertake duties, including Prep, as required. Heads of Year and SLT undertake a Saturday duty with the boarders.
- Teaching staff are expected to eat in the dining room with pupils. Support staff are also welcome to dine with pupils should they wish to. The Orangery is also available for Support Staff to have lunch.

Responsibilities of the employer

- It is the responsibility of the School as an employer to promote a culture of openness and support
- To ensure that systems are in place for concerns to be raised
- To ensure that adults are not placed in situations which render them particularly vulnerable
- To ensure that all adults are aware of expectations, policies and procedures, including those at induction.

Trust and Authority

- As a result of their knowledge, position and/or the authority invested in their role, all those working with children in a school or education setting are in a position of trust.
- Staff should always maintain appropriate professional boundaries, avoid behaviour which could be misinterpreted by others and report any such incident to a senior manager.
- 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.
- Staff should not use their position to gain access to information for their own advantage and/or a pupil's detriment; use their power to intimidate, threaten, coerce or undermine pupils or use their status and standing to form or promote relationships with pupils which are of a sexual nature, or which may become so.
- The relationship between a person working with a child/ren is one in which the adult has a position of power or influence. It is vital for adults to understand this power; **that the relationship 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 adults have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.
- Where a person aged 18 or over is in a position of trust with a child under 18, it is **an offence** for that person to engage in sexual activity with or in the presence of that child, or to cause or incite that child to engage in or watch sexual activity (even if, in the case of those over 16, the relationship is consensual).

Professional Judgement

- On very rare occasions, there may be a time when staff must make a judgement in the best interests of the pupils in their charge which contravenes this guidance or for which no guidance exists.
- Such judgements should always be recorded and shared with the Head and the Deputy Head immediately.
- The parent or carer must also be informed where necessary. In doing so, individuals will be seen to be acting reasonably.
- Always discuss any misunderstanding, accidents or threats with the Head teacher or designated safeguarding lead
- Adults should always consider whether their actions are warranted, proportionate and safe, and applied equitably

Confidentiality

- The storing and processing of personal information is governed by the General Data Protection Regulations UK (GDPR) and Data Protection Act 2018.
- Staff who need to share 'special category personal data' must be made aware that the DPA 2018 considers 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent.
- All adults in school must be given the name of the DSL/s and informed of the school's referral procedures.
- If a child – 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 setting's procedures. The adult should not promise confidentiality to a child or parent but should give reassurance that the information will be treated sensitively.
- Staff need to ensure that where personal information is recorded electronically that systems and devices are kept secure in accordance with the school AUP and Privacy (GDPR) statement.
- Staff may have access to confidential or personal information about pupils or colleagues in the process of undertaking their everyday responsibilities. They should never use this information for their own or others' advantage (including that of partners, friends, relatives or other schools/services). Confidential information about a pupil should never be used casually in conversation or shared with any person other than on a need-to-know basis and never be used to intimidate, humiliate or embarrass the pupil.
- Information about pupils, parents or colleagues must never be disclosed to telephone enquirers. Staff should ask the enquirer to put the request in writing so that it can be dealt with appropriately.
- 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 duty to pass on information without delay, following the procedures as set out in the school's safeguarding and child protection policy.
- If in doubt about whether to share information or keep it confidential, staff should seek guidance from the Head, the Deputy Head, the Designated Safeguarding Lead or the Bursar.
- Staff need to know the procedures for responding to allegations against staff, including the Head, and to whom any concerns or allegations should be reported.

Propriety and Behaviour

- Staff are expected to adopt high standards of personal conduct in order to maintain the confidence and respect of all those with whom and for whom they work. All staff have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of children. this means that staff 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, or about, a pupil; use inappropriate language to or in the presence of pupils; discuss their personal or sexual relationships with or in the presence of pupils; make (or encourage others to make) unprofessional personal comments which scapegoat, demean, discriminate or humiliate, or might be interpreted as such.

- Staff have an individual responsibility at all times to ensure appropriate use of school property and resources.
- Staff should understand the need to act as good role models for pupils. This includes their work in school and on school trips. They also have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of pupils.
- Staff should understand and be aware that safe practice also involves using judgement and integrity about behaviours outside the work setting. Behaviour in their personal lives may impact on their work with pupils and the reputation of the school.
- Staff conduct and performance must not be adversely impacted by alcohol or drugs when undertaking their duties (including on school trips). Illegal drugs are prohibited on site. Consumption of alcohol is not permitted on site except at school functions or when otherwise agreed by the Head that modest amounts of alcohol may be consumed.
- Smoking or the use of e-cigarettes, PVs (personal vaporisers) or ENDS (electronic nicotine delivery systems) are not permitted on site.
- Staff should be aware that any unlawful discriminatory behaviour or other conduct that brings the school or profession into disrepute will result in disciplinary action.
- Staff are reminded that they must inform the head of any name changes that have not previously been declared; of any cautions, convictions or relevant orders during their time of employment, and if/or they are charged with a criminal offence.
- Staff should disclose any relationship or association (in the real world or online) that may impact on the school's ability to safeguard pupils. This applies to all staff in all schools, not just those in early or later years childcare. (KCSIE)

Attendance and Punctuality

- All staff are expected to be present on site for their contracted hours, unless they have a formal flexible working arrangement or have prior approval to work off site or leave early from their line manager.
- For the avoidance of doubt, full time Teachers are expected to be available for work between the hours of 8am and 6pm Monday to Friday, which is the normal school day. All full-time teachers should be onsite until 6pm on Mondays and 5pm, Tuesday to Friday unless they have prior approval from the Head or Deputy Head to leave earlier.
- Staff should be on site by 8am, unless otherwise agreed, and be in a position to welcome children into form rooms by 8.20am. Staff should not leave a class unattended and should arrive punctually for any session.
- For security purposes, all staff must log in on arrival and log out on departure from the site.
- Staff should make every effort to attend when required to do so. If a member of staff is going to be unavoidably late/delayed or is ill, they must report the absence as soon as possible to the appropriate line manager and Deputy Head. See the relevant sickness absence policies (Staff Handbook Part One)
- In the case of leave of absence requests, authorisation must be sought from your line manager and signed off by the Bursar or the Deputy Head.

- All staff are required to attend safeguarding and compliance elements of each INSET/ staff training and complete, in a timely fashion, any safeguarding training deemed necessary by the Head.
- All staff are required to attend Speech Day unless otherwise indicated in your contract.
- Attendance at your own child's assemblies, open days, sports days should be arranged with the Deputy Head.
- Hours accrued cannot be used to off-set against time off for personal events.
- Registers must be completed accurately and on time to comply with our Safeguarding Policy.

Dress and Appearance

- All staff should be mindful of the need to maintain professional boundaries, this also applies to online or virtual teaching. Dress should promote a positive and professional image. For example, jackets and ties are appropriate for classroom teaching, as are smart dresses/skirts/jackets, and trousers rather than leggings/jeans. Shoes rather than trainers, unless in sportswear.
- Dress should be smart, appropriate to the role and not likely to be viewed as offensive, revealing or sexually provocative.
- It should not distract, cause embarrassment or give rise to misunderstanding, is absent of any political or otherwise inappropriate slogans and is appropriate to the school's ethos, reputation and status. This also applies to tattoos, piercings and jewellery.
- During online teaching, dress should be similar to the clothing worn on a normal school day.
- Games staff should be in school branded games kit and in smart clothing when not on the games field.
- When attending off-site activities, staff should remain professional and reflect the dress code expected of pupils.

Allegations against staff including low-level concerns

Staff are required to follow the guidance set out in KCSIE 2024, the Holmewood House Safeguarding and Child Protection policy, and the Low-level Concerns Policy.

- Any staff safeguarding concerns about the conduct of a member of staff, supply teachers, volunteers or contractors **must be reported without delay**.
- If staff have a safeguarding concern or an allegation is made about another member of staff (including volunteers or contractors), posing a risk of harm to children this should be referred to the Head who will act as 'case manager' and who will inform the LADO and DSL. This behaviour may take place on or offsite and on or offline.
- Where concerns are about the Head, these must be referred to the Chair of the Board of Governors who will inform the LADO.
- For anyone working in Holmewood House, including supply teachers, volunteers and contractors, allegations that meet the harms threshold are identified where a member of staff 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 indicated 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.
- Staff should note that the final point above includes behaviour that may have happened outside school or college. This is known as a transferrable risk.

- Concerns may be graded ‘**low-level**’ if the concern does not meet the criteria for an allegation; and the member of staff, supply teacher, volunteer, or contractor has acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work. Example behaviours might include, but are not limited to:
 - Being over friendly with children
 - Having favourites
 - Taking photographs of children on any mobile device, e.g. phone, laptop etc.
 - Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
 - Using inappropriate sexualised, intimidating or offensive language.
- If the concern has been raised via a third party, the Head should collect as much evidence as possible by speaking:
 - directly to the person who raised the concern, unless it has been raised anonymously
 - to the individual involved and any witnesses.
- Reports about supply staff and contractors should be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.
- Staff should be encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.
- Low-level concerns should be recorded in writing, including:
 - name* of individual sharing their concerns
 - details of the concern
 - context in which the concern arose
 - action taken (* if the individual wishes to remain anonymous then that should be respected as far as reasonably possible)
- Records must be kept confidential, held securely and comply with the Data Protection Act 2018. While the school should decide how long they retain such information, it is recommended that it is kept at least until the individual leaves their employment.
- Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. If a concerning pattern of behaviour is identified and now meets the criteria for an allegation, then the matter should be referred to the LADO.

Health & Safety and First Aid at work

- All Staff have a duty to ensure that a safe working environment exists and always act and be seen to act in the pupil’s best interest.
- Fire and evacuation procedures must be adhered to, and Staff are required to familiarise themselves with the procedures and their responsibilities as set out in the Health and Safety Policy and the First Aid and Healthcare Policy.
- Staff should have regard to pupils’ individual healthcare plans and make a record of all medications administered.
- Staff should always ensure that an appropriate health/risk assessment is undertaken prior to undertaking trips or certain activities.
- In emergency or exceptional circumstances if a school/ school trip has no trained first aider, it is the responsibility of school leaders and / or the employer 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.

- All staff should know the location of defibrillators on the school site.
- Staff receive suitable training and achieve the necessary level of competency before taking responsibility to support children with medical conditions.
- If a member of staff is concerned or uncertain about the amount or type of medication being given to a pupil this should be discussed with the Designated Safeguarding Lead.

Medication and other substances

- Staff must not be under the influence of alcohol or any other substance which may affect their ability to care for children
- If staff are taking medication which may affect their ability to care for children, they should seek medical advice. Staff must only work directly with children if medical advice confirms that the medication is unlikely to impair that staff member's ability to look after children properly.
- All medication on the premises must be securely stored, and out of reach of children, at all times.
- Staff must be trained in Medication Awareness before they are able to give medication e.g. in the Boarding House, on a residential trip.

Transporting Pupils

- Staff should follow the school's Minibus Policy and report any concerns to the Estates Manager.
- Staff should ensure they are fit to drive and free from any drugs, alcohol or medicine which is likely to impair judgement and/ or ability to drive.
- Staff must be aware that the safety and welfare of the child is their responsibility until they are safely passed over to a parent/guardian.
- A member of staff should never be alone in a vehicle with a pupil without prior consent from the Deputy Head.
- Wherever possible and practicable, transport should be in a vehicle other than a private vehicle, with at least one adult additional to the driver acting as an escort.
- Staff should ensure that their behaviour is safe and that the transport arrangements and vehicles meet all legal requirements, that vehicles are suitable, well maintained, with child appropriate seating and relevant insurance in place.
- **It is a legal requirement that all passengers wear seatbelts and the driver should ensure that they do so.**
- 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.

Accident and Incident Reporting

- An accident report form should be completed for all accidents on site.
- A copy of the form should be given to the Medical Centre as appropriate to the circumstances.
- In the case of a serious accident or incident the school is aware of the need to report it following 'Reporting of Injuries, Diseases and Dangerous Occurrences Regulations' (RIDDOR)
- Near miss forms should be completed as appropriate including following a school trip

External Activity

- Any outside work or activity which may conflict with the interests of the school, or which makes use of school resources or property must obtain written agreement advance from the Head.
- The use of school resources and property for personal purposes is not permitted unless agreed in writing by the Head.

- Staff should not arrange private tuition of any of the school's pupils, in school or beyond, during term time or holiday time, **without the prior written approval of the Head**
- Staff should not arrange tuition on the school's premises of any pupil not registered at the School **without the prior written approval of the Head**.

Use of Personal Mobile Phones

- Staff should be fully aware of the Use of Personal Smart Technology Including Mobile Phones Policy. The term 'phone' in this policy denotes any portable electronic devices, including smart watches. This policy also contains guidance specific to EYFS.
- In EYFS settings, the use of personal devices, including mobile phones and smart watches, is not permitted. All personal mobile devices must be securely locked away during sessions.
- Taking and storing photographs is not permitted on a personal mobile device of any sort, including phones and watches. Staff should only use school equipment to take or record images, including during off-site events.

Use of Technology, Electronic Communications and Storage of Images

- The Acceptable Use Policy should be followed at all times. All staff must have read and signed the Acceptable Use Policy.
- Staff must ensure that they establish safe and responsible behaviours in their use of electronic communications and when online. Staff are expected to use Information Technology in the course of any lesson only as an aid to teaching. Staff should not be sending or receiving work or personal emails or accessing the internet other than for the purpose of teaching. On the rare occasions when teacher input may not be needed by children (e.g., during a test) a teacher's paramount duty is to supervise the children. Use of email or the internet for work purposes may be undertaken only if the supervision of the children remains secure. Staff should not at any time use personal devices, e.g. mobile phones, smart watches or tablets, to access the internet during lesson times.
- School operates monitoring and filtering of all internet activity which is checked on a daily basis by the DSL. Misuse will be addressed with staff and could lead to disciplinary procedures.
- Staff should have a thorough knowledge of the school's Cyberbullying Policy.
- Staff must log off when they leave a computer unattended.
- Staff must take appropriate measure to ensure that children are not exposed to unsuitable material, including indecent or inappropriate images. Should this occur they know the actions to take.
- Staff must ensure that any films or media content shown to children and young people are age appropriate.
- Staff must never allow visitors to use their log on details.
- Staff should keep social networking profiles private and refrain from joining groups that are directly linked to Holmewood House School.
- Staff should refrain from making comments about Holmewood House School or discussing Holmewood House School on their personal social media networks.
- Pupils and ex pupils under the age of 18 should not be 'friends' or 'contacts'.
- Staff should have no online contact with ex pupils under the age of 18.
- Staff with their own website should keep private details off the website and guard against giving out information which could bring the school into disrepute.
- Email exchanges with pupils should be for professional purposes only, using the school email system alone, with the use of appropriate formal language and greetings. Staff should be aware that any email can be forwarded (or if deleted can be retrieved), so should think before sending.
- When using e-mail, Staff need to be aware of the less formal style that can characterise this form of communication and ensure that e-mails do not convey an inappropriate tone.

- **Staff should never photograph pupils using their own personal devices.** If this happens, staff should inform the Designated Safeguarding Lead that they have used their own device and the photographs need to be uploaded onto the school system and deleted from the personal device within 24 hours. Best practice is to book a device in advance or arrange for photographs to be taken by the school marketing manager. All photographs taken of the children should be uploaded on school computers only.
- Staff should adhere to the Using Images Policy, including guidance on using mobile devices during off site activities and residential trips.
- It is not appropriate for Staff to take images of pupils for their personal use. However, working with pupils may involve the taking or recording of images. Any such work should take place with due regard to the law and the need to safeguard the privacy, dignity, safety and well-being of pupils.
- When taking photographs, Staff need to remain sensitive to pupils who appear uncomfortable and should recognise the potential for such activities to raise concerns or lead to misunderstandings.
- Staff should be aware of those parents who have stated that no photographs of their children are to be taken for magazine, prospectus, publicity or website inclusion.
- Images should be stored securely on school hardware and be used only by relevant or appropriate staff authorised to do so. When images are used, the pupils in them should not be named fully.

Educational Visits

- Staff arranging and accompanying school visits and trips must comply with the school's Educational Trips and Visits policy which sets out the responsibilities for safeguarding, risk assessment and pupil welfare in accordance with statutory regulations.
- Staff must ensure that their behaviour remains professional at all times.
- Staff should never invite a child into their room/accommodation when on overnight or extended trips.
- Staff should take particular care when supervising pupils in the less formal atmosphere of an educational visit where a more relaxed discipline or informal dress and language code may be acceptable. However, staff remain in a position of trust and need to ensure that their behaviour cannot be interpreted as seeking to establish an inappropriate relationship or friendship.

Boarding

- Access to boarding accommodation is not permitted unless staff have a specific duty or responsibility to boarders.
- Staff with responsibility for Boarding receive additional training at induction.

On-site Living Accommodation

- Staff be vigilant in maintaining their privacy, including when living in on-site accommodation.
- Staff should be mindful of the need to avoid placing themselves in vulnerable situations.
- Staff should refuse any request for their accommodation to be used as an additional resource for the school or setting.
- Staff should be mindful of the need to maintain appropriate personal and professional boundaries.
- Staff should not ask pupils to undertake jobs or errands for their personal benefit.
- Staff should be clear about arrangements for visitors on site.
- Staff should follow all boarding policies and procedures and keep up to date with requirements.

Whistleblowing

- Concerns regarding colleagues should be reported under the Whistleblowing procedures.

- Where a member of staff has good reason for concern regarding the conduct or competence of a colleague, they should follow the procedures in the policy. This is particularly important where the welfare of children may be at risk.
- All staff have a duty to self-report if there is any reason why they may not be able to carry out their duties effectively or if there is anything that may affect their ability to work safely with children.
- Staff need to be aware of their responsibilities under The Prevent Duty. Any concerns about pupils should be reported to the Designated Safeguarding Lead following the procedures set out in the Safeguarding and Child Protection Policy.
- Staff should escalate their concerns if they believe a child or children are not being protected and / or report any behaviour by colleagues that raises concern
- Staff who use whistle blowing procedures should have their employment rights protected. The NSPCC 'what you can do to report abuse' dedicated helpline is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally, or have concerns about the way a concern is being handled by their school or college. Staff can call 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: help@nspcc.org.uk.

Good Practice when Supporting Pupils

- Staff must be prepared to provide support and comfort to children during times when there may be stress at school, worry about problems at home or homesickness. They should be able to attend to a child's welfare and needs without becoming unduly concerned that they may be doing the wrong thing. Nevertheless, the boundaries of what is acceptable without being over-intimate need to be clear and the following guidance is offered to staff:

Communication and Contact with Pupils (including the use of technology)

- All communication and contact between pupils and adults should take place within clear and explicit professional boundaries.
- Staff are expected follow the school's acceptable use policy and online safety guidance.
- Staff should also be circumspect in their communications and contact with pupils so as to avoid any possible misinterpretation of their motives or any behaviour that could be construed as grooming.
- Staff should ensure that they establish safe and responsible online behaviours, working to local and national guidelines and school acceptable use policies which detail how new and emerging technologies may be used.
- Staff should share any concerns arising from the use of technology with the appropriate member of staff. The Safeguarding and Child Protection Policy and procedures should be followed in all cases relating to safeguarding issues including Female Genital Mutilation (FGM), child on child abuse and The Prevent Duty.

Language

- Staff should not swear, blaspheme or use offensive language in front of pupils.
- Staff should not use discriminatory and demeaning language in relation to gender, religion, ethnicity, sexual orientation, disability or age.
- Staff should not make sexual innuendos or any comments of a sexual nature (other than in the context of SRE in the PSHE curriculum), nor make any comments trivialising alcohol or drug abuse.
- The use of sarcastic, demeaning or insensitive comments towards young people can also be regarded as a form of abuse which is potentially very damaging and must be avoided.

- It is recognised that, in order to discharge particular pastoral responsibilities, staff may from time to time need to engage in conversation with children that covers sensitive matters. Staff must use their professional judgement to ensure that they are not drawn into areas inappropriate to their duties or their relationship with the pupils concerned. In circumstances where such conversations occur, staff must let the Head and/or the Deputy Head know immediately.

One-to-One Situations

- One-to-one situations, including on a virtual platform, have the potential to make pupils more vulnerable to harm by those who seek to exploit their position of trust.
- Staff may also be more vulnerable to unjust or unfounded allegations being made against them.
- When one-to-one situations occur, staff must follow School guidance ensure the safety and security of pupils and staff alike; be aware of relevant risk assessments, policies and procedures, including Child Protection, Acceptable Use Policy and Behaviour & Sanctions.
- Teachers of individual lessons / one to one situations e.g. music, LAMDA and individual teaching sessions (including SEND and EAL) or pastoral discussions should ensure that their teaching takes place where visual access and/or an open door with others can be maintained.
- Work one to one with a child only when absolutely necessary (both in person or online) and with the knowledge and consent of senior leaders and parents/carers
- Ensure prior to any online learning, there are clear expectations of behaviour and conduct of all parties that have been agreed in advance.
- Permission for staff engaging in private tuition both on and off site must be sought in writing** from the Head. This is an extra layer of protection for both the child and the member of staff.
- Staff should never invite a child into their room/accommodation when on overnight or extended trips or in the Boarding House.

Avoiding Misinterpretation

In order to avoid misinterpretation of certain situations, Staff should:

- Try to model appropriate boundaries regarding personal space
- Avoid special relationships or rumours of having 'favourites'
- Avoid spending unequal amounts of time with a given child or group of children
- Be wary of forming 'special' relationships with particular children's families that might compromise them professionally
- Be aware of how their actions may be interpreted by others looking in from outside
- Be observant of the behaviour of colleagues and, if they feel that their actions could be seen by others as inappropriate, tell them or the designated safeguarding lead.

Interviewing Children and Dealing with an Unhappy Child

- If it is necessary to be alone with a child, this should, ideally, be in a place in full view of others.
- If a child is injured or upset, appropriate comforting is a natural reaction. In full view of others, this is fine, but staff should be aware that in a one to one situation, such comforting may be open to misinterpretation.
- Be aware that an upset child might readily misconstrue a situation and, if possible, always ensure that the child is accompanied by a friend.
- When investigating allegations of e.g. bullying, it is wise to invite another pupil to attend, so that the child feels supported. This will also act as protection from misinterpretation.
- In responding to individual children's distress, staff will need to consider carefully whether they should offer advice, sympathy or counselling if a discussion enters a sensitive area or, alternatively, refer them to a colleague or agency better placed to offer appropriate advice.

Behaviour Management

- All pupils have a right to be treated with respect and dignity even in those circumstances where they display difficult and challenging behaviour.
- The use of any form of **corporal punishment and smacking is unlawful** in all schools and education settings.
- Staff should act as a positive role model at all times. They should not use any form of degrading treatment to punish a pupil. The use of sarcasm, demeaning or insensitive comments is not acceptable in any situation.
- Staff should avoid shouting at children other than as a warning in an emergency/safety situation.
- Staff should be aware of the School's policy on seclusion and isolation, including the associated risks and comply with legislation and guidance in relation to human rights and restriction of liberty.
- Any sanctions or rewards used should be part of recognised systems and procedures as set out in the Behaviour Policy. Staff should be aware of the specific needs of children with particularly challenging behaviour and/or SEND when dealing with behaviour issues.
- Where a pupil has specific needs in respect of particularly challenging behaviour, a positive handling plan, including assessment of risk, should be drawn up and agreed by all parties, including, for example, a medical practitioner, SENCO, Educational Psychologist, where appropriate.
- Staff should understand the importance of challenging inappropriate behaviours between peers including child on child sexual violence and harassment. Regarding such behaviour as 'banter' or 'just growing up' is **not acceptable** and can lead to a culture that normalises abuse leading children to accept it as normal and not coming forward to report it.
- Any incidents of bullying/ child on child abuse should be dealt with swiftly in accordance with the Behaviour and Sanctions, Anti-bullying Policy and or Cyberbullying Policy. Any incident of suspected bullying will be logged fully investigated by the Deputy Head.

Physical contact

Given the age of the pupils, physical contact between pupils and staff may be appropriate. Staff must exercise common sense when with children in their care and should make sure any physical contact is appropriate to the situation. Staff should never have any physical contact with a child that could be misinterpreted. Some incidences where physical contact may be necessary/unavoidable are:

- Intimate care of children in the EYFS which is age appropriate (eg changing nappies etc.)
- Contact in PE/Swimming. It should, however, be seen as appropriate by others
- Physical contact may be necessary in Drama and in some forms of skills coaching – e.g. in instrumental music lessons. Any such contact should likewise be seen as appropriate
- First Aid – staff who administer First Aid should, where possible, ensure that another adult is present if there is any doubt over the possibility of any physical contact being misconstrued
- Teachers of individual instrumental music lessons should teach only in the designated space where all teaching rooms are clearly visible from the outside and should avoid unnecessary physical contact
- Comforting a child who is upset or unwell
- Helping a child who has soiled their clothing

Physical Intervention

- All staff with responsibility for children's safety and welfare must deal professionally with all incidents involving aggressive behaviour and only use physical intervention as a last resort, always ensuring minimal risk of injury to pupils and staff.

- If a child needs to be restrained, the school's Physical Restraint and Use of Reasonable Force Policy should be followed.
- **Corporal punishment and the threat of corporal punishment are prohibited. Staff must never shout at, humiliate or use sarcasm with pupils.**
- Staff must follow the guidelines set out in the Physical Restraint and Use of Reasonable Force Policy and incidents of the use of physical restraint will be recorded.

Changing

- PE, Games, swimming or other changing supervision needs to be visible and protective but also non-intrusive and discreet. Staff should announce their intent to enter, before entering the changing rooms.
- Where possible, more than one member of staff should be in charge of changing, to avoid the potential for compromising circumstances and to remove as far as possible any opportunity for abuse.
- When it is not possible for more than one member of staff to be in attendance, staff need to be particularly alert to the potential hazards of being the sole member of staff in charge of changing. At such times, a member of staff should ensure that a group of children is present and should avoid being alone in the changing room with an individual child.
- Any concerns with regard to the supervision of changing should be addressed to the Head of Sport and/or to one of the Designated Safeguarding Leads.
- Any other events – e.g. theatrical productions – that require changing arrangements should follow the above guidance.
- Staff should avoid changing in the presence of children.
- Staff changing rooms are provided for Staff Swim session. Other ideas for wellbeing sessions should be discussed with the Deputy Head.

Searching and Confiscation

- There may be times when a member of staff needs to search a pupil or a pupil's belongings because something has gone missing and there are reasonable grounds to conduct a search. In such circumstances staff must follow the guidelines set out in the Searching and Confiscation Policy.

Intimate Care

- Staff must adhere to the School's policy on Intimate Care and guidelines for use of changing rooms including the swimming pool facilities.
- All arrangements for Intimate Care are accompanied by robust recording systems.
- Care plans for those requiring such support must be updated and relevant, including where there is a change to staff rotas. Any changes to the intimate care plan should be made in writing and without delay, even if the change in arrangements is temporary; e.g. staff shortages, changes to staff rotas.
- Volunteers and visiting staff from other schools / agencies should not undertake care procedures without appropriate training.
- Plans for intimate care should ensure that pupils are actively consulted about their own care plan.
- Intimate care must only be provided by staff known to the child, who have also been checked against the relevant DBS barred list.
- Adults must not change or use the toilet in the presence or sight of pupils; shower with pupils assist with personal or intimate care which the pupil is able to undertake independently.
- Pupils are entitled to respect and privacy at all times and especially when in a state of undress, including, for example, when changing, toileting and showering. However, there needs to be an

appropriate level of supervision in order to safeguard pupils, satisfy health and safety considerations and ensure that bullying or teasing does not occur.

- Any supervision in and around the changing facilities should be appropriate to the needs and age of the children concerned and sensitive to the potential for embarrassment

Social Contact with Pupils

- Staff should not establish or seek to establish social contact with pupils for the purpose of securing a friendship or to pursue or strengthen a relationship.
- If a pupil or parent seeks to establish social contact, or if this occurs coincidentally, the member of Staff should exercise his or her professional judgement in making a response.
- Some social contacts will be easily recognised and openly acknowledged, for example when the parent and Staff are part of the same social circle. Nevertheless, Staff should be aware that some social contacts that are not common knowledge can be misconstrued as being part of a grooming process.
- It is recognised that Staff can support a parent who may be in particular difficulty; however, care needs to be exercised in situations where the parent comes to depend on the member of staff for support outside their professional role. These situations should be discussed with the Head, the Deputy Head or the Designated Safeguarding Lead and, where necessary, referrals made to the appropriate support agency.

Contact with Pupils Out of School

- Staff should never arrange meetings with individual pupils off the school premises without the prior written approval of the Head.
- Staff should never take children on overnight trips alone.
- Staff should not arrange private tuition, child minding/ babysitting of any of the school's pupils, in school or beyond, during term time or holiday time, without the prior written approval of the Head
- Staff should not arrange tuition on the school's premises of any pupil from beyond the school without the prior written approval of the Head.
- Staff should not give pupils their home address, home telephone number, mobile phone number, or non-School e-mail address
- Staff should not make arrangements to meet pupils, individually or in groups, outside School other than on School trips authorised by the Head and Trips organiser
- Staff are advised not to attend private pupil parties and should be aware of their professional standing and responsibilities when attending parties arranged by parents at which pupils are also present

Gifts, Rewards and Favours

- Staff should be aware that consistently conferring special attention and favour upon a child might be construed as being part of a 'grooming' process and as such will give rise to concerns about their behaviour.
- Staff should not give presents to an individual pupil outside of the school rewards system. This could be a form of grooming.
- Staff should take care to ensure they do not accept any gift that might be construed as a bribe or lead the giver to expect preferential treatment.
- It is unacceptable to receive gifts on a regular basis or of any significant value. See Anti-Bribery Policy.
- Staff should exercise care when selecting pupils for school teams, productions, trips and/or specific work tasks in order to avoid perceptions of favouritism or injustice.

- Similar care should be exercised when pupils are excluded from an activity. No child should be excluded from an activity without prior consultation with the Head or Deputy Head.

Relationships

- Staff should understand that they are in a position of trust in relation to pupils, giving them influence and power by virtue of the knowledge they have and/or the authority invested in their role.
- Staff should ensure that their relationships with pupils clearly take place within the boundaries of a respectful professional relationship and avoid behaviour which might be misinterpreted by others.
- A relationship between an adult and a pupil is not a relationship between equals and there is a potential for exploitation and harm of vulnerable young people.
- Staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.

Infatuations

- Occasionally, pupils may develop an infatuation for a member of staff. In such situations the advice of the Head or Deputy Head must be sought.
- Staff 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 beyond reproach
- Other members of staff have a part to play in alerting a colleague to the possibility of an infatuation in order that appropriate steps can be taken to minimise hurt and distress and the risk to the member of staff concerned.
- Whilst the risk of infatuation is not limited to younger members of staff, they must recognise their particular vulnerability to adolescent infatuation. If a member of staff is concerned that he/she is developing a friendship with a pupil that would have the potential to become an unacceptable relationship, he/she must ensure that the relationship does not develop further.
- Staff have a responsibility to 'whistleblow' on themselves or a colleague immediately in such circumstances.

Sexual Contact

- Staff should not have any form of communication with a pupil that could be interpreted as sexually suggestive or provocative i.e. verbal comments, letters, texts, emails or physical contact.
- Staff should not make sexual remarks to, or about a pupil, discuss their own sexual relationships with or in the presence of pupils or have sexual relationships with pupils. It is an offence for a member of staff to engage in sexual activity with or in the presence of a pupil or to cause or incite that pupil to engage in or watch sexual activity.
- Any sexual activity between a member of staff and a pupil may be regarded as a criminal offence and will always be a matter for disciplinary action.

Grooming

- A child abuser may spend a great deal of time and energy 'grooming' a child and thereby creating an opportunity for abuse. Such grooming will involve gaining the child's confidence and trust and may also involve gaining the trust of the child's family and/or of other adults associated with the child
- Within the context of a school, it is essential to be aware of possible warning signs of grooming and to raise any concerns in this regard with the Designated Safeguarding Lead or the Head. Such warning signs may include spending excessive amounts of time with a particular child or

group of children, arranging to meet with children outside of school, albeit in the company of their parents or e.g. by arranging holiday tuition (often with the parents' full support), breaching guidelines with regard to being alone with children or using inappropriately sexual language with children. All of these behaviours are dealt with in the guidance above and staff should feel comfortable that, by following the guidance, they will avoid arousing unjustified suspicions.

- In recent times, internet grooming has become an increasing concern. The school's ICT policies provide safeguards against such activity within school, but staff should take seriously and report to the Designated Safeguarding Lead or the Head any concern that a child may at home be engaged in unsuitable internet activity. Staff who identify a pupil who is at risk of being drawn into terrorism must challenge extremist ideas and pass their concerns on immediately to the Designated Safeguarding Lead. The Acceptable Use Policy along with Safeguarding and Child Protection must be referred to in this case.
- Staff who contravene any of the above guidelines or, in retrospect, feel that an action could be seen as inappropriate, should discuss the matter immediately with the Designated Safeguarding Lead or the Head so that notes can be made and securely kept should reference need to be made to them in the future.