



STAFF BEHAVIOUR POLICY (STAFF CODE OF CONDUCT)

This policy, which applies to the whole school, including the Early Years Foundation Stage (EYFS), is publicly available on the school website and upon request a copy (which can be made available in large print or other accessible format if required) may be obtained from the School Office.

Scope: All who work, volunteer or supply services to our school have an equal responsibility to understand and implement this policy and its procedures both within and outside of normal school hours, including activities away from school. All new employees and volunteers are required to state that they have read, understood and will abide by this policy and its procedural documents and confirm this by signing the Policies Register.

Legal Status: Complies with The Education (Independent School Standards) (England) Regulations currently in force.

Monitoring and Review: These arrangements are subject to continuous monitoring, refinement, and audit by the Headteacher. The Advisory Board will undertake a full annual review of this document, inclusive of its implementation and the efficiency with which the related duties have been implemented. This review will be formally documented in writing. Any deficiencies or weaknesses recognised in arrangements or procedures will be remedied immediately and without delay. All staff will be informed of the updated/reviewed arrangements and it will be made available to them in writing or electronically.

Signed

Reviewed: September 2024

Next Review: September 2025

Ms.M. Beech
Acting Headteacher
Read on 02.05.25

Mr Luckham
Headteacher at time of Policy Writing and Proprietor's Representative
September 2025

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Definitions used in this Code of Conduct are as follows:

- **‘Fundamental British values’** It includes ‘democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.

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- **‘Parents’** is intended to include carers, guardians and other adults acting *in loco parentis*.
- **‘Pupils’** is used throughout the standards but should be taken to include references to children of all ages who are taught by qualified teachers, including those in post-16 education.
- **‘School’** means whatever educational setting the standards are applied in. The standards are required to be used by teachers in maintained schools and non-maintained special schools. Use of the standards in academies and free schools depends on the specific establishment arrangements of those schools. Independent schools are not required to use the standards but may do so if they wish.
- **‘staff’** means all adults, paid or unpaid working in our school – inclusive of volunteers.
- **‘Special educational needs and Disabilities’**, as defined by the Department for Education.
- **‘Statutory frameworks’** includes all legal requirements, including but not limited to the requirement to promote equal opportunities and to provide reasonable adjustments for those with disabilities, as provided for in the Equality Act 2010.

Purpose and Application

Purpose: Relationships with fellow, staff, employees, directors, contractors, visitors, volunteers, pupils and their parents, guardians or carers must be reasonable and mutually respectful at all times. This Code has been produced to place the welfare of children at the centre of the school and its culture and to ensure that all those who work in the school and may have contact with children are clear on the rules of conduct and the expectations of the school. Children place trust in those connected to the school creating obligations which we must all meet to ensure the successful outcomes achieved by the children in our care. This *Staff Behaviour Policy and Code of Conduct* has regard to the school's Safeguarding Children and Child Protection Policy and procedures, which are available on the school website, and the following (collectively referred to in this Code as the **Guidance**) The purpose of the Code is to:

- confirm and reinforce the professional responsibilities of all staff;
- clarify the legal position in relation to sensitive aspects of staff pupil relationships and communication, including the use of social media;
- set out the expectations of standards and behaviour to be maintained within the school;
- help adults establish safe practices and reduce the risk of false accusations or improper conduct.

Scope of application with other policies inclusive of the code on conduct outside school: The Code must be read in conjunction with the school's policies, particularly the Safeguarding Children and Child Protection Policy and procedures and Whistleblowing policy. The same guidelines should be applied to after-school clubs, school trips, and especially trips that involve an overnight stay away from the school. There are separate, more detailed guidelines for school trips in the Educational Visits Policy. The principles of this guidance also apply to contact with children or young people who are pupils at another school.

Preamble: Teachers make the education of their pupils their first concern and are accountable for achieving the highest possible standards in work and conduct. Teachers act with honesty and integrity; have strong subject knowledge, keep their knowledge and skills as teachers up-to-date and are self-critical; forge positive professional relationships; and work with parents in the best interests of their pupils.

Discussion of the procedures set out in that document forms a vital part of our induction procedures. We make it clear in induction and other training, and in guidance provided for staff that they have a responsibility to speak up about safeguarding and welfare matters within the school and to external agencies where necessary. This is one part of our establishing a positive safeguarding culture in the school. The Safeguarding Child Protection Policy provides guidance for teachers and other members of staff when faced with handling any issue relating to child abuse. It is not intended to be a substitute for proper training. The Headteacher should always be informed if a member of staff has any concerns in order to ensure the activation of appropriate procedures.

It is important that all adults working with pupils understand that the nature of their work and the responsibilities related to it, place them in a position of trust. This practice guidance provides clear advice on appropriate and safe behaviours for all adults working with our pupils in paid or unpaid capacities, in all settings and in all contexts. The guidance aims to:

- keep our pupils safe by clarifying which behaviours constitute safe practice and which behaviours should be avoided;

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- assist adults working with pupils to work safely and responsibly and to monitor their own standards and practice;
- support managers and employers in setting clear expectations of behaviour and/or codes of practice relevant to the services being provided;
- support the school in giving a clear message that unlawful or unsafe behaviour is unacceptable and that, where appropriate, disciplinary or legal action will be taken;
- support safer recruitment practice;
- minimise the risk of misplaced or malicious allegations made against adults who work with pupils;
- reduce the incidence of positions of trust being abused or misused.

The school works with the Safeguarding children multi-agency partnership in its child protection and safeguarding procedures in managing allegations against staff.

Your duty: It is the contractual duty of every member of staff to observe the rules and obligations in this Code. You must also make yourself familiar with and follow School Policies, Procedures and Processes and any related Guidance. The school also has a duty of care to its staff, parents, guardians or carers, and pupils and the implementation of the practices in this Code will help to discharge that duty.

Wrongdoing: All staff are required to report their own wrongdoing, or any wrongdoing or proposed wrongdoing of any other member of staff or any conduct which they may suspect to be inappropriate to the Headteacher. The school operates a whistleblowing policy which is available on the policy page of the school website.

Unsuitability: The guidance contained in this document is an attempt to identify what behaviours are expected of adults who work with our pupils. Adults whose practice deviates from this guidance and/or their professional or employment-related code of conduct may bring into question their suitability to work with pupils in any capacity.

This means that adults should:

- *have a clear understanding about the nature and content of this document;*
- *discuss any uncertainties or confusion with the Headteacher;*
- *understand what behaviours may call into question their suitability to continue to work with pupils and young people.*

Responsibilities: All staff at Kingswood School have an overriding responsibility to act and to conduct themselves at all times in a manner which makes a positive and active contribution to the education and welfare of the children in our school and in our care. All staff must have proper and professional regard for the ethos, policies and practices of the school in which they teach, and maintain high standards in their own presentation, attendance and punctuality. Also, they must have an understanding of, and always act within, the statutory frameworks which set out their professional duties and responsibilities. All staff have a responsibility to keep pupils safe and to protect them from abuse (sexual, physical and emotional), neglect and safeguarding concerns. Our Staff Code of Conduct covers staff behaviour, pupil relationships and communications including the use of social media.

This means that staff should:

- understand the responsibilities which are part of their employment or role, and be aware that sanctions will be applied if these provisions are breached;
- always act, and be seen to act, in the child's best interests;
- avoid any conduct which would lead any reasonable person to question their motivation and intentions;
- take responsibility for their own actions and behaviour.

General conduct

School property: Staff must take proper care when using school property and must not use school property for any unauthorised use or for private gain.

Use of premises: Staff must not carry out on school premises any work or activity other than pursuant to the terms and conditions of employment, without the prior permission of the Headteacher.

Behaviour of others: staff should be aware that their behaviour may raise concerns if deemed inappropriate. Such concerns will be given careful consideration as to whether they constitute a potential risk to pupils at the school.

Alcohol and drugs: No member of Staff should be on duty supervising pupils whilst under the influence of alcohol, drugs or any other substance which may impair judgment.

Alcohol and drug testing: The school reserves the right to ask members of Staff to undertake an appropriate test if there is reason to believe that they are under the influence of alcohol, drugs and/or any other substance which may impair judgment. Any unreasonable refusal by a member of Staff to undergo the appropriate test is likely to lead to disciplinary action.

Whistleblowing: (Also please refer to our Whistleblowing Policy) The term ‘whistleblowing’ is considered as the confidential raising of problems or concerns within an organisation by a member of staff. This is not “leaking” information but refers to matters of impropriety e.g. a breach of law, school procedures or ethics. Nor is whistleblowing the raising of a grievance within the school (which would be dealt with under the staff grievance procedures). All staff are required to report their own wrongdoing, or any wrongdoing or proposed wrongdoing of any other member of staff to the Headteacher.

Safeguarding: This is the responsibility of all who work, volunteer or learn in our school and are required to report instances of actual or suspected child abuse or neglect to **Ms.M.Beech-Acting Headteacher** who is the Designated Safeguarding Lead (DSL), or **Alex Kenyan** and **Meral Barlow** who are **Deputy Designated Safeguarding Lead (Deputy DSL)**. Kingswood School recognises it is an agent of referral and not of investigation. Any person may make a referral (including whistle blowing) to external agencies such as the Local Safeguarding Children Partnership or Local Authority Designated Officer (LADO).

We make it clear, both in induction and other training and in guidance provided for staff, that they have a responsibility to speak up about safeguarding and welfare matters within our school and to external agencies where necessary. This is one part of the way in which we establish in our school, a positive safeguarding culture. The school provides immunity from retribution or disciplinary action against such staff for “Whistleblowing” in good faith. Staff at all levels, including newly appointed and ancillary staff, have been given briefing or training on responding to suspicions or allegations of abuse and know what action they should take in response to such suspicions or allegations.

The staff and proprietor of the school seek to run all aspects of school business and activity with full regard for high standards of conduct and integrity. If members of school staff, parents, the proprietor or the school community at large become aware of activities which give cause for concern, the school has this whistleblowing policy, which acts as a framework to allow concerns to be raised confidentially and provides for a thorough and appropriate investigation of the matter to bring it to a satisfactory conclusion, under the school’s disciplinary procedure. The school is committed to tackling fraud and other forms of malpractice and treats these issues seriously. The school recognises that some concerns may be extremely sensitive and has therefore developed a system which allows for the confidential raising of concerns within the school environment but also has recourse to an external party outside the management structure of the school.

All Staff must raise any concerns relating to female genital mutilation (FGM) with the Designated Safeguarding Lead and involve children’s social care as appropriate in accordance with the school’s child protection and safeguarding policy and procedures. Teachers must also report to the police cases where they discover (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a girl under the age of 18. The report should be made orally by calling 101, the single non-emergency number. It will be rare for teachers to see visual evidence, and they must not be examining pupils but those failing to report such cases will face disciplinary sanctions.

Behaviour Management of Pupils including Physical Intervention (please see our Behaviour Management and Physical Intervention policies): Where pupils display difficult or challenging behaviour, adults should follow the school behaviour and
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discipline policy using strategies appropriate to the circumstance and situation. A person will not be taken to have used corporal punishment if the action was taken for reasons that include averting an immediate danger of personal injury to, or an immediate danger of death of, any person including the child. The law and guidance for schools' states that adults may reasonably intervene to prevent a child from:

- committing a criminal offence;
- injuring themselves or others;
- causing damage to property;
- engaging in behaviour prejudicial to good order and to maintain good order and discipline.

Physical Restraint: All members of staff are aware of the regulations regarding the use of force by teachers, as set out in DfE Circular 10/98, relating to section 550A of the Education Act 1996: *The Use of Force to Control or Restrain Children*. Teachers in Kingswood School do not hit, push or slap children. Staff only intervene with physical restraint, such as holding, to prevent physical injury to the child, other children or adults and/or serious damage to property. The actions that we take are in line with government guidelines on the restraint of children. Details of such an event (what happened, what action was taken and by whom, and the names of witnesses) should be brought to the attention of the Headteacher and recorded in the child's personal file. The child's parents are informed on the same day.

Punishments that are humiliating or degrading must not be used.

The following sanctions / punishments will *never* be used: -

- Any form of hitting of a child (including hitting a child in anger or retaliation)
- Deprivation of food or drink.
- Enforced eating or drinking.
- Prevention of contact to parents or any appropriate independent listener or helpline by telephone.
- Requirement to wear distinctive clothing or the wearing of nightclothes by day.
- Withholding of any aids or equipment needed by a child.

Staff should:

- *not use force as a form of punishment;*
- *try to defuse situations before they escalate;*
- *inform parents of any behaviour management techniques used;*
- *adhere to the school's behaviour management policy;*
- *be mindful of factors which may impact upon a child or young person's behaviour e.g., bullying, abuse, and where necessary take appropriate action.*

Action taken in self-defense or in an emergency: The law allows anyone to defend themselves against an attack provided they do not use more force than is necessary. Similarly, where a pupil is at risk of immediate injury or on the point of inflicting injury on someone else, any member of Staff (whether authorised or not) would be entitled to intervene.

Physical Contact with Children: Staff should:

- be aware that even well-intentioned physical contact may be misconstrued by the child, an observer or by anyone to whom this action is described;
- be mindful of and sensitive to factors both inside and outside of the school or setting which may impact on a pupil's behaviour;
- avoid shouting at children other than as a warning in an emergency/safety situation;
- always seek to defuse situations and avoid the use of physical intervention wherever possible;
- where physical intervention is necessary, only use minimum force and for the shortest time needed;
- not use physical intervention as a form of punishment;
- never touch a child in a way which may be considered indecent;
- always be prepared to report and explain actions and accept that all physical contact be open to scrutiny;

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- not indulge in horseplay;
- always encourage children, where possible, to undertake self-care tasks independently;
- work within Health and Safety regulations;
- be aware of cultural or religious views about touching and always be sensitive to issues of gender;
- understand that physical contact in some circumstances can be easily misinterpreted.

As a school Kingswood School will:

- ensure the school has a compliant physical intervention policy which staff understand, detailing when and how physical interventions should be recorded and reported;
- ensure that staff are provided with appropriate training and support.

Positions of Trust and Ethical Conduct: As a result of our knowledge, position, and/or the authority invested in their role, all our staff are in positions of trust. A member of staff can be described as in a position of power or influence because of their role. It is vital for all staff to understand the power this can give them over those they care for and the responsibility they must exercise as a consequence of this relationship. Staff are expected to ensure that while there is an unequal balance of power, staff have a responsibility to ensure that this is not used for personal advantage or gratification. Staff will always maintain appropriate professional boundaries and avoid behaviour which could be misinterpreted by others. We expect all staff to report and record any incident with this potential. Staff should 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 sexual nature, or which may become so.

Abuse of a position of trust and inappropriate relationships with school pupils: Sexual relationships or sexual contact with any pupil, or encouraging a relationship to develop in a way which might lead to a sexual relationship, or any relationship just considered inappropriate with any pupil at the school, is a grave breach of trust that will usually lead to disciplinary action and may also lead to criminal prosecution. It is a criminal offence to have any sexual relationship with any school pupil under the age of 18. Whilst not a criminal offence, it is a breach of this Code and considered to be gross misconduct to have a sexual relationship with any pupil of this school, even if over the age of 18.

Inappropriate relationships with pupils at another school: Forming relationships with children or young people, who are pupils of this school or pupils at another school, will be a criminal offence if they are under 16 but may also be a criminal offence if under the age of 18 and will be regarded as gross misconduct. Such behaviour tends to bring the school into disrepute and gives rise to concern that the staff involved cannot be trusted to maintain professional boundaries with pupils at the school. Whilst not necessarily a criminal offence, the school considers it inappropriate for staff to form inappropriate relationships with a pupil of any school, irrespective of their age.

Sexual Contact: All adults should clearly understand the need to maintain appropriate boundaries in their contacts with pupils. Intimate or sexual relationships between children/young people and the adults who work with them will be regarded as a grave breach of trust. Allowing or encouraging a relationship to develop in a way which might lead to a sexual relationship is also unacceptable. **Staff must not:**

- have sexual relationships with pupils;
- have any form of communication with a child or young person which could be interpreted as sexually suggestive or provocative i.e., verbal comments, letters, notes, electronic mail, phone calls, texts, physical contact;
- make sexual remarks to, or about, a child/young person;
- discuss their own sexual relationships with or in the presence of pupils.

Any sexual activity between an adult and the child or young person with whom they work may be regarded as a criminal offence and will always be a matter for disciplinary action. All children and young people are protected by specific legal provisions in this

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respect regardless of whether the child or young person consents or not. The sexual activity referred to does not just involve physical contact including penetrative and non-penetrative acts. It may also include non-contact activities, such as causing children to engage in or watch sexual activity or the production of pornographic material. There are occasions when adults embark on a course of behaviour known as 'grooming' where the sole purpose is to gain the trust of a child and manipulate that relationship so sexual abuse can take place. Adults should be aware that consistently conferring inappropriate 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:

- ensure that their interactions with pupils clearly take place within the boundaries of a respectful professional relationship;
- take care that their language or conduct does not give rise to comment or speculation. Attitudes, demeanor and language all require care and thought, particularly when members of staff are dealing with adolescent boys and girls.

Guidance for staff on conduct with pupils inclusive of working alone with pupils: These guidelines are designed to encourage an atmosphere of trust in which all colleagues can conduct their professional lives with confidence. The school recognises the need for, and the desirability of, friendly and respectful social and professional rapport between staff and children. Happy relations in the school are essential. Staff must conduct themselves professionally in their relationships with pupils, parents and staff and must not behave in a way that could bring the school into disrepute or risk allegations being made. Members of staff and volunteers need to be aware that unwary actions can be misconstrued as unprofessional conduct, with a potentially damaging effect on careers. Working alone with pupils may include: musical instrument tuition, 1:1 coaching, pupil counselling, conveying a pupil by car etc.

To avoid misunderstandings the following should be adhered to carefully:

- Members of staff should exercise particular caution and sensitivity before visiting lavatories or changing areas. Male members of staff should never be in girls' changing areas unless accompanied by a female member of staff and likewise for female staff and boys changing rooms;
- No member of staff should ever be behind a locked door with a child;
- Ensure that unnecessary contact with children is avoided (e.g. children sitting on laps or hair stroking etc.) and that outward displays of affection are only appropriate in the case of comforting a distressed child, and should never occur unless there is another adult present;
 - Whilst it would be unrealistic and undesirable to preclude all physical contact between adults and children, staff are expected to exercise caution and avoid placing themselves in a position where their actions might be open to criticism or misinterpretation;
- Staff should take great care that relationships with individual children are kept on a professional level. It is important that all children are treated the same and that discipline is fair, consistent and impartial. Staff should take care that "joking comments" cannot be misconstrued to give offence;
- Staff must not be party to gossip about colleagues or children;
- Personal or academic information on children should be kept confidential and away from other children or parents;
- The highest level of confidentiality should always be maintained in relationships with both adults and children. Staff, however, should make it clear that there are certain circumstances (e.g. where a child is suffering or is likely to suffer harm) when other people will need to be told, so that the community or the child can be protected. If a child asks to tell a member of staff something in confidence, they should always be told that this will depend upon the circumstances and absolute confidence cannot be guaranteed;
- If a child behaves inappropriately or makes an inappropriate advance to a member of staff, it is essential that the child is immediately informed that the language or behaviour is unacceptable. The incident, and what has been done and said, should be recorded, and reported to the Designated Safeguarding Lead immediately;
- One-to-one meetings should, wherever possible, take place in public or semi-public places, such as classrooms or offices. If in classrooms, ensure you are seated so that you and the child can be seen through the visibility panel in the door;
- When in a private meeting with a child or one-to-one session, as occurs with Therapists, ensure furniture is positioned to allow easy access into or out of the room and that the glass panel in the door is not obscured so that you can be seen clearly;
- Staff will at no time travel unaccompanied outside of the school with children;

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- Inform another adult of where the 1:1 teaching is taking place;
- Staff should ensure that a meeting is arranged during normal school hours when there are plenty of other people about;
- Do not continue a meeting for any longer than is necessary to achieve its purpose;
- Avoid sitting or standing in close proximity to a pupil, except as necessary to check work;
- Avoid using "engaged" or equivalent signs on doors or windows;
- Avoid idle discussion;
- Avoid all unnecessary physical contact and apologise straight away if there is accidental physical contact;
- Avoid any conduct that could be taken as a sexual advance;
- Report any incident that causes you concern to the Designated Safeguarding Lead in accordance with the school's Child Protection Policy, and make a written record (signed and dated);
- Report any situation where a pupil becomes distressed or angry to the Designated Safeguarding Lead.

Making professional judgements: There will be rare occasions and circumstances in which staff have to make decisions or take action in the best interest of a pupil, which could contravene existing guidance or where no guidance exists. Individuals are expected to make judgements about their behaviour in order to secure the best interests and welfare of the pupils in their charge and, in so doing, will be seen to be acting reasonably. These judgements should always be recorded and shared with a member of the senior leadership team. Adults should always consider whether their actions are warranted, proportionate, safe and applied equitably. Staff should:

- discuss the circumstances that informed their action, or their proposed action, with their line manager or, where appropriate, the school's designated safeguarding lead. 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 Headteacher or Designated Safeguarding Lead
- always record discussions and actions taken with their justifications;
- record any areas of disagreement and, if necessary, refer to another agency/the LA/Ofsted/TRA/other Regulatory Body.

Gifts, Rewards or Favouritism: All giving of gifts or rewards are part of our behaviour policy for supporting positive behaviour or recognising particular achievements. There may be specific occasions when staff may wish to give a child a personal gift. This is only acceptable practice where, in line with the agreed policy, senior manager and parent/carer(s) have discussed the reasons for it and the action is recorded. Any gift should be openly given and not based on favouritism. Staff remain alert at all times to the fact that the giving of gifts can be misconstrued as a gesture to either bribe or groom a child. Staff should apply the same professional standards, regardless of gender or sexuality or any other protected characteristic under the Equality Act 2010.

Staff will take care in selecting children for specific activities or privileges to avoid perceptions of favouritism or unfairness. Methods and criteria for selection will always be transparent and subject to scrutiny. Care is taken to ensure that no member of staff accepts any gifts that might be construed as a bribe by others or lead the giver to expect preferential treatment. There are always occasions in school when children or parents wish to pass on a small token of appreciation such as a thank you. However, it is unacceptable to receive gifts on a regular basis, or of any significant value.

Staff must:

- *be aware of the school's policy on the giving and receiving of gifts;*
- *ensure that gifts received or given in situations which may be misconstrued are declared;*
- *generally, only give gifts to an individual young person as part of an agreed reward system;*
- *where giving gifts other than as above, ensure that these are of insignificant value;*
- *ensure that all selection processes which concern pupils are fair and that wherever practicable these are undertaken and agreed by more than one member of staff; and*
- *ensure that they do not behave in a manner which is either favourable or unfavourable to individual pupils.*

Infatuations: Any unplanned contact of this nature or suspected infatuations or "crushes" will be reported to the Headteacher. Staff are not to disclose their personal telephone numbers, email address and so on to pupils. Occasionally a child or young person

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may develop an infatuation with a member of staff who works with them. Staff are required to deal sensitively with these situations and to maintain the dignity and safety of all concerned. Such situations carry a high risk of words or actions being misinterpreted and they must ensure that their own behaviour is beyond reproach. A member of staff who becomes aware that a child or young person is developing an infatuation must discuss this with their senior manager and alert the Headteacher at the earliest opportunity so that appropriate action can be taken to avoid any hurt, distress or embarrassment from the child, family or staff's perspective. If staff have similar concerns regarding parents, then this should also be passed onto the Headteacher. *Concerns about the welfare of colleagues or children should be communicated to the Headteacher immediately.*

Staff should:

- *report and record any incidents or indications (verbal, written or physical) that suggest a child or young person may have developed an infatuation with a member of staff;*
- *always acknowledge and maintain professional boundaries.*

Appropriate Communications: All staff should ensure not to use any language to the children which may be offensive. Absolutely no swear words or words with a sexual connotation may ever be used. Any incidents of this will be treated as a disciplinary matter and action will be taken. Staff should avoid the use of sarcasm or derogatory words towards children. Electronic communications should be carefully considered and kept to the school's selected programmes (e.g. email).

To each other as staff – staff should be polite and professional, supportive and co-operative to each other. We expect our staff to work as a team. This means we need staff to be able to share information and ideas, be ready to be thoughtful and reflective about the education we provide, and readily responsive to instruction from the senior staff. We expect staff to refrain from any actions which may undermine another staff member's confidence or professional abilities, including bullying one another. At all times, staff should remember that we are all working with the best interests of the children in mind. Staff should conduct themselves in public at all times as a professional, whether at a school social occasion outside school hours, or in school. At school social occasions, and at external school related functions, staff should be moderate in their behaviour, language and in their consumption of alcohol. They should act as if on duty at all times when in contact with school parents, pupils and staff. Whatever the occasion staff are expected to keep the academic and professional procedures and processes of the school confidential as required by the Headteacher at all times unless given clear and unequivocal permission to do otherwise.

To the Parents – Staff must be polite to parents at all times. We expect staff to be ready to listen and help our parents and treat them as very important partners in our work of educating our pupils and their children. Parents must be treated with courtesy and respect, and we should expect that back from them. Parents should be spoken to quietly about their children, and given the opportunity to speak in private, especially when anything of a sensitive nature is to be discussed. Parents should not be treated as personal friends. This courtesy should be extended back to staff by the parents and anything else should be discouraged by example. They should not be told any professional confidences about the school, its staff or children.

Any incident of inappropriate behaviour by a parent should be responded to with a quiet statement to the parent that you will refer the issue to the Headteacher for discussion. Staff should never engage in private or public heated discussion with parents, particularly if they are angry. In this case, remove yourself physically from the situation and state you will refer this to the Headteacher.

Dress and Appearance: Staff should always be dressed appropriately and smartly and in line with the staff dress code. Those who dress or appear in a manner which could be viewed as offensive or inappropriate will render themselves vulnerable to criticism or allegation. This means that staff 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;
- is absent of any political or otherwise contentious slogans;
- is not considered to be discriminatory;

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- is compliant with professional standards.

Confidentiality: The storing and processing of personal information is governed by the Data Protection Act 1998 and the school recognises its responsibilities with regards to the security of data kept regarding its pupils and staff. Members of staff may have access to confidential information about pupils in order to undertake their everyday responsibilities. In some circumstances staff may be given highly sensitive or private information. They should never use confidential or personal information about a pupil or her/his family for their own, or others' advantage (including that of partners, friends, relatives or other schools). Information must never be used to intimidate, humiliate, or embarrass the pupil. In circumstances where the pupil's identity does not need to be disclosed, the information should be used anonymously. If a member of staff is in any doubt about whether to share information or keep it confidential, he or she should seek guidance from the Designated Safeguarding Lead. Any media or legal enquiries should be passed to senior management. **This means that staff should:**

- be clear about when information can be shared and in what circumstances it is appropriate to do so;
- treat information they receive about pupils in a discreet and confidential manner;
- 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;
- know who any concerns or allegations should be reported.

Use of Electronic Devices Including Personal Mobile Phones and Cameras

The use of staff-owned electronic devices should not be used to take images of pupils at any time. Instead, only school cameras may be used for photographs under the direction of the Headteacher. These photographs must only be downloaded using the school's computers and not onto a personal, private computer. Personal mobile phones may be used in dedicated staff areas or in class and teaching rooms ONLY when the children are not present. Staff should not accept mobile phone calls during a lesson or when they are with children. The only exception to this is if the Headteacher calls a staff member. These calls will only be made in unusual or emergency situations. Phones brought to school should be left in an individual's own bag and should be turned off or on silent.

Inappropriate material: staff must ensure pupils are not exposed to inappropriate or indecent images. Inappropriate material, such as pornography, should not be brought to work and staff must not use school property or the school network to access such material. You should not allow unauthorised access to school equipment and should keep your computer passwords safe. If you discover material on either staff or pupil electronic equipment that is potentially illegal or inappropriate, you must immediately isolate the equipment and contact the Designated Safeguarding Lead in accordance with the school's Child Protection Policy. Adults should not attempt to investigate the matter or evaluate the material themselves, as this may lead to evidence being contaminated which in itself can lead to a criminal prosecution. Pupils must not be exposed to unsuitable material on the internet and staff should ensure that any film or material shown is age appropriate. There are no circumstances that will justify adults possessing indecent images of children. Adults who access and possess links to such websites will be viewed as a significant and potential threat to children. Accessing, making and storing indecent images of children is illegal. This will lead to criminal investigation and the individual being barred from working with pupils, if proven.

Staff should:

- abide by the school's acceptable use and e-safety policy;
- ensure that children cannot be exposed to indecent or inappropriate images;
- ensure that any films or material shown to children are age appropriate.

Communication with Pupils (including the Use of Technology)

Communication with pupils in both in the 'real' world and through web based and telecommunication interactions should take place within explicit 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.

Staff should not contact pupils or parents of pupils from their personal mobile phone or give their mobile phone number to pupils or parents of pupils. Instead, a school telephone should be used. Also, staff should avoid storing pupils' or parents of pupils' telephone numbers on their mobile phones, send to or accept from colleagues, pupils or parents of pupil's texts or images that could be viewed as inappropriate. The school staff should also be alert to the possible risks that might arise from social contact with pupils outside of Kingswood School.

Social Networking Sites: Staff must not have any images of school children or parents on their personal pages on social networking sites. Staff must not accept children as "friends" or "contacts" on these sites and must ensure the highest privacy controls are used at all times on their personal pages on such sites, checking regularly for updates. Staff should not make reference to the school on any personal electronic communications or social network including 'job status'. Staff should only engage in electronic communication via the school email network and not through other inappropriate methods such as networking sites, blogging, chat rooms and private email. Failure to do so is a disciplinary matter.

Staff should not request or respond to any personal information from children other than which may be necessary in their professional role. They should ensure that their communications are open and transparent and avoid any communication which could be interpreted as 'grooming behaviour'. Staff should not give their personal contact details to children for example, e-mail address, home or mobile telephone numbers, details of web-based identities. If children locate these by any other means and attempt to contact or correspond with the staff member, the adult should not respond and must report the matter to their manager. The child should be firmly and politely informed that this is not acceptable.

We advise all our staff to carefully restrict their Facebook profiles to ensure they cannot be contacted by parents and pupils. This could involve removing their last name from their page. We also advise staff not to accept friend requests from pupils until graduates have been out of school for three years. Inappropriate adult behaviour which must be avoided also includes:

- Talking about sex lives particularly in front of children which is not permitted;
- Being alone with children in a group setting for unusually long periods of time without good reason;
- Showing unusual interest in one specific child;
- Inappropriate use of mobile phones where phone calls or texts take attention away from supervising children;
- Staff should not use social networking pages at school on either school or personal devices.

Physical Contact with Pupils: There are occasions when it is entirely appropriate and proper for staff to have physical contact with pupils, but it is crucial that they only do so in ways appropriate to their professional role. A 'no touch' approach is impractical for most staff and will in some circumstances be inappropriate. When physical contact is made with pupils this should be in response to their needs at the time, of limited duration and appropriate to their age, stage of development, gender, ethnicity and background. Physical contact should never be secretive, or for the gratification of the adult, or represent a misuse of authority. If a member of staff believes that an action could be misinterpreted, the incident and circumstances should be recorded as soon as possible in the school's incident book and, if appropriate, a copy placed on the child's file.

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 child for the minimum time necessary. The general culture of 'limited touch' should be adapted, where appropriate, to the individual requirements of each pupil. Pupils with special needs may require more physical contact to assist their everyday learning. The arrangements should be understood and agreed by all concerned, justified in terms of the child's needs, consistently applied and open to scrutiny.

It is recognised that some pupils may seek inappropriate physical contact. It is the responsibility of the staff member to sensitively deter the pupil and help them understand the importance of personal boundaries. Such circumstances must always be reported and discussed with a senior manager and the parent/ carer.

Some staff working in certain settings, for example sports, drama or outdoor activities or teach specific subjects such as PE or music, will have to initiate some physical contact with pupils, for example to demonstrate technique in the use of a particular piece

of equipment, adjust posture, or perhaps to support a pupil so they can perform an activity safely or prevent injury. Such activities should be carried out in accordance with existing codes of conduct, regulations and best practice. Physical contact should take place only when it is necessary in relation to a particular activity. It should take place in a safe and open environment i.e., one easily observed by others and last for the minimum time necessary. This means that staff should:

- *treat children with dignity and respect and avoid contact with intimate parts of the body;*
- *always explain to a child the reason why contact is necessary and what form that contact will take;*
- *consider alternatives, where it is anticipated that a pupil might misinterpret any such contact;*
- *be familiar with and follow recommended guidance and protocols;*
- *conduct activities where they can be seen by others;*
- *be aware of gender, cultural or religious issues that may need to be considered prior to initiating physical contact.*
- *have up to date guidance and protocols on appropriate physical contact in place that promote safe practice and include clear expectations of behaviour and conduct;*
- *ensure that staff are made aware of this guidance and that safe practice is continually promoted through supervision and training.*

Intimate Care: Some job responsibilities with children may necessitate contact with children. For example assisting young children with toileting, or in the provision of medical care. The nature, circumstances and context of such contact should comply with professional codes of practice or guidance and/or be part of a formally agreed plan, which is regularly reviewed. Pupils should be encouraged to act as independently as possible and to undertake as much of their own personal care as is possible and practicable. When assistance is required, this should normally be undertaken by one member of staff, however, they should try to ensure that another appropriate adult is in the vicinity who is aware of the task to be undertaken and that, wherever possible, they are visible and/or audible. Intimate or personal care procedures should not involve more than one member of staff unless the pupil's care plan specifies the reason for this. Any vulnerability, including those that may arise from a physical or learning difficulty should be considered when formulating the individual pupil's care plan. The views of parents, carers and the pupil, regardless of their age and understanding, should be actively sought in formulating the plan and in the necessary regular reviews of these arrangements.

Pupils are entitled to respect and privacy at all times and especially when in a state of undress, including, for example, when changing, toileting and showering. However, there needs to be an appropriate level of supervision in order to safeguard pupils, satisfy health and safety considerations and ensure that bullying or teasing does not occur. This supervision should be appropriate to the needs and age of the young people concerned and sensitive to the potential for embarrassment. All children have a right to safety, privacy and dignity when contact of a physical or intimate nature is required.

Staff should:

- adhere to the school's intimate care guidelines or code of practice;
- make other staff aware of the task being undertaken;
- explain to the child what is happening before a care procedure begins;
- 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 announce their intention of entering;
- always consider the supervision needs of the pupils and only remain in the room where their needs require this.

Staff should not:

- change or toilet in the presence or sight of pupils;
- shower with pupils;
- assist with intimate or personal care tasks which the pupil is able to undertake independently.

This means that Kingswood School will:

- have written care plans in place for any pupil who could be expected to require intimate care;
- ensure that pupils are actively consulted about their own care plan.

Transporting Pupils: In certain situations, e.g., out of school activities, staff or volunteers may agree to transport pupils. Kingswood School has a designated member of staff to plan and provide oversight of all transporting arrangements and respond to any difficulties that may arise. Wherever possible and practicable it is advisable that transport is undertaken other than in private vehicles, with at least one member of staff additional to the driver acting as an escort. Where adults transport children in a vehicle which requires a specialist license/insurance e.g., PCV or LGV, staff should ensure that they have an appropriate licence and insurance to drive such a vehicle. 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. 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 for younger children. It is inappropriate for adults to offer lifts to a child or young person outside their normal working duties, unless this has been brought to the attention of the line manager and has been agreed with the parents/carers. There may be occasions where the child or young person requires transport in an emergency situation or where not to give a lift may place a child at risk. Such circumstances must always be recorded and reported to a senior manager and parents/carers.

This means that our 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;*
- *be aware that the safety and welfare of the child is their responsibility until they are safely passed over to a parent/carer;*
- *record details of the journey in accordance with agreed procedures;*
- *ensure that their behaviour is appropriate at all times;*
- *ensure that there are proper arrangements in place to ensure vehicle, passenger and driver safety. This includes having proper and appropriate insurance for the type of vehicle being driven;*
- *ensure that any impromptu or emergency arrangements of lifts are recorded and can be justified if questioned.*

First Aid and Administration of Medication: Health and safety legislation places duties on all employers to ensure appropriate health and safety policies and equipment are in place and an appropriate person is appointed to take charge of first-aid arrangements. Any employee may volunteer to undertake this task, but it is not a contractual requirement and appropriate training should be given before an individual takes on a role which may require administering first aid or medication.

This means that Kingswood School should:

- *ensure staff understand the extent and limitations of their role in applying basic care and hygiene tasks for minor abrasions and understand where an injury requires more experienced intervention;*
- *ensure there are trained and named individuals to undertake first aid responsibilities;*
- *ensure training is regularly monitored and updated;*
- *always ensure that arrangements are in place to obtain parental consent for the administration of first aid or medication.*

In circumstances where children need medication regularly, a health care plan should be drawn up to ensure the safety and protection of pupils and staff. With the permission of parents, pupils should be encouraged to self-administer medication or treatment. 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. Parents should always be informed when first aid has been administered. Staff must:

- *adhere to the school's policy for administering first aid or medication;*
- *comply with the necessary reporting requirements;*
- *make other adults aware of the task being undertaken;*
- *explain to the child what is happening;*

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- *always act and be seen to act in the child's best interests;*
- *ensure that where staff are taking any medication, that they are fit to work with children if required;*
- *report and record any administration of first aid or medication;*
- *have regard to any health plan which is in place;*
- *always ensure that an appropriate health/risk assessment is undertaken prior to undertaking certain activities.*

Home Visits: When this instance occurs, the purpose of any visit must be discussed with a member of the senior leadership team and wherever possible, two members of school staff should visit. Ensure that the home visit is planned and discussed with the parent of the pupil so as to not arrive unannounced. Staff should inform another member of staff and keep a clear record of the time, location and expected duration of their visit, ensuring they are clear themselves on the location and, where deemed appropriate, inform a member of staff when the home visit is finished. Staff must ensure they have a mobile phone with them when making a home visit, so that they may contact a member of staff as required. Where any behaviour or situation gives rise to a concern, staff must ensure it is reported to the Headteacher. If no adult is at home when staff arrive, do not enter the house. Instead consider whether there is a safeguarding concern and take appropriate action. Staff should, wherever possible, meet with parents at the school.

Curriculum content: Many areas of the curriculum can include or raise subject matter which is sexually explicit or of a political or sensitive nature. Responding to children's questions requires careful judgement and staff should take guidance in these circumstances from the Designated Safeguarding Lead. Care should be taken to ensure that resource materials cannot be misinterpreted and clearly relate to the learning outcomes identified by the lesson plan. This can be supported by developing ground rules with pupils to ensure sensitive topics can be discussed in a safe learning environment. This plan should highlight particular areas of risk and sensitivity and care should especially be taken in those areas of the curriculum where usual boundaries or rules are less rigorously applied e.g., drama. Care should also be taken to comply with the school's policy on spiritual, moral, social, cultural (SMSC), which promotes fundamental British values and be rigorously reviewed to ensure it is lawful and consistently applied. Staff should also comply at all times with the policy for Relations and Sex Education (RSE).

Staff should:

- take care when encouraging pupils to use self-expression, not to overstep personal/professional boundaries;
- have clear written lesson plans;
- be able to justify all curriculum materials and relate these to clearly identifiable lessons plan.

Staff should not:

- enter into or encourage inappropriate discussions which may offend or harm others;
- undermine fundamental British values or express any prejudicial views;
- attempt to influence or impose their personal values, attitudes or beliefs on pupils.

Political Influence: All adults who work with children and young people must be alert to the position they are in to influence young people politically. However, they have an important and necessary responsibility to assist them to become politically aware and respect a set of attitudes which can be referred to as British values. Moreover, all adults who work with young people must consciously refrain from aiming to influence them in any particular political or religious ideology or mind set. This means that staff should:

- *avoid aiming to influence young people in any one political viewpoint;*
- *recognise, support and encourage young people to be aware of and respect British Values (see our curriculum planning document).*

The Prevent Initiative: (Please refer to both our Child Protection Policy and our Prevent Duty Policy). All adults who work with children and young people must be familiar with the Prevent Initiative and with the terms intolerance, extremism, fundamentalism and radicalisation. All adults who work with children and young people must be alert to them displaying racial or religious intolerance, homophobia and misogyny, particularly when linked to expressions of religious belief. Staff must:

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- *be aware of the governments Prevent Initiative;*
- *discuss with the Headteacher if they are concerned in any way about an individual pupil showing signs of political or religious radicalisation or of being influenced by others in this way and*
- *discuss with the Headteacher if they are concerned in any way about an individual pupil showing signs of religious or racial intolerance, misogyny or homophobic views.*

Legal Status:

- This policy complies with Regulation 3 paragraphs 7(a) and (b) and 8 (a) and (b) of The Education (Independent School Standards) (England) (Amendment) Regulations currently in force and other relevant and current regulations and any other guidance concerning safeguarding children to which schools are obliged to have regard.
- *Keeping children safe in education (KCSIE) (September 2022);* which refers to the non-statutory advice for practitioners: What to do if you're worried a child is being abused;
- *Disqualification under the Childcare Act 2006* (June 2018);
- *Working together to safeguard children* (July 2018) (WTWT refers to the non-statutory advice: *Information sharing* (July 2018);
- *Prevent Duty Guidance: for England and Wales* (2015) (**Prevent**). Prevent is supplemented by: *The Prevent duty: Departmental advice for schools and childminders* (June 2015); *Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism* (2015); *The use of social media for online radicalisation* (July 2015);
- Guidance on female genital mutilation, to include: *multi-agency statutory guidance on female genital mutilation* (October 2018);
- Home Office statutory guidance *Mandatory Reporting of Female Genital Mutilation: procedural information* (October 2015);
- Guidance published by the Department for Health which provides useful information and support for health professionals which will be taken into account by the school's medical staff.

Appendix 1 – Low Level Concerns Policy

1. Statement of intent: Kingswood understands the importance of acknowledging, recording and reporting **all** safeguarding concerns, regardless of their perceived severity. We understand that, while a concern may be low-level, that concern can escalate over time to become much more serious.

Our school prides itself on creating a safe and prosperous environment for pupils, and our staff are expected to adhere to high standards of behaviour when it comes to professional conduct regarding pupils. The school has clear professional boundaries which all staff are made aware of and will adhere to. We are committed to ensuring that any safeguarding concerns are dealt with as soon as they arise and before they have had a chance to become more severe, to minimise the risk of harm posed to our pupils and other children. **As part of our whole school approach to safeguarding, we ensure that we promote an open and transparent culture in which all concerns (including allegations that do not meet the harms threshold) about all adults working in or on behalf of the school (including supply teachers, volunteers and contractors) are shared responsibly and confidentially with the right person. Concerns are recorded and dealt with appropriately, to enable the school to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the school are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the school. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools and colleges from potential false allegations or misunderstandings.**

2. Definitions: For the purposes of this policy, a low-level concern is defined as any concern had about an adult's behaviour towards, or concerning, a child that does not meet the harms threshold (see below), or is otherwise not serious enough to consider a referral at the time of its reporting. Low-level concerns refer to behaviour on the part of a staff member towards pupils that is considered inappropriate in line with statutory safeguarding advice, the Staff Code of Conduct, and the '[Appropriate and inappropriate behaviour](#)' subsection of this policy.

Low-level concerns are differentiated from concerns that can cause harm. The harms threshold is the point at which a concern is no longer low-level and constitutes a threat of harm to a child. This threshold is defined as accusations that an adult has:

- behaved in a way that has harmed a child or may have harmed a child;
- possibly committed a criminal offence against, or related to, a child;
- behaved towards a child in a way that indicates they may pose a risk of harm to children;
- behaved in a way that indicates they may not be suitable to work with children, including behaviour that has happened outside of school.

While low-level concerns are, by their nature, less serious than concerns which meet the harms threshold, the school understands that many serious safeguarding concerns often begin with low-level concerns, e.g. being overly friendly with children. The school will ensure that all staff are aware of the importance of recognising concerns before they have an opportunity to escalate from low-level to serious.

3. Roles and responsibilities: The Advisory Board is responsible for:

- ensuring that the school complies with its duties under child protection and safeguarding legislation;
- ensuring that policies, procedures, and training opportunities with regard to reporting safeguarding concerns are compliant and effective;
- guaranteeing that there is an effective Staff code of Conduct that outlines behavioural expectations;
- ensuring that a suitably trained DSL has been appointed, alongside deputy DSLs where appropriate;
- ensuring that there are robust reporting arrangements, including inter-agency collaboration;
- ensuring that there are appropriate procedures in place to handle allegations and low-level concerns reported against members of staff.

The Headteacher is responsible for:

- being a point of contact for all staff when they have safeguarding concerns, whether serious or low-level;

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- assessing whether safeguarding concerns about staff members meet the threshold for being termed an allegation, or whether they are low-level concerns;
- implementing this policy, and all related policies, throughout the school, and ensuring that staff adhere to it at all times;
- safeguarding pupils' wellbeing and maintaining public trust in the teaching profession;
- ensuring that all staff have undertaken safeguarding training;
- ensuring that all staff have an ongoing awareness of low-level concerns and reporting procedures.

The DSL is responsible for:

- being a point of contact for all staff when they have safeguarding concerns, whether serious or low-level;
- assessing whether safeguarding concerns about staff members meet the threshold for being termed an allegation, or whether they are low-level concerns;
- following all procedures outlined in this policy for acting upon low-level concerns;
- liaising with the Headteacher, staff members, the Advisory Board and all relevant agencies to act upon concerns, where necessary;
- keeping detailed, accurate and secure records of all low-level concerns and any actions taken.

Staff are responsible for:

- adhering to all the relevant policies and procedures, including acting within the Staff Code of Conduct at all times;
- interacting with pupils in a way that is respectful and appropriate for their level of authority and has due regard to the power imbalance between pupils and staff members;
- understanding the importance of reporting low-level safeguarding concerns;
- reporting any and all safeguarding concerns they may have about pupils immediately;
- reporting any and all safeguarding concerns they may have about the behaviour of a member of staff immediately.

4. Prevention amongst staff: Appropriate and inappropriate behaviour: The school will ensure that all staff members are aware of the standards of appropriate behaviour expected towards pupils. Staff will ensure that they pay due regard to the fact that:

- they are in a unique position of trust, care, responsibility, authority, and influence in relation to pupils;
- there is a significant power imbalance in the pupil-staff dynamic;
- there are more stringent expectations on their behaviour with regard to pupils due to their position as a public professional.

Staff will remain aware of the fact that all pupils under the age of 18, regardless of the phase and year group they are at within the school, are children by law – resultantly, staff will ensure that they do not assume maturity on behalf of a pupil and do not engage with pupils as they would with their own peers. Staff will be aware that where there is any doubt regarding whether the behaviour of another adult is appropriate, this should be reported to the DSL, Headteacher or other nominated person immediately.

Inappropriate behaviour can exist on a wide spectrum, from inadvertent or thoughtless behaviour to behaviour which is ultimately intended to enable abuse. Examples of inappropriate behaviour that would constitute a low-level concern that should be reported to the DSL include, but are not limited to:

- being overly friendly with children – this could include, but is not limited to, communicating with a child through personal social media or allowing inappropriate conversations or enquiries to occur with pupils, e.g. conversations that are about a staff member's personal life or are of a sexual nature;
- having favourites – this could include, but is not limited to, calling pupils by pet names or terms of endearment or buying pupils gifts;
- taking photographs of children on their personal mobile phones or devices;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door;
- humiliating pupils.

Staff will be aware that some of the above low-level concerns may meet the harms threshold depending on certain factors, e.g. the age or needs of the child or the content of exchanged messages, and that some of the above incidents may not be concerns in context, e.g. a pre-approved, one-to-one meeting with a child behind a closed door between the child and a school counsellor who has received all appropriate safety checks.

Staff will also be made aware that behaviour which raises concerns may not be intentionally inappropriate, and that this does not negate the need to report the behaviour. Staff members who engage in low-level inappropriate behaviour in relation to pupils inadvertently will be made aware and supported to correct this behaviour in line with the Staff Code of Conduct. The Headteacher will also evaluate whether additional training would be beneficial for any staff members exhibiting concerning behaviour, or the staff cohort as a whole where low-level concerning behaviour is seen more widely.

School culture: The school understands that spotting the early signs of harmful behaviour towards children can be difficult, and that many will be hesitant to report concerns they have about their colleagues' behaviour, particularly the behaviour of their superiors. Staff are encouraged to maintain an attitude that recognises that abuse can happen anywhere, in any setting, and that anyone can be a perpetrator regardless of their age, sex, level of authority, personality, etc.

The school will ensure that all staff members have received training as part of their induction that outlines appropriate behaviour towards pupils for staff members. All staff will read, understand, and adhere to the Appropriate and inappropriate behaviour subsection of this policy, as well as Staff Behaviour Policy (Staff Code of Conduct) and Inappropriate Relationships with Pupils Policy within the Staff Behaviour Policy (Staff Code of Conduct). Staff will address any questions they have regarding safeguarding to the DSL. The school will work to foster an environment where personal and professional boundaries are clearly set and respected for all individuals in the school community, e.g. pupils are not treated as friends and an appropriate professional distance is maintained by staff.

The school will ensure that all staff are sufficiently trained surrounding the reporting of safeguarding concerns as part of their induction, and that refresher training is conducted as necessary. The school will ensure that all staff understand how to recognise and report safeguarding concerns. Staff will be trained to identify inappropriate, concerning, or problematic behaviour towards pupils that may indicate a safeguarding concern, and how to identify signs of abuse or harm in pupils.

Evaluating school culture following concerns: The school will ensure that appropriate consideration is given to the school's culture and whether or not it has enabled the inappropriate behaviour to occur. The Headteacher will review whether any changes need to be made to relevant policies or training programmes in light of any evaluations of the school's culture, in order to achieve an open and transparent culture that deals with all concerns promptly and appropriately.

5. Reporting concerns: The school will promote a culture in which safeguarding pupils is the uppermost priority, beyond any perceived professional loyalties to colleagues, ensuring that staff are actively encouraged to report concerns, regardless of their relationship with the staff member.

Staff will report all safeguarding concerns they have to the Headteacher, DSL, or other nominated person (such as a safeguarding champion) immediately in line with the procedures laid out in Safeguarding (Child Protection) Policy. Staff members will report concerns without undue delay. Where the report concerns a specific incident, staff members will report their concerns no later than 24 hours after the incident where possible. Staff members will be aware that concerns are still worth reporting even if they do not seem serious.

Staff members will report their concerns to the Headteacher or deputy Headteacher verbally, or by submitting a [Low-level Concern Reporting Form](#). When submitting concerns, staff will take care to ensure that they observe the Confidentiality Policy and Allegations of Abuse against Staff as stated in Safeguarding (Child Protection) Policy (currently in force) cited in Keeping Children Safe in Education (KCSIE) (also currently in force), and protect the identity of all individuals to which the concern pertains as far as possible.

Staff members may request anonymity when reporting a concern, and the school will endeavour to respect this as far as possible. The school will not, however, promise anonymity to staff members who report concerns in case the situation arises where they must be named, e.g. where it is necessary for a fair disciplinary hearing. In line with [the Whistleblowing Policy](#), staff will be protected from potential repercussions caused by reporting a genuine concern.

- Where a low-level concern relates to the Headteacher, it should be reported to the chair of the Advisory Board.
- Where a low-level concern relates to a person employed by a supply agency or a contractor to work in the school, staff will also be required to report this to the Headteacher, who will, in turn, inform the employer of the subject of the concern.

All concerns reported to the Headteacher will be documented in line with the Records Management Policy. If the school was in any doubt as to whether the information which has been shared about a member of staff in fact meets the harm threshold, the school will consult with the LADO.

6. Self-reporting: On occasion, a member of staff may feel as though they have acted in a way that:

- could be misinterpreted;
- could appear compromising to others.

They realise, upon reflection, falls below the standards set out in within the Staff Behaviour Policy (Staff Code of Conduct) or violates the Inappropriate Relationships with Pupils Policy within the Staff Behaviour Policy (Staff Code of Conduct).

The school will ensure that an environment is maintained that encourages staff members to self-report if they feel as though they have acted inappropriately or in a way that could be construed as inappropriate upon reflection. The Headteacher and DSL will, to the best of their abilities, maintain a culture of approachability for staff members, and will be understanding and sensitive towards those who self-report. Staff members who self-report will not be treated more favourably during any resulting investigations than staff members who were reported by someone else; however, their self-awareness and intentions will be taken into consideration.

7. Evaluating concerns: Where the Headteacher is notified of a safeguarding concern, they will use their professional judgement to determine if the concern is low-level or if it must be immediately escalated, e.g. where a child is at immediate risk of harm. When deciding if a concern is low-level, the Headteacher will discuss the concern with the DSL and the deputy Headteacher and will seek advice from the LADO where there is any doubt about whether the concern in fact meets the harm threshold. When seeking external advice, the Headteacher will ensure they adhere to the General Data Protection Regulations (GDPR) Data Protection Policy, and the information sharing principles outlined in the Safeguarding (Child Protection) Policy at all times. To evaluate a concern, the Headteacher and DSL will:

- speak to the individual who raised the concern to determine the facts and obtain any relevant additional information;
- review the information and determine whether the behaviour displayed by the individual about whom the concern was reported is consistent with the Staff Behaviour Policy (Staff Code of Conduct) and the law;
- determine whether the concern, when considered alongside any other low-level concerns previously made about the same individual, should be reclassified as an allegation and dealt with alongside the Confidentiality Policy and Allegations of Abuse against Staff as stated in Safeguarding (Child Protection) Policy (currently in force) cited in Keeping Children Safe in Education (KCSIE) (also currently in force);
- consult with, and seek advice from, external agencies when in doubt over the course of action to follow;
- speak to the individual about whom the concern has been raised to inform them of the concern and to give them an opportunity to respond to it.

Ensure that accurate and detailed records are kept of all internal and external conversations regarding evaluating the concern, and any actions or decisions taken.

8. Acting on concerns: Where the concern is unfounded: If it is discovered upon evaluation that the low-level concern refers to behaviour that was not considered to be in breach of the Staff Behaviour Policy (Staff Code of Conduct), the Inappropriate Behaviour with Pupils Policy within the Staff Behaviour Policy (Staff Code of Conduct) and the law, the Headteacher will speak to the individual about whom the concern was made to discuss their behaviour, why and how the behaviour may have been misconstrued, and what they can do to avoid such misunderstandings in the future. The Headteacher will also speak to the individual who shared the concern, outlining why the behaviour reported is consistent with school standards and the law. The Headteacher will take care to ensure that conversations with individuals who reported concerns that transpired to be unfounded do not deter that individual from reporting concerns in the future.

The Headteacher will discuss the concern with the DSL (and if they have been involved, the LADO) to discern whether the behaviour, and the reporting of this behaviour, is indicative of ambiguity in the school's policies or procedures, or the training it offers to staff. Where such ambiguity is found, the DSL and Headteacher will work together to resolve this with input from other staff members, as necessary.

Where the concern is low-level: Where the Headteacher determines that a concern is low-level, the school will respond to this in a sensitive and proportionate manner. The following procedure will be followed:

- The DSL holds a meeting with the individual about whom the concern was reported, during which they will:
 - talk to the individual in a non-accusatory and sympathetic manner;
 - inform them of how their behaviour was perceived by the individual who reported the concern (without naming them, where possible);
 - clearly state what about their behaviour was inappropriate and problematic;
 - discuss the reasons for the behaviour with the individual;
 - inform the individual clearly what about their behaviour needs to change;
 - discuss any support that the individual may require in order to achieve the proper standards of behaviour;
 - allow the individual the opportunity to respond to the concern in their own words.
- The DSL asks the individual to re-read the Staff Behaviour Policy (Staff Code of Conduct) and/or the Inappropriate Relationships with Pupils Policy within the Staff Behaviour Policy (Staff Code of Conduct) , depending on the nature of the concern;
- The DSL and the Headteacher will consider whether the individual should receive guidance, supervision or any further training;
- Where considered appropriate in the circumstances, the Headteacher will develop an action plan, with input from the individual, that outlines ongoing and transparent monitoring of the individual's behaviour and any other support measures implemented to ensure the staff member's behaviour improves;
- Where it is necessary to undergo an investigation into the behaviour, this will be done discreetly, and information will only be disclosed to individuals on a need-to-know basis;
- Where any pupil or other individual has been made to feel uncomfortable by the individual's behaviour, they will be offered pastoral support, where appropriate.

The Headteacher will ensure that all details of the low-level concern, including any resultant actions taken, are recorded and securely stored in line with **the Records Management Policy** and the General Data Protection Regulations (GDPR) Data Protection Policy. The Headteacher will ensure that these records are kept organised and up-to-date, and that it is easy to refer back to them if any other concerns are reported about the same individual.

The specific approach to handling low-level concerns will be adapted on a case-by-case basis. It is unlikely that a low-level concern will result in disciplinary procedures; however, individuals may be given warnings in line with the Staff Disciplinary Policy and Procedure where behaviour does not improve once it is brought to their attention. Where behaviour does not improve over a longer period of time, the concerns will be escalated and dealt with in line with the Confidentiality Policy and Allegations of Abuse against Staff as stated in Safeguarding (Child Protection) Policy (currently in force) cited in Keeping Children Safe in Education (KCSIE) (also currently in force)

Where the concern is serious: The Headteacher may decide upon evaluation that a concern is more serious than the reporter originally thought, e.g. when viewed in conjunction with other evidence or other concerns made about the same individual. Where this decision is made, the concern will be escalated, and dealt with as an allegation. The Headteacher will then follow the procedures laid out in the Confidentiality Policy and Allegations of Abuse against Staff as stated in Safeguarding (Child Protection) Policy (currently in force) cited in Keeping Children Safe in Education (KCSIE) (also currently in force)

9. Record keeping: The school will retain all records of low-level concerns, including those that were found to be unfounded. The Headteacher will ensure that all records include the most accurate and up-to-date information and will store them in the electronic low-level concerns file. The Headteacher will ensure that all low-level concerns are stored together, in an organised and consistent manner, to ensure they can be easily reviewed and analysed where necessary.

Records will include:

- a clear and comprehensive summary of the concern;
- the context in which the concern arose;
- details of how the concern was followed up and resolved;
- a note of any action taken, decisions reached, and the outcome;
- the name of the individual sharing concerns – if the individual wishes to remain anonymous, this will be respected as far as reasonably possible.

The DSL will periodically review the recent low-level concerns made to ensure that they are being appropriately dealt with and to check for any concerning behaviour patterns amongst the staff cohort as a whole. The DSL will keep records of these reviews. Where any concerning patterns of behaviour have been identified with regard to a member of staff, the DSL will consult with the Headteacher to decide on a course of action. Where a pattern of behaviour has become so concerning that it meets the harms threshold, this will be referred to the LADO as soon as practicable. It should be considered whether there are any wider cultural issues within the school that enabled the behaviour to occur and where appropriate policies, including this one, could be revised, or extra training provided to staff to decrease the risk of it happening again.

Records of low-level concerns will not be kept in the personnel file of the individuals to whom the concerns pertain, unless there have been multiple low-level concerns made about the same individual. Where a concern is thought to be serious and is processed as an allegation, records of this will be kept in staff personnel files. Where multiple low-level concerns have been made about the same individual, these will be kept together, and in chronological order.

Where an allegation is made about an individual who has previously been subject to such allegations, or where a low-level concern is reclassified as a serious concern after meeting the harms threshold, all records of low-level concerns about that individual will be moved to the staff personnel file and kept alongside records of the allegation.

[There is no statutory timeframe for the retention and secure disposal of low-level concern records. Please amend the following point in line with your setting's retention schedules]. The DSL will ensure that these records will be kept confidential, held securely and will comply with the Data Protection Act 2018 and the UK General Data Protection Regulations (UK GDPR) via the CPOMS secure servers. Records will be confidential, kept password-protected, and securely destroyed after the staff member to whom the concerns pertain has left the school.

The school will only refer to concerns about a staff member in employment references where they have amounted to a substantiated safeguarding allegation, i.e. it has met the harms threshold and has been found to have basis through investigation, or where it is not exclusively a safeguarding issue and forms part of an issue that would normally be included in a reference, e.g. misconduct or poor performance. Low-level safeguarding concerns will not be included in a reference, unless they have comprised a pattern of behaviour that has met the harms threshold.

Appendix A - Low-level Concern Reporting Form:

Thank you for reporting your concerns to the safeguarding team; we are grateful to you for taking the safety and welfare of our pupils seriously. Please fill in the below form, including as much detail as you can, and return it directly to the Headteacher or DSL. Please refrain from discussing this concern with anyone other than the Headteacher or DSL until the matter has been dealt with. We ask that you keep all details, including the name staff member to whom the concern pertains, confidential.

Your details	
Name (optional)	
Role	
Date and time of completing this form	
Details of individual whom the concern is about	
Name	

Role		
Relationship to the individual reporting the concern, e.g. manager, colleague		
Details of concern		
<p>Please include as much detail as possible. Think about the following: What behaviour and/or incident are you reporting? What exactly happened? Why does the behaviour and/or incident worry you? Why do you believe the behaviour and/or incident is not consistent with our Staff Code of Conduct?</p>		
Details of any children or young people involved		
Name(s)		
Do you believe there is a risk of harm to the above children or young people, either now or in the future, as a result of the individual's behaviour? Explain your answer.		
Next steps		
What would you like to see happen in response to your concern?		
Are you willing to meet with the Headteacher and DSL to discuss your concern? Please circle as appropriate.	Yes	No
Please state any other information that you believe is relevant to the processing of this concern.		
Signature		
For use by safeguarding team upon receipt of concern		
Date and time concern received		
Signature of DSL or deputy DSL		
Actions to be taken (e.g. no action, investigation, reclassification as allegation meeting the harms threshold.)		

Appendix 2 – Social contact with parents and pupils outside of the workplace

It is acknowledged that staff may have genuine friendships and social contact with parents of pupils, independent of the professional relationship. Staff should, however remember that their discussions with friends parents or non-parents of the school

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must ensure confidentiality and not discuss matters relating to the school or pupils. Staff must not post anything onto social networking sites such as Facebook that could be construed to have any impact on the organisation's reputation. (We advise all our staff to carefully restrict their Facebook profiles to ensure they cannot be contacted by parents and pupils; this could involve removing their last name from their page). We explain to staff that although they are able to accept friendship requests from friends who may also be parents of pupils at the school, staff must be aware of the potential issues this could cause. Staff must not post anything onto social networking sites that would offend any other member of staff or parent using the setting. If any of the above points are found to be happening, then the member of staff involved will face disciplinary action, which could result in dismissal. We also advise staff not to accept friend requests from pupils until graduates have been out of school for three years.

Staff should also be aware that professionals who sexually harm children often seek to establish relationships and contact outside of the workplace with both the child and their parents, in order to 'groom' the adult and the child and/or create opportunities for sexual abuse. It is also important to recognise that social contact may provide opportunities for other types of grooming such as for the purpose of sexual exploitation or radicalisation. Staff should recognise that some types of social contact with pupils or their families could be perceived as harmful or exerting inappropriate influence on children and may bring the setting into disrepute (e.g., attending a political protest, circulating propaganda).

If a pupil or parent seeks to establish social contact, or if this occurs coincidentally, the member of staff should exercise her/his professional judgement. This also applies to social contacts made through outside interests or the staff member's own family. Some staff may, as part of their professional role, be required to support a parent or carer. If that person comes to depend upon the staff member or seeks support outside of their professional role this should be discussed with senior management and where necessary referrals made to the appropriate support agency.

Staff should:

- always approve any planned social contact with pupils or parents with senior colleagues, for example when it is part of a reward scheme;
- advise senior management of any regular social contact they have with a pupil which could give rise to concern;
- refrain from sending personal communication to pupils or parents unless agreed with senior managers;
- inform senior management of any relationship with a parent where this extends beyond the usual parent/professional relationship;
- inform senior management of any requests or arrangements where parents wish to use their services outside of the workplace e.g., tutoring.

Appendix 3 – Teachers Standards

Code of Conduct: To the pupils– be clear in our instructions, information, grammar, politeness and being authoritative within the school rules and the school behaviour and discipline policies. We have a duty to be supportive of the children and promote their welfare. We must offer support to vulnerable children while at all times maintaining an appropriate professional relationship and distance from them. At all times staff must be aware of and act within the professional boundaries that are normal for teachers and staff working in schools in the UK and which are detailed within this document. Specifically, staff should at all times recognise that self-restraint and checking with the Headteacher should be the norm if you are uncertain how to act. We must listen to children's concerns and worries especially when they are upset and hurt. Staff must all be aware of the school's Child Protection Policy and act in accordance with it, especially if a child discloses something of relevance in this regard.

The following Teachers Standards outline the minimum standards expected of teachers at Kingswood School and as such, form part of our Code of Conduct, which all teaching staff must meet.

Set high expectations which inspire, motivate and challenge pupils:

- establish a safe and stimulating environment for pupils, rooted in mutual respect;
 - set goals that stretch and challenge pupils of all backgrounds, abilities and dispositions;
- Kingswood School is committed to safeguarding and promoting the welfare of our pupils and expects all staff and volunteers to share this commitment. It is our aim that all pupils fulfil their potential.*

- demonstrate consistently the positive attitudes, values and behaviour which are expected of pupils.

Promote good progress and outcomes by pupils:

- be accountable for pupils' attainment, progress and outcomes;
- be aware of pupils' capabilities and their prior knowledge, and plan teaching to build on these;
- guide pupils to reflect on the progress they have made and their emerging needs;
- demonstrate knowledge and understanding of how pupils learn and how this impacts on teaching;
- encourage pupils to take a responsible and conscientious attitude to their own work and study.

Demonstrate good subject and curriculum knowledge:

- have a secure knowledge of the relevant subject(s) and curriculum areas, foster and maintain pupils' interest in the subject, and address misunderstandings;
- demonstrate a critical understanding of developments in the subject and curriculum areas, and promote the value of scholarship;
- demonstrate an understanding of and take responsibility for promoting high standards of literacy, articulacy and the correct use of standard English, whatever the teacher's specialist subject;
- if teaching early reading, demonstrate a clear understanding of systematic synthetic phonics;
- if teaching early mathematics, demonstrate a clear understanding of appropriate teaching strategies.

Plan and teach well-structured lessons:

- impart knowledge and develop understanding through effective use of lesson time;
- promote a love of learning and children's intellectual curiosity;
- set homework and plan other out-of-class activities to consolidate and extend the knowledge and understanding pupils have acquired;
- reflect systematically on the effectiveness of lessons and approaches to teaching;
- contribute to the design and provision of an engaging curriculum within the relevant subject area(s).

Adapt the teaching to respond to the strengths and needs of all pupils:

- know when and how to differentiate appropriately, using approaches which enable pupils to be taught effectively;
- have a secure understanding of how a range of factors can inhibit pupils' ability to learn, and how best to overcome these;
- demonstrate an awareness of the physical, social and intellectual development of children, and know how to adapt teaching to support pupils' education at different stages of development;
- have a clear understanding of the needs of all pupils, including: those with special educational needs and disabilities; those of high ability; those with English as an additional language; those with disabilities; and be able to use and evaluate distinctive teaching approaches to engage and support them.

Make accurate and productive use of assessment:

- knowing and understanding how to assess the relevant subject, therapy and curriculum areas, including statutory assessment requirements;
- making use of formative and summative assessment to secure pupils' progress;
- using relevant data to monitor progress, set targets, and plan subsequent lessons;
- giving pupils regular feedback, both orally and through accurate marking, and encourage pupils to respond to the feedback.

Manage behaviour effectively to ensure a good and safe learning environment:

- having clear rules and routines for behaviour in classrooms, and take responsibility for promoting good and courteous behaviour both in classrooms and around the school, in accordance with the school's behaviour policy; praise, sanction and reward consistently and fairly;
- managing classes effectively, using approaches which are appropriate to pupils' needs in order to involve and motivate them;
- maintaining good relationships with pupils, exercise appropriate authority, and act decisively when necessary.

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Fulfil wider professional responsibilities

- make a positive contribution to the wider life and ethos of the school;
- develop effective professional relationships with colleagues, knowing how and when to draw on advice and specialist support;
- deploy support staff effectively;
- take responsibility for improving teaching through appropriate professional development, responding to advice and feedback from colleagues;
- communicate effectively with parents regarding pupils' achievements and well-being.

Personal and Professional Conduct including Standards of Behaviour for all teaching and support staff

At Kingswood School it is incumbent on all staff including volunteers to comply with the following Professional Code of Conduct inclusive of implementing the anti-bullying, supervision of children and behavioural policies inclusive of their associated documents. All staff are required to demonstrate consistently high standards of personal and professional conduct. The following statements define the behaviour and attitudes which set the required standard for conduct throughout their time at Kingswood School. We have a duty to uphold public trust in us as professionals and maintain high standards of ethics and behaviour, within and outside school, by:

- treating pupils with dignity, building relationships rooted in mutual respect, and at all times observing proper boundaries appropriate to a teacher's professional position;
- having regard for the need to safeguard pupils' well-being, in accordance with statutory provisions showing tolerance of and respect for the rights of others;
- not undermining fundamental British values, including democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs;
- ensuring that personal beliefs are not expressed in ways which exploit pupils' vulnerability or might lead them to break the law.

There may be times where an individual's actions in their personal life come under scrutiny from the community, the media or public authorities, including with regard to their own children, or children or adults in the community. Staff should be aware that their behaviour, either in or out of the workplace, could compromise their position within the school in relation to the protection of children, loss of trust and confidence, or bringing the employer into disrepute. Such behaviour may also result in, prohibition from teaching by the TRA, a bar from engaging in regulated activity, or action by another relevant regulatory body.

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 or humiliate, or might be interpreted as such.

This means that staff should:

- be aware that behaviour by themselves, those with whom they share a household, or others in their personal lives, may impact on their work with children.