LONDON PARK SCHOOLS
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LONDON PARK SCHOOLS
STAFF CODE OF CONDUCT

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Approved by:	Governing Body
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This is a whole school policy.

Purpose and application

1 *Purpose:* Relationships with fellow staff, employees, governors, contractors, visitors, students and their parents or guardians should be reasonable and mutually respectful at all times. This Code has been formulated in order to maintain this balance. This Code takes into account the UK DCSF (as it then was) Guidance - *Guidance for safer working practice for adults who work with children and young people in education settings,* Working Together to Safeguard Children (March 2018), *Keeping children safe in education* (September 2023), Prevent Duty Guidance for England and Wales (2023) and the School's Safeguarding and Child Protection Policy. The policy is based on the principles of UK best practice.

This policy should be read in conjunction with the following policies:

- Safeguarding and Child Protection Policy
- E-Safety and IT Acceptable Use Policy

The purpose of the Code is to:

- confirm and reinforce the professional responsibilities of staff;
- clarify the School's position in relation to sensitive aspects of staff/student relationships and communication including the use of social media;
- set out the expectations of standards to be maintained within the School; and
- help adults establish safe practices and reduce the risk of false accusations or improper conduct.

2 *Your duty:* It is the contractual duty of every member of staff to observe the rules and obligations in this Code. You should also follow the guidance unless there is a good reason not to follow it in a particular case. The School also has a duty of care to its staff, parents, guardians or carers and students and the implementation of the practices in this Code will help to discharge that duty.

3 *Duty of Disclosure:* You are required immediately to notify the School if you are charged or convicted of any criminal offence, if you receive a police caution, reprimand or warning, or if there is a formal child protection investigation of you or any member of your household.

Application: Allegations of unprofessional conduct or improper contact or words can arise at any time. Professionalism and vigilance are required to ensure the safety of children in our care, and to reduce the risk of an allegation of impropriety against a member of staff. This guidance applies to all adults working in this School, and not just teachers. Forming inappropriate relationships with children or young people who are students or students at another school may also 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 students. This Code applies to all staff working in the School, whether paid or unpaid, whatever their position, role or responsibilities and Staff includes employees, governors, contractors, and volunteers.

Guiding principles

4 *Principles for all Staff in all LPS settings including Hybrid:* All Staff should put the wellbeing, development and progress of all students first by:

- taking all reasonable steps to ensure the safety and wellbeing of students under their supervision;
- using professional expertise and judgment for the best interests of students in their care;
- demonstrating self-awareness and taking responsibility for their own actions and for providing help and support to students;
- raising concerns about the practices, including low level concerns, of teachers or other professionals where these may have a negative impact on students' learning or progress, or may put students at risk;
- being familiar with the School's child protection procedures;
- knowing the identity of the current Designated Safeguarding Lead and Deputy Designated Safeguarding Leads;
- being aware that they are in a position of trust (i.e. the adult is in a position of power or influence over the student due to his or her work); that the relationship is not a relationship between equals and that this position must never be used to intimidate, bully, humiliate, coerce or threaten students.

All staff should demonstrate respect for diversity and take steps to promote equality by:

- acting appropriately and in accordance with this Code of Conduct, towards all students, parents, guardians or carers and colleagues;
- addressing issues of discrimination and bullying whenever they arise;
- not promoting partisan views in any shape or form including, but not restricted to:
    - Political views
    - Religious affiliation
    - Positions on social causes;
- helping to create a fair and inclusive School environment.

All Staff should work as part of a unified Staff body by:

- developing productive and supportive relationships with colleagues;
- exercising any management responsibilities in a respectful, inclusive and fair manner;
- complying with all School policies and procedures;
- participating in the School's development and improvement activities;
- recognising the role of the School in the life of the local community;
- upholding the School's reputation and standing within the local community and building trust and confidence in it.

General conduct and behaviour

Alcohol and Drugs

- Consumption of alcohol and/or illegal drugs is not permitted on site except where, in the case of a school function, modest amounts of alcohol may be consumed. Employees' conduct and performance must not be adversely impacted by alcohol or drugs when undertaking their duties.
- To promote a healthy and pleasant working environment, and because of fire risk, smoking (in any form, including the use of e-cigarettes) is not allowed anywhere on the school site.
- LPS branded kit must not be worn in any premises where alcohol is served, or the school could come into disrepute from behaviour.
- Consumption of alcohol may only be consumed on school residential trips if the member of staff is not on duty. Members of staff may not exceed the UK legal alcohol limit for driving as they may be called back to duty at any moment. Employees' conduct and performance must not be adversely impacted by alcohol or drugs when undertaking their duties. Numbers of staff needed on duty at any given moment on a school trip will be identified on the risk assessment.

Attendance and Timekeeping

Staff must contact the school by 7.15am if they are unable to come into school and cover work must be set by 8.30am. If a staff member is absent or late for any other reason, they should liaise with their line manager, the person responsible for cover and inform their most direct member of SLT.
Sickness and unexpected absence should also be reported to the HR manager.

Eating and Drinking

The School is a nut and sesame free zone and food containing either should not be brought into school at any time.

Personal Appearance

The School regularly receives visits from parents, potential parents and others, and naturally wishes to convey an impression of efficiency and organisation. Therefore, whilst not wishing to impose unreasonable obligations on staff they are, nonetheless, required to look smart in appearance. Open-toed shoes must not be worn in the Science Lab or DT room, or long dresses in the lab for safety reasons. PE and Games staff must be in LPS branded kit only.

Mobility and Flexibility

Due to the demands and nature of the school, staff should be prepared to transfer upon request within departments either temporarily or permanently, to undertake work of a different nature, providing it is reasonable and safe to do so, and the staff member is adequately trained.

5 *General Guidance:* You should be aware of the general guidance that will apply in all cases.

In particular, you:

- need to exercise professional judgment but always act within the spirit of these guidelines. If you are involved in a situation where no specific guidance exists, you should discuss the circumstances with the Designated Safeguarding Lead. A written record should be kept that includes justification for any action taken;
- must be familiar with procedures for handling allegations against Staff;
- must be aware of the School's child protection procedures and guidance pertaining to Keeping Children Safe in Education (KCSIE);
- must seek guidance from a Designated Safeguarding Lead if you are in any doubt about appropriate conduct;
- must report any actions which could be misinterpreted, any misunderstandings, accidents or threats involving you and a student or a group of students to the Designated Safeguarding Lead
- Follow all school health and safety procedures and report any hazards or incidents immediately according to normal notification routes.

7 Behaviour giving particular cause for concern: You should take particular care when dealing with a student who:

a. appears to be emotionally distressed, or generally vulnerable and/or who is seeking expressions of affection;
b. appears to hold a grudge against you;
c. acts in a sexually provocative way, or who is inclined to make exaggerated claims about themselves and others, or to fantasise, or one whose manner with adults is over-familiar;
d. may have reason to make up an allegation to cover the fact that he or she has not worked hard enough for public examinations;

8 *Procedure to be followed in these cases:* Some of these behaviours may be indications that a child has been, or is currently being, abused and should therefore be reported to a Designated Safeguarding Lead or Deputy Designated safeguarding lead under the School's child protection procedure.

9 *Record keeping:* Comprehensive records are essential. Any incident involving children that could give cause for concern, whether contemplated in these guidelines or not, must be recorded on CPOMS, with justifications for any action taken. In addition, any incident must be reported promptly to a Designated Safeguarding Lead or a Deputy Designated Safeguarding Lead.

10 *School property:* You must take proper care when using School property and you must not use School property for any unauthorised use or for private gain.

11 *Use of premises:* You must not carry out on School premises any work or activity other than pursuant to your terms and conditions of employment without the prior permission of the Head.

12 *Behaviour of others*: You should be aware that the behaviour of your partner or other family members may raise concerns. Such concerns will be given careful consideration as to whether they constitute a potential risk to students at the School.

13 *Good order and discipline:* Teaching staff and other staff in charge or control of students must maintain good order and discipline at all times when students are present on School premises and whenever students are engaged in authorised school activities, whether on School premises or elsewhere.

14 *Assemblies:* All day school teaching staff are expected to attend assembly as outlined by SLT and Heads of Section, even if they are not a form tutor.

15 *Language*: You should use appropriate language at all times. For example, you should:

a. avoid words or expressions that have any unnecessary sexual content or innuendo;
b. avoid any form of aggressive or threatening words;
c. avoid displays of affection either personally or in writing (e.g. messages in birthday cards, text messages, emails etc.);
d. avoid any words or actions that are over-familiar;
e. not swear, blaspheme or use any sort of offensive language in front of students;
f. avoid the use of sarcasm or derogatory words when punishing or disciplining students and avoid making unprofessional personal comments about anyone. Any sanctions should be in accordance with the School's Behaviour Policy
g. be aware that some parts of the curriculum may raise sexually explicit subject matters. Care should be taken in subjects where rules/boundaries are relaxed (e.g. Drama, Art and PSHE). Staff should have clear lesson plans and should take care to avoid overstepping personal and professional boundaries.

16 *Dress:* You should dress appropriately and in a professional manner and in accordance with the staff dress code.

a. In the interests of security, employees must wear their ID badge around school and not remove it without due permission. The School also reserves the right to search outer clothing and bags of staff while on site.

17 *One-to-one meetings:* If you are teaching one student, or conducting a one-to-one meeting or teaching session (in person or online) with a student, you should take particular care for example:

a. when working alone with a student is an integral part of your role, conduct and agree full risk assessments;
b. use a room that has sufficient windows onto a corridor so the occupants can be seen, or keep the door open, or inform a colleague that the lesson/meeting is taking place;
c. arrange the meeting during normal school hours when there are plenty of other people about, preferably in one of the school's numerous public shared spaces;
d. do not continue the meeting for any longer than is necessary to achieve its purposes;
e. avoid sitting or standing unnecessarily close to a student, except as necessary to check work;
f. avoid using "engaged" or equivalent signs on doors or windows when meeting with children on your own;
g. avoid all unnecessary physical contact and apologise straight away if there is accidental physical contact;
h. avoid any conduct that could be taken as a sexual advance;
i. report any incident that causes you concern to a Designated Safeguarding Lead under the School's child protection procedure, and make a written record (signed and dated); and

j. report any situation where a student becomes distressed or angry to the Head or Senior Deputy Head.

18 *Meetings outside school*: Pre-arranged meetings with students outside school should not be permitted unless approval is obtained from their parents, guardians or carers and the Head or Deputy Head. If you are holding such a meeting, you should inform colleagues before the meeting. See Lone Working Policy

19 *Home visits*: see the Lone Working Policy.

20 *The use of personal living space*: students should not be in or invited into the personal living space/living accommodation of any member of staff, unless agreed with the parents, guardians or carers and the Head or Deputy Head. Students should not be asked to assist with chores or tasks in the personal living space. Personal living spaces should not be used as an additional resource for the School.

21 *Dealing with "crushes":* Crushes, fixations or infatuations are part of normal adolescent development. However, they need sensitive handling to avoid allegations of exploitation. Such crushes carry a high risk of words, actions and expressions being misinterpreted, therefore, the highest levels of professionalism are required. If you suspect that a student has a "crush" on you or on another colleague, you should bring it to the attention of the Head or Deputy Head at the earliest opportunity. Suggestions that a student may have developed a crush should be recorded.

22 *Dealing with personal communications from students:* Staff should avoid being alone with students who have developed a crush on them and if any student sends personal communications to the member of staff, this should be reported to the Head and Deputy Head and recorded.

Confidentiality and data protection

23 *Treatment of students' information:* You should respect the privacy of students, parents and colleagues and should not pass information about, for example, addresses or telephone numbers to others, without checking first with the person concerned.

24 *Consent required:* Lists of students'/parents' names and addresses must not be used for any purpose without the consent of the Head. Information about students, parents or colleagues should never be disclosed to telephone enquirers. You should ask the enquirer to put the request in writing so that it can be dealt with appropriately.

25 *Disclosing confidential information:* Confidential information should only be disclosed on a need-to-know basis. Where it is not necessary to disclose a child's identity the information should be disclosed anonymously. If you are unsure whether you should disclose information, you should seek advice from a member of the Senior Team.

26 *Duty to disclose confidential information:* You may have to disclose information, for example where abuse is alleged or suspected. In such cases, there is a duty to pass on the information immediately, but only to the Designated Safeguarding Lead under the School's Child Protection Procedures. The storing of personal information must not breach the School's Data Protection Policy. Note: never give

an undertaking of confidentiality to a student where child protection issues are involved (see separate Safeguarding and Child Protection Policy).

27 *The use of force or physical restraint:* Staff have a duty to intervene in order to prevent students from hurting themselves or others. There may also be situations in which a student seriously disrupts good order in the school or causes damage to property. If a member of staff ever needs to intervene physically the following will apply:

Students sometimes present a risk to themselves and others. The first and paramount consideration is the welfare of the children in our care. The second is the welfare and protection of the adults who look after them.

All physical interventions at this School are conducted within a framework of positive behaviour management. The School Behaviour Policy is intended to reward effort and application, and encourage students to take responsibility for improving their own behaviour. Part of our preventative approach to risk reduction involves looking for early warning signs, learning and communicating any factors which may influence unexpected behaviour and taking steps to divert behaviours leading towards foreseeable risk.

All staff are encouraged to read Use of Reasonable Force in Schools (July 2013)

28 *The use of physical intervention*: should be avoided if possible. However, by law, teaching staff, and other staff who are authorised by the Head to have control or charge of students, may use such force or physical contact as is reasonable in the circumstances to prevent a student from doing, or continuing to do any of the following:

- committing a criminal offence;
- injuring themselves or others;
- causing damage to property;

29 *Application of code of restraint:* This applies when a teacher, or other authorised person, is on School premises and when he or she is in control or charge of the student elsewhere, for example on a field trip or other authorised out of school activity. It only applies where no other form of control is available and where it is necessary to intervene.

30 *Before intervening:* Before intervening physically you should, wherever practicable, tell the student to stop and what will happen if he or she does not. You should continue attempting to communicate with the student throughout the incident and should make it clear that physical contact or restraint will stop as soon as it ceases to be necessary. You should always avoid touching or holding a student in a way that might be considered indecent.

31 *Type of intervention:* You should also avoid any form of aggressive contact such as holding, pushing, pulling or hitting which could amount to a criminal assault, nor act in a way that might reasonably be expected to cause injury.

32 *Inform senior staff:* You should inform the Head or Senior Deputy Head immediately following an incident where force has been used. This is to help prevent any misunderstanding or misrepresentation of the incident, and it will be helpful in the event of a complaint. You should provide a written report as soon as possible afterwards. This should include written and signed accounts of those involved, including the student. The parents, guardians or carers should be informed the same day.

33 *Action taken in self-defence or in an emergency*: Natural Justice allows anyone to defend themselves against an attack provided they do not use more force than is necessary. Similarly, where a student 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.

34 *Using reasonable force:* There is no legal definition of "reasonable force". It will always depend on the circumstances. Note that:

- any use of force should be proportionate to the behaviour of the student involved and the seriousness of the harm prevented;
- physical force could not be justified to prevent a student from committing a trivial misdemeanour;
- any force should always be the minimum needed to achieve the desired result;
- whether it is reasonable to use force and the degree of force that could be reasonably employed might also depend on the age, understanding and sex of the student.

Physical contact in other circumstances

35 *When physical contact may be appropriate:* Physical contact with a student may be necessary and beneficial in order to demonstrate a required action, or a correct technique in, for example, positioning a hand on a musical instrument and other music lessons or during DT, sports and games. Any physical contact should be in response to the student's needs, of limited duration and appropriate to the student's age, stage of development, gender, ethnicity and background. Physical contact can be easily misinterpreted and should be limited. Staff should use professional judgement.

36 *Guidance on using physical contact:* You should observe the following guidelines (where applicable):

- explain the intended action to the student;
- do not proceed with the action if the student appears to be apprehensive or reluctant, or if you have other concerns about the student's likely reaction;
- ensure that the door is open and if you are in any doubt, ask a colleague or another student to be present during the demonstration; and
- consider alternatives if it appears likely that the student might misinterpret the contact.

Help Protocols

- The expectation at this School is that all staff should support one another. This means that staff always offer help and always be willing to accept it. Help does not always mean taking over. It may mean just staying around in case you are needed, getting somebody else or looking after somebody else's group. Supporting a colleague does not only mean agreeing with their suggestions and offering sympathy when things go wrong.
- Real support sometimes means acting as a critical friend to help colleagues become aware of possible alternative strategies.

37 *Report concerns:* If you are at all concerned about any instance of physical contact, you must inform the Head or Senior Deputy Head without delay and make a written record in the incident book and on the student's file if necessary.

38 *Offering comfort to distressed students:* Touching may also be appropriate where a student is in distress and needs comforting. You should use your own professional judgement when you feel a student needs this kind of support and should be aware of any special circumstances relating to the

student. For example, a child who has been abused may find physical contact particularly difficult. You should always notify the Head or Senior Deputy Head when comfort has been offered and should seek guidance if unsure whether it would be appropriate in a particular case.

39 *Administering first aid:* The treatment must meet the School's health and safety at work rules and intimate care guidelines, and parents, guardians or carers should be informed. Staff should:

- adhere to the School's policy on administering first aid/medication;
- comply with the necessary reporting requirements;
- make other adults aware of the task that is being undertaken;
- explain what is happening;
- report and record the administration of first aid;
- have regard to any health plans;
- ensure that an appropriate health / risk assessment is undertaken prior to undertaking certain activities.

40 *Students' entitlement to privacy:* Children are entitled to privacy when changing or showering. However, there still must be an appropriate level of supervision to ensure safety. You should:

- avoid physical contact or visually intrusive behaviour when children are undressed;
- announce yourself when entering changing rooms and avoid remaining unless required;
- not shower or change in the same place as children; and
- not assist with any personal care task which a student can undertake themselves.

41 *Where a child has been abused:* Where a child has previously been abused, staff should be informed on a 'need to know' basis, and should be extra cautious when considering the necessity of physical contact. Some children may seek inappropriate physical contact. Staff should sensitively deter the student and help them understand the importance of personal boundaries. Such incidents should be reported and discussed with the Senior Team and parents, guardians or carers.

42 *Children with special educational needs or disabilities:* Some children may need more physical contact to assist their everyday learning, which should be agreed and understood by all concerned, justified, openly applied and open to scrutiny.

Code of conduct for contact outside school

43 *Contact outside school:* You should avoid unnecessary contact with students outside school. For example:

a. you should not give students your home address, home telephone number, mobile telephone number or personal e-mail address. Except in an emergency, communication should only be made using School property;
b. you should not send personal communications to children (such as birthday cards or faith cards, text messages etc.) unless agreed with the Head or Senior Deputy Head.
c. not make arrangements to meet students, individually or in groups, outside school other than on school trips authorised by the Head;
d. avoid contacting students at home unless this is strictly necessary, and you should keep a record of any such occasion;

e. you should not allow a student to be passenger in your own vehicle other than on School business, accompanied by another member of staff, and with permission from the Head or Senior Deputy Head; you should not invite students (groups or individuals) to your home unless, unless there is a good reason and it has been approved by the Head;
f. report and record any situation which may place a child at risk, or which may compromise the School's or your professional standing;
g. ensure that students do not see anything in your home that may cause embarrassment or that might become the subject of inappropriate gossip or rumour; and
h. never engage in secretive social contact with students or their parents, guardians or carers.

44 *Social contact*: You should be aware that where you meet children or parents, guardians or carers socially, such contact could be misinterpreted as grooming. Any social contact that could give rise to concern should be reported to the Head or Senior Deputy Head immediately.

45 *Friendships with parents, guardians or carers and students*: Members of Staff who are friends with parents, guardians or carers of students or who, for example, are voluntary workers in youth organisations attended by students, will of course have contact with those students outside school. However, members of Staff should still respect the above advice and should make the Head aware of any such connections in writing.

46 *Scope of application of code on contact outside school*: 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 students at another school.

47 *Transporting students*: There may be some situations when Staff are required to transport students. You should:

- ensure that you are fit to drive and free from any substances that may impair your judgement or ability to drive;
- be aware that until the student is passed over to a parent/carer, you have responsibility for that student's health and safety;
- record the details of the journey;
- record and be able to justify impromptu or emergency lifts;
- ensure that there are proper arrangements in place to ensure vehicle, passenger and driver safety, including appropriate insurance, seat belts, adherence to maximum capacity guidelines etc;
- ensure you have discussed this with the Head or Senior Deputy Head, in advance.

48 *After school activities:* When taking part in after school activities, you should:

- be accompanied by another adult unless otherwise agreed with the Head or Senior Deputy Head;
- undertake a risk assessment;
- obtain parental consent;

49 *Educational visits*: When taking part in educational visits, you should:

- follow the School's Educational Visits Policy;
- be accompanied by another adult unless otherwise agreed with the Head or Senior Deputy Head;
- undertake a risk assessment;
- obtain parental consent;

- never share bedrooms with students;

50 *Overnight supervision*: Where overnight supervision is required to preserve the integrity of the examination process:

- you should ensure that a risk assessment has been undertaken and that all members of the household have had the appropriate checks;
- arrangements should be made with and agreed by parents, guardians or carers and the student;
- one to one supervision should be avoided where possible;
- choice, flexibility and contact with "the outside world" should be incorporated, so far as it is consistent with appropriate supervision and the School's guidelines;
- whenever possible, independent oversight of the arrangements should be made and;
- any misinterpretation, misunderstanding or complaint should be reported.

Communication with students (including the use of technology)

51 *Communicating with children and parents:* All communication with children or parents should conform to School policy and be limited to professional matters. Except in an emergency, communication should only be made using School property.

52 *Application:* These rules apply to any form of communication including mobile telephones, web-cameras, social networking websites and blogs.

53 *Acceptable use:* Adults must establish safe and responsible online behaviours. Adults should report to senior colleagues, any new and emerging technologies which may have a bearing on School practices. Local and national guidelines on acceptable user policies should be followed. Staff should also:

- ensure that your own personal social networking sites are set as private and ensure that students are not approved contacts;
- never use or access social networking sites of students and do not use internet or web-based communication channels to send personal messages to students;
- do not use your own equipment (e.g. mobile telephones) to communicate with students - use equipment provided by the School and ensure that parents, guardians or carers have given permission;
- only make contact with students for professional reasons;
- recognise that text messaging should only be used as part of an agreed protocol and only when other forms of communication are not possible;
- not give your personal mobile phone number or email address to any student, nor communicate with them by text message or personal email;
- the group leader on all trips and visits involving an overnight stay should take a school mobile phone with him/her for the duration of the trip. If you need to note down student mobile numbers to allow them out in small, unsupervised groups this is permitted. The group leader should delete any student numbers at the end of the trip and ensure staff follow suit;
- staff should be aware that it is not, under any circumstance, appropriate to use social media to contact students. It is a criminal offence for a person aged 18 or over to have a sexual relationship with a child under 18 where that person is in a position of trust in respect of that child, even if the relationship is consensual

54 *Personal details*: Adults should not give their personal contact details to students, including personal e-mail addresses, home or mobile telephone numbers, unless the need to do so is agreed with Head or Senior Deputy Head and parents, guardians or carers.

55 *Communicating outside the agreed protocols*: E-mail or text communications between an adult and a student outside agreed protocols may lead to disciplinary and/or criminal investigations. This also includes communications through internet-based websites.

Code of conduct for photographs and videos

56 *Permission required:* The school maintains a list of students in respect of whom parents have withheld their consent to photographs or video footage being taken. Please familiarise yourself with this list before taking photographs or video footage of students. This also applies to when photographs or video footage is distributed or displayed.

57 *Guidance where permission obtained:* Where permission has been obtained, the following should be considered:

- the purpose of the activity should be clear as should what will happen to the photos. You must be able to justify images in your possession;
- all images should be made available in order to determine acceptability;
- images should not be made during one-to-one situations;
- ensure that the student is appropriately dressed;
- where appropriate, ensure that the student understands why the images are being taken and has agreed to the activity;
- only use equipment provided or authorised by the School, if staff are using their own equipment with prior permission, they must delete photos as soon as is possible;
- if an image is to be displayed in a place to which the public have access it should not display the student's name. Similarly, where a student is named (in a school prospectus, for example) the name should not be accompanied by a photograph or video;
- all images of children should be stored securely and only accessed by those authorised to do so; and
- images must not be taken secretively.

58 *Appropriate material:*
You must ensure children are not exposed to inappropriate or indecent images. Inappropriate material, such as pornography, should not be brought to work and you must not use School property to access such material. Possession of such material could lead to arrest and imprisonment. You should not allow unauthorised access to School equipment and should keep your computer passwords safe. If you discover material that is potentially illegal, you must isolate the equipment and contact the Designated Safeguarding Lead under the School's child protection procedures immediately. Students must not be exposed to unsuitable material on the internet and Staff should ensure that any film or material shown is age appropriate.

Gifts and rewards

59 *Anti-bribery and corruption policy*: Before accepting or giving any gifts or rewards, Staff must familiarise themselves with the Anti-Bribery and Corruption Policy contained in the Employment Manual.

60 *If a gift is received*:

If you receive a gift from a student or a parent, you should:

- declare the gift where there is a possibility it could be misconstrued, or in any event where the gift is of a value of more than GBP 100. The Head may in their absolute discretion require you to decline the gift,
- decline outright gifts that could be perceived as a bribe or that have created an expectation of preferential treatment. Although it is accepted for parents, guardians or carers or students to make small gifts to show appreciation, you must not receive gifts on a regular basis or receive anything of significant value.

61 *Giving gifts and rewards*: Where you are thinking of giving a gift or reward:

- it should only be provided as part of an agreed reward system;
- in all cases except the above, the gift or reward should be of little monetary value and should be discussed and agreed with the Head, and the parent or carer;
- selection processes should be fair and where possible should be agreed by more than one member of Staff;
- gifts should be given openly and not based on favouritism.

Allocation of gifts and rewards: Decisions regarding entitlement to benefits or privileges such as admission to school trips, activities or classroom tasks must avoid perceptions of bias, grooming or favouritism. The selection process must be based on transparent criteria.

62 *Sexual contact*: Staff must not:

- have any type of sexual relationship with a student or students;
- have sexually suggestive or provocative communications with a student;
- make sexual remarks to or about a student;
- discuss their own sexual relationships in the presence of students.

Sexual relationships or contact with students, or encouraging a relationship to develop in a way which might lead to a sexual relationship is a grave breach of trust that will usually lead to disciplinary action and may also lead to criminal prosecution.

63 *The Prevent Duty:*

The UK has strict laws against terrorism and will prosecute anyone involved in any such activities. All schools are subject to the duty to have due regard to the need to prevent people from being drawn into terrorism.

You must immediately contact a Designated Safeguarding Lead under the School's child protection procedure if you have any concerns.

64 *Low Level Concerns*

The School strives to embed a culture of openness and transparency in which the School's values and expected behaviour, as set out in the Staff Code of Conduct, are constantly reinforced by all staff.

All staff should feel enabled to share any concerns about their own or another member of staff's behaviour, with the appropriate member of staff as set out below.

The distinction between an allegation and a low-level concern

The term 'allegation' (in this context) means that it is alleged that an adult who works with children has:

- behaved in a way that has harmed a child, or may have harmed a child and/or;
- possibly committed a criminal offence against or related to a child and/or;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children (this includes behaviour that may have happened outside of School that might make an individual unsuitable to work with children)

A low-level concern is any concern about an adult's behaviour towards a child that does not meet the allegation threshold set out above or is not otherwise serious enough to consider a referral to the LADO.

A low-level concern is any concern, no matter how small, and even if no more than a 'nagging doubt' that an adult may have acted in a manner which:

- is not consistent with the Staff Code of Conduct, and/or
- relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children.

Examples of such behaviour could include, but are not limited to, being over friendly with children, having favourites, keeping photographs of children on their personal devices etc.

Staff are not expected to determine whether their concern is a low-level concern, serious enough to consider a referral to the LADO or meets the threshold of an allegation. Once staff share what they believe to be a low-level concern through the neutral notification form, that determination will be made by the Head. The Head may wish to consult with the DSL and take a more collaborative decision-making approach if the need arises.

How to share low-level concerns

It is important that low-level concerns are shared with the Head as reasonably possible and, in any event, within 24 hours of becoming aware of the concern and relevant incident(s).

Concerns can be shared verbally in the first instance, or in writing using the neutral notification form. The context in which the low-level concern arose and details which are chronological, precise and accurate as possible of the concern and relevant incident(s) must be provided.

Where details of the low-level concern is provided verbally, the Head will make an appropriate record of the conversation, either contemporaneously or immediately following the discussion. The Head will check the accuracy of the record with the member of staff who raised the concern.

Low-level concerns will be treated in confidence as far as possible, but the School may in certain circumstances be subject to legal reporting requirements or other legal obligations to share information with appropriate persons, including legal claims and formal investigations.

Self-reporting

Staff who find themself in a situation which could be misinterpreted, might appear compromising to others, have behaved in a manner which on reflection they consider falls below the standard set out in the Code of Conduct for Staff are encouraged to self-report via the neutral notification form. Self-reporting can be positive for a number of reasons: it is self-protective in that it enables a potentially difficult issue to be addressed at the earliest opportunity; it demonstrates awareness of the expected behavioural standards and self-awareness of the individual's own actions or how they could be perceived; and is an important means of maintaining a culture where all staff aspire to the highest standards of conduct and behaviour.

Recording and reviewing low-level concerns

All low-level concerns will be recorded in writing by the Head. The record will include details of the context in which the concern arose, and the action taken. The name of the member of staff sharing the concern will be noted however, where the member of staff wishes to remain anonymous this will be respected as far as possible.

Records will be reviewed at regular intervals to identify potential patterns of concerning, problematic or inappropriate behaviour. The school must consider if any wider cultural issues in the School enabled the behaviour to occur and if appropriate policies could be revised or extra training delivered to minimise the risk of recurrence. Where a pattern is identified, an appropriate course of action will be taken, for example, internal disciplinary procedures, or referral to the LADO if the harm threshold is met.

65 Whistleblowing
The School has a Whistleblowing Policy, a copy of which is included in Appendix A.

66 Consequences of breaching the Code of Conduct:
The School's position: It is in your interests to follow this policy so as to maintain standards of behaviour and your own professional reputation. A breach of this policy may be treated as misconduct and will render you liable to disciplinary action including in serious cases, dismissal.

Termination of employment: If the School ceases to use the services of a member of Staff or volunteer because they are unsuitable to work with children, a settlement agreement (formerly known as a compromise agreement) will not be used and a referral to the Disclosure and Barring Service will be made as soon as possible if the criteria for a referral are met. Any such incidents will be followed by a review of the safeguarding procedures within the School, with a report being presented to the Governors without delay.

67 *Resignation:* If a member of Staff or volunteer tenders his or her resignation or ceases to provide his or her services to the School at a time when child protection concerns exist in relation to that person, those concerns will still be investigated in full by the School and a referral will be made to the UK Disclosure and Barring Service as soon as possible if the criteria for a referral are met.

This policy should be read in conjunction with:

- Staff handbook
- Keeping Children Safe in Education
- LPS Safeguarding policy
- Lone working policy

Appendix A

Whistleblowing Policy

The School's policy on whistleblowing enables members of staff to raise concerns internally and in a confidential fashion about fraud, malpractice, health and safety, criminal offences, miscarriages of justice, a failure to comply with legal obligations, inappropriate behaviour or unethical conduct. The policy also provides, if necessary, for such concerns to be raised outside the organisation.

The School is committed to conducting its business with honesty and integrity and expects all staff to maintain high standards. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring and to address them when they do occur.

Aims

- The School does not tolerate malpractice;
- encourages staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated, as appropriate;
- respects the confidentiality of staff raising concerns and will provide procedures to maintain confidentiality so far as is consistent with progressing the issues effectively;
- will provide the opportunity to raise concerns outside of the normal line management structure where this is appropriate;

- will only invoke the School's disciplinary procedure in the case of false, malicious, vexatious or frivolous allegations. The policy seeks to reassure staff that they can raise genuine concerns without fear of reprisal, even if they turn out to be mistaken; and
- will provide a clear and simple procedure for raising concerns, which is accessible to all members of staff.

Scope of this policy

This procedure is separate from the School's adopted procedures regarding grievances. Individuals should not use the whistleblowing procedure to raise concerns relating to their own personal circumstances, such as the way they have been treated at work. In those cases, the School's Grievance Procedure or Anti- Bullying Policy should be used, as appropriate. If you are uncertain whether something is within the scope of this procedure you should first seek advice from the Head or the Bursar.

This procedure is to enable members of staff to express a legitimate concern regarding suspected malpractice within the School.

Malpractice is not easily defined; however, it includes allegations of fraud, financial irregularities, corruption, bribery, dishonesty, acting contrary to the staff code of ethics, criminal activities, or failing to comply with a legal obligation, a miscarriage of justice, or creating or ignoring a serious risk to health, safety or the environment (negligence).

A whistle-blower is a person who raises a genuine concern relating to suspected malpractice within the School. If you have any genuine concerns related to suspected malpractice affecting any of the School's activities (a whistleblowing concern) you should report it under this procedure.

If staff and volunteers feel unable to raise an issue with the School or feel that their genuine concerns are not being addressed, they may report their concerns to other whistleblowing channels, such as:

- Protect, an independent whistleblowing charity, previously known as Public Concern at Work (helpline: 020 3117 2502, email: whistle@protect-advice.org.uk, website: www.protect-advice.org.uk).
- The NSPCC whistleblowing helpline (tel: 0800 028 0285 or email: help@nspcc.org.uk).

Confidentiality

We hope that staff will feel able to voice whistleblowing concerns openly under this procedure. However, if you wish to raise a concern confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone investigating the concern to know your identity, this will be discussed with you.

If there is evidence of criminal activity, then the Police will in all cases be informed.

We do not encourage staff to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible. Whistleblowers who are concerned about possible reprisals if their identity is revealed should discuss this with the Head or Bursar and appropriate measures can then be taken to preserve

confidentiality. If you are in any doubt, you can seek advice from Protect, the independent whistleblowing charity, that offer a confidential helpline. Their contact details are set out above.

Raising a whistleblowing concern

We hope that in many cases you will be able to raise any concerns with your line manager or the People Advisor. You may tell them in person or put the matter in writing if you prefer. They may be able to agree a way of resolving your concern quickly and effectively. In some cases, they may refer the matter to the Head, one of the Deputy Heads or the Bursar.

However, where the matter is more serious, or you feel that your line manager or the HR Executive has not addressed your concern, or you prefer not to raise it with them for any reason, you are at liberty to raise a whistleblowing concern to the Head, the Deputy Head or the Bursar directly. If you feel unable to approach the Head, the Deputy Head or the Bursar directly, then the Chair of Governors should be the first point of contact.

A meeting will be arranged with you as soon as possible to discuss your concern. You may bring a colleague or union representative to any meetings under this procedure. Your companion must respect the confidentiality of your disclosure and any subsequent investigation. You may be required to attend additional meetings in order to provide further information as the concerns raised are investigated.

Any concern raised will be investigated thoroughly and in a timely manner, and appropriate corrective action will be pursued. You will be kept informed of the progress of the investigation and it's likely timescale. Whenever possible and subject to third party rights, you will be informed of the resolution. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

If you are not satisfied that your concern is being properly dealt with, you will have a right to raise it in confidence with the Governing Body. Alternatively, you can follow the external procedure below.

External Procedures

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in school. In most cases you should not find it necessary to alert anyone externally.

However, where all internal procedures have been exhausted, a member of staff shall have a right of access to an external person/body. This may include (depending on the subject matter of the disclosure) HMRC, the Audit Commission, the Health and Safety Executive and/or the Local Authority Designated Officer (where the disclosure relates to a child protection issue).

It will very rarely, if ever, be appropriate for you to alert the media.

It should be noted that under the Public Interest Disclosure Act 1998, there are circumstances where a member of staff may be entitled to raise a concern directly with an external body where the individual reasonably believes:-

- that exceptionally serious circumstances justify it;
- that the School would conceal or destroy the relevant evidence;
- where they believe they would be victimised by the School; or
- where the Secretary of State has ordered it.

We strongly encourage you to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, Protect, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern.

Malicious Accusations

False, malicious, vexatious or frivolous accusations will be dealt with under the School's Disciplinary Procedure.

Protection from Reprisal or Victimisation

It is understandable that whistle blowers are sometimes worried about possible repercussions. We aim to encourage openness and will support staff who raise genuine concerns under this policy, even if they turn out to be mistaken.

No member of staff will suffer a detriment or be disciplined for raising a genuine and legitimate concern, providing that they do so in good faith and following the Whistleblowing procedures. If you believe that you have suffered any such treatment, you should inform the Head, Deputy or Bursar immediately. If the matter is not remedied, you may raise it formally using the School's Grievance Procedure.

You must not threaten or retaliate against whistle blowers in any way. If you are involved in such conduct you may be subject to disciplinary action.