



St Paul's School
FOUNDED 1509

Staff Code of Conduct

Owner:	Surmaster	Date of last review:	03/26
Consulted:	Core Strategy Group Selected SPS Exec members Selected SPPS SLT members	Date of authorisation:	03/26
Authorised by:	Full Governing Body	Date of next review:	06/26
Applicable to:	SPS & SPPS		

This policy is available on the Handbook page of the School Intranet and policies page of the School website and can be made available in large print or other accessible format if required; such requests can be made by email to policyquery@stpaulsschool.org.uk. This policy must be read, understood, and followed by all staff and volunteers. If any staff member or volunteer has any questions or comments in relation to this document, please contact smpa@stpaulsschool.org.uk.

Contents

Staff Code of Conduct	1
1. Background Information	3
2. Underpinning Principles.....	3
3. Duty of Care	4
4. Exercise of Professional Judgement and Training	4
5. Power and Positions of Trust	5
6. General Conduct	5
7. Sexual Contact with Young People	7
8. Grooming and Sexual Communication with Children.....	7
9. Confidentiality.....	7
10. Propriety and Behaviour	8

11.	Conflict of Interests, Gifts & Hospitality	9
12.	Social Contact.....	11
13.	Physical Contact	14
14.	Behaviour Management	15
15.	Care, Control, Restrictive Interventions, and use of 'Reasonable Force'	15
16.	Changing Areas and Washrooms	18
17.	One-to-One Situations	19
18.	Transporting Children	19
19.	Boarding, Educational Visits, Sports and After School Activities	20
20.	First Aid and Administration of Medication.....	22
21.	The Curriculum.....	23
22.	Photography, Videos, and other media	24
23.	Use of the School IT Systems, Including Internet Use and Digital Communication with Pupils	25
24.	Whistleblowing	28
25.	Sharing Concerns and Recording Incidents.....	29
26.	Disclosure and Barring Service Checks	29
27.	Low-Level Concerns	29
28.	Appearance	31
29.	Infatuations and Crushes	32
30.	Home visits.....	33
31.	Exposure to inappropriate images.....	33
32.	Personal living accommodation (including on-site provision).....	34
	Appendix 1: One to One Supervision Risk Assessment.....	35
	Appendix 2: Unintended breaches of School firewall by staff.....	48

1. Background Information

- 1.1 This document has been drawn from the DfE guidance (2005) which was produced by the National Network of Investigation and Referral Support Co-ordinators and the document Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings (updated February 2022). It also reflects the requirements of the relevant sections of the Education (Independent Schools Standards) Regulations (England) (2015) and the Independent School Standards – Guidance for Independent Schools (April 2019). The guidance recognises that the vast majority of adults working with children in education settings act professionally, seeking to provide a safe and supportive environment to secure the well-being and best outcomes for the young people in their care. Members of staff have a crucial role to play in shaping the lives of young people. They have a unique opportunity to interact with children and young people in ways that are both affirming and inspiring. This guidance has been produced to help staff establish the safest possible learning and working environments. The aims are to safeguard young people and reduce the risk of staff being falsely accused of improper or unprofessional conduct.
- 1.2 This Code of Conduct applies to all members of staff working at St Paul's School (SPS) and St Paul's Prep School (SPPS), including St Paul's Boarding Houses (hereafter referred to as the "School"). This includes: teaching staff; support staff; temporary part-time workers; contractors; volunteers and members of the Board of Governors (hereafter referred to as "staff").
- 1.3 This Code of Conduct must be provided to all staff on induction, so that they are clear about professional conduct and boundaries.

2. Underpinning Principles

- 2.1 The welfare of the child is paramount (Children Act 1989).
- 2.2 Staff are responsible for their own actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motivation and intentions.
- 2.3 Staff should work, and be seen to work, in an open and transparent way.
- 2.4 Staff should submit a Low-Level Concern (See section 27) and discuss, and/or take advice promptly from their Head of Department, Line Manager, the Designated Safeguarding Lead, the High Master, Head or Surmaster (as appropriate), over any incident which may give rise to concern.
- 2.5 Records should be made of any such incident and of decisions made/further actions agreed, in accordance with the School's Data Protection Policy.
- 2.6 All staff are made aware of the Designated Safeguarding Lead (**DSL**) at St Paul's, who is the Lead DSL across St Paul's and St Paul's Prep School. At St Paul's Prep School, the Senior Deputy Head is the DSL. Full contact details for the Lead DSL, DSL and all Deputy DSLs are set out in section 1 of the Safeguarding and Child Protection Policy, which is available on the School intranet and

on the website. All staff should be familiar with local child protection arrangements and understand their responsibilities to safeguard and protect children. This information is also contained in the Safeguarding and Child Protection Policy.

- 2.7 Staff should be aware that breaches of the law and other professional guidelines could result in criminal or disciplinary action being taken against them. The School's Disciplinary Procedure (Conduct) document is on the Handbook page (HR section) of the School intranet and contains specific examples of offences which are normally regarded as gross misconduct. The Safeguarding and Child Protection Policy outlines the School's responsibilities and procedures for reporting to external agencies allegations of practices or behaviour which have put (or may have put) pupils at risk of significant harm.
- 2.8 The ICT Acceptable Use Policy provides further guidance on safe use of ICT.

3. Duty of Care

- 3.1 All staff have a duty to keep young people safe and to protect them from physical and emotional harm. This duty is in part exercised through the development of respectful, caring, and professional relationships between staff and pupils and behaviour by staff that demonstrates integrity, maturity, and good judgement.
- 3.2 Employers have a duty of care towards their employees under the Health and Safety at Work Act 1974 which requires them to provide a safe working environment for staff and guidance about safe working practices. The Act also imposes a duty on employees to take care of themselves and anyone else who may be affected by their actions or failings. In this respect, the duty of care towards both staff and children can be demonstrated through the use of these guidelines.

4. Exercise of Professional Judgement and Training

- 4.1 Staff should always maintain appropriate professional boundaries, avoid behaviour which could be misinterpreted by pupils or others and report any such incident using the School's Low-Level Concern procedures (see section 27). This is as relevant in the online world as it is in the classroom; staff engaging with pupils and/or parents online have a responsibility to model safe practice at all times.
- 4.2 This guidance cannot provide a complete checklist of what is, or is not, appropriate behaviour for staff. It does highlight, however, behaviour that is illegal, inappropriate, or inadvisable. There will be occasions and circumstances in which staff have to make decisions, or take action, in the best interests of the child or young person which could contravene this guidance or where no guidance exists.
- 4.3 The School recognises the importance of appropriate training in informing teachers' professional judgement. The Surmaster is responsible for ensuring that all staff who are new to the School receive training in this Code of Conduct, the Safeguarding and Child Protection policy, Whistleblowing procedures, and Acceptable use of ICT as part of the induction process.

This training will also include informing staff about behaviour which may constitute serious misconduct, as outlined in the School's Disciplinary Procedure (Conduct). The lead DSL is responsible for ensuring that all staff are informed of any substantive changes to policies and guidelines which relate to child protection and safe working with children. The lead DSL will provide refresher training throughout the academic year, or as appropriate.

5. Power and Positions of Trust

- 5.1 As a result of their knowledge, position and/or the authority invested in their role, all adults working with children and young people in education settings are in positions of trust in relation to the young people in their care. A relationship between a member of staff and a pupil cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable young people and staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.
- 5.2 Staff should always avoid behaviour which might be misinterpreted by others, and report and record any incident with this potential by submitting a Low-Level Concern (see section 27).

6. General Conduct

- 6.1 The staff Code of Conduct promotes the safety, welfare and good physical and mental health of staff and pupils. The school educates pupils to understand the effect and risks associated with alcohol and tobacco in relation to their health, wellbeing, and the law and that the use of illegal drugs is, or may be, a criminal offence and will be harmful to their health, integrity, independence, opportunities, and careers as well as damaging the society in which they live. Staff are expected to promote this view and act as responsible role models.
- 6.2 Smoking: the school has obligations to ensure the wellbeing of all members of staff and pupils. To facilitate this, and in the interests of providing a pleasant environment for all, the school prohibits smoking (to include the smoking of e-cigarettes or vaping) and use of any other smoking related product (such as nicotine substitutes or snus) or paraphernalia on all school premises at any time. Staff should not smoke (to include the smoking of e-cigarettes, vaping or use of snus) within sight of pupils during trips, visits or when otherwise discharging their professional duties off the school site.
- 6.3 Alcohol: staff must not, under any circumstances, consume or be under the influence of any alcohol when pupils are present, or within their care, or at any other time when carrying out their professional duties. Please refer to the Alcohol Policy for further guidance.
- 6.4 Drugs and substances: for the purposes of this policy 'drugs' covers controlled drugs and the paraphernalia of drugs, psychoactive substances or substances intended to resemble drugs, or 'legal' drugs which can be obtained from a chemist shop, performance enhancing drugs, anabolic steroids, glue, and other substances held or supplied in each case for purposes of misuse.

Controlled substances: it is a criminal offence to use, possess or deal in any controlled substances and anyone found through the disciplinary procedure to be involved in any of these activities, whether during or outside working hours, will normally be dismissed for gross misconduct. The school will notify the police where appropriate.

The school does not permit drugs (as defined above), other than prescribed drugs, to be used or stored on school premises; if in any doubt, please consult your line manager/HR before bringing any drugs onto the school site. All prescribed drugs, or other legal medications (e.g., paracetamol), must be stored appropriately when on the school site to prevent access by others. Any prescribed Controlled Drug (e.g., Ritalin) that is brought to the school site by a staff member must be clearly labelled, and stored safely, securely and in such a way that they cannot be accessed by pupils or other members of staff. A staff member who needs to take a Controlled Drug during the school day should therefore ensure the medication is kept locked away appropriately for instance in the locked drawer of their desk, or other locked container; or should contact the Health Centre for assistance. Under no circumstances is the sale of drugs (prescribed or not) permitted.

It is strictly forbidden to come to work, or to remain at work, under the influence of any drug (as defined above); if in any doubt, please consult your line manager/HR before coming to work. If you have been prescribed drugs whose side effects could have an impact on your work or behaviour, you should report this immediately to your line manager/HR. If the school considers that you are under the influence of any drug (including prescribed drugs which have, or could have, affected your work or behaviour, and of which you have failed to notify your line manager/HR), disciplinary action will normally be taken, which could render a member of staff liable to summary dismissal after an appropriate hearing.

- 6.5 Staff must not engage in conduct (including through other employment) outside work which could reasonably be expected to damage the reputation and standing of the school. Staff must exercise caution when using information technology, including social networking sites, and be aware of the risks to themselves and others.
- 6.6 Staff have a duty to inform the school of personal relationships that may give rise to a safeguarding risk to children at the school.
- 6.7 Staff have a professional duty to set a responsible example to pupils. Staff should not put themselves in a position which may compromise their professional status. Staff should bear in mind that most pupils have mobile recording and photographic technology to hand, and the potential this has for comments or actions to be recorded out of context.
- 6.8 On occasions when adults are socialising in groups, in public locations, it is important that professional standards are maintained, and no opportunity is given to pupils to compromise these.
- 6.9 Staff must inform the High Master immediately if they are arrested or subject to a criminal conviction or caution. Where safeguarding concerns arise, the High Master will carry out a formal risk assessment to identify and mitigate any potential risk to pupils and staff.

7. Sexual Contact with Young People

- 7.1 Any sexual behaviour by a member of staff with or towards a child or young person is both inappropriate and illegal.
- 7.2 The Sexual Offences Act 2003 makes it an offence for a person aged 18 or over (e.g. teacher, language assistant, GAP assistant) 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. A situation where a person is in a position of trust could arise where the child is in full-time education and the person looks after children in the same establishment as the child, even if they do not teach the child.
- 7.3 It is also an offence to involve children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males; any adult can commit acts of sexual abuse, as can other children.

8. Grooming and Sexual Communication with Children

- 8.1 Grooming is the process by which an individual prepares a child, significant adults, and the environment for abuse of this child. All staff should be aware of the paradigm patterns of grooming which are listed in the Safeguarding and Child Protection procedures. All staff should try as far as possible not to do anything (such as conferring special attention and favour upon a child, gift giving, inappropriate social contact) which might be construed as being part of a grooming process.
- 8.2 Staff should also avoid any form of communication with a child which could be interpreted as sexually suggestive or provocative, either in verbal comments, letters, notes, electronic mail, phone calls, texts, social media, or through inappropriate physical contact.

9. Confidentiality

- 9.1 Members of staff may have access to personal details about pupils in order to undertake their everyday responsibilities. In some circumstances, staff may be given additional highly sensitive or private information. Such information should be treated in a discreet and confidential manner. In particular, staff should never use online media to discuss pupils, colleagues, parents, or carers or to criticise colleagues, the School's leadership team or others within the School community.
- 9.2 To help ensure sensitive data is suitably protected, staff are expected to:
- use strong passwords for digital accounts which are changed regularly;
 - Protect mobile devices with a password or PIN, whether in or outside of School, to protect access to its content and prevent potential misuse;
 - When required by School systems, use two factor authentication to access sensitive data.

- 9.3 Confidential information about a child or young person should never be used casually in conversation or shared with any person other than on a need-to-know basis. In circumstances where the child's identity does not need to be disclosed, the information should be used anonymously.
- 9.4 There are some circumstances in which a member of staff may be expected to share information about a child, for example when abuse is alleged or suspected. In such cases, individuals have a duty to pass information on without delay, in accordance with the Safeguarding and Child Protection Policy.
- 9.5 If a member of staff is in any doubt about whether to share information, or keep it confidential, they should seek guidance from one of the DSLs.
- 9.6 The storing and processing of personal information about pupils is governed by the Data Protection Act (DPA) 2018 and the General Data Protection Regulations – see the Data Protection Policy in the Integrated Safeguarding Portfolio section of the Staff Handbook. Those staff who need to share 'special category personal data' should be aware that the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition. This allows practitioners to share information without consent, if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk. In practice, the sharing of such information will normally be restricted to the DSL, Deputy DSL, or other nominated members of the School's Pastoral Management team. Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers provides further guidance.
- 9.7 The booklet What To Do If You're Worried A Child Is Being Abused (2015) contains further guidance on sharing information to protect children.

10. Propriety and Behaviour

- 10.1 The DfE Teachers' Standards include the following section on Personal and Professional Conduct; **this section applies equally to all school staff** in their interactions with all members of the school community.

A teacher is expected 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 a teacher's career.

- *Teachers uphold public trust in the profession 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.*
- *Teachers 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 attendance and punctuality.*
- *Teachers must have an understanding of, and always act within, the statutory frameworks which set out their professional duties and responsibilities.*

10.2 Further, the Education (Independent Schools Standards) (England) Regulations (ISSRs) (2014) places a responsibility on the School and its staff to:

- Actively promote the fundamental British values of democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs;
- Not discriminate against pupils on the basis of protected characteristics, which include: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex, sexual orientation.

10.3 The School rejects absolutely any form of prejudiced discrimination, intolerance of difference and any form of bullying, harassment or abuse related to race, gender, sexuality, or other characteristic protected under the Equality Act (2010). Staff must model fair-minded, generous, and inclusive interactions, and must uphold the Pupil Behaviour Code and Anti-Bullying policy by appropriately challenging or reporting pupil attitudes or behaviours in breach of these standards, for instance the use of misogynistic or racist language. In addition, in accordance with the Safeguarding and Child Protection policy, staff must remain alert to the signs that a child has been the victim or perpetrator of any form of harassment or abuse, including peer on peer abuse, and including sexual harassment, assault or other harmful sexual behaviour. The School holds a zero-tolerance position on any form of sexual abuse, and will proceed on both a safeguarding and disciplinary basis as appropriate in accordance with DfE guidelines.

11. Conflict of Interests, Gifts & Hospitality

11.1 A conflict of interests may arise where an individual's personal, family or business interests and/or loyalties conflict (or may conflict) with those of the School. Such conflicts can create problems by inhibiting free discussion; resulting in decisions or actions which are not in the best interests of the School and risking the impression that the School has acted improperly.

11.2 The School's 'Register of Interests' is a formal record which allows for the declaration of any possible conflict of interests while discharging professional duties. All staff have obligations of loyalty and mutual trust and confidence to the School; these, and the associated actions, are set out in the School's 'Conflict of Interests' policy, with which all staff should be familiar. All

staff are required to report relevant interests, which will be recorded in the 'Register of Interests'. If member of staff is uncertain as to whether they should notify the School about a particular circumstance they should discuss the matter with the High Master / Head of SPPS, who will then decide whether the matter should be entered in the School's 'Register of Interests'.

11.3 From time-to-time parents or pupils may offer members of staff gifts on an individual basis as a demonstration of their gratitude for the work done on their behalf, and this is perfectly legitimate. However, in some contexts such gifts could be construed as an improper inducement to, for instance, accord preferential treatment in the future. Consequently, it is necessary for the School to have rules applying to such gifts. These are set out in detail in the School's 'Gifts and Hospitality' policy, with which all staff should be familiar. In particular, please note:

- Any gifts of cash of whatever value, or any other gifts of a total value over £100, must be declared on the Gifts and Hospitality Register via completion of an online form. The form can be accessed via the SPS Staff Handbook. Gifts of cash must be donated to the School or the School's nominated charity. The parent should be thanked for their cash gift and informed that it is being donated to the School or the School's nominated charity. You may retain any other gifts, although gifts of a total value over £500 should not be accepted without the prior approval of the High Master.
- Any gifts from a group of parents that exceed an average value of £25 per pupil must be declared on the Gifts and Hospitality Register via completion of the online form. Other than cash gifts (see above), such gifts may be retained, although gifts of a total value over £500 should not be accepted without the prior approval of the High Master.
- You may retain gifts received from suppliers if they are token work-related items e.g. pens, notepads, flash drives, desk calendars or diaries. Any other gifts should be politely refused or donated to the School or the School's nominated charity. In either case the Finance Director should be notified by email, and if the gift is being donated to charity, then the giver of the gift should be told that this is the case.

11.4 Staff should not put themselves in a position where it might appear that they are showing favouritism to one or more pupils. In particular, members of staff should not give gifts to individual pupils as doing so may give rise to concerns about grooming. As far as possible, be consistent and transparent in how you reward pupils or otherwise foster teacher-pupil relationships. In addition, be aware of the potential for a pupil to form an unsolicited, emotionally-dependent, attachment to a teacher. If pastoral interactions with a pupil become inappropriate or difficult, then the DSL, should be immediately informed and guidance sought. The circumstances should be recorded in writing by submitting a Low-Level Concern (see section 27) and, if necessary, a note placed on the child's file.

12. Social Contact

- 12.1 Members of staff must not establish or seek to establish social contact with pupils, or former pupils, while they remain of school age; for example, former pupils of SPPS who have left the School or pupils at the Senior School who have left the School before the end of the U8 year. If a pupil seeks to establish social contact, or if this occurs coincidentally, the member of staff should contact the DSL immediately and, where appropriate, submit a Low-Level Concern (see section 27).
- 12.2 Pupils are deemed to have left the School, and to have become Old Paulines, following the last day of the summer holiday, after the summer term of their final year at School; for the avoidance of doubt, the date that pupils become Old Paulines is 1st September. Social contact between staff and Old Paulines is not usually a matter for the School. However, were an intimate or sexual relationship to develop between a member of staff and a former pupil within two years of them leaving the School at the end of their Upper Eight year, then this would raise concerns about possible abuse of the staff member's professional position in grooming the young person whilst at School. Any such concerns would be referred by the School to the LADO and may lead to disciplinary action being taken against the member of staff after an appropriate hearing.
- 12.3 It is not advisable for members of staff to reach out and make, or reciprocate, social contact with Old Paulines until a period of 12 months has elapsed from the point the former pupil leaves (or would have left) the school at the end of their Upper Eighth year. Staff should be aware that making social contact with former pupils within this period of time has the potential to be misconstrued and could raise concerns amongst colleagues. If in doubt staff members should contact the DSL for advice.
- 12.4 Some pupils will, upon leaving school at the end of their Upper Eighth year, take on a position as a GAP Year employee in the school. Although these Gap Year employees will be staff colleagues, careful consideration should be given to managing social interactions between staff and Gap Year employees. Staff should seek to avoid one-to-one social contact with Gap Year employees and should avoid one-to-one communication outside of school systems. If online/mobile phone communications are required as part of their role in the school, please contact the DSL in advance for advice.
- 12.5 Staff must not share their personal contact details, such as home/mobile phone number, home, or personal e-mail address, with pupils. Staff must not have pupil phone numbers on personal phones. School mobile phones, or a central School contact number, must be used in situations where staff/pupils may require an emergency contact number, such as during a school fixture, day trip or residential trip.
- Any member of staff who unintentionally shares their personal contact details with a pupil must record the incident using the School's Low Level Concern form.
- 12.6 Staff must not share their personal contact details, such as home/mobile phone number or personal e-mail address, with parents. The school recognises that not all members of staff have easy access to a school landline. For those staff who fall into this category the following options are available:

- In SPS, landlines are available for staff to use in the HR meeting rooms when these rooms are not in use. They are located next to the Staff Room in the Senior School.
- In SPS, contact the appropriate Undermaster for that parent and arrange to use their office landline to make the call.
- In SPPS, a landline is available in the Marking Room.
- In SPPS, contact the appropriate Head of Year for that parent and arrange to use their office landline to make the call.

If a school landline is unavailable then staff should use the appropriate 'Hide caller ID' function on their personal mobile device, such as using 141 before the number you are dialling.

As with any emergency situation, if a delay in calling a parent would increase the risk of harm to a child, then staff should not hesitate in making the call with their own personal device if this is the only option available to them. This should then be logged using the School's Low Level Concern form.

12.7 In exceptional cases, and only with the prior authorisation of the DSL, it is permissible for a member of staff to share a dedicated school mobile contact number for use during school hours with a pupil whose welfare is of concern, as part of a risk management plan. In all such cases, in advance of sharing a dedicated school mobile contact number, the intention to share the number must be:

- authorised by the DSL (and any other senior managers as required by the DSL);
- notified and explained to parents if deemed not to put the pupil at further risk;
- explained to the pupil concerned via a written or oral briefing, so it is clear to them how and when they may use the dedicated school mobile contact details and that the details must not be shared with others.

It is advisable for staff to retain records of such authorisations, notifications and the details of the explanation given to pupils. Staff should also seek advice in advance from the DSL regarding the content of the explanatory briefings given to pupils.

12.8 Staff must maintain the highest professional standards at School social events, and they must not continue to socialise with pupils after the official finishing time or at alternative locations.

12.9 Staff must politely decline any invitation to attend a pupil's family home unless this has been sanctioned in advance by the DSL (also see section 12.10).

12.10 The relationship between tutors and parents helps provide a personal face to the School. Approachability and trust are vital, and parents should feel comfortable contacting the tutor through normal school channels, and vice versa. An open and honest relationship with parents can also help provide an insight into a boy's home life. A good, friendly rapport is to be encouraged, and tutors should use School based opportunities, such as parents' evenings, information evenings and co-curricular events involving their tutees, to help build these relationships.

12.11 Individual staff must politely decline any parental invitation to socialise informally, such as dinner or drinks, in restaurants or elsewhere, or offers of hospitality at events (also see section 12.10). The practice of socialising informally with parents carries with it the risk of blurring professional boundaries and this is not necessarily in the best interests of the child. In managing the parent-staff relationship, staff should be aware of appropriate professional boundaries and feel confident in holding to them. Advice is available, as required, from the SPS Deputy Head Pastoral, SPPS Senior Deputy or Surmaster.

12.12 Some staff, or a member of their family (for example where a member of staff is a Pauline parent), may have established family friendships/relationships with current parents and/or current pupils. In these circumstances, social contact, which may include visiting the family home, is acceptable, though staff must always be mindful of maintaining appropriate professional boundaries and confidences. Such friendships/relationships must be formally declared at the start of each academic year via an annual Low-Level Concern 'Declaration of Interests' (see section 27.7). Advice is also available, as required, from the SPS Deputy Head Pastoral, SPPS Senior Deputy or Surmaster.

12.13 Situations may arise where groups of parents invite multiple members of staff to social functions outside of school, with or without the presence of pupils. For example, a group of parents who wish to recognise the contribution of staff to the success of a sports team. For any informal social function involving staff and parents (whether pupils will be present or not) the first step is always to contact the DSL (SPS) or Senior Deputy Head (SPPS), to provide details of the invitation, to seek advice and request permission to attend. For the avoidance of doubt, the following constraints will always apply:

- All events involving a single member of staff will be declined;
- All events at a parental home, regardless of the numbers of parents and staff present, will be declined;
- All staff members must abstain from alcohol on the day of the event, until the completion of the event, when they are no longer in the company of parents and pupils and any professional responsibilities have been discharged.

If permission to attend the event is granted, 'best practice' reminders will be provided to attendees in advance by the DSL. These might include:

- In a social setting, professional boundaries can slip – in conversation be mindful of reputational damage to yourself and the School;
- Do not use a personal device to take photographs during the evening if pupils are in the image;
- Any gift received must be dealt with as set out in the 'Gifts and Hospitality' policy (also see section 11.3)
- Submit a Low-Level Concern on the day following the event for transparency and remember to flag anything that, on reflection, you feel is noteworthy.

13. Physical Contact

- 13.1 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.
- 13.2 A 'no touch' approach is impractical for most staff and may 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 given their age, stage of development, gender, ethnicity, and background.
- 13.3 It is not possible to be specific about the appropriateness of each physical contact, since an action that is appropriate with one child in one set of circumstances may be inappropriate in another, or with a different child. Staff should therefore use their professional judgement at all times, with regard to the School's Safeguarding and other policies; the applicable circumstances, such as whether there are other adults present; the individual pupil's age; any other material factors, including, but not limited to, whether the child has SEND or other vulnerabilities and whether any alternative strategies to physical contact can be used.
- 13.4 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 DSL should be informed of the incident and a Low-Level Concern (see section 27) submitted as soon as possible and, if appropriate, a copy placed on the child's file.
- 13.5 Physical contact may be appropriate where a pupil is in distress and needs comforting or if a member of staff has to give first aid. This is sometimes unavoidable with young children. Staff should remain self-aware at all times in order that their contact is not threatening, intrusive or subject to misinterpretation. Staff should listen, observe, and take note of the child's reaction or feelings, and so far as possible, use a level of contact or form of communication which is acceptable to the pupil and their job role. Parents should always be informed when first aid has been administered. Staff should use their own professional judgment when they feel a pupil needs this kind of support and should be aware of any special circumstances relating to the pupil. Particular care must be taken in instances which involve the same pupil over a period of time.
- 13.6 In certain curriculum areas, such as PE/games, music and drama, staff may need to initiate some physical contact with children, for example to support a child so that they can perform a task safely, to demonstrate the use of a particular piece of equipment/instrument or assist them with an exercise. Physical contact should only take place when it is necessary in relation to a particular activity, it should be for the minimum time necessary to complete the activity and take place in an open environment (see section 17, one-to-one situations, below). Contact should be relevant to a pupil's age and understanding and staff should at all times remain sensitive to any discomfort expressed verbally or non-verbally by the pupil.
- 13.7 Physical contact which occurs regularly with an individual child or young person is likely to raise questions unless the justification for this is part of a formally agreed plan (for example in relation to pupils with SEN or physical disabilities). Any such contact should be the subject of an agreed School risk management plan and subject to review. Where feasible, staff should seek

the child's permission before initiating contact. 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 which is acceptable to the child for the minimum time necessary.

- 13.8 Extra caution may be required where it is known that a child has suffered previous abuse or neglect. In the child's view, physical contact might be associated with such experiences and lead to staff being vulnerable to allegations of abuse.
- 13.9 It is recognised that some children may seek out inappropriate physical contact. In such circumstances staff should deter the child sensitively by helping them to understand the importance of personal boundaries, and also inform the DSL of the incident by submitting a Low-Level Concern (see section 27).
- 13.10 The general culture of 'limited touch' should be adapted, where appropriate, to the individual requirements of each child. Children with special needs may require more physical contact to assist their everyday learning. The arrangements should be understood and agreed by all concerned, including parents, justified in terms of the child's needs, consistently applied and open to scrutiny, and recorded in a specific support plan.

14. Behaviour Management

- 14.1 All pupils have a right to be treated with respect and dignity. Corporal punishment is unlawful in all schools. Equally, staff should not use any form of degrading treatment, force or restrictive intervention, to punish a pupil. Whilst the use of humour can help to defuse a situation, the use of demeaning or insensitive comments towards pupils is not acceptable in any situation. Staff should be aware that the School's anti-bullying policy applies to all members of the School community (pupils, parents, and staff).
- 14.2 Where a pupil's behaviour causes concern, the School's behaviour, rewards, and sanctions policy should be adhered to (see the Staff Handbook on the Intranet). If a member of staff is in any doubt as to the best course of action, they should seek further advice from a member of the Undermaster team, the Deputy Head (Pastoral) or the DSL. At St Paul's Prep School, guidance may be sought from any member of the senior leadership team.

15. Care, Control, Restrictive Interventions (both Physical and Non-Physical), and use of 'Reasonable Force'

- 15.1 The circumstances in which staff can restrictively intervene with a pupil are covered by the 1996 Education Act. Further advice is contained in the DfE advice document, which contains statutory and non-statutory guidance: *Restrictive interventions, including use of reasonable force, in schools (April 2026)*. All staff are expected to follow the advice (including definitions) from this document as enshrined in section 7 of the Behaviour, Rewards and Sanctions policy, staff training and the Staff Code of Conduct. The School's aims are to ensure that restrictive interventions (physical or otherwise) are kept to the minimum strictly necessary; and that any that are necessary are completed safely and for an appropriate reason.

15.2 **Restrictive interventions** of any kind should only be used after the member of staff concerned has assessed the situation, and in making their judgement has considered:

- Whether it is necessary;
- Whether it is proportionate;
- The potential impact on the pupil's welfare.

This list is not exhaustive and staff should also take into account other relevant considerations, particularly whether the child has any SEND, medical condition, emotional condition, communication challenge or other need that might make a restrictive intervention particularly distressing. Where circumstances allow, staff are encouraged to communicate with other adults to establish relevant information and discuss proposed actions. Further detail around making such judgements can be found within the Behaviour, Rewards and Sanctions policy, and in the DfE Guidance document.

Some restrictive interventions may involve the use of reasonable force by the staff member.

15.3 **Reasonable force.** Staff may legitimately use reasonable force within an intervention to prevent a pupil from committing a criminal offence, injuring themselves or others, causing damage to property, causing disorder among pupils at the school, whether during a teaching session or otherwise. Staff should have regard to the health and safety of themselves and others. This applies when staff are on School premises and when they are in charge of pupils elsewhere, for example on a School trip or other authorised out of School activity.

15.4 The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. 'Reasonable' means 'using no more force than is necessary for the least amount of time'. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of the classroom. Reasonable force is only appropriate where no other form of control or restraint is available and where it may be necessary to intervene. Any force used must always be the minimum needed to achieve the desired result and must be appropriate for the age, sex and understanding of the pupil and in keeping with the School's Behaviour, Rewards and Sanctions Policy.

15.5 Before intervening physically a member of staff must, where practicable, tell the pupil to stop and what will happen if they do not. The member of staff must continue attempting to communicate with the pupil throughout the incident and must make it clear that physical contact or restraint will stop as soon as it ceases to be necessary.

15.6 Under no circumstances should physical force or any other form of restrictive intervention be used as a form of punishment. The use of unwarranted physical force is likely to constitute a criminal offence. Restraint of any kind must always be administered safely, and never restricting airways, breathing, circulation, or applying pressure to neck or abdomen. If a pupil is unintentionally held on the ground, staff should release their holds and reposition to standing or a safer alternative as quickly as possible. All staff acknowledge that the use of force or restraint can be dangerous.

15.7 In all cases where any restrictive intervention or use of reasonable force is deemed necessary, the incident and subsequent actions **must** be documented and reported as soon as practicable, and with all endeavours on the same day. At SPS, such incidents and actions should be reported to the High Master, the Surmaster, the Deputy Head (Pastoral) and the DSL via the 'Restrictive Intervention and Reasonable Force Form'. At St Paul's Prep School, such incidents and actions should be reported using the same form to the Head, the Senior Deputy Head and the Prep School DSL. All reports should include:

- names of pupil and staff directly involved;
- any relevant needs or circumstances of the pupil, including whether the pupil involved has an identified special educational need or disability and their SEN status code;
- time, date, location and approximate length of time the intervention was used;
- brief account of the incident, including what led up to the incident, identified or potential triggers if known, any preventative or de-escalation strategies used, what type of reasonable force was applied (if any), the degree of force (if any), and details of physical injuries sustained, if applicable;
- brief account of why the use of force was assessed as necessary in that instance;
- any post-incident support, such as details of any medical treatment for injuries or other adverse impacts.

15.8 For each *significant incident in which a member of staff uses force on a pupil, it must be reported to each parent of the pupil as soon as practicable after the incident, and with all endeavours on the same day (except where the pupil is aged 20 or over, or it appears to the reporting staff member that doing so would be likely to result in significant harm to the pupil – in such an instance, the School, via the DSL or other member of the Safeguarding team (or any other staff member if they are unavailable), must report the incident to the local authority within whose area the pupil is ordinarily resident).

[*Note: a 'significant incident' is defined by the DfE as any incident where the use of force goes beyond appropriate physical contact between pupil(s) and staff member(s), for instance those appropriate instances of limited touch as described in Section 13 (Physical Contact) of this Code. It will include whenever physical force is used to implement a non-physical restrictive intervention]

15.9 A report of a significant incident made to parents should include the following details as a minimum:

- time, date, location and approximate duration of the intervention;
- brief account of what type of reasonable force was applied, and the degree of force;
- details of any physical injuries sustained, if applicable;
- brief account of why the use of force was assessed as necessary in that instance.

Best practice would then involve pastoral leads convening for follow up discussion of the incident as outlined in the DfE guidance, to best promote the ongoing welfare of the child.

16. Changing Areas and Washrooms

(Including shower and toilet areas and drama dressing rooms and backstage areas)

16.1 Young people are entitled to respect and privacy when changing clothes, using the toilet, or taking a shower. However, there needs to be an appropriate level of supervision in order to safeguard young people, 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.

16.2 In the Senior School, when supervising pupils using the changing rooms, staff should place themselves outside the main changing area, i.e., in the corridor or locker area, and not inside the changing rooms, toilets, or shower areas. Staff should enter the changing rooms, toilets, or shower areas only in an emergency or when addressing genuine concerns about a child's safety or welfare, or where there is reasonable suspicion of a serious breach of School discipline. Wherever possible, the staff member should seek support from a colleague so that they are not working alone.

In the Prep School, when supervising pupils using the changing rooms for PE, staff should place themselves at the entrance to the changing room. When supervising pupils changing for swimming, staff should place themselves outside of the changing room next to the entrance. When supervising pupils using the changing rooms for Games, staff should routinely patrol the changing rooms in order to manage behaviour. There should be a minimum of two staff supervising each changing room when pupils are changing for Games. For PE and swimming, there may only be one member of staff supervising. If a member of staff needs to enter the main changing room during swimming or PE, they should do so in line with the Senior School guidance above.

16.3 During production week for all drama productions, colleagues may at times have to enter dressing rooms to speak to members of the cast. They should knock, wait for permission to enter, and remain in the dressing room for as little time as is necessary. If, when they enter, a pupil is in a state of undress, they should leave immediately. The backstage corridor areas are places where pupils (as well as participating children from other schools) often need to circulate half-way through dressing for a show; staff should apply their professional judgement in these areas and ensure that they are never alone with a single pupil in a situation which could be misconstrued or compromising.

16.4 Members of staff should not use the pupils' toilets during school hours, or when pupils are in the school building. When using external facilities for games and sports or other trips, the time spent in shared public changing rooms or toilets should be kept to a minimum. Where practicable, staff-pupil use of such facilities should be deliberately staggered so as not to coincide.

16.5 In line with agreed pupil management procedures, it is acceptable for senior staff, duty staff, or staff with specific responsibility for a changing area (e.g., PE/games coaches), to periodically check changing areas or washrooms to confirm that they are being used/occupied appropriately.

16.6 If a member of staff believes their actions in any of these areas could be misinterpreted, the DSL should be informed of the incident and a Low-Level Concern (see section 27) submitted as soon as possible and, if appropriate, a copy placed on the child's file.

17. One-to-One Situations

17.1 Staff working in one-to-one situations with children and young people present a higher level of safeguarding risk. Teachers and others should recognise this possibility and plan and conduct such meetings in accordance with the guidance detailed in the model risk assessment (see Appendix 1). Every attempt should be made to ensure the safety and security needs of both staff and pupils.

17.2 In the case of individual music lessons with Visiting Music Teachers (VMTs), the Music School Manager should ensure that all the VMTs have read and understood the VMT Code of Conduct, particularly in relation to physical contact.

17.3 Staff should not arrange meetings with pupils in remote, secluded areas of School. They should ensure that there is visual access and/or an open door in one-to-one situations. Should a child become distressed, anxious, or angry during such a meeting, or should anything happen which could be misinterpreted or give rise to a concern, this must be reported via a Low-Level Concern (see section 27) and a written report detailing the incident kept on the child's file.

17.4 Some pupils may be reluctant to end the pupil-staff relationship they have enjoyed whilst at School. When a pupil leaves School the professional duty of care ends, however, it is important to continue to maintain professional standards of behaviour. Although current and former pupils may request meetings with staff for help with university applications, gap year advice or references for future careers, these meetings and any associated correspondence should be conducted through school systems, or at School within office hours, and in a professional manner.

18. Transporting Children

18.1 In certain situations, e.g., out of School activities, staff may agree to transport children.

18.2 Staff should only transport pupils in a private vehicle in exceptional circumstances, such as a medical emergency. If it is unavoidable, staff should always seek approval from the DSL and/or the Educational Visits Coordinator (EVC) and obtain parental consent before doing so.

18.3 For journeys in hired cars, and (in exceptional circumstances) a car belonging to a member of staff, the School has 'Occasional Business Use' insurance, which covers the use of such vehicles on behalf of the employer. For journeys using minibuses, please see the guidance in the School's Educational Visits Policy.

18.4 Staff should:

- plan and agree arrangements with all parties, including parents and the EVC, in advance;
- ensure that they are alone with a child for the minimum time possible. Wherever possible, another adult should accompany;

- identify the transport arrangements in the trip risk assessment, which must be signed off by the EVC and the DSL;
- be aware that the safety and welfare of the child is their responsibility until this is safely passed over to a parent / carer;
- ensure that when (in exceptional circumstances) travelling in a private car, that pupils fill the back seats first, and a pupil sits next to the driver only if this is unavoidable;
- for fixtures, staff should also see the guidance in the 'Away Sports Fixtures' Policy.

19. Boarding, Educational Visits, Sports and After School Activities

19.1 Staff should take particular care when supervising pupils in the less formal atmosphere of a residential setting or after-School activity.

19.2 During School activities that take place off the School site, or on the School site but out of school hours (including boarding and social events, such as society dinners), staff remain in a position of trust and need to ensure that their behaviour cannot be interpreted as seeking to establish an inappropriate relationship or friendship, and that they maintain high standards of professional conduct and remember their position as role models at all times.

19.3 Any physical contact should be restricted to occasions when it is absolutely necessary (for example: when breaking up a fight between two pupils; dressing a wound; taking a pupil's temperature; or intervening to prevent a pupil from putting themselves in danger; or comforting a pupil in a state of distress) or when playing a contact sport, where the contact should be proportionate and as befits the activity and accounts for any physical mismatches between the staff member and the pupils.

19.4 Where out of School activities include overnight stays, careful consideration needs to be given to sleeping arrangements. Pupils, staff, and parents should be informed of these prior to the start of the trip. Staff should always be accommodated in separate rooms to pupils, with access to separate washing and toilet facilities; on the rare occasions where separate washing and toilet facilities cannot be guaranteed this must be appropriately risk assessed and control measures implemented (e.g., setting times for their use, stationing a member of staff outside the door when staff are using the facilities).

19.5 The following protocols apply in all situations, including society/club dinners, within the boarding houses, on School trips and during foreign exchanges involving an overnight stay, including where St Paul's staff are overseeing the hosting of foreign exchange pupils:

- The consumption of alcohol by staff (SPS & SPPS) must at all times be in line with the SPS & SPPS Alcohol policy;
- Members of staff who attend any School event (whether on duty or not) involving any pupils, St Paul's or otherwise, must abstain from alcohol on the day of the event until the completion of the event when pupils have departed and professional responsibilities have been discharged, and there are no longer any pupils in their care;
- All members of staff involved in a School trip must abstain from alcohol for the duration of the trip;

- Pupils may not consume alcohol on the School site at any time, or at any School organised or related event/activity off-site. This applies equally to pupils who are 18 or over;
- Alcohol must not be made available at any on-site or off-site School run event where pupils are present;
- Staff should not take pupils on trips, organise out of School activities, or entertain a pupil or pupils in a restaurant or other social venue, or in School, except as part of an organised School function or trip, for which permission should be sought in advance in line with normal School procedures.

19.6 In addition, the following protocols should be observed in all but emergency situations (for example: fire evacuation; where there is immediate concern for a pupil's safety or state of mind; where you suspect a pupil or pupils might be consuming alcohol or using drugs):

- Members of staff should refrain from being in washrooms, changing rooms or toilets when pupils are, or might be, in them in a state of undress. Where it is essential to get a message to or from a pupil who is in a washroom, changing room or toilet, the staff member should ask another pupil to convey the message.
- When checking on a pupil in his room, or wishing to speak to him, the member of staff should always knock and wait for the pupil to say when they are happy for them to open the door. Pupils will have been instructed to say, "please wait" or "come in" promptly as appropriate. If a pupil does not answer (for example if asleep), the member of staff must identify themselves to the pupil as about to enter before opening the door.
- If a pupil is in a state of undress when a member of staff opens the door, the member of staff should promptly withdraw from the room, instructing the pupil to get dressed before they return and then return after a specified period of time, sufficient to allow the pupil to get dressed.

19.7 As far as possible, any planned meetings with pupils should take place in an office, classroom or public area and the member of staff should maintain an appropriate distance from the pupil. A member of staff should not generally enter beyond the doorway of a pupil's bedroom: the majority of actions that a supervising staff member will be required to undertake (for instance, checking pupils are in their rooms; checking on good order; finding a pupil to arrange a longer conversation; conducting short conversations about academic work) can and should be accomplished without entering beyond the room's doorway. Where there is a compelling safety, welfare, or operational reason why the staff member must enter the room, the door must be propped open and the pupil/s within must have signalled that they are happy for the member of staff to come in. The member of staff must respect and bear in mind the privacy and personal space of the pupil/s concerned, under no circumstances sitting on their bed, and should leave the room as swiftly as the task allows. Time spent within a pupil room in this way should be noted with the Housemaster/Trip Leader, or where the matter was more than a brief operational task, entered as a Low-Level Concern (see section 27).

19.8 Health and Safety arrangements require members of staff to keep colleagues/employers aware of their whereabouts, especially when involved in an out of School activity. Staff must be aware of and follow the guidance in the School's policy for Health and Safety of Pupils on Educational Visits.

19.9 In addition, for trips involving pupils from St Paul's Prep School, staff must adhere to the following guidelines as well as the points above:

- Support staff should not be left in sole charge of pupils except where it has been previously agreed as part of the risk assessment;
- Support staff should not be involved in night-time supervision or in dealing directly with pupil discipline. Disciplinary issues should be referred to the trip leader or to another experienced member of the teaching staff who is accompanying the trip;
- Duty rotas should be clear and in writing.

19.10 If, at any point on the trip, a member of staff is concerned that a pupil is suffering harm or is at risk of harm, the matter should be referred to the DSL as soon as possible or, in their absence, a Deputy DSL. If at any point there is a risk of immediate serious harm to a child, a referral should be made to children's social care immediately (within one working day). Anybody can make a referral.

20. First Aid and Administration of Medication

20.1 Information about pupils with acute allergies and/or medical needs is available on iSAMS. An updated list of these pupils is circulated to all academic staff at the beginning of each academic year.

20.2 In the event of an untrained member of staff finding themselves in an emergency situation requiring urgent medical attention, they should contact 999 immediately and ask for the appropriate emergency service.

20.3 The School has a number of trained first aiders (see the list on the Intranet). Teachers may volunteer to undertake this task but it is not a contractual requirement. Staff should receive appropriate training before administering first aid or medication. In particular, staff who might have to administer Emergency Medication (such as an epi-pen) should receive appropriate training before leading an off-site visit or trip involving one or more pupils who have to carry Emergency Medication.

20.4 Under normal circumstances in School, all medication should be administered by the School Nurse or Doctor or by the child themselves in the presence of the School Nurse or Doctor. The exception to this is that pupils can carry and administer their own prescription medication, emergency medication or over-the-counter medication if they do so in a responsible manner, ensure that it is solely for their own personal use and follow the directions on the packet.

20.5 For School trips, explicit parental consent should be obtained before giving any medication to a pupil, even over-the-counter medicines such as paracetamol, ibuprofen, or antihistamine. Such consent can be received by any means: letter/telephone/email/text message.

20.6 Should prescription medication be required during a School trip, the member of staff responsible for the trip should obtain a copy of the Medication Form from the School Nurse in advance of the trip.

- 20.7 Controlled Drugs are those which, under the Misuse of Drugs Regulations (2001), must be locked away appropriately and strictly monitored and recorded in a dedicated book as they are used. Should controlled drugs be required during a School trip, the staff member responsible for the trip should remain in possession of the medication and ensure that it is securely kept at all times and only administered as per the prescription and in the presence of another member of staff.
- 20.8 Further information is available from the First Aid Policy which is available on the School website and the Staff Handbook page of the School's intranet.
- 20.9 When administering first aid, wherever possible, staff should ensure that another adult is present, or is aware of the action being taken. The School Nurse and the boy's parents should always be informed when first aid has been administered.
- 20.10 Any member of staff who is from time-to-time prescribed medication by a doctor should inform the doctor of their responsibilities and check whether any side effects might affect their ability to carry out these responsibilities. St Paul's staff should then inform the Surmaster and St Paul's Prep School staff should inform the Senior Deputy Head so that a risk assessment can be carried out and any reasonable adjustments made to their working environment or responsibilities while they remain on the course of treatment.

21. The Curriculum

- 21.1 Some areas of the curriculum will include or raise subject matter which is of a sexual or of an otherwise sensitive nature (e.g., depression, self-harm, eating disorders, domestic violence, bullying, etc). Care should be taken to ensure that resource materials cannot be misinterpreted and clearly relate to the learning outcomes identified when planning lessons. Those with less experience should seek guidance from a senior member of staff, such as their Head of Department or the DSL.
- 21.2 The curriculum will sometimes include or lead to unplanned discussion about subject matter of a sexual or otherwise sensitive nature (e.g., depression, self-harm, eating disorders, domestic violence, etc). Responding to pupils' questions will require careful judgement and staff should take guidance before lessons with this potential from a senior member of staff. Members of staff should be aware of the potential for sexual education classes to be misused for 'grooming' purposes and should avoid over-sexualised and/or unnecessarily graphic teaching materials and/or conversations. If in doubt about the acceptability of any content, advice must be sought from the DSL.
- 21.3 Be aware that such discussions might affect particular pupils more than others (for example, if a pupil has suffered a related traumatic experience). Where a discussion takes a course that makes you feel uncomfortable or appears to make a pupil feel uncomfortable, report it via a Low-Level Concern (see section 27) as soon as possible. The circumstances should be recorded in writing as soon as possible and, if appropriate, a copy placed on the child's file.
- 21.4 Parents have the right to withdraw their children from the sex-based elements of the school's RSE provision up to and until three terms before their child turns 16. After that point, if the child

wishes to receive sex education rather than be withdrawn, the school will make arrangements to provide appropriate catch up. The right to withdraw does not apply to Relationships Education, Health Education or any part of the Science curriculum that deals with the biological aspects of human growth and reproduction.

- 21.5 Further guidance can be found in the Relationships and Sex Education (RSE) Policy, which is published on the Staff Handbook page of the intranet. At St Paul's Prep School, guidance can be found in the St Paul's Prep School Relationships and Sex Education Policy, which is published on the School's website.
- 21.6 All members of staff should avoid any behaviour in the teaching of any subject which might lead any reasonable person to interpret their actions or words as promoting partisan political views in the School. At any point where political issues are brought to the attention of pupils, staff should take any steps as are reasonably practicable to ensure pupils are offered a balanced presentation of opposing views.

22. Photography, Videos, and other media

- 22.1 Staff are only allowed to take digital/video images involving pupils to support educational aims, for publicity purposes or to celebrate achievement. Images and other media must only be made and/or stored on School devices; the use of personal devices (including personal phones) is not allowed. Staff need to be aware that there is potential for the capturing of images on a personal device (including a phone), and/or for the storing of images of pupils in a private location, to be misconstrued. For example, capturing and storing images of particular pupils in certain contexts may raise concerns about 'grooming'. Careful consideration should always be given as to how activities are organised and undertaken. Staff should ensure that children are appropriately dressed and are comfortable that their image is being recorded.
- 22.2 Using images of children for publicity purposes will require the consent of the parents of the individual concerned. Images should not be displayed on websites, in publications or in a public place without such consent. Staff should not post any images on any personal social media. The definition of a public place includes areas where visitors to the School have access.
- 22.3 Parents are requested to give their permission for the use of pupils' photographs on the School's intranet, website, or social media as part of their registration for the School. The permission applies throughout their time at School and for three years after leaving and parents have the right to alter their consent at any time. The school's marketing and communications department manages the list of those parents who have not provided consent for senior school pupils; the SPPS Director of Computing manages the equivalent list for St Paul's Prep School. The consent list must be checked in advance before posting any images of a child on social media channels. Even where parental permission is granted, the following guidelines from the Department of Education should be adhered to: "If the pupil is named, avoid using the photograph. If the photograph is used, avoid naming the pupil". We will not normally use children's full names alongside their photographs in our own printed publications, in videos or on our website. However, pupils' first names may be used and their full names may be given in group situations where they cannot be linked to individuals in the photograph. In cases where it is

necessary for the sake of the article to include a photograph that would directly identify an individual pupil, parental consent must be sought and received before the article is published.

- 22.4 School mobile devices must be used if recording digital/video images involving pupils. Any digital/video images of pupils recorded on a School mobile device must be uploaded to the appropriated shared area of the School network (i.e. the Digital Asset Management System or DAMS – contact the Marketing team for further details) then deleted from the School device as soon as is practically possible.

Photographs of children must not be stored on a member of staff's personal drive on the network, or departmental drives, for longer than is necessary to complete a particular task (for example, when producing a PowerPoint presentation for an assembly).

- 22.5 Any images which might be considered sexually suggestive, demeaning, or otherwise inappropriate in any way should be actively deleted. Additionally, staff should not take images of a child's injury, bruising or similar (e.g. following a disclosure of abuse), even if requested by children's social care; or make audio recordings of a child's disclosure.

23. Use of the School IT Systems, Including Internet Use and Digital Communication with Pupils

- 23.1 As part of our safeguarding policy we expect staff and pupils and, where appropriate, parents, to follow this protocol when using PCs and mobile devices. All of the advice contained in other sections of this Code applies equally in the digital realm. In addition, there are other risks, specific to the use of PCs, mobile devices, software applications and the internet, that need to be understood by those who work with schoolchildren.

- 23.2 All members of staff are required to have read and to follow the School's ICT Acceptable Use Policy, Generative Artificial Intelligence (AI) policy, mobile devices policy, e-Safety policy and Social Media policy. All staff are prohibited from befriending St Paul's or St Paul's Prep School pupils via social media (such as Facebook and Instagram). An invitation to become a friend or similar should be politely but firmly declined and the member of staff should remind the pupil of the School rules relating to social media and personal contact details. Email, messaging or use of social media between staff and pupils outside agreed protocols may lead to disciplinary action and/or criminal investigations. Friend requests from the parents of current pupils should be politely declined, with a reminder of the more formal channels which they can use to discuss their child's education.

- 23.3 Our relevant policies and this code apply to all practice in connection with your work at the School, regardless of whether this is conducted over a School machine, a School system, on your own device or over systems belonging to you or a third party.

- 23.4 The ICT Acceptable Use Policy provides the following advice:

All staff must recognise that once something is posted online it has a persistence that is not like something that is said. It is also replicable and searchable (directly and through its metadata), and you cannot be sure who your audience is or will be. Once something is posted online, its effects are often magnified and can be mirrored out of context. For example, Hashtags can link

your content to other content with the same hashtag; retweeting a post can be viewed as a public sign of endorsement, which may be inappropriate in some circumstances. All of this requires experience to understand. Remember: when you post, you have not only your own reputation to consider but also that of others and that of the School. Every member of the community has to take responsibility for his or her actions online. If you are in doubt, it is best not to post, send an email, etc. We encourage staff to use digital technologies but to do so in an informed, thoughtful way that is fully consistent with the position of trust we occupy. The School promotes responsible participation with pupils through such means and this may involve sites or apps where users create profiles, form relationships, and share information. Contact of this kind can enhance learning and personal development and can help to ensure supervision and safeguarding of pupils, as well as encouraging them to interact appropriately in the digital realm. However, staff must ensure that any such contact does not breach the guidance provided in sections 10 (Propriety and Behaviour) and 12 (Social Contact) above.

- 23.5 Staff are expected to use generative artificial intelligence (AI) thoughtfully, transparently, and professionally, as a supportive tool rather than a substitute for human judgment. While AI may be used to enhance efficiency, creativity, and understanding, staff remain accountable for their use of all outputs and must always critically check for accuracy, bias, and appropriateness before use. Only school-approved AI tools should be used for professional purposes, with strict safeguards around privacy, data protection, safeguarding, and intellectual property. Staff must not share confidential or personal data, nor rely on AI for high-stakes professional judgments, ensuring that human oversight, ethical awareness, and the school's values remain firmly at the centre of all AI-supported work.
- 23.6 Staff should ensure that they understand the tools they are using, the implications of any privacy and sharing settings, and, on a site-by-site basis, the terms and parameters of any connections or networks made. In particular, be sensitive to the potential for a relationship with a pupil to be misunderstood or misrepresented by the pupil or misrepresented by the terminology or interface of a given online platform. Be aware that pupils will be naturally curious about your personal life outside School and may try to find out more about you. Staff should ensure their settings prohibit others from tagging them in any photos or updates without their permission and be proactive in asking others to remove any undesirable content related to them. Social media sites often update their privacy settings and may add new features. Staff are advised to revisit their privacy settings on a regular basis to ensure they remain effective. When joining or being added to a Facebook (or other social media) group, always check whether it is public, closed (where anyone can see the members of the group but not the discussion) or secret (where neither the members or the discussion are visible).
- 23.7 Certain sites and apps may lend themselves in a straightforward way to use at School, irrespective of whether this is by adults or pupils (e.g., a social app that records running). Others may require the creation of a separate account (e.g., 'X') for teaching purposes, or a thorough and careful understanding of the settings needed to ensure that pupils see only what they wish them to see (e.g., Facebook, Instagram). Staff who use social media sites should ensure maximum privacy settings are used.

- 23.8 Particular awareness is necessary of issues associated with the words deployed to describe the establishment of contacts and networks on-line: there are innumerable ways, across countless sites, of defining or describing contacts and connections. For example, Facebook has distorted the usual understanding of the term “friending”, and there are “circles” on Google.
- 23.9 Where a site or app is used in the course of a School activity or with a class, it is recommended that the idea is talked through with the Director of Digital Learning & Innovation first: they will be able to advise and, if necessary, will take the matter to the High Master/Surmaster or Head. Pupils participating in such activities must not be identifiable in any way that puts them at risk. Where contributions and/or comments are created by pupils, the teacher in charge accepts full responsibility for the monitoring and moderating of the site or app and will treat any issues arising appropriately.
- 23.10 In any professional capacity, staff must not use pseudonyms or post anonymously, though it is good practice to signal any School-related account as being distinct from a personal account (by using your title and surname, or School role or designation, e.g., Ms Smith, SPS English Teacher). Staff must ensure they do not claim or appear to claim to represent or speak in the name of the School except where specific permission to do so has been given by the High Master/Surmaster or Head. A School email address should never be used for any personal use of social media.
- 23.11 There should be no communications between staff and pupils on personal social media. Electronic communications between staff and pupils should be conducted on School systems, such as School email, or the School virtual learning environment. Exceptions to this can only be made via application to the DSL and e-Safety Officers.
- 23.12 Staff should at all times be aware of their obligations to keep appropriate records of contact with pupils and to work in an obviously open and transparent manner when communicating with pupils. In particular, staff should recognise the difficulties presented by certain messaging platforms, such as private direct messaging (e.g., via WhatsApp, Slack, etc.) and make use of School-based platforms. If a pupil messages a member of staff privately, the communication should be re-directed to a School-based platform (e.g., School email) and any concerns reported via a Low-Level Concern (see section 27).
- 23.13 Staff may, of course, choose to use social sites and apps in a personal capacity. It remains the case that ‘when you post, you have not only your own reputation to consider but also that of others and that of the School’. You may wish to say where you work and what you do. Many people who do this include a disclaimer along the lines of, ‘the views expressed here are my own and not my employer’s’. Such a disclaimer in no way dispenses with the need to exercise good judgement and care in what you say and do online.
- 23.14 All staff must understand the standards of behaviour expected of them. Breaches of these standards may result in disciplinary action. Such breaches might include, but are not restricted to: failure to comply with the law or relevant regulatory bodies; communication of confidential or personal information; defamation or disparagement of the School or School community and its members; harassment or bullying; failure to comply with our policy concerning the use and distribution of images. The School’s Disciplinary Procedure (Conduct) document gives specific examples of inappropriate use of the internet which may constitute gross misconduct. Under

no circumstances should adults in School access, or attempt to access, inappropriate images, videos, media or materials. Accessing child pornography or indecent images of children on the internet, and making, storing, or disseminating such material, is illegal and, if proven, will lead to the individual being barred from working with children and young people.

23.15 Staff should be aware that the school filters and monitors internet use on the school site and school devices. Staff may unintentionally trigger the filtering and monitoring software in school if they have accessed unsuitable material off site without closing it on their browser. Appendix 2 details how such unintended breaches will be managed.

23.16 While members of staff are provided with a School email account for professional use, it is recommended that they also have a separate account with the provider of their choice for personal email communications. During the School day our primary focus should be the education and welfare of pupils and any personal correspondence or business should not substantively inhibit or conflict with that focus.

23.17 In all things, staff should act with consideration and with an awareness of the trust invested in them for the safeguarding of pupils. Moreover, staff should be proactive in promoting good online practice by every member of the community. Your judgement will be informed by your experience, prior training, character, and the context of any given situation, but it must also be informed by your professional obligations. Where you have concerns about a pupil's behaviour online, including if you feel you are the victim of cyberbullying or inappropriate comments photos or posts, or if you believe your own actions may be misinterpreted, you should immediately inform and take guidance from the Director of Digital Learning & Innovation and submit a Low-Level Concern (see section 27). Should you receive any abusive messages, it is advisable not to delete them but to keep a record of them to facilitate any subsequent investigation.

23.18 Staff engaging in online teaching & learning should display the same standards that they would in the real world; they should also role model this to pupils and parents. Specific guidance on safe remote working can be found within the Integrated Safeguarding Portfolio ([here](#)) section of the Staff Handbook.

24. Whistleblowing

24.1 Whistleblowing is the mechanism by which staff can voice their concerns, made in good faith, without fear of repercussion. The School has a Whistleblowing code, published in the Staff Handbook that meets the terms of the Public Interest Disclosure Act 1998 and aims to support staff in appropriately reporting any such concerns.

24.2 Staff members are expected to understand and take seriously their individual responsibilities to bring matters of concern to the attention of senior management and, where necessary, relevant external agencies. This includes concerns about the behaviour of another staff member in addition to concerns about poor or unsafe practices or potential failures in the School's safeguarding regime.

25. Sharing Concerns and Recording Incidents

- 25.1 The welfare of the child is paramount. All staff should be aware of the School's Safeguarding and Child Protection policy (available via the Staff Handbook on the School intranet), including procedures for dealing with allegations against staff. Staff who are the subject of allegations are advised to contact their professional association.
- 25.2 In the event of an incident occurring, which may result in an action being misinterpreted and/or a spurious allegation being made against a member of staff, the relevant information should be clearly and promptly recorded and shared with the High Master (or in their absence, the Chair of Governors) in accordance with the School's Safeguarding and Child Protection policy. Early discussion with a parent or carer could avoid any misunderstanding. At St Paul's Prep School such information should be shared with the Head (or in their absence, the High Master).
- 25.3 Members of staff should feel able to discuss with their Head of Department or a member of senior management any difficulties or problems that may affect their relationship with pupils so that appropriate support can be provided, or action can be taken.
- 25.4 All staff have a duty to report any child protection concerns to the DSL, or in their absence, a Deputy DSL.

26. Disclosure and Barring Service Checks

- 26.1 All staff are subject to an enhanced Disclosure and Barring Service check before taking up their position at the School. It is the responsibility of members of staff to inform the High Master (SPS staff) or Head (SPPS staff) in confidence if they are charged with a criminal offence whilst in the employment of the School. Staff must notify the High Master (SPS staff) or Head (SPPS staff) immediately of anything that affects their suitability, including any cautions, warnings, convictions, orders, or other determinations made in respect of them that would render them disqualified from working with children.

27. Low-Level Concerns

- 27.1 As part of our whole School approach to safeguarding we wish to promote an open and transparent culture in which all concerns about all adults working on behalf of the School (including supply teachers, volunteers, and contractors) are dealt with promptly and appropriately. Creating a culture in which all concerns are shared responsibly and with the right person, and recorded and dealt with appropriately, is critical.
- 27.2 There may be occasions where something occurs which is out of the ordinary and which causes a member of staff to have doubts about the behaviour of another adult towards a pupil or another child or concerns about how their own behaviour might be misinterpreted. It is important that any concerns, or incidents which might give rise to concerns about the conduct of staff, are reported to the High Master (SPS)/Head (SPPS) and DSL, however minor. In the vast majority of cases, there will be a perfectly innocent explanation for what has occurred, and staff should not feel that making a report, or being the subject of a report, will cause them to suffer

any detriment or stigma where this is the case. Reporting of these types of concerns is a neutral act, and the High Master (SPS)/Head (SPPS) and DSL will, on receipt of a report, determine how to best approach the issue.

27.3 A concern of this nature is called a 'Low-Level Concern'. The term 'Low-Level Concern' does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold of harm. A Low-Level Concern is any concern – no matter how small, but still the cause of a sense of unease or a 'nagging doubt' – that an adult working in or on behalf of the School may have acted in a way that is inconsistent with the staff code of conduct.

27.4 A Low-Level Concern should be used by staff where they are at all concerned about the behaviour of an adult, not just where it is clear that a role or professional boundary has been broken. The purpose of such reporting is to protect both pupils, and the staff working with them, and allows a system for a simple record to be kept in case events are later referred to or any patterns emerge. In this way we can:

- address unprofessional behaviour, and support the individual to correct it at an early stage;
- provide a responsive, sensitive, and proportionate handling of such concerns when they are raised;
- help identify any weakness in the School's safeguarding system.

27.5 The Low-Level Concern system also enables staff to self-report, as well as to report on other staff members. It is accepted that there are occasions when School staff, as professionals, have to make decisions to act in a particular way in order to protect the health, safety, and welfare of their pupils. This may, in some cases, put the adult in a vulnerable position and cause the adult, with hindsight, to consider that on reflection they might not act in the same way in a similar situation in future. In this scenario, staff must submit a Low-Level Concern.

A Low-Level Concern may be made in person to the DSL, High Master, or Head (as appropriate) or on the Low-Level Concern Form available on the staff handbook page on the intranet. If the notification is made in person in the first instance, staff may be required to complete a Low-Level Concern Form later.

27.6 Examples of circumstances in which staff must submit a Low-Level Concern are as follows:

- witness a colleague being over familiar with pupils;
- know that a colleague has favourites amongst those they teach;
- become aware that a colleague has images of pupils on personal devices;
- email, messaging, use of social media sites or other communication between a colleague and pupils outside agreed protocols;
- if a staff member becomes involved in an intimate or sexual relationship with a former St Paul's pupil, regardless of the age of the (former) pupil;
- any incident where, for whatever reason, you believe a member of staff has not complied with this Code of Conduct;
- any social contact with pupils outside of School (other than planned/authorised events, educational visits or trips, or trivial incidents such as passing a pupil in the street or the supermarket or noticing that they are sitting, separately, in the same restaurant or cinema)

- particularly where the member of staff and /or pupil(s) is/are under the influence of alcohol;
- the fact of, and explanation for, any one-to-one contact with a pupil on School trips, particularly if this takes place in a bedroom or other private space;
 - any incident of physical contact with a pupil when no one else is present, including when administering first aid or medical treatment (School medical staff are exempt from this requirement), and including physical demonstrations in one-to-one sports coaching, music lessons, etc;
 - any incident where a staff member feels that their own actions or behaviour towards a pupil, or that of another adult, may have been misinterpreted or may have given rise to a risk of misinterpretation.

This is not intended to be an exhaustive list. Anything which causes staff to have a 'nagging doubt' about the way in which other adults behave or interact with pupils should be notified, in order to protect both pupils and the members of staff involved.

27.7 Where a member of staff, or a member of their family, has an established family friendship/relationship with a current parent and/or current pupil this should be formally declared at the start of each academic year via an annual 'Declaration of Interests'. Once declared this removes the need for informal social contact associated with such friendships/relationships to be reported using the Low-Level Concern system.

28. Appearance

- 28.1 Staff should ensure that they are dressed decently, safely, and appropriately for the tasks they undertake; this applies equally to online or virtual teaching. It is important that staff maintain a professional appearance at all times when pupils are present on site. Line managers are responsible for ensuring that staff observe the standards set by this dress code.
- 28.2 All members of staff are supplied with a school lanyard and identity badge that must be worn and visible at all times when on site for security reasons, whether in or out of term-time.
- 28.3 The normal dress code for female teaching and office-based staff is smart office wear, which may include shirt/blouse, trousers, skirt, suits, and dresses.
- 28.4 The normal dress code for male teaching and office-based staff is a suit (or blazer and smart trousers), worn with a shirt and tie. Ties need not be worn in the summer term or when doing so would pose a health and safety risk (for example during science practical lessons or when operating machinery).
- 28.5 Staff may wear religious and cultural dress (including clerical collars, head scarves, skullcaps, and turbans).
- 28.6 Jeans and trainers should not be worn in term-time except on official 'non-uniform' days. Outside term-time, a more informal dress code is acceptable, though staff should be mindful of the need to project a professional appearance when hosting visitors on site, or, for example, when conducting interviews.

- 28.7 It is inappropriate in a School setting at any time to wear casual clothing such as cut-off shorts, crop tops, see-through material or clothes that expose areas of the body normally covered at work. Similarly, staff should not wear excessive or unconventional clothing, t-shirts with inappropriate slogans or excessive branding, or jewellery that could present a health and safety risk. Footwear must take account of health and safety considerations; for example, flip-flops should not be worn. Staff should consult their line manager if specific clothing is required for a medical issue (such as, for example, a request to wear shorts due to a plaster required for a broken leg).
- 28.8 Tattoos that include imagery and/or text that are inappropriate for a School setting should remain covered at all times.
- 28.9 PE staff and those who assist with the coaching of games activities may wear suitable sports apparel to facilitate instruction and supervision of these activities. For fixtures, male staff responsible for teams are expected to wear suit (or blazer) and tie, and female staff smart outdoor wear, unless involved in refereeing or otherwise officiating, where sports apparel is more suitable.
- 28.10 Staff involved in manual labour (such as the Grounds, Estates and Services staff) may wear clothing appropriate to their professional role. Contractors will wear clothing suitable for their role, which will be agreed in advance, and which does not contravene the direction given above.
- 28.11 Where there is a requirement to use safety clothing and equipment, it should be worn or used as appropriate and directed.
- 28.12 In the event of a dispute on any aspect of the dress code, St Paul's staff should consult with the Surmaster, St Paul's Prep School with the Senior Deputy Head of SPPS and Support staff with the Director of Operations.

29. Infatuations and Crushes

- 29.1 All staff need to recognise that it is not uncommon for pupils to be strongly attracted to a member of staff and/or develop a 'crush' or infatuation. They should make every effort to ensure that their own behaviour cannot be brought into question, does not appear to encourage this and be aware that such infatuations may carry a risk of their words or actions being misinterpreted.
- 29.2 Any member of staff who receives a report, overhears something, or otherwise notices any sign, however small or seemingly insignificant, that a young person has become or may be becoming infatuated with either themselves or a colleague, should immediately report this to the DSL via a Low-Level Concern (see section 27). In this way appropriate early intervention can be taken which can prevent escalation and avoid hurt, embarrassment or distress for those concerned.
- 29.3 The DSL will give careful thought to those circumstances where the staff member, pupil and their parents/carers should be spoken to and will ensure a plan to manage the situation is put in place. This plan will respond sensitively to the child and staff member and maintain the dignity of all. This plan will involve all parties, be robust and regularly monitored and reviewed.

30. Home visits

- 30.1 All work with pupils and parents should usually be undertaken in the School or in public places. There are however occasions, in response to an urgent, planned, or specific situation or job role, where it is necessary to make one-off or regular home visits. Such situations must be identified to the DSL in advance, and a risk assessment must be put in place to safeguard both staff and pupils.
- 30.2 A risk management plan will be agreed prior to any planned home visit taking place. The plan will take account of any known factors regarding the pupil, parents/carers and any others living in the household.
- 30.3 Home visits must be carried out by a minimum of two staff. Particular consideration will be given to any circumstances which might render staff members becoming more vulnerable to an allegation being made e.g., hostility, child protection concerns, complaints, or grievances. Specific thought will be given to visits outside of 'office hours' or in remote or secluded locations.

31. Exposure to inappropriate media

- 31.1 Staff should take extreme care to ensure that children and young people are not exposed, through any medium, to inappropriate or indecent media.
- 31.2 There are no circumstances that will justify adults: making, downloading, possessing, or distributing indecent images, videos or pseudo-images of children (child abuse images). Accessing these images, whether using the settings or personal equipment, on or off the premises, or making, storing, or disseminating such material is illegal.
- 31.3 If indecent images of children are discovered at the School or on the School's equipment or setting's equipment an immediate referral will be made to the Local Authority Designated Officer (LADO) and the police. The images/equipment will be secured and there will be no attempt to view or delete the images as this could jeopardise necessary criminal action. If the images are of children known to the School, a referral will also be made to children's social care in line with local arrangements.
- 31.4 Under no circumstances should any adult use School equipment to access pornography. Personal equipment containing pornography or links to it should never be brought into or used in School. Further information can be found in the Acceptable Use Policy, Section 23.14 of this policy and Appendix 2 of this Policy. This would raise serious concerns about the suitability of the adult to continue working with children and young people. In the event of any indecent images of children or unsuitable material being discovered on a device the equipment should not be tampered with in any way. It must be secured and isolated from the network, and the LADO must be contacted without delay. School staff should not attempt to investigate the matter or evaluate the material themselves as this may lead to a contamination of evidence and a possibility that they will be at risk of prosecution themselves.
- 31.5 Staff should keep their passwords confidential and not allow unauthorised access to equipment.

32. Personal living accommodation (including on-site provision)

- 32.1 Staff, or the family members of those who live on-site, should not invite any pupils into their living accommodation unless the reason to do so has been firmly established and agreed in advance with the DSL and the pupil's parents/carers. It is not generally appropriate for staff to use their private living space for any School activity, play or learning that involves pupils visiting or spending time in their private living accommodation. This includes seeing pupils for e.g., discussion of reports, academic reviews, private tuition, social events, pastoral care, or counselling. Likewise, pupils should not be asked or invited to assist staff with private or personal jobs or tasks, either for or without reward, at or in their private accommodation.



Appendix 1: One to One Supervision Risk Assessment

Date: (1)	Assessed by: (2)	Validated by: (3)	Location: (4)	Assessment ref no (5)	Review date: (6)
06/25	SM	DSL	School wide	Not Required	06/26
<p>Task: (7)</p> <p>This Risk Assessment covers 1 to 1 supervision which might take place around the School. This includes formal activities such as individual music lessons, interviews with individual pupils, and ad hoc meetings. This should be read in conjunction with the Staff Code of Conduct. Underpinning principles:</p> <ul style="list-style-type: none"> - The welfare of the child is paramount - Staff should understand their responsibilities to safeguard and promote the welfare of pupils - Staff are responsible for their own actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motivation and intentions - Staff should work, and be seen to work, in an open and transparent way <p>Adults should always consider whether their actions are warranted, proportionate, safe, and applied equitably.</p>					
Activity	Hazard	Person(s) in danger	Existing measures & Requirements to control risk	Risk rating	Result
(8)	(9)	(10)	(11)	(12)	(13)

<p>Planned/unplanned 'one-to-one' situations (such as music lessons, programmed meetings, medical consultations, use of communal washroom/WC facilities during School trips)</p>	<ul style="list-style-type: none"> - Inappropriate behaviour not witnessed by a third party - Behaviour misconstrued by either party - Distress/loss of trust 	<p>Pupils, staff</p>	<ul style="list-style-type: none"> - ensure that wherever possible there is visual access and/or an open door in one-to-one situations - avoid use of 'engaged' or equivalent signs wherever possible. Such signs may create an opportunity for secrecy or the interpretation of secrecy - always report any situation where a pupil becomes distressed, anxious, or angry - consider the needs and circumstances of the pupil involved - If a private conversation, staff should consider moving to a different room. - Blinds over window panels in doors should be up. Windows should not be obscured by coats/academic gowns/posters, etc. - Arrange the meeting during published School operating hours when there are plenty of other people about; - do not continue the meeting for any longer than is necessary to achieve its purposes; - avoid sitting or standing in close proximity to the pupil, except as necessary to check work, wherever possible ensure there is a physical barrier between pupil and teacher (table or table leg, chair, etc); - avoid all unnecessary physical contact such as touching or patting and apologise and move 	<p>Medium</p>	<p>A</p>
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			<p>away straight away if there is accidental physical contact;</p> <ul style="list-style-type: none"> - avoid any conduct that could be taken as a sexual advance; - Induction: all staff referred to the Code of Conduct and Safeguarding Policy. - All staff issued with “Keeping Children Safe in Education” and “What to do if you are worried a child is being abused 2015 - Advice for practitioners” on induction - All staff reminded of their duties during one-to-one supervision as part of their safeguarding induction (to include VMTs). - Training, updates to “Keeping Children Safe in Education” and Safeguarding Policies are delivered to staff at INSET. - A current certificate of training in Child Protection, or a willingness to undertake the training, is a requirement of the VMT Contract to Use Facilities. - All staff will be required to attend training sessions every 3 years to ensure this qualification is up to date. - All staff will be in receipt of the correct vetting checks, including enhanced DBS. 		
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			<ul style="list-style-type: none"> - If staff members have concerns about a child, they should raise these with the designated safeguarding lead - report any situation where a pupil becomes distressed, anxious, or angry to a Hod/Line Manager/DSL - Other members of staff should be aware of any planned meeting to demonstrate transparency, particularly if you envisage any difficulties from your interaction with the pupil. - Staff are reminded of the whistleblowing policy and feel comfortable using it. - Staff are able to report issues to the DSL, for safeguarding issues, or High Master/Head for safeguarding issues relating to staff. - Wherever possible, avoid being in a WC/Washroom/Changing room where a pupil is present and/or toileting/changing/washing. Where this is unavoidable, try to stagger times when staff/pupils use the same facility to minimise the potential for embarrassment/misunderstanding. Never linger in such situations and always make it clear that you are averting your gaze away from any pupil in a state of undress. Report any situation where inadvertent contact of this kind occurs to the DSL. 		
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			<p>Staff must:</p> <ul style="list-style-type: none"> - ensure that they do not behave in a manner which is either favourable or unfavourable to individual pupils - ensure that gifts received or given in situations which may be misconstrued are declared and recorded - only give gifts to a pupil as part of an agreed reward system - where giving gifts other than as above, ensure that these are of insignificant value and given to all pupils equally <p><i>Staff must not:</i></p> <ul style="list-style-type: none"> - make, or encourage others to make sexual remarks to, or about, a pupil, or 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 		
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Social Contact	<ul style="list-style-type: none"> - Inappropriate relationships outside School - Inappropriate behaviour not witnessed by a third party - Behaviour misconstrued by either party - Distress/loss of trust 	Pupils, staff	Staff will: <ul style="list-style-type: none"> - politely decline any invitation to attend a pupil's family home unless this has been sanctioned in advance by the DSL. - 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. - not send personal communications 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. babysitting, tutoring. 	Low	A
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One-to-one communications	<ul style="list-style-type: none"> - Inappropriate relationships outside School - Inappropriate behaviour not witnessed by a third party - Behaviour misconstrued by either party - Distress/loss of trust 	Pupils, staff	<p>This means that adults should:</p> <ul style="list-style-type: none"> - not communicate/make contact or respond to contact with pupils outside of the purposes of their work. - not give out their personal details. - use only equipment and Internet services provided by the School to communicate with pupils, as agreed with the Director of Digital Learning & Innovation. - follow the School's Acceptable Use policy - ensure that their use of technologies could not bring the School into disrepute 	Medium	A
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<p>Physical Contact</p>	<p>Inappropriate or inadvertent physical contact</p>	<p>Pupil, staff</p>	<ul style="list-style-type: none"> - Code of Conduct: "limited touch". - Report any inadvertent contact to DSL. - be aware that even well-intentioned physical contact may be misconstrued by the pupil, an observer, or any person to whom this action is described - never touch a pupil in a way which may be considered indecent; always be prepared to explain actions and accept that all physical contact will be open to scrutiny - never indulge in horseplay or fun fights - always allow/encourage pupils, where able, to undertake self-care tasks independently - ensure the way they offer comfort to a distressed pupil is age appropriate - always tell a colleague when and how they offered comfort to a distressed pupil - establish the preferences of pupils - consider alternatives, where it is anticipated that a pupil might misinterpret or be uncomfortable with physical contact - always explain to the pupil the reason why contact is necessary and what form that contact will take - report and record situations which may give rise to concern - be aware of cultural or religious views about touching and be sensitive to issues of gender 	<p>Medium</p>	<p>A</p>
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Home visits	<ul style="list-style-type: none"> - Inappropriate relationships outside School - Inappropriate behaviour not witnessed by a third party - Behaviour misconstrued by either party - Distress/loss of trust 	Pupils, staff	All staff should: <ul style="list-style-type: none"> - politely decline any invitation to attend a pupil's family home unless this has been sanctioned in advance by the DSL. - agree the purpose for any home visit with the DSL - adhere to agreed risk management strategies - ensure there is visual access and/or an open door in one-to-one situations - always make detailed records including times of arrival and departure - ensure any behaviour or situation which gives rise to concern is discussed with their HoD/Line Manager/DSL 	Low	A
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Transporting pupils	<ul style="list-style-type: none"> - Inappropriate relationships outside School - Inappropriate behaviour not witnessed by a third party - Behaviour misconstrued by either party - Distress/loss of trust 	Pupils, staff	Staff should: <ul style="list-style-type: none"> - plan and agree arrangements with all parties in advance - respond sensitively and flexibly where any concerns arise - take into account any specific or additional needs of the pupil - have an appropriate licence/permit for the vehicle - 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 - ensure that if they need to be alone with a pupil this is for the minimum time - be aware that the safety and welfare of the pupil is their responsibility until this is safely passed over to a parent/carer - report the nature of the journey, the route and expected time of arrival in accordance with agreed procedures - ensure that their behaviour and all arrangements 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 	Low	A
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First Aid	<ul style="list-style-type: none"> - Inappropriate behaviour not witnessed by a third party - Behaviour misconstrued by either party - Distress/loss of trust 	Pupils, staff	<p>This means that education settings should:</p> <ul style="list-style-type: none"> - ensure there are trained and named individuals to undertake first aid responsibilities, including paediatric first aid if relevant - ensure training is regularly monitored and updated - make other staff aware of the task being undertaken - have regard to pupils' individual healthcare plan - always ensure that an appropriate health/risk assessment is undertaken prior to undertaking certain activities - explain to the pupil what is happening. - always act and be seen to act in the pupil's best interest - make a record of all medications administered - not work with pupils whilst taking medication unless medical advice confirms that they are able to do so 	Medium	A
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Photography, videos, and other images	<ul style="list-style-type: none"> - Inappropriate relationships - Inappropriate behaviour not witnessed by a third party - Behaviour misconstrued by either party - Distress/loss of trust 	Pupils, staff	Staff should not: <ul style="list-style-type: none"> - take images of pupils for their personal use - display or distribute images of pupils unless they are sure that they have parental consent to do so (and, where appropriate, consent from the child) - take images of children using personal equipment. - retain images of children on their personal device or within their personal drive on the School network. - take images of children in a state of undress or semi-undress - take images of children which could be considered as indecent or sexual 	Low	A
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Personal living accommodation including on site provision	<ul style="list-style-type: none"> - Inappropriate relationships - Inappropriate behaviour not witnessed by a third party - Behaviour misconstrued by either party - Distress/loss of trust 	Pupils, staff	Staff should: <ul style="list-style-type: none"> - be vigilant in maintaining their privacy, including when living in on-site accommodation - be mindful of the need to avoid placing themselves in vulnerable situations - refuse any request for their accommodation to be used as an additional resource for the School or setting - be mindful of the need to maintain appropriate personal and professional boundaries - not ask pupils to undertake jobs or errands for their personal benefit - refuse all requests for pupils to enter their accommodation without prior knowledge and approval of the DSL - Staff should not invite pupils into their accommodation without the prior knowledge and approval of the High Master (for example, the Head of Boarding hosting a birthday party). 		
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Appendix 2: Unintended breaches of School firewall by staff

What is an 'unintended' breach?

An unintended breach involves the activation of the firewall for websites that are running on a staff members *personal* device that have not been closed down. This happens most commonly when the member of staff arrives on the school premises and opens the browser on their device. The firewall then activates on connection to the school wi-fi and blocks the site.

The IT manager and DSL are alerted to any breaches of the school firewall by members of staff; after consultation with the IT manager, the DSL will decide whether this is an unintended breach or potentially an example of serious misconduct. Consideration is given to the nature of the content on the site, whether it was the member of staff's own device, the time the breach occurred and the frequency of previous breaches.

The Staff Disciplinary Procedure (Code) provides examples of offences which are normally regarded as serious misconduct rather than unintended breaches. This list includes:

- *Serious misuse or abuse of ICT equipment or computing facilities. This includes viewing, retrieving or downloading of pornographic material, or any other unsuitable material.*

In these cases, the school will follow the Disciplinary Procedure immediately.

Procedure for unintended breaches

The DSL and IT manager will be notified of any breach of the school firewall. The IT manager may provide the DSL with a 'screen shot' of the firewall breach. This will identify the staff member, device used, day/time of activation and the name of the blocked website. The IT manager will check the nature of site and consult with the DSL as to whether they believe, given all of the evidence, that the breach was accidental.

- **First unintended breach**

An appropriate member of the safeguarding team, chosen by the DSL, will have a conversation with the member of staff and inform them they have breached the firewall and the nature of the breach. A reminder will be given to close down sites as Wi-Fi falls under

the AUP that they have signed. The DSL will ask for reassurance that the member of staff is aware of how to close down sites that they have left open and who to approach if they are not (IT manager).

The DSL will then contact the Director of HR to confirm that they have resolved the issue informally, and will log this information in a restricted drive.

- **Second unintended breach**

The DSL will request a meeting with the member of staff. They will be reminded of the conversation they have previously had and warned that this is a second breach of the AUP. The DSL will again ask for reassurance that the member of staff is aware of how to close down sites that they have left open. The member of staff is informed that a third breach will lead to an investigation and potential implementation of the School's Disciplinary Procedures.

The DSL logs the conversation, including repeated confirmation that they should close down websites that have been left open before entering the school site and that they are aware of the next steps if a further breach occurs. The DSL will then contact the Director of HR to confirm that they have resolved the issue informally, and will log this information in a restricted drive.

- **Third unintended breach**

Following confirmation from the DSL of a further unintended breach, the Director of HR will write to the staff member informing them that an investigation will be carried out under the School's Disciplinary Procedure. The outcome of this investigation may result in a formal disciplinary hearing.