



St Paul's School  
FOUNDED 1509

# Staff Code of Conduct

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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](mailto: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](mailto:smpa@stpaulsschool.org.uk).

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## 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 (2019). It also reflects the requirements of the relevant sections of the Education (Independent Schools Standards) Regulations (England) (2015) and the ISI Commentary on the regulatory requirements (2018). 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 (including teacher and non-teaching staff, temporary part-time workers, support staff, contractors, volunteers and members of the Board of Governors (hereafter "staff")) working at St Paul's School (SPS) and St Paul's Juniors (SPJ) including the St Paul's Boarding House, (hereafter referred to as the "School").
- 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 make a Neutral Notification (See Section 28) of, and discuss and/or take advice promptly from their Head of Department, Line Manager, 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 know that the Surmaster is the Designated Safeguarding Lead (**DSL**) at St Paul's and that the Deputy Head Pastoral, Head of Wellbeing and Mental Health and the Safeguarding Coordinator, the 6<sup>th</sup> form Undermaster and the L8th Undermaster are the Deputy DSLs for safeguarding and child protection. At St Paul's Juniors the Pastoral Deputy Head is the DSL and the Head of First Years, Head of Computing and Safeguarding Coordinator are the Deputy DSLs.

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

- 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 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 SPS 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 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.
- 4.2 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 Surmaster is also responsible for informing all staff of any substantive changes to policies and guidelines which relate to child protection and safe working. At St Paul's Juniors the Senior Deputy Head is responsible for the induction process.

## **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 via Neutral Notification (see section 29 below).

## **6. Conduct Outside Work**

- 6.1 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.
- 6.2 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.
- 6.3 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.
- 6.4 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 s/he does 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. Women can also 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;
- 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 he or she 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 2018 and the General Data Protection Regulations - see the Data Protection Policy in 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 Teachers' Standards (May 2012) include a section on Personal and Professional Conduct:

- 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, which are defined as comprising: 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.

10.2 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.

10.3 Teachers must have an understanding of, and always act within, the statutory frameworks which set out their professional duties and responsibilities.

10.4 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.

## **11. Gifts**

- 11.1 A Register of Gifts and Interests is a formal record of hospitality, gifts and donations received by every individual within an organisation. It also allows for the declaration of any possible conflicts of interest while discharging professional duties. The introduction on 1 July 2011 of the main provisions of the Bribery Act 2010 means that the School must have a policy on the declaration of interests by its employees. As a consequence, the School introduced a Register of Interests and Gifts with immediate effect.
- 11.2 All staff are required to register their interests, and gifts and hospitality above £100 in value, on the Register. If the cumulative value of a series of small gifts, or hospitality from the same (or connected) source exceeds £200, this too must be registered. If in doubt, either ask for guidance from the Surmaster (SPS) or Head (SPJ) or simply register the gift(s).
- 11.3 The registration process is simple. The form can be accessed via the SPS Staff Handbook and the SPJ Staff Notes pages of the intranet. Disclosures are confidential and covered by the Data Protection Act and GDPR.
- 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 via Neutral Notification (see section 28 below) and, if necessary, a note placed on the child's file.

## **12. Social Contact**

- 12.1 Members of staff should not establish or seek to establish social contact with pupils - or former pupils while they remain of school age; for example, former pupils of SPJ who have left the school or pupils at the senior school who have left the school before the end of the U8 year - for the purpose of securing a relationship that involves an inappropriate level of emotional dependence (on either side) or that would otherwise represent an abuse of the position of trust. If a pupil seeks to establish social contact, or if this occurs coincidentally, the member of staff should exercise her/his professional judgement in making a response and be aware that such social contact could be misconstrued. In particular, staff must be aware of their legal and professional responsibilities, and their duty of care, even where the pupils involved are all over 18. If something occurs which causes the member of staff concern or which the member of staff thinks could be misconstrued, he or she should contact the DSL immediately and where appropriate a Neutral Notification (see section 28 below) should be made of the incident.
- 12.2 Staff are advised that there are risks in making available their personal contact details such as home/mobile phone number, home or personal e-mail address to pupils and that in general it



is not advisable to do so. However, a personal mobile phone number may be shared with pupils in the following situations:

- As an emergency contact number for a tutor pupil to contact their Tutor (at SPS only) – whether by telephone or direct message (e.g. WhatsApp, Slack, etc);
- As an emergency contact number during a school fixture, day trip or residential trip;
- As a contact number, for use during school hours, for a pupil whose welfare is of concern, as part of a risk management plan, as and where agreed with the DSL,

provided that, in any and all cases, the intention to share the number is:

- notified to, and authorised by, a relevant Senior Manager (e.g. the Deputy Head Co-curricular, or Deputy Head Pastoral or Designated Safeguarding Lead) in advance;
- notified and explained to parents in advance, in writing;
- explained to the pupil(s) carefully in advance, via a written or oral briefing, so it is clear to them how and when they may use the number.

It is advisable for staff to retain records of the notifications, authorisation received, and the details of the explanation given to pupils. Staff should also seek advice in advance from a relevant Senior Manager regarding the content of the explanatory briefings given to pupils.

- 12.3 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.
- 12.4 After their formal Leavers' Ceremony Upper 8<sup>th</sup> pupils are deemed to have left the school and to have become Old Paulines. 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 shortly after the pupil has left the School, this would raise concerns about possible abuse of the staff member's professional position in grooming the young person whilst at the school. Any such concern 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.

### **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.

- 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 Neutral Notification (see section 28 below) made 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 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 pupils and 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, music, drama, staff may need to initiate some physical contact with children, for example to demonstrate a technique in the use of equipment or an instrument. Physical contact should only take place when it is necessary in relation to a particular activity. The extent of contact should be made clear and undertaken with the permission of the pupil. Contact should be relevant to their age and understanding. Staff should 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 via Neutral Notification.
- 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, justified in terms of the child's needs, consistently applied and open to scrutiny.

#### **14. Physical Education and Other Activities which Require Physical Contact**

- 14.1 Some staff, for example, those who teach PE and games, or those who offer music tuition, will on occasions have to initiate physical contact with pupils in order 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. This should be done with the pupil's agreement.

- 14.2 Contact under these circumstances 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). Staff should remain sensitive to any discomfort expressed verbally or non-verbally by the child.

## **15. Changing Areas and Washrooms**

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

- 15.1 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.
- 15.2 When supervising boys using the changing rooms, staff should place themselves outside the main changing area, ie 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.
- 15.3 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 boy is in a state of undress, they should leave immediately. The backstage corridor areas are places where boys (and girls) 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.
- 15.4 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.
- 15.5 It is acceptable, where necessary, to check briefly that boys are not loitering in the changing areas or toilets (for example when boys should be at assembly or in lessons).
- 15.6 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 Neutral Notification made as soon as possible and, if appropriate, a copy placed on the child's file.

## **16. Pupils in Distress**

- 16.1 There may be occasions when a distressed pupil needs comfort and reassurance. This may include age appropriate physical contact. Staff should remain self-aware at all times in order

that their contact is not threatening, intrusive or subject to misinterpretation. If a member of staff believes such action could be misinterpreted, the DSL should be informed of the incident and a Neutral Notification made as soon as possible and, if appropriate, a copy placed on the child's file.

## **17. Behaviour Management**

- 17.1 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 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).
- 17.2 Where a pupil's behaviour causes concern, the School's behaviour, rewards and sanctions policy should be adhered to (see Handbook on the Intranet). If a member of staff is in any doubt as to the best course of action, he or she should seek further advice from a member of the Undermaster team or the DSL. At St Paul's Juniors guidance may be sought from any member of the Senior Pastoral team.

## **18. Care, Control, Physical Intervention and use of 'Reasonable Force'**

- 18.1 The circumstances in which staff can intervene with a pupil are covered by the 1996 Education Act. Further advice is contained in the DfE non-statutory advice document: *Use of reasonable force (July 2013)*. All staff are expected to read and follow this advice. Staff may legitimately intervene to prevent a pupil from committing a criminal offence, injuring themselves or others, causing damage to property, engaging in behaviour prejudicial to good order and to maintain good order and discipline. 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.
- 18.2 Under no circumstances should physical force be used as a form of punishment. The use of unwarranted physical force is likely to constitute a criminal offence.
- 18.3 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' in these circumstances means 'using no more force than is needed'. 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.

- 18.4 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.
- 18.5 In all cases where physical intervention is deemed necessary at SPS, the incident and subsequent actions should be documented and reported to the High Master, or, in his absence, the Surmaster (who is also the DSL) or the Deputy DSL via Neutral Notification (see section 28 below). At St Paul's Juniors such actions should be reported to the Head, or, in her absence the Pastoral Deputy Head (who is also the DSL) via Neutral Notification.

## **19. One to One Situations**

- 19.1 **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 accordingly **in accordance with the guidance detailed in the model risk assessment at Appendix 1.** Every attempt should be made to ensure the safety and security needs of both staff and pupils.
- 19.2 In the case of individual music lessons with Visiting Music Teachers (VMTs), the Music Administrator should ensure that all the VMTs have read and understood this Code of Conduct, particularly in relation to physical contact (see section 11).
- 19.3 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 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 Neutral Notification and a written report detailing the incident kept on the child's file.
- 19.4 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 at School within office hours and in a professional manner.

## **20. Transporting Children**

- 20.1 In certain situations e.g. out of school activities, staff may agree to transport children.
- 20.2 Wherever possible and practicable it is advisable that transport is undertaken other than in private vehicles. If it is unavoidable, staff should always seek approval from the DSL and/or the EVC and obtain parental consent before doing so. For journeys in private (including hired) cars belonging to staff the School has 'Occasional Business Use' insurance, which covers the use of your car on behalf of the employer. For journeys using minibuses, please see the guidance in the School's [Educational Visits Policy](#).

### 20.3 Staff should:

- Plan and agree arrangements with all parties, including parents and the educational visits coordinator, 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 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.

## 21. Boarding, Educational Visits, Sports and After School Activities

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

21.2 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), a more relaxed discipline or informal dress and language code may be acceptable. However, staff remain in a position of trust and need to ensure that their behaviour cannot be interpreted as seeking to establish an inappropriate relationship or friendship, and that they maintain high standards of professional conduct and remember their position as role models at all times. In particular, it is inappropriate to be tactile with boys or to drink alcohol irresponsibly.

21.3 Any physical contact should be restricted to occasions when it is absolutely necessary (for example: when breaking up a fight between two boys; dressing a wound; taking a boy's temperature; or intervening to prevent a boy from putting himself in danger; or comforting a boy 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 boys.

21.4 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. Where practicable, staff should be accommodated in separate rooms to boys, with access to separate washing and toilet facilities.

21.5 The following protocols apply in all situations, including society/club dinners, within the boarding house, 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:

- (SPS) Two members of staff must be under the legal limit for driving in that country throughout any period of duty. Duty extends to being prepared to respond to an emergency during a foreign exchange as the host or hosted member of staff, even when pupils are being hosted by families overnight.

- (SPJ) One member of staff must always abstain from alcohol in a 24 hour period whilst all other members of staff accompanying the trip must always remain under the legal limit for driving in that country.
- A member of staff should not entertain a pupil or pupils in their own accommodation. Additionally, staff should not take pupils on trips, organise out of school activities, or entertain a pupil or pupils in a pub or restaurant or in School, except as part of an organised school function or trip, for which permission should be sought in advance from the Surmaster. On such occasions, a minimum of two members of staff must be present throughout and the provision of any alcohol should be restricted to those boys over the legal age (and any other restrictions) for the country in which the event takes place and subject to the prior consent of the boys' parents. Any such provision should be controlled by the member of staff on duty and limited to no more than a single pint or bottle of regular strength beer or 2x125ml glasses of wine, served with a meal; no spirits at any time.
- If any boy or boys are given access to Boarding House or other staff accommodation for any reason, a minimum of two members of staff must be present throughout and no inappropriate favouritism or inappropriate one-to-one contact is permitted.
- It is illegal in the UK to serve alcohol to pupils under the age of 18. An exception is that where boys are 16 or 17, it is legally permissible to serve (but not sell) them beer, wine or cider with a meal.
- During intervals at school plays, musical, or other performances, the provision or sale of alcohol should be restricted to parents, staff and those boys able to prove that they are over 18.
- If comforting a boy in a state of distress, a member of staff should be mindful that physical contact may be misinterpreted by the boy and should in all cases report any such contact to the DSL at the earliest opportunity.
- 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. They should then inform the Surmaster 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.

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

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

- If a boy 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 boy to get dressed before they return and then return after a specified period of time, sufficient to allow the boy to get dressed.
- 21.7 As far as possible, any planned meetings with boys should take place in an office, classroom or public area and the member of staff should maintain an appropriate distance from the boy. In particular, a member of staff should not cross the threshold of a boy's bedroom, unless the door is propped open and the boy has signalled he is happy for the member of staff to come in.
- 21.8 On occasions when a member of staff is helping a boy with his work or advising him on school matters in the boy's bedroom, the member of staff should maintain an appropriate distance and sit on a chair or stand; under no circumstances should a member of staff sit or lie down on a boy's bed.
- 21.9 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.
- 21.10 In addition for trips involving boys from St Paul's Juniors, staff must be aware of and follow the St Paul's Juniors Policy on Educational Visits. In particular they 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.
- 21.11 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 his absence the 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.

## **22. First Aid and Administration of Medication**

- 22.1 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.
- 22.2 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.



- 22.3 The School has a number of trained first aiders (see 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 epipen) should receive appropriate training before leading an off-site visit or trip involving one or more boys who have to carry Emergency Medication.
- 22.4 Under normal circumstances in School, all medication should be administered by the School Nurse or Doctor or by the child himself 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.
- 22.5 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.
- 22.6 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.
- 22.7 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.
- 22.8 Further information is available from the School Medicines Policy which is available on the School web-site and the staff handbook page of the School's intranet.
- 22.9 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.
- 22.10 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 (DSL) and St Paul's Juniors staff should inform the Pastoral Deputy Head (DSL) 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.

## **23. The Curriculum**

- 23.1 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.

- 23.2 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.
- 23.3 Be aware that such discussions might affect particular boys more than others (for example, if a boy has suffered a related traumatic experience). Where a discussion takes a course that makes you feel uncomfortable or appears to make a boy feel uncomfortable, report it via Neutral Notification (see section 28 below) 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.
- 23.4 Parents have the right to withdraw their children from all or part of any sex education provided (but not from the biological aspects of human growth and reproduction necessary under the science curriculum).
- 23.5 Further guidance can be found in the [Sex and Relationship Education Policy](#), which is published on the Staff Handbook page of the intranet. At St Paul's Juniors guidance can be found in the St Paul's Juniors Sex and Relationships Policy, which is published on the School's website.
- 23.6 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.

## **24. Photography, Videos and other media**

- 24.1 Many school activities involve recording images, which are undertaken as part of the curriculum, extra school activities, for publicity, or to celebrate achievement. Staff need to be aware of the potential for these aspects of teaching to be misused for 'grooming' purposes. Careful consideration should be given as to how these activities are organised and undertaken. Staff should ensure that children are appropriately dressed and are comfortable that their photograph is being taken.
- 24.2 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. The definition of a public place includes areas where visitors to the School have access.

- 24.3 Parental agreement to the above is sought when the child starts at the School and parents have the right to alter their consent at any time. The Surmaster's PA at St Paul's and the Head's PA at St Paul's Juniors keep a list of those parents who have provided consent and can provide confirmation to staff as required. At St Paul's Juniors the following guidelines should be adhered to: "If the pupil is named, avoid using the photograph. If the photograph is used, avoid naming the pupil" (advice from DfE). 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.
- 24.4 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 boys in certain contexts may raise concerns about 'grooming'. Think about the images you take and where you keep them. Images of your tutor group on your phone or personal folders might be entirely reasonable, but consider carefully whether and what to store. In particular, any images which might be considered sexually suggestive, demeaning, or otherwise inappropriate in any way should be actively deleted. **Additionally, 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.**
- 24.5 At St Paul's Juniors where photographs of children on school activities are taken on personal cameras (including mobile phones) they should be uploaded to the shared J: drive (Departments on Langley) at the earliest possible opportunity and then deleted from the personal device. It is recommended that photographs of children are not stored on a member of staff's personal H: drive on the network for longer than is necessary to complete a particular task (for example, when producing a PowerPoint presentation for an assembly or when writing an article for the Grapevine).

## **25. Use of the School IT Systems, Including Internet Use and Digital Communication with Pupils**

- 25.1 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 (particularly sections 1-9, 16-18, and 22 above) 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.
- 25.2 All members of staff are required to have read and to follow the School's ICT Acceptable Use Policy, mobile devices policy and eSafety policy. All members of staff are required to have read and to follow the School's ICT Acceptable Use Policy and eSafety policy. All staff are prohibited from befriending St Paul's or St Paul's Juniors 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. Staff may exercise discretion when dealing with friend requests from parents and former pupils. It is acceptable to decline these invitations and remind parents of more formal channels which they can use to discuss their child's education.

25.3 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.

25.4 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 students 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 7 (Propriety and Behaviour) and 9 (Social Contact) above.

25.5 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 your settings prohibit others from tagging you in any photos or updates without your permission and be proactive in asking others to remove any undesirable content related to you. 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).

25.6 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., Twitter) for teaching purposes or a thorough and careful understanding of the settings needed to ensure that pupils see only what you wish them to see (e.g., Facebook, Flickr). Staff who use sites such as Facebook should ensure maximum privacy settings.

- 25.7 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.
- 25.8 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 ICT first: he/she 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.
- 25.9 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, BRGSurmaster). 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.
- 25.10 Staff should be aware of their obligations to keep, as appropriate, records of contact with pupils and to work in an obviously open and transparent manner when communicating with pupils. In particular, they should recognise the difficulties presented by certain messaging platforms, such as private direct messaging (e.g. via WhatsApp, Slack, etc). Where an interaction with a pupil or pupils indicates that records will be necessary, or where you are concerned that a pupil is trying to message you privately, re-direct communication to a recordable platform, like school email, and report any concerns via Neutral Notification.
- 25.11 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.
- 25.12 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 inappropriate images. 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.

25.13 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.

25.14 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 ICT and make a Neutral Notification (see section 28 below). 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.

## **26. Whistleblowing**

26.1 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.

26.2 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.

## **27. Sharing Concerns and Recording Incidents**

27.1 The welfare of the child is paramount. All staff should be aware of the School's [child protection procedures](#), including procedures for dealing with allegations against staff. Staff who are the subject of allegations are advised to contact their professional association.

27.2 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 his 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 Juniors such information should be shared with the Head (or in her absence, the High Master).

- 27.3 Members of staff should feel able to discuss with their Head of Department or a member of the Senior Management Team any difficulties or problems that may affect their relationship with pupils so that appropriate support can be provided or action can be taken.
- 27.4 All staff have a duty to report any child protection concerns to the DSL, or in his absence, the Deputy DSL.

## **28. Disclosure and Barring Service Checks**

- 28.1 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 (SPJ 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 (SPJ 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.

## **29. Neutral Notification**

- 29.1 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 (SPJ) 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 (SPJ) and DSL will, on receipt of a report, determine how to best approach the issue.
- 29.2 The process for reporting a concern of this nature is called 'Neutral Notification'. This is a procedure for self-reporting or reporting about the behaviour and action of others.
- 29.3 Neutral Notification should be used by staff to record all events and/or situations which have the potential to be misconstrued or misinterpreted by others; or 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 neutral 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.
- 29.4 The Neutral Notification system is intended to enable staff to self-report, as well as to make notifications about 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 make a Neutral Notification.

29.5 Neutral Notifications may be made in person to the DSL, High Master or Head (as appropriate) or on the Neutral Notification 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 Neutral Notification Form later.

29.6 A staff member who makes a Neutral Notification, or a more serious allegation, in good faith will suffer no detriment as a result, and will benefit from the protection set out in the Whistleblowing Policy.

29.7 The circumstances in which staff must make a Neutral Notification are as follows:

- any incident where s/he feels that his/her 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;
- any use by an adult of sexually inappropriate language, references or jokes to a pupil;
- email, messaging, use of social media sites or other communication between adults and pupils outside agreed protocols;
- 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 member of staff has been alone with a pupil or pupils in a vehicle where this has not been authorised in advance;
- 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;
- if a pupil becomes aware of and/or uses a staff member's home address, mobile or home phone number, or non-school e-mail address other than in accordance with agreed protocols;
- if a staff member becomes involved in an intimate or sexual relationship with a former pupil at this School, regardless of the age of the (former) pupil;
- the fact of, and explanation for, any one to one contact with a pupil on schools trips, particularly if this takes place in a bedroom or other private space;
- non-trivial illnesses or accidents of pupils on school trips;
- any incident where, for whatever reason, a member of staff has not complied with this Code of Conduct.
- Staff are required to keep the school informed on an on-going basis of any information that might have implications for the safeguarding of the children in the school, for example where their relationships and associations both within and outside the workplace (including online) may have implications for the safeguarding of children in School.



29.8 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.

### **30. Appearance**

30.1 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.

30.2 All members of staff are supplied with an identity badge that must be worn and visible at all times when on site for security reasons, whether in or out of term-time.

30.3 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.

30.4 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 where doing so would pose a health and safety risk (for example during science practical lessons or when operating machinery).

30.5 Staff may wear religious and cultural dress (including clerical collars, head scarves, skullcaps and turbans).

30.6 Jeans and trainers should not be worn in term-time except on official 'Mufti' 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.

30.7 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).

30.8 Tattoos that include imagery and/or text that are inappropriate for a school setting should remain covered at all times.

30.9 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 Saturday 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.

- 30.10 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.
- 30.11 Where there is a requirement to use safety clothing and equipment, it should be worn or used as appropriate and directed.
- 30.12 In the event of a dispute on any aspect of the dress code, St Paul's staff should consult with the Head of SPS, St Paul's Juniors with the Senior Deputy Head of SPJ and Support staff with the Chief Operating Officer.

### **31. Infatuations and Crushes**

- 31.1 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.
- 31.2 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 Neutral Notification (see section 29.). In this way appropriate early intervention can be taken which can prevent escalation and avoid hurt, embarrassment or distress for those concerned.
- 31.3 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.

### **32. Home visits**

- 32.1 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.
- 32.2 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.
- 32.3 Particular consideration will be given to any circumstances which might render the staff member becoming more vulnerable to an allegation being made e.g. hostility, child protection concerns, complaints or grievances. Specific thought will be given to visits outside of 'office

hours' or in remote or secluded locations. In the unlikely event that little or no information is available, visits will not be made alone.

### **33. Exposure to inappropriate images**

- 33.1 Staff should take extreme care to ensure that children and young people are not exposed, through any medium, to inappropriate or indecent images.
- 33.2 There are no circumstances that will justify adults: making, downloading, possessing or distributing indecent images or pseudo-images of children (child abuse images). Accessing these images, whether using the setting's or personal equipment, on or off the premises, or making, storing or disseminating such material is illegal.
- 33.3 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 (DO) 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.
- 33.4 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. This would raise serious concerns about the suitability of the adult to continue working with children and young people. Staff should keep their passwords confidential and not allow unauthorised access to equipment. 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 Local Authority Designated Officer 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.

### **34. Personal living accommodation (including on-site provision)**

- 34.1 Generally, 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)<br><br>08/19   | Assessed by: (2)<br><br>Richard Girvan | Validated by: (3)<br><br>SMG<br>(Safeguarding<br>Management<br>Group) | Location: (4)<br><br>School wide                         | Assessment ref no (5)<br><br>Not Required | Review date: (6)<br><br>08/20 |
| <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. <b>Underpinning principles:</b></p> <ul style="list-style-type: none"> <li>- The welfare of the child is paramount</li> <li>- Staff should understand their responsibilities to safeguard and promote the welfare of pupils</li> <li>- 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</li> <li>- Staff should work, and be seen to work, in an open and transparent way</li> </ul> <p>Adults should always consider whether their actions are warranted, proportionate, safe and applied equitably.</p> |  |   |  |   |                               |
| Activity<br>(8)  | Hazard<br>(9)                          | Person(s) in<br>danger<br>(10)  | Existing measures & Requirements to control risk<br>(11) | Risk rating<br>(12)                       | Result<br>(13)                |

Appendix 1

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| <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"> <li>- Inappropriate behaviour not witnessed by a third party</li> <li>- Behaviour misconstrued by either party</li> <li>- Distress/loss of trust</li> </ul> | <p>Pupils, staff</p> | <ul style="list-style-type: none"> <li>- ensure that wherever possible there is visual access and/or an open door in one to one situations</li> <li>- avoid use of 'engaged' or equivalent signs wherever possible. Such signs may create an opportunity for secrecy or the interpretation of secrecy</li> <li>- always report any situation where a pupil becomes distressed or angry</li> <li>- consider the needs and circumstances of the pupil involved</li> <li>- If a private conversation, staff should consider moving to a different room.</li> <li>- Blinds over window panels in doors should be up. Windows should not be obscured by coats/academic gowns/posters, etc.</li> <li>- Arrange the meeting during published School Operating Hours when there are plenty of other people about;</li> <li>- do not continue the meeting for any longer than is necessary to achieve its purposes;</li> <li>- 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);</li> </ul> | <p>Medium</p> | <p>A</p> |
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Appendix 1

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|  |  |  | <ul style="list-style-type: none"> <li>- avoid all unnecessary physical contact such as touching or patting and apologise and move away straight away if there is accidental physical contact;</li> <li>- avoid any conduct that could be taken as a sexual advance;</li> <li>- Induction: all staff referred to the Code of Conduct and Safeguarding Policy.</li> <li>- 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</li> <li>- All staff reminded of their duties during 1 to 1 supervision as part of their safeguarding induction (to include VMTs).</li> <li>- Training, updates to “Keeping Children Safe in Education” and Safeguarding Policies are delivered to staff at INSET.</li> <li>- 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.</li> <li>- All staff will be required to attend training sessions every 3 years to ensure this qualification is up to date.</li> <li>- All staff will be in receipt of the correct vetting checks, including enhanced DBS.</li> </ul> |  |  |
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Appendix 1

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|  |  |  | <ul style="list-style-type: none"> <li>- If staff members have concerns about a child, they should raise these with the designated safeguarding lead</li> <li>- report any situation where a pupil becomes distressed or angry to a Hod/Line Manager/DSL</li> <li>- 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.</li> <li>- Staff are reminded of the whistleblowing policy and feel comfortable using it.</li> <li>- Staff are able to report issues to the DSL, for safeguarding issues, or High Master/Head for safeguarding issues relating to staff.</li> <li>- 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</li> </ul> |  |  |
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Appendix 1

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|  |  |  | <p>inadvertent contact of this kind occurs to the DSL.</p> <p>Staff must:</p> <ul style="list-style-type: none"> <li>- ensure that they do not behave in a manner which is either favourable or unfavourable to individual pupils</li> <li>- ensure that gifts received or given in situations which may be misconstrued are declared and recorded</li> <li>- only give gifts to a pupil as part of an agreed reward system</li> <li>- where giving gifts other than as above, ensure that these are of insignificant value and given to all pupils equally</li> </ul> <p><i>Staff must not:</i></p> <ul style="list-style-type: none"> <li>- make, or encourage others to make sexual remarks to, or about, a pupil use inappropriate language to or in the presence of pupils</li> <li>- discuss their personal or sexual relationships with or in the presence of pupils</li> <li>- make (or encourage others to make) unprofessional personal comments which scapegoat, demean or humiliate, or might be interpreted as such</li> </ul> |  |  |
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Appendix 1

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| <p>Social Contact</p> | <ul style="list-style-type: none"> <li>- Inappropriate relationships outside school</li> <li>- Inappropriate behaviour not witnessed by a third party</li> <li>- Behaviour misconstrued by either party</li> </ul> <p>Distress/loss of trust</p> | <p>Pupils, staff</p> | <p>Staff will:</p> <ul style="list-style-type: none"> <li>- always approve any planned social contact with pupils or parents with senior colleagues, for example when it is part of a reward scheme</li> <li>- advise senior management of any regular social contact they have with a pupil which could give rise to concern</li> <li>- refrain from sending personal communication to pupils or parents unless agreed with senior managers</li> <li>- inform senior management of any relationship with a parent where this extends beyond the usual parent/professional relationship</li> <li>- inform senior management of any requests or arrangements where parents wish to use their services outside of the workplace e.g. babysitting, tutoring</li> </ul> | <p>Low</p> | <p>A</p> |
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Appendix 1

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| <p>One to One communications</p> | <ul style="list-style-type: none"> <li>- Inappropriate relationships outside school</li> <li>- Inappropriate behaviour not witnessed by a third party</li> <li>- Behaviour misconstrued by either party</li> </ul> <p>Distress/loss of trust</p> | <p>Pupils, staff</p> | <p>This means that adults should:</p> <ul style="list-style-type: none"> <li>- not seek to communicate/make contact or respond to contact with pupils outside of the purposes of their work</li> <li>- not give out their personal details unless agreed with senior management</li> <li>- use only equipment and Internet services provided by the school to communicate with pupils, as agreed with the HoD ICT.</li> <li>- follow the school's Acceptable Use policy</li> <li>- ensure that their use of technologies could not bring the school into disrepute</li> </ul> | <p>Medium</p> | <p>A</p> |
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Appendix 1

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| Physical Contact | Inappropriate or inadvertent physical contact | Pupil, staff | <ul style="list-style-type: none"> <li>- Code of Conduct: "limited touch".</li> <li>- Report any inadvertent contact to DSL.</li> <li>- 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</li> <li>- 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</li> <li>- never indulge in horseplay or fun fights</li> <li>- always allow/encourage pupils, where able, to undertake self-care tasks independently</li> <li>- ensure the way they offer comfort to a distressed pupil is age appropriate</li> <li>- always tell a colleague when and how they offered comfort to a distressed pupil</li> <li>- establish the preferences of pupils</li> <li>- consider alternatives, where it is anticipated that a pupil might misinterpret or be uncomfortable with physical contact</li> <li>- always explain to the pupil the reason why contact is necessary and what form that contact will take</li> <li>- report and record situations which may give rise to concern</li> </ul> | Medium | A |
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Appendix 1

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|             |  |               | <ul style="list-style-type: none"> <li>- be aware of cultural or religious views about touching and be sensitive to issues of gender</li> </ul>   |     |   |
| Home visits | <ul style="list-style-type: none"> <li>- Inappropriate relationships outside school</li> <li>- Inappropriate behaviour not witnessed by a third party</li> <li>- Behaviour misconstrued by either party</li> </ul> <p>Distress/loss of trust</p> | Pupils, staff | <p>All staff should:</p> <ul style="list-style-type: none"> <li>- agree the purpose for any home visit with their HoD/Line Manager</li> <li>- adhere to agreed risk management strategies</li> </ul> <p>avoid unannounced visits wherever possible</p> <ul style="list-style-type: none"> <li>- ensure there is visual access and/or an open door in one to one situations</li> <li>- always make detailed records including times of arrival and departure</li> <li>- ensure any behaviour or situation which gives rise to concern is discussed with their HoD/Line Manager</li> <li>- Always inform the Surmaster of the Home Visit</li> </ul> | Low | A |

Appendix 1

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| <p>Transporting pupils</p> | <ul style="list-style-type: none"> <li>- Inappropriate relationships outside school</li> <li>- Inappropriate behaviour not witnessed by a third party</li> <li>- Behaviour misconstrued by either party</li> <li>- Distress/loss of trust</li> </ul> | <p>Pupils, staff</p> | <p>Staff should:</p> <ul style="list-style-type: none"> <li>- plan and agree arrangements with all parties in advance</li> <li>- respond sensitively and flexibly where any concerns arise</li> <li>-- take into account any specific or additional needs of the pupil</li> <li>- have an appropriate licence/permit for the vehicle</li> <li>- 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</li> <li>- ensure that if they need to be alone with a pupil this is for the minimum time</li> <li>- be aware that the safety and welfare of the pupil is their responsibility until this is safely passed over to a parent/carer</li> <li>- report the nature of the journey, the route and expected time of arrival in accordance with agreed procedures</li> <li>- ensure that their behaviour and all arrangements ensure vehicle, passenger and driver safety. This includes having</li> </ul> | <p>Low</p> | <p>A</p> |
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|           |  |               | <p>proper and appropriate insurance for the type of vehicle being driven</p> <ul style="list-style-type: none"> <li>- ensure that any impromptu or emergency arrangements of lifts are recorded and can be justified</li> </ul>  |        |   |
| First Aid | <ul style="list-style-type: none"> <li>- Inappropriate behaviour not witnessed by a third party</li> <li>- Behaviour misconstrued by either party</li> <li>- Distress/loss of trust</li> </ul> | Pupils, staff | <p>This means that education settings should:</p> <ul style="list-style-type: none"> <li>- ensure there are trained and named individuals to undertake first aid responsibilities, including paediatric first aid if relevant</li> <li>- ensure training is regularly monitored and updated</li> <li>- make other staff aware of the task being undertaken</li> <li>- have regard to pupils' individual healthcare plan</li> <li>- always ensure that an appropriate health/risk assessment is undertaken prior to undertaking certain activities</li> <li>- explain to the pupil what is happening.</li> <li>- always act and be seen to act in the pupil's best interest</li> <li>- make a record of all medications administered</li> <li>- not work with pupils whilst taking medication unless medical advice confirms that they are able to do so</li> </ul> | Medium | A |

Appendix 1

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|---|---|----------------------|---|------------|----------|
| <p>Photography, videos and other images</p> | <ul style="list-style-type: none"> <li>- Inappropriate relationships</li> <li>- Inappropriate behaviour not witnessed by a third party</li> <li>- Behaviour misconstrued by either party</li> <li>- Distress/loss of trust</li> </ul> | <p>Pupils, staff</p> | <p>Staff should not:</p> <ul style="list-style-type: none"> <li>- take images of pupils for their personal use</li> <li>- 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)</li> <li>- take images of children using personal equipment, unless cleared with senior management</li> <li>- take images of children in a state of undress or semi-undress</li> <li>- take images of children which could be considered as indecent or sexual</li> </ul> | <p>Low</p> | <p>A</p> |
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Appendix 1

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| <p>Personal living accommodation including on site provision</p> | <ul style="list-style-type: none"> <li>- Inappropriate relationships</li> <li>- Inappropriate behaviour not witnessed by a third party</li> <li>- Behaviour misconstrued by either party</li> <li>- Distress/loss of trust</li> </ul> | <p>Pupils, staff</p> | <p>Staff should:</p> <ul style="list-style-type: none"> <li>- be vigilant in maintaining their privacy, including when living in on-site accommodation</li> <li>- be mindful of the need to avoid placing themselves in vulnerable situations</li> <li>- refuse any request for their accommodation to be used as an additional resource for the school or setting</li> <li>- be mindful of the need to maintain appropriate personal and professional boundaries</li> <li>- not ask pupils to undertake jobs or errands for their personal benefit</li> <li>- Staff should refuse all requests for pupils to enter their accommodation without prior knowledge and approval of the Surmaster</li> <li>- Staff should not invite pupils in to their accommodation without the prior knowledge and approval of the High Master (for example, the Head of Boarding hosting a birthday party).</li> </ul> |  |  |
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