



Trust Suite of HR Policies:

Code of Conduct

Version	V5.1
Approved by:	Board of Trustees
Approval Date:	17/12/25
Review Frequency:	Annually

Inclusion – Improving education for everyone.

Integrity – We are consistently open, honest, ethical, and genuine.

Initiative – We have the courage to always seek a better way to a better future.

Involvement – We encourage our community to take ownership and responsibility.

Inspiration – We use our drive and commitment to energise, engage and inspire.

Table of revision

<p>Sept 25 V4</p>	<p>Minor amendments made throughout the document in accordance to EPMs guidance</p> <p>1.2 added 'This Code underpins a whole-school culture where safeguarding is everyone's responsibility, and proactive vigilance is embedded in daily practice'</p> <p>1.6 added 'In certain cases, behaviour in breach of this Code may also lead to a referral to the Disclosure and Barring Service (DBS) and/or the Teaching Regulation Agency (TRA) and may result in criminal proceedings where appropriate.'</p> <p>4.1 added 'and report any allegation that may meet the harm threshold to the Local Authority Designated Officer (LADO) without delay.'</p> <p>5 low level concerns bullet points added 'being over strict with children' and 'disfavouring pupils' at bullet points 1 and 2 respectively</p> <p>Added after bullet points 'A centralised record of low level concerns will be maintained by the school, as required by KCSIE.'</p> <p>6.2 added 'All adults must speak up about behaviours or practices that could put children at risk and ensure they are reported via appropriate channels.'</p> <p>8.1 added 'Non-exhaustive examples of unacceptable behaviour are contained in our disciplinary procedure/rules'</p> <p>8.4 added 'A person's dress and appearance are matters of personal choice, self-expression, religious and cultural customs.'</p> <p>Added after slogans 'images, or symbols that could reasonably be considered offensive, inappropriate, or contrary to the inclusive values of the school. This also applies to online or virtual teaching.'</p> <p>8.5 Added '...items that could reasonably be considered offensive, discriminatory, threatening, extremist,...' and added bullet points</p> <p>9.1 added after gratification...' Adults must not use their position to gain access to information for their own advantage and/or a pupil's or family's detriment or use their power to intimidate, threaten, coerce, or undermine current or former pupils.'</p> <p>11.2 added 'However, small, low-value items given to a whole class may be appropriate if they are inclusive in nature and clearly intended as a gesture of appreciation. These should be proportionate, non-preferential, and aligned with the ethos of the school'</p> <p>12.1 added 'Adults must not communicate with pupils via personal social media accounts, nor should they accept or initiate friend or follower requests or engage in messaging through such platforms. Communication should only take place through school-approved channels and systems, and only for legitimate professional reasons.'</p>
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	<p>12.4 added 'Adults must ensure their use of social media and online platforms is consistent with the professional standards expected by the school' and added 'Adults should avoid posting material that could be perceived as unprofessional, discriminatory, or damaging to the reputation of the school or their role within it.'</p> <p>12.6 New content added about using trust/school equipment.</p> <p>13.9 added 'Where appropriate, staff may offer verbal or visual prompts to support pupils in developing independence with personal care. This can be an important and proportionate step for pupils working towards managing these tasks themselves.' And added 'To minimise the risk of safeguarding allegations for both pupils and staff, it is advised that intimate care is carried out in the vicinity of another adult wherever possible — one of whom may act solely in a monitoring capacity. In such instances, the monitoring adult does not need to be named in the pupil's care plan, but the arrangement should be understood and agreed as part of routine procedure.'</p> <p>Added statement at 14.4</p> <p>16.1 added 'Where staff are expected to work on one to one with a pupil on a virtual platform, clear expectations should be set out for all those involved that are reflective of the settings safeguarding policies and procedures. Any arrangements should be reviewed on a regular basis.'</p> <p>16.4 added 'In all cases where employees are involved in supervision, two employees must be present at all times. This is to ensure safeguarding best practice and to maintain the validity of the examination arrangements, in line with the expectations of awarding bodies.'</p> <p>17.3 added 'Where such arrangements are approved, the following conditions must be met to ensure safety and compliance with legal and safeguarding requirements:' and bullet points and statement following.</p> <p>20.6 bullet point ten updated wording</p> <p>21.3.5 added 'Consider avoiding direct links to platforms such as YouTube in case of autoplay or links to other videos that have not been vetted.'</p> <p>23.1 added 'If any concerns are raised via a third party, the Headteacher, Senior Manager or Designated Safeguarding Lead should collect as much evidence as possible. Where low-level concerns are raised the Headteacher, Senior Manager or Designated Safeguarding Lead should speak to the individual involved and any witnesses and consider the matter under the Disciplinary Procedure which may result in informal or formal action'</p>
Mar 26 V5.1	Reviewed in line with Working Together to Safeguarding Children (March 2026) – no changes required

Contents

Trust Suite Intro

Staffing Policy Statement

1. Introduction
2. Expected Professional Standards
3. Confidentiality
4. Propriety, Behaviour and Appearance
5. Sexual Contact with Children and Young People and Abuse of Trust
6. Infatuations and Crushes
7. Gifts, Rewards, Favouritism and Exclusion
8. Social Contact and Social Networking
9. Physical Contact, Personal Privacy and Personal Care
10. Behaviour Management and Physical Intervention
11. First Aid and Medication
12. One to One Situations and Meetings with Pupils
13. Transporting Pupils
14. Educational Visits and School Clubs
15. Curriculum
16. Photography, Videos, and other Creative Arts
17. Use of technology for online/virtual teaching
18. Use of ICT Facilities and Monitoring
19. Reporting Concerns and Recording Incidents
20. Monitoring and Review

Trust Suite

Introduction

High quality employees are essential to the success of every school. INMAT intend to be outstanding employers, recruiting and developing the best employees for the benefit of students.

As an outstanding employer, INMAT require HR policies that are:

- Compliant with latest law/regulations and case-law
- Fit for purpose for an Academy
- Fair to the employer and employee
- Clear and easily understood

These policies will be reviewed annually at a minimum.

Detailed support documentation, including procedures and template forms/letters, accompany these policies.

The Trust is the employer of employees at an academy, with the Governing Body having the responsibility for the leadership and management of the academy, ensuring appropriate policies are in place are part of that responsibility.

These policies are operational from:

1 January 2020

Staffing Policy Statement

1. Introduction

- 1.1. INMAT is committed to the employment of high calibre employees who support school improvement through exceptional work performance. It is expected that all employees will contribute toward clearly defined organisational standards and objectives. Employees will be supported in doing this by a set of staffing procedures, all of which follow the guiding principles set out in this document.
- 1.2. This Staffing Policy Statement should be read and implemented in conjunction with the appropriate staffing procedure.
- 1.3. Collectively the Staffing Policy Statement and staffing procedures are referred to as INMAT Staffing Policy and Procedures.

2. Staffing Policies

- 2.1. INMAT is committed to having Staffing Policy and Procedures that are:
 - Supportive of school improvement
 - Comprehensive and fit for purpose
 - Legally compliant
 - Clear, consistent and easy to understand
 - Fair to the employer and employee
 - Regularly reviewed with the review date clearly stated
 - Supported by templates and guidance as appropriate
- 2.2. The Staffing Policy and Procedures are non-contractual and may be amended at any time following consultation unless it is stated otherwise in an individual staffing procedure.
- 2.3. The Staffing Policy and Procedures apply to all employees of INMAT unless it is stated otherwise in an individual staffing procedure.
- 2.4. The processes that are set out in the Staffing Policy and Procedures, including any time limits, may be varied as appropriate in any case.

3. Accountabilities

- 3.1. The Trustees are accountable for INMAT Staffing Policy and Procedures.

- 3.2. The CEO is responsible for the implementation of INMAT Staffing Policy and Procedures, ensuring that they are applied consistently and communicated to employees appropriately.
- 3.3. The Executive Officers will ensure that:
- The Staffing Policy and Procedures are readily available and accessible to all employees
 - New employees are given access and made aware of the Staffing Policy and Procedures during their induction period
- 3.4. Cases against the Chief Executive Officer will be managed by the Trustees in accordance with the process set out in the appropriate staffing procedure.
- 3.5. Cases against a Headteacher will be managed by CEO in accordance with the process set out in the appropriate staffing procedure.

4. Definitions

- 4.1. The following terms and definitions apply in all staffing policies in which they are used:

Board of Trustees: The Trustees of INMAT. This may refer to a panel of trustees formed to manage a process rather than the full board of trustees.

Chief Executive Officer: The Chief Executive Officer of INMAT. This also refers to any other title used to identify the Chief Executive Officer, or other senior manager delegated to deal with a matter by the Chief Executive Officer, as appropriate

Local Academy Committee: The Local Academy Committee of a School within INMAT. This may refer to a panel of governors formed to manage a process rather than the full Governing Body.

Headteacher: The Headteacher of a School within INMAT. This also refers to any other title used to identify the Headteacher, or other senior manager delegated to deal with the matter by the Headteacher or CEO, as appropriate.

Executive Officer: A member of the Trust senior leadership team.

School Senior Manager: A member of a School's senior leadership team within INMAT. This may be a Deputy Headteacher, Head of Department, School Business Manager, or other senior employee delegated to deal with a matter by the Headteacher or CEO

Line Manager: An employee with line management responsibility for a member of staff.

Teaching Staff: Those employees employed by INMAT whose terms and conditions are covered by the Conditions of Service for School Teachers in England and Wales (the Burgundy Book).

Support Staff: Those employees employed by INMAT whose terms and conditions are covered by the National Joint Council for Local Government Services Conditions of Service (the Green Book). Support Staff include HLTA's and TA's.

Companion: A representative of a trade union or workplace colleague chosen by the employee to accompany them to a formal meeting, where this provision is stipulated in the relevant staffing procedure. A companion may make representations and ask questions but should not answer questions on the employee's behalf.

HR Adviser: A HR professional appointed to support a process being followed. This may be a member of INMAT HR team or an external adviser.

Investigating Officer: A senior manager or external person appointed by the Board of Trustees or CEO to investigate an allegation.

Designated Safeguarding Lead (DSL): To act as the first point of contact for any safeguarding or child protection incident or concern in the setting and even sometimes outside of the workplace.

Data Protection Officer (DPO): Aids your business to fulfil various data protection duties: **Identify and monitor the data processors whilst at work**, ensuring that they deal with data in a manner consistent with the key data protection principles. Process and respond to all requests for information, correction, or erasure by data subjects. Ensure data remains up-to-date and is destroyed when necessary.

5. Trade Union Officials

- 5.1. INMAT Staffing Policy and Procedures apply to all employees. Where an employee is a trade union representative, wherever possible, no formal action will be taken until the circumstances of the case have been discussed with the relevant professional trade union officer.

6. Probation

- 6.1. Concerns raised during an employee's probationary period may be taken into account in determining whether or not the probationary period is completed satisfactorily. Where this is the case, the matter will normally be dealt with in accordance with the Trust's probation procedure and not the individual staffing procedure to which the issue relates, for example, sickness absence or disciplinary.

7. Confidentiality

- 7.1. All parties must treat information relating to cases being dealt with in accordance with the Staffing Policy and Procedures as confidential, unless there is recourse to legal action or if there is police or LADO involvement in which case appropriate information will be shared by INMAT in accordance with Data Protection policies.

- 7.2. The employee and anyone accompanying the employee (including witnesses) must not make electronic recordings of any meetings or hearings conducted under this procedure. Failure to observe confidentiality could be a reason for disciplinary action under the School's disciplinary procedure unless expressly authorised and agreed by all parties.

8. Equalities

- 8.1. The Staffing Policy and Procedures will be operated in accordance with INMAT Equality and Diversity Policy. The Trust is committed to developing, maintaining and supporting a culture of equality and diversity in employment. The impact of INMAT Staffing Policy and Procedures will be monitored in accordance with the Equality Act 2010.

9. Formal Meetings

- 9.1. The following arrangements relate to formal meetings, convened in accordance with a staffing procedure. The individual staffing procedure indicates when a meeting constitutes a formal meeting.

10. Arrangements Prior to the Formal Meeting

- 10.1. An employee invited to a formal meeting convened in accordance with a staffing procedure will be provided with:
- a) 10 working days' notice of the meeting
 - b) The date, time and location of the meeting
 - c) Information about the purpose of the meeting, including allegations, where appropriate
 - d) Possible consequences of the meeting, including dismissal, where appropriate
 - e) Notification of their right to be accompanied by their companion
 - f) Copies of documents to be discussed
 - g) Names of people attending the meeting and their role
 - h) An additional copy of correspondence for the employee's companion where requested
 - i) The opportunity to request special arrangements, e.g., relating to disability, language requirements
- 10.2. An employee invited to a formal meeting is required to confirm their attendance, provide the name of their companion where relevant and provide any other requested information at least three working days prior to the meeting.
- 10.3. The employee must take all reasonable steps to attend meetings. Failure to do so without good reason may be treated as misconduct.

- 10.4. If the employee is unable to attend a formal meeting at the scheduled time, the Trust will make a reasonable attempt to re-schedule it on an alternative date. In the event that the employee is unable to attend a rescheduled formal meeting, they may be given alternative options to provide information and be advised that it may go ahead in their absence. Alternatives may include the following, as appropriate to the circumstances of the case:
- Meet in another venue or at their home
 - Attend via telephone conference
 - Send a companion to represent them, providing appropriate written consent
 - Provide a written submission
 - Request that the meeting takes place in their absence
- 10.5. Any manager visiting an employee's home will be accompanied by another manager.
- 10.6. A meeting may be adjourned if the chair of the meeting is awaiting receipt of information, needs to gather further information or give consideration to matters discussed at a previous meeting. The employee will be given a reasonable opportunity to consider any new information obtained before the meeting is reconvened.
- 10.7. If the employee's chosen companion is unavailable to attend a formal meeting at the scheduled time and will not be available for more than 5 working days afterwards, the employee will normally be required to find an alternative companion.

11. Procedure During a Formal Meeting

- 11.1. The Chair of a formal meeting, hearing or appeal may be accompanied by an HR Adviser, including during any deliberations. The HR Adviser will not have a vote in any decision that is reached.
- 11.2. An employee's companion may make representations and ask questions but should not answer questions on the employee's behalf.

12. Outcome of a Formal Meeting

- 12.1. The Chair of the meeting will confirm the outcome of a formal meeting in writing to the employee as soon as possible and usually within 10 working days of the meeting.
- 12.2. The record of the meeting will include the outcome and the details of people present.

13. Dismissal

- 13.1. If a decision is taken to dismiss an employee, the Chair, of the formal meeting at which the decision was reached, will inform the employee, and their companion, that the employee is dismissed, with the required contractual or statutory notice, whichever is the greater.
- 13.2. The written confirmation of the dismissal will include:
 - Confirmation that the employee has been dismissed
 - The grounds for the dismissal and the reasons
 - The required contractual or statutory notice due (or payment in lieu of notice where applicable) and the date the dismissal will be effective
 - The employee's right of appeal
- 13.3. Termination of employment will normally be with full notice or payment in lieu of notice. In some cases, it may not be appropriate for the employee to work during their notice. The contract may state that the employee remains at home on 'garden leave' or this may be agreed between the parties.
- 13.4. Where dismissal has been on the grounds of gross misconduct, the employee may be dismissed without notice or pay in lieu of notice and this will be confirmed in the outcome letter.
- 13.5. A Fit Note must be provided to cover the employee's notice period when they are absent due to sickness.

14. Appeals

- 14.1. Appeals constitute formal meetings and should be conducted in accordance with point 10 above.
- 14.2. Appeals will be heard by a panel who have not had prior involvement with the case.
- 14.3. The appeals panel may be advised by a person engaged by the Trust.
- 14.4. The purpose of an appeal hearing is to review the decision made during the formal process and to decide if the decision was reasonable in all the circumstances.
- 14.5. Individual staffing procedures state where an employee has the right to appeal a decision that has been made.
- 14.6. An employee will be advised of their right to appeal a decision taken during a formal meeting, in writing, when the outcome is communicated to them.
- 14.7. Appeals should be made in writing, stating the grounds for appeal in full, within 10 working days of the date of the written decision.

- 14.8. All appeal hearings will be held as soon as possible and, in normal circumstances, within 10 working days after receipt of the appeal.
- 14.9. Individual staffing procedures state who the appeal should be submitted to and who is responsible for hearing it.
- 14.10. The date that any dismissal takes effect will not be delayed pending the outcome of an appeal. However, if the appeal is successful, the decision to dismiss will be revoked with no loss of continuity or pay.
- 14.11. Upon conclusion of the appeal process, there is no further right of appeal.
- 14.12. The employee may appeal on the following grounds only:
- That the sanction applied was too severe or disproportionate
 - That the procedure has been applied defectively or unfairly
 - That new evidence has come to light that was not available at the previous hearing and that it is likely to make a difference to the original decision
- 14.13. The decision at appeal can confirm or overturn the original decision, or apply a greater, lesser, or alternative penalty.

Code of Conduct - INMAT

1. Introduction

- 1.1. This code of conduct must be read and applied in conjunction with INMAT Staffing Policy Statement, and the trust safeguarding policy.
- 1.2. This code sets out the professional standards expected and the duty upon adults to abide by it. All adults have a duty to keep pupils safe, promote their welfare and to protect them from radicalisation (the Prevent Duty), abuse (sexual, physical and emotional), neglect and safeguarding concerns. This duty is, in part, exercised through the development of respectful, caring and professional relationships between adults and pupils and behaviour by adults that demonstrates integrity, maturity and good judgement. Following this code will help to safeguard adults from being maliciously, falsely or mistakenly suspected or accused of misconduct in relation to pupils. This Code underpins a whole-school culture where safeguarding is everyone's responsibility, and proactive vigilance is embedded in daily practice.
- 1.3. For the purposes of this code, the term and references to 'adult' means the following: board of trustees, governing bodies, all teaching and other employees working in the Central Trust and in Schools (whether paid or unpaid, employed or self-employed and whether or not employed directly by the Trust), external contractors providing services to pupils on behalf of the Trust, teacher trainees and other trainees/apprentices, volunteers and any other individuals who work for or provide services on behalf of or for the Trust to include but not limited to all those detailed in the Single Central Record (as amended).
- 1.4. For the purposes of this code 'young person/people', 'pupils' and 'child/ren' includes all those for whom the Trust provides education or other services, and pupils who no longer attend INMAT schools, and are under the age of 18.
- 1.5. This code takes account of the most recent versions of the following guidance (statutory and non-statutory):
 - 'Keeping Children Safe in Education' Department of Education ('DfE') (statutory)
 - 'Working Together to Safeguard Children' HM Government (statutory)

'Guidance for Safer Working Practice for Those Working with Children and Young People in Education Settings' (non-statutory)

This code cannot provide an exhaustive list of what is, or is not, appropriate behaviour for adults. However, it does highlight behaviour that is illegal, inappropriate or inadvisable in relation to the required professional standards. There will be occasions and circumstances in which adults have to make decisions or take action in the best interests of the pupil where no specific

guidance has been given. Adults are expected to make responsible and informed judgements about their own behaviour in order to secure the best interests and welfare of the pupils.

- 1.6. Any behaviour in breach of this code by employees may result in action under the Trust's disciplinary procedure. Such behaviour may constitute gross misconduct and, as such, may result in summary dismissal. In certain cases, behaviour in breach of this Code may also lead to a referral to the Disclosure and Barring Service (DBS) and/or the Teaching Regulation Agency (TRA) and may result in criminal proceedings where appropriate. The Trust will take a strict approach to serious breaches of this Code. Some breaches may be considered low-level concerns which may be dealt with informally or formally under the disciplinary procedure.

2. Safeguarding and Child Protection

- 2.1. Adults have a duty to act in accordance with their school's current Safeguarding and Child Protection Policy which is available from the DSL and report any safeguarding, child protection, welfare or radicalisation concerns about a pupil to the DSL.

3. Whistleblowing

- 3.1. Adults must raise concerns they have about the safeguarding or child protection practices by following the Trust's Whistleblowing Procedure, which is available from the school and Trust website. An adult who raises a matter under the whistleblowing policy or makes a public interest disclosure will have the protection of the relevant legislation.

4. Allegations of Abuse Against Teachers and Other Employees and Volunteers

- 4.1. Where it is alleged that an adult has:
 - behaved in a way that has harmed a child, or may have harmed a child
 - possibly committed a criminal offence against or related to a child
 - behaved towards a child or children in a way that indicates they would pose a risk of harm to children
 - behaved or may have behaved in a way that indicates they may not be suitable to work with children

Then the Trust will follow the Trust's Procedures for Dealing with Allegations of Abuse against Teachers and Other Employees and Volunteers, and the guidance set out in Part Four of 'Keeping Children

Safe in Education' DfE, both of which are available from the Trust website, and report any allegation that may meet the harm threshold to the Local Authority Designated Officer (LADO) without delay.

5. *Low-Level Concerns*

In accordance with Part Four of Keeping Children Safe in Education, a low-level concern is defined as behaviour towards a child that does not meet the harm threshold, as outlined in 4.1 above but is a concern that an adult, working in or on behalf of the Trust/School, may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work
- does not meet the threshold or is otherwise not considered serious enough to consider a referral to the LADO
- Examples of low-level concerns could include, but are not limited to:
 - being over-friendly with children/ being over strict with children
 - having favourites/ disavouring pupils
 - taking photographs of children on their mobile phone
 - engaging with a child on a one-to-one basis in a secluded area or behind a closed door

A centralised record of low level concerns will be maintained by the school, as required by KCSIE.

INMAT is committed to creating and embedding a culture of openness, trust and transparency in which the school's values and expected behaviours, as set out in this policy, are adhered to, monitored and reinforced by all staff. All adults have a duty to report low-level concerns, in addition to concerns that meet the harm threshold, to those with designated safeguarding responsibilities to ensure matters are dealt with promptly and appropriately. The headteacher or CEO will manage all such concerns in accordance with Part Four of Keeping Children Safe in Education.

In the event that an adult has found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on

reflection they believe they have behaved in such a way that they consider falls below the expected professional standards, the adult should self-refer to those with designated safeguarding responsibilities. The trustees are committed to creating an environment where staff are encouraged and feel confident to self-refer.

6. Expected Professional Standards

6.1. All adults as appropriate to the role and/or job description of the individual, must:

- Place the wellbeing and learning of pupils at the centre of their professional practice
- Have high expectations for all pupils, be committed to addressing underachievement, and work to help pupils progress regardless of their background and personal circumstances
- Treat pupils fairly and with respect, take their knowledge, views, opinions and feelings seriously, and value diversity and individuality
- Model the characteristics they are trying to inspire in pupils, including enthusiasm for learning, a spirit of enquiry, honesty, tolerance, social responsibility, patience, and a genuine concern for other people
- Respond sensitively to the differences in home backgrounds and circumstances of pupils, recognising the key role that parents and carers play in pupils' education
- Seek to work in partnership with parents and carers, respecting their views and promoting understanding and co-operation to support the young person's learning and wellbeing in and out of School
- Reflect on their own practice, develop their skills, knowledge and expertise, and adapt appropriately to learn with and from colleagues
- Ensure that the same professional standards are always applied regardless of protected characteristics, culture, disability, gender, language, racial origin, religious belief and/or sexual identity

Teachers are required to comply with the Teachers' Standards 1 September 2012, in particular, Part 2 Personal and Professional Standards. All adults must be familiar with and act in accordance with the most recent versions of the following documents:

- 'Keeping Children Safe in Education' DfE (statutory)
- 'Working Together to Safeguard Children' HM Government (statutory)
- 'Prevent Duty Guidance' HM Government (statutory)

- 'The Prevent Duty Departmental Advice for Schools and Childcare Providers' DfE
 - 'Guidance for Safer Working Practice for Those Working with Children and Young People in Education Settings' (non-statutory)
- 6.2. All adults must speak up about behaviours or practices that could put children at risk and ensure they are reported via appropriate channels. An employee who fails to bring a matter of concern to the attention of senior management and/or the relevant agencies is likely to be subject to disciplinary action. This includes concerns that meet the criteria of a 'low level concern', or those which bring a sense of unease or 'nagging doubt'.

7. Confidentiality

- 7.1. As data controllers, all academies are subject to the General Data Protection Regulation (GDPR UK) and Data Protection Act 2018 ("Data Protection Legislation"). In addition, teachers owe a common law duty of care to safeguard the welfare of their pupils. This duty is acknowledged in the provisions governing disclosure of information about pupils.
- 7.2. Adults may have access to special category personal data about pupils and their families, which must be kept confidential at all times and only shared when legally permissible to do so and in the interests of the child. Records should only be shared with those who have a legitimate professional need to see them. In circumstances where special category personal data needs to be shared, the Data Protection Legislation contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent. In such cases, adults have a duty to pass the information on without delay to those with designated safeguarding responsibilities. See paragraph 22 below.
- 7.3. Confidential or personal information about a pupil or their family must never be disclosed to anyone other than on a need-to-know basis and advice should be sought prior to disclosure to ensure such disclosure is in accordance with the Data Protection Legislation, The Education (Pupil Information) Regulations 2005 (Maintained Schools), and the School's Privacy Notices. In circumstances where the pupil's identity does not need to be disclosed the information should be used anonymously. The information must never be used to intimidate, humiliate, or embarrass the pupil. The information must never be used by anyone for their own or others advantage (including that of partners, friend's relatives or other organisations)
- 7.4. Confidential information about pupils must be held securely. Confidential information about pupils must not be held off the school site other than on security protected school equipment. The information must only be stored for the length of time necessary to discharge the task for which it is required. If a pupil or parent/carer makes a disclosure regarding abuse or neglect, the adult

must follow the school's procedures and the guidance as set out in 'Keeping Children Safe in Education' DfE. Confidentiality must not be promised to the pupil or parent/carer; however, reassurance should be given that the information will be treated sensitively.

- 7.5. If an adult is in any doubt about the storage or sharing of information, they must seek guidance from the Executive Officers. Any media or legal enquiries must be passed to Trust's Data Protection Officer

8. Propriety, Behaviour and Appearance

- 8.1. All adults working with children have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of pupils. They should adopt high standards of personal conduct in order to maintain the confidence and respect of their colleagues, pupils and the public in general. An adult's behaviour or actions, either in or out of the workplace, must not compromise their position within the work setting, or bring the Trust into disrepute. Non-exhaustive examples of unacceptable behaviour are contained in our disciplinary procedure/rules
- 8.2. Adults are required to notify the Trust immediately of any allegation/s of misconduct that are of a safeguarding nature made against them (or implicating them), by a child or adult in relation to any outside work or interest (whether paid or unpaid) and, of any arrest or criminal charge whether child-related or not. Where employees fail to do so, this will be treated as a serious breach of this code and dealt with under our disciplinary procedure.
- 8.3. Individuals should not:
- behave in a manner which would lead any reasonable person to question their suitability to work with children or to act as an appropriate role model
 - make, or encourage others to make sexual remarks to, or about, a pupil
 - use inappropriate language to or in the presence of pupils
 - discuss their personal or sexual relationships with or in the presence of pupils
 - make, or encourage others to make, unprofessional personal comments which scapegoat, demean or humiliate, or might be interpreted as such
 - Behave in an unsuitable way towards children may result in disqualification from childcare under the Childcare Act 2006, prohibition from teaching by the TRA, a bar from engaging in regulated activity, or action by another relevant regulatory.
- 8.4. A person's dress and appearance are matters of personal choice, self-expression, religious and cultural customs. However, adults must maintain an

appropriate standard of dress and personal appearance at work which promotes a positive and professional image. Clothing and footwear must be safe and clean and take account of health and safety considerations. Adults must ensure they are dressed in ways which are appropriate to their role and not likely to be viewed as offensive, revealing or sexually provocative and specifically should not distract, cause embarrassment, or give rise to misunderstanding, should be religious and culturally sensitive and free of any political or otherwise contentious slogans, images, or symbols that could reasonably be considered offensive, inappropriate, or contrary to the inclusive values of the school. This also applies to online or virtual teaching. Adults who dress or appear in a manner which may be considered as inappropriate could render themselves vulnerable to criticism or, where the adult is an employee, allegations of misconduct that may lead to action under our disciplinary procedure.

8.5. Personal property of a sexually explicit nature, or items that could reasonably be considered offensive, discriminatory, threatening, extremist, or property which might be regarded as promoting radicalisation or otherwise inappropriate such as books, magazines, CDs, DVDs or such material on any electronic media including links to such material must not be brought onto or stored on Trust/school premises or on any Trust/school equipment. This includes, but is not limited to:

- material that promotes hatred or violence,
- content that undermines the dignity of individuals or groups based on protected characteristics (e.g., race, religion, sex, sexual orientation, disability),
 - media that glorifies criminal behaviour or illegal drug use,
 - or content that could be perceived as undermining the professional standards or safeguarding obligations of the school.

9. Sexual Contact with Children and Young People and Abuse of Trust

9.1. A relationship between an adult and a child or young person is not a relationship between equals; the adult has a position of power or influence. There is potential for exploitation and harm of children or vulnerable young people and all adults have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification. Adults must not use their position to gain access to information for their own advantage and/or a pupil's or family's detriment or use their power to intimidate, threaten, coerce, or undermine current or former pupils. Adults must not use their status or position to form or promote relationships with children (whether current pupils or not), that are of a sexual nature, or which may become so.

- 9.2. Adults should maintain appropriate professional boundaries and avoid behaviour that might be misinterpreted by others. They should report any incident with this potential to a senior manager. This is as relevant in the online world as it is in the classroom; staff engagement with pupils and/or parents online is discouraged unless through appropriate school approved platforms. Staff have a responsibility to model safe practice at all times.
- 9.3. Any sexual behaviour or activity by an adult with or towards a child/pupil or young person is illegal. Children and young people are protected by the same laws as adults in relation to non-consensual sexual behaviour. They are additionally protected by specific legal provisions regardless of whether there is consent or not. Where a person aged 18 or over is in a specified position of trust with a child or young person under 18 years, the Sexual Offences Act 2003 makes it an offence for that person to engage in sexual activity with or in the presence of that child or to cause or incite that child to engage in or watch sexual activity.
- 9.4. Sexual behaviour includes non-contact activities, such as causing a child or young person to engage in or watch sexual activity or the production of indecent images of children. 'Working Together to Safeguard Children', Appendix A defines sexual abuse as "...forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening..."
- 9.5. Adults must not have sexual relationships with pupils or have any form of communication with a child, which could be interpreted as sexually suggestive or provocative i.e., verbal comments, letters, notes, texts, electronic mail, phone calls, social networking contact or physical contact. The adult should not make sexual remarks to, or about, a child or discuss their own sexual relationships with or in the presence of pupils. Adults should take care that their language or conduct does not give rise to comment or speculations. Attitudes, demeanour and language all require care and thought.
- 9.6. There are occasions when adults embark on a course of behaviour known as 'grooming' where the sole purpose is to gain the trust of a child or young person and manipulate that relationship. This includes so that sexual abuse or criminal activity can take place, or where the relationship has overstepped professional boundaries. Adults should be aware that conferring special attention without good reason or favouring a pupil has the potential to be construed as being part of a 'grooming' process, which is a criminal offence.
- 9.7. Adults must not embark on behaviours which could be construed as 'low level concerns' as identified in Keeping Children Safe in Education. Examples of low-level behaviours include but are not limited to; being over friendly with children, having favourites, taking photos of children on their mobile phone, engaging with a child on a one-to-one basis in a secluded area or behind closed door, or

using inappropriate sexualised, intimidating or offensive language. This includes with children who have left the school.

10. Infatuations and Crushes

- 10.1. A child or young person may develop an infatuation with an adult who works with them. An adult, who becomes aware (may receive a report, overhear something, or otherwise notice any sign no matter how small or seemingly insignificant) that a pupil has become or maybe becoming infatuated with them or a colleague, must report this without delay to the [DSL](#), or an appropriate senior manager in their absence, so that appropriate action can be taken to avoid any hurt, distress or embarrassment. The situation will be taken seriously, and the adult should be careful to ensure that no encouragement of any kind is given to the pupil. It should also be recognised that careless and insensitive reactions may provoke false accusations.
- 10.2. Examples of situations which must be reported are given below:
- Where an adult is concerned that they might be developing a relationship with a pupil which could have the potential to represent an abuse of trust.
 - Where an adult is concerned that a pupil is becoming attracted to them or that there is a developing attachment or dependency.
 - Where an adult is concerned that actions or words have been misunderstood or misconstrued by a pupil such that an abuse of trust might be wrongly suspected by others.
 - Where an adult is concerned about the apparent development of a relationship by another adult or receives information about such a relationship.

11. Gifts, Rewards, Favouritism and Exclusion

- 11.1. It is against the law for public servants to take bribes. Adults need to take care that they do not accept any gift that might be construed by others as a bribe or lead the giver to expect preferential treatment. There are occasions when pupils or parents/carers wish to pass small tokens of appreciation to adults, e.g., at Christmas or as a thank you and this is acceptable. However, it is unacceptable to receive gifts regularly or of any significant value. Please refer to the gifts and hospitality policy.
- 11.2. Personal gifts must not be given to pupils or their families/carers. This could be misinterpreted as a gesture either to bribe or groom. It might be perceived that a 'favour' of some kind is expected in return. However, small, low-value items given to a whole class may be appropriate if they are inclusive in nature and clearly intended as a gesture of appreciation. These should be proportionate, non-preferential, and aligned with the ethos of the school. Any reward given to

a pupil should be in line with the school's behaviour policy recorded, and not based on favouritism.

- 11.3. Care should be taken when selecting children for specific activities, jobs, privileges and when pupils are excluded from an activity in order to avoid perceptions of favouritism or injustice. Methods of selection and exclusion should be subject to clear, fair and agreed criteria.

12. Social Contact and Social Networking

- 12.1. Communication between pupils and adults, including pupils no longer at the school, by whatever method, should take place within clear and explicit professional boundaries. This includes the wider use of technology such as mobile phones, tablets, text messages, emails, instant messages, websites, social media such as Facebook, Twitter, Instagram, chatrooms, forums, blogs, apps such as WhatsApp, gaming sites, digital cameras, videos, webcams and other handheld devices. Adults must not communicate with pupils via personal social media accounts, nor should they accept or initiate friend or follower requests or engage in messaging through such platforms. Communication should only take place through school-approved channels and systems, and only for legitimate professional reasons.
- 12.2. Adults should not share any personal information with pupils, and they should not request, or respond to, any personal information from the child/young person, other than that which might be appropriate as part of their professional role. They should ensure that all communications are transparent and avoid any communication that could be interpreted as 'grooming behaviour'.
- 12.3. Adults must not give their personal contact details such as home/mobile phone number; home or personal e-mail address or social networking details to pupils unless the need to do so is agreed in writing with senior management. If, for example, a pupil attempts to locate an adult's personal contact details and attempts to contact or correspond with them, the adult should not respond and must report the matter to their manager.
- 12.4. Adults must ensure their use of social media and online platforms is consistent with the professional standards expected by the school. It is recommended that adults ensure that all possible privacy settings are activated to prevent pupils from making contact on personal profiles and to prevent pupils from accessing photo albums or other personal information which may appear on social networking sites. Adults should avoid posting material that could be perceived as unprofessional, discriminatory, or damaging to the reputation of the school or their role within it.
- 12.5. Adults are personally responsible for what they communicate in social media and must bear in mind that what is published might be read by us, pupils, parents and carers, the general public, future employers and friends and family

for a long time. Adults must ensure that their online profiles are consistent with the professional image expected by us and must not post material which damages the reputation of the Trust, or which causes concern about their suitability to work with children and young people. Those who post material which may be considered as inappropriate could render themselves vulnerable to criticism or, in the case of an employee, allegations of misconduct which may be dealt with under the disciplinary procedure. Even where it is made clear that the writer's views on such topics do not represent those of the Trust, such comments are inappropriate.

- 12.6. Adults must not use school systems or devices for accessing social media platforms for personal use unless explicitly authorised.
- 12.7. Adults are advised not to have any online friendships with any young people under the age of 18 unless they are family members or close family friends. Adults are advised not to have online friendships with parents or carers of pupils or members of the Governing Body/Trustees. Where such online friendships exist, adults must ensure that appropriate professional boundaries are maintained.
- 12.8. It is acknowledged that adults may have genuine friendships and social contact with parents or carers of pupils, independent of the professional relationship. Adults should, however, inform Headteacher of:
 - Any relationship with a parent/carer where this extends beyond the usual parent/carer/professional relationship
 - Any regular social contact they have with a pupil or parent/carer, which could give rise to concern
 - Any requests or arrangements where parents/carers wish to use their services outside of the workplace e.g., babysitting, tutoring
 - Any planned social contact with pupils or parents/carers with senior colleagues, e.g., when it is part of a reward scheme. If a parent/carer seeks to establish social contact, or if this occurs coincidentally, the adult should exercise their professional judgment and should ensure that all communications are transparent and open to scrutiny.
- 12.9. Some employees may, as part of their professional role, be required to support a parent or carer. If that person comes to depend upon the employee or seeks support outside of their professional role this should be discussed with senior management and where necessary referrals made to the appropriate support agency.

13. Physical Contact, Personal Privacy and Personal Care

- 13.1. There are occasions when it is entirely appropriate and proper for employees to have physical contact with pupils, but it is crucial that they only do so in

ways appropriate to their professional role and in relation to the pupil's individual needs and any agreed care plan. 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, culture and background. Employees must use their professional judgement at all times. It is not possible to be specific about the appropriateness of each physical contact, since an action that is appropriate with one pupil in one set of circumstances may be inappropriate in another, or with a different pupil.

- 13.2. Physical contact should never be secretive or casual, or for the gratification of the adult, or represent a misuse of authority. Adults should never touch a pupil in a way which may be considered indecent. If an adult believes that an action could be misinterpreted, the incident and circumstances should be reported as soon as possible to the DSL and be recorded in the school's incident book, and, if appropriate, a copy placed on the pupil's file.
- 13.3. There may be occasions when a distressed pupil needs comfort and reassurance. This may include age-appropriate physical contact. Adults should remain self-aware at all times in order that their contact is not threatening, intrusive or subject to misinterpretation. Adults should always tell a colleague when and how they offered comfort to a distressed pupil.
- 13.4. Physical contact, which occurs regularly with a pupil or pupils, 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 and open policy and subject to review. Where feasible, employees should seek the pupil's permission before initiating contact. Adults should listen, observe and take note of the pupil's reaction or feelings and so far, as is possible, use a level of contact which is acceptable to the pupil for the minimum time necessary.
- 13.5. Where an adult has a particular concern about the need to provide this type of care and reassurance, they should seek further advice from the DSL.
- 13.6. Some employees, for example, those who teach PE and games or who provide music tuition, will on occasions have to initiate physical contact with pupils in order to support a pupil so 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. Contact under these circumstances should be for the minimum time necessary to complete the activity and take place in a safe and open environment. Adults should remain sensitive to any discomfort expressed verbally or non-verbally by the pupil.
- 13.7. All parties should clearly understand from the outset what physical contact is necessary and appropriate in undertaking specific activities. Keeping parents/carers informed of the extent and nature of any physical contact may also prevent allegations of misconduct arising. Any incidents of physical contact

that cause concern or fall outside of these protocols and guidelines should be reported to the senior manager and parent/carer.

- 13.8. Pupils are entitled to respect and privacy when changing clothes or taking a shower. However, there needs to be an appropriate level of supervision in order to safeguard pupils, satisfy health and safety considerations and ensure that bullying or teasing does not occur. This supervision should be appropriate to the needs and age of the pupils concerned and sensitive to the potential for embarrassment. Adults who are required as part of their role to attend changing rooms should announce their intention of entering any pupil changing rooms and only remain in the room where the pupil/s needs require this.
- 13.9. Employees with a job description which includes intimate care duties will have appropriate training and written guidance including a written care plan for any pupil who could be expected to require intimate care. Employees should adhere to the school's Intimate and Personal Care Policy. No other adult should be involved in intimate care duties except in an emergency. A signed record should be kept of all intimate and personal care tasks undertaken and, where these have been carried out in another room, include times left and returned. Where appropriate, staff may offer verbal or visual prompts to support pupils in developing independence with personal care. This can be an important and proportionate step for pupils working towards managing these tasks themselves. However, employees should not assist with personal or intimate care tasks which the pupil is able to undertake independently.

To minimise the risk of safeguarding allegations for both pupils and staff, it is advised that intimate care is carried out in the vicinity of another adult wherever possible — one of whom may act solely in a monitoring capacity. In such instances, the monitoring adult does not need to be named in the pupil's care plan, but the arrangement should be understood and agreed as part of routine procedure.

14. Behaviour Management and Physical Intervention

- 14.1. All pupils have a right to be treated with respect and dignity. Adults must not use any form of degrading treatment to punish a pupil. The use of sarcasm, demeaning or insensitive comments towards pupils are not acceptable in any situation. Deliberately intimidating pupils by shouting aggressively, hectoring or overbearing physical presence is not acceptable in any situation. Any sanctions or rewards used should be part of the school's Behaviour Management Policy.
- 14.2. Staff should understand the importance of challenging inappropriate behaviours between peers, including child on child sexual violence and sexual harassment. Downplaying certain behaviours (e.g., dismissing sexual harassment as "just banter") can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that

normalises abuse leading to children accepting it as normal and not coming forward to report it. Where pupils display difficult or challenging behaviour, adults should follow the school's or setting's behaviour and discipline policy using strategies appropriate to the circumstance and situation.

- 14.3. Physical intervention can only be justified in exceptional circumstances. Non-statutory guidance is available from the Department of Education website. See 'Use of reasonable force - advice for Headteachers, staff and Governing Bodies'. Adults 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. Adults should have regard to the health and safety of themselves and others. It is always unlawful to use force as a punishment. The use of unwarranted physical force is likely to constitute a criminal offence.
- 14.4. Adults must never use force as a form of punishment. This is both unlawful and a breach of safeguarding principles.
- 14.5. Where a pupil has specific needs in respect of particularly challenging behaviour, a positive handling plan, including a risk assessment, should be put in place and agreed by all parties. Where it is judged that a pupil's behaviour presents a serious risk to themselves or others, a robust risk assessment that is regularly reviewed and a physical intervention plan, where relevant, must be put in place. All incidents and subsequent actions should be recorded and reported to a manager and the pupil's parents/carers. Where it can be anticipated that physical intervention is likely to be required, a plan should be put in place that the pupil and parents/carers are aware of and have agreed to. Parental consent does not permit the use of unlawful physical intervention or deprive a pupil of their liberty. The school has separate policies on Behaviour Management and the Use of Physical Intervention.

15. First Aid and Medication

- 15.1. The school has a separate policy on supporting pupils with a medical condition. Employees should have regard to the statutory guidance 'Supporting pupils at school with medical conditions' DfE December 2015, which includes advice on managing medicines. All settings must have an adequate number of qualified first aiders/appointed persons. Employees must have had the appropriate training and achieved the necessary level of competency before administering first aid or medication or taking on the responsibility to support pupils with medical conditions. If an adult is concerned or uncertain about the amount or type of medication being given to a pupil this should be discussed with *the DSL*.
- 15.2. Adults taking medication that may affect their ability to care for children should seek medical advice regarding their suitability to do so and should not work with pupils whilst taking medication unless medical advice confirms that they

are able to do so. Adult medication on the premises must be securely stored out of the reach of children.

16. One to One Situations and Meetings with Pupils

- 16.1. One to one situations have the potential to make children and young people more vulnerable to harm by those who seek to exploit their position of trust. Adults working in one-to-one settings with pupils may also be more vulnerable to unjust or unfounded allegations being made against them. Adults must recognise this possibility and plan and conduct such meetings accordingly. Every attempt should be made to ensure that the safety and security needs of both adults and pupils are met. The School Senior Management team should undertake a risk assessment in relation to the specific nature and implications of one-to-one work for each adult and pupil, which should be reviewed regularly. Where such a meeting is demonstrably unavoidable it is advisable to avoid remote or secluded areas and to ensure that the door of the room is left open and/or visual/auditory contact with others is maintained. Any arrangements should be reviewed on a regular basis. Where staff are expected to work on one to one with a pupil on a virtual platform, clear expectations should be set out for all those involved that are reflective of the settings safeguarding policies and procedures. Any arrangements should be reviewed on a regular basis.
- 16.2. Pre-arranged meetings with pupils away from the premises or on the school/Trust premises when the school/Trust is not in session are not permitted unless written approval is obtained from their parent/carer and the Headteacher or another senior colleague with delegated authority.
- 16.3. No pupil should be in or invited into, the home of an adult who works with them unless they are family members or close family friends, in which case adults are advised to notify their line manager. Pupils must not be asked to assist adults with jobs or tasks at or in their private accommodation or for their personal benefit.
- 16.4. There are occasions during exam periods when timetables clash and arrangements need to be made to preserve the integrity of the examination process and in these circumstances, exam boards may allow candidates to take an exam the following morning, including Saturdays. The examination board requires the centre to determine a method of supervision on journeys to and from the centre and overnight, which ensures the candidate's wellbeing. This supervision may be undertaken by a parent/carer or, employees may be asked to volunteer to supervise pupils, which may with prior approval be in their own home. In all cases where employees are involved in supervision, two employees must be present at all times. This is to ensure safeguarding best practice and to maintain the validity of the examination arrangements, in line with the expectations of awarding bodies.

- 16.5. Other than in an emergency, an adult must not enter a pupil's home if the parent/carer is absent. Always make detailed records including times of arrival and departure and ensure any behaviour or situation that gives rise to concern is discussed with The Headteacher. A risk assessment should be undertaken, and appropriate risk management measures put in place prior to any planned home visit taking place. In the unlikely event that little or no information is available, home visits should not be made alone. The school has a separate Home Visit and Lone-Working Policy

17. Transporting Pupils

- 17.1. In certain situations, e.g., out of school activities, adults may agree to transport pupils. Transport arrangements should be made in advance by a designated employee who will be responsible for planning and overseeing all transport arrangements and respond to any concerns that may arise. Wherever possible and practicable, transport should be provided other than in private vehicles, with at least one adult additional to the driver acting as an escort.
- 17.2. Adults should ensure that their behaviour is safe and that the transport arrangements and the vehicle meet all legal requirements. They must ensure that the vehicle is roadworthy and appropriately insured and that the maximum capacity is not exceeded. It is a legal requirement that all passengers wear seatbelts, and the driver should ensure that they do so. The driver should be aware of the current legislation concerning the use of car seats for younger children where applicable. It is illegal to drive using hand-held phones or similar devices and the driver must ensure that they adhere to all driving regulations.
- 17.3. It is inappropriate for adults to offer lifts to a pupil, unless the need has been agreed with the school Senior Leadership Team and, if this falls outside their normal working duties, has been agreed with parents/carers. Where such arrangements are approved, the following conditions must be met to ensure safety and compliance with legal and safeguarding requirements:
- The driver must hold a full, clean driving licence.
 - The vehicle must be roadworthy, appropriately taxed and insured for business use.
 - A current MOT certificate must be in place where applicable.
 - The vehicle must be fitted with legally compliant and age-appropriate car seats or restraints where required.
 - Wherever possible, two members of staff should be present in the vehicle to safeguard both the pupil and the adult.

These safeguards are designed to protect pupils, staff and the reputation of the school. Any deviation from this guidance must be authorised by senior leadership and risk-assessed accordingly.

- 17.4. There may be occasions where a pupil requires transport in an emergency situation or where not to give a lift may place a pupil at risk. Such circumstances must always be recorded and reported to the Headteacher.

18. Educational Visits and School Clubs

- 18.1. Adults should take particular care when supervising pupils in the less formal atmosphere of an educational visit, particularly in a residential setting, or after-school activity. Adults remain in a position of trust and the same standards of conduct apply. Please refer to the school's policy on educational visits and the Health and Safety.

19. Curriculum

- 19.1. Some areas of the curriculum can include or raise a subject matter which is sexually explicit, of a political, cultural, religious or an otherwise sensitive nature. Care should be taken to ensure that resource materials cannot be misinterpreted and clearly relate to the learning outcomes identified by the lesson plan. This plan should highlight particular areas of risk and sensitivity.
- 19.2. The curriculum can sometimes include or lead to an unplanned discussion about the subject matter of a sexually explicit, political, cultural, religious or otherwise sensitive nature. Responding to pupils' questions can require careful judgement and adults must take guidance in these circumstances from the Designated Safeguarding Lead. Adults must not enter into or encourage inappropriate discussion about sexual, political or religious activity or behaviour or, discussions which may offend or harm others. Adults should take care to protect children from the risk of radicalisation and should act in accordance with advice given under Part 1 of Keeping Children Safe in Education DfE and accordingly must not express any prejudicial views or attempt to influence or impose their personal values, attitudes or beliefs on pupils.
- 19.3. Please refer to the schools policy on sex and relationships education (SRE) and, the policy on spiritual, moral, social and cultural development (SMSC), which promotes fundamental British values. Care should be taken to comply with these policies and ensure they are consistently applied.

20. Photography, Videos and Other Creative Arts

- 20.1. Please refer to the school's guidance on e-safety, the use of images and the consent forms therein. Adults should have regard to the ICO CCTV code of practice and the guidance 'Taking Photographs in Schools'.

- 20.2. Many educational activities involve the taking or recording of images. This may be undertaken as part of the curriculum, extra school activities, for displays, publicity, to celebrate achievement or, to provide evidence of the activity. An image of a child is personal data and it is, therefore, a requirement under Data Protection Legislation that explicit consent is obtained from the parent/carer of a child before any images are made such as those used for school or Trust web sites, notice boards, productions or other purposes, unless an alternative legal justification for processing this data is applicable.
- 20.3. Adults need to be aware of the potential for such images to be taken and/or misused to create indecent images of children and/or for 'grooming' purposes. Careful consideration should be given as to how these activities are organised and undertaken. There should be an agreement as to whether the images will be destroyed or retained for further use, where these will be stored and who will have access to them.
- 20.4. Adults should remain sensitive to any pupil who appears uncomfortable and should recognise the potential for misinterpretation. It is also important to take into account the wishes of the child, remembering that some children do not wish to have their photograph taken.
- 20.5. Adults should only use equipment provided or authorised by the school to make/take images and should not use personal equipment, mobile telephones or any other similar devices to make/take images.
- 20.6. The following guidance should be followed:
- If a photograph is used, avoid naming the pupil
 - If the pupil is named, avoid using the photograph
 - Photographs/images must be securely stored and used only by those authorised to do so
 - Be clear about the purpose of the activity and about what will happen to the photographs/images when the lesson/activity is concluded
 - Only retain images when there is a clear and agreed purpose for doing so
 - Ensure that the school Senior Leadership Team is aware that the photography/image equipment is being used and for what purpose
 - Ensure that all photographs/images are available for scrutiny in order to screen for acceptability
 - Be able to justify the photographs/images made
 - Do not take images of pupils for personal use
 - Only take images where the pupil consents to this and, where the pupil is under the age of 18, where parental or carer consent has also been obtained

- Do not take photographs in one-to-one situations
- Do not display or distribute photographs/images of pupils unless there is consent to do so from the parent/carer
- Only publish images of pupils where they and their parent/carer have given explicit written consent to do so
- Do not take images of pupils in a state of undress or semi-undress
- Do not take images of pupils which could be considered as indecent or sexual
- Do not take images of a child's injury, bruising or similar (e.g., following disclosure of abuse) even if requested by children's social care
- Do not make audio recordings of a child's disclosure

21. Use of technology for online/virtual teaching

- 21.1. Staff should use school/trust devices and contact pupils only via the pupil school email address/log in. This ensures that the school's filtering and monitoring software is enabled.
- 21.2. In deciding whether to provide virtual or online learning for pupils, senior leaders will take into account issues such as accessibility within the family home, the mental health and wellbeing of children, including screen time, the potential for inappropriate behaviour by staff or pupils, staff access to the technology required, etc. Virtual lessons will be timetabled and senior staff, DSL and/or heads of department will be able to drop into any virtual lesson at any time – the online version of entering a classroom.
- 21.3. Staff engaging in online learning should display the same standards of dress and conduct that they would in the real world; they should also role model this to pupils and parents. The following points should be considered:
- 21.3.1. think about the background; photos, artwork, identifying features, mirrors – ideally the backing should be nondescript
- 21.3.2. staff and pupils should be in living / communal areas – no bedrooms
- 21.3.3. staff and pupils should be appropriately dressed
- 21.3.4. filters at a child's home may be set at a threshold which is different to the school
- 21.3.5. resources/videos must be age appropriate – the child may not have support immediately to hand at home if they feel distressed or anxious about content. Consider avoiding direct links to platforms such as YouTube in case of autoplay or links to other videos that have not been vetted.

- 21.4. It is the responsibility of the staff member to act as a moderator; raise any issues of suitability (of dress, setting, behaviour) with the child and/or parent immediately and end the online interaction if necessary. Recording lessons does not prevent abuse. Staff will adhere to the school's policy on recording of online lessons. If a staff member believes that a child or parent is recording the interaction, the lesson should be brought to an end or that child should be logged out immediately.
- 21.5. If staff need to contact a pupil or parent by phone and do not have access to a work phone, they should discuss this with a senior member of staff and, if there is no alternative, always use 'caller withheld' to ensure the pupil/parent is not able to identify the staff member's personal contact details.

22. Use of ICT Facilities and Monitoring

- 22.1. This section should be read in conjunction with the school's Acceptable Use of ICT Facilities Policy/social media Policy. Posting, creating, accessing, transmitting, downloading, uploading or storing any of the following material (unless it is part of an authorised investigation) is likely to amount to gross misconduct and result (where the adult is employed) in summary dismissal (this list is not exhaustive):
- a) Pseudo-images of children (child abuse images), pornographic or sexually suggestive material or images of children or adults which may be construed as such in the circumstances (that is, writing, texting, pictures, films and video clips of a sexually explicit or arousing nature).
 - b) Any other type of offensive, obscene or discriminatory material, criminal material or material which is liable to cause distress or embarrassment to the Trust, Academy or others.
- 22.2. If indecent images of children are discovered at the premises or on the Trust's equipment/devices, an immediate referral should be made to the DSL (unless they are implicated) and the external Designated Officer (DO) and, if relevant, the police contacted. The images/equipment should be secured, should not be used by others and should be isolated from the network. There should be no attempt to view, tamper with or delete the images as this could jeopardise any necessary criminal investigation. If the images are of children who are known to the school, a referral should also be made to children's social care in accordance with local arrangements.
- 22.3. The contents of our ICT resources and communications systems are the Trust's property. Therefore, adults should have no expectation of privacy in any message, files, data, document, facsimile, telephone conversation, social media post, conversation or message, or any other kind of information or communications transmitted to, received or printed from, or stored or recorded on our electronic information and communications systems. The Trust reserves

the right to monitor, intercept and review, without prior notification or authorisation from adults. Usage of our IT resources and communications systems, including but not limited to telephone, e-mail, messaging, voicemail, CCTV, internet and social media postings and activities are monitored to ensure that our rules are being complied with and for the following purposes:

- a) To monitor whether the use of the e-mail system or the internet is legitimate and in accordance with this Code
 - b) To assist in the investigation of alleged wrongful acts
 - c) To comply with any legal obligation
- 22.4. Personal data will be stored in accordance with the Trust's Privacy Notices. We may store copies of data or communications for a period of time after they are created and may delete such copies from time to time without notice. If necessary, information may be handed to the police in connection with a criminal investigation.
- 22.5. If applicable to the school devices a CCTV system monitors the school 24 hours a day. This data is recorded and may be used as evidence of any alleged wrongdoing.
- 22.6. Cyber-bullying can be experienced by adults as well as pupils. Adults should notify their Line Manager if they are subject to cyber-bullying. The Trust will endeavour to protect adults and stop any inappropriate conduct.

23. Reporting Concerns and Recording Incidents

- 23.1. All adults must report concerns and incidents in accordance with the guidance set out in Keeping Children Safe in Education DfE and the Trust's Procedures for Dealing with Allegations of Abuse against Teachers and Other Employees and Volunteers. In the event of an allegation being made, or incident being witnessed, the relevant information should be immediately recorded and reported to the DSL. This includes concerns which may be deemed a 'low level concern'. If any concerns are raised via a third party, the Headteacher, Senior Manager or Designated Safeguarding Lead should collect as much evidence as possible. Where low-level concerns are raised the Headteacher, Senior Manager or Designated Safeguarding Lead should speak to the individual involved and any witnesses and consider the matter under the Disciplinary Procedure which may result in informal or formal action. An employee who fails to bring a matter of concern to the attention of senior management and/or the relevant agencies will be subject to disciplinary action.
- 23.2. In addition to behaviours outlined elsewhere in this code and, the types of abuse and neglect set out in 'Keeping Children Safe in Education' DfE, the following is a non-exhaustive list of some further behaviours which would be a cause for concern:

An adult who:

- Allows a pupil/young person to be treated badly; pretends not to know it is happening
- Gossips/shares information inappropriately
- Demonstrates inappropriate discriminatory behaviour and/or uses inappropriate language
- Dresses in a way which is inappropriate for the job role
- Does not treat pupils fairly - demonstrates favouritism
- Demonstrates a lack of understanding about personal and professional boundaries
- Uses their position of trust to intimidate, threaten, coerce or undermine
- Appears to have an inappropriate social relationship with a pupil or pupils
- Appears to have special or different relationships with a pupil or pupils
- Seems to seek out unnecessary opportunities to be alone with a pupil

24. Monitoring and Review

- 24.1. The central trust office is responsible for monitoring the implementation, use and effectiveness of this policy and will report on these matters annually or more frequently if necessary.

This policy will be reviewed by the board of trustees as necessary.