



# Staff Code of Conduct

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## CONTENTS

	Page
Introduction and Underpinning Principles	3
1. Position of Power and Trust & Staff / Pupil Relationships	5
2. Confidentiality and Data Protection	6
3. Standards of Behaviour	7
4. Dress and Appearance	7
5. Living Space	8
6. Gifts, Rewards and Favouritism	8
7. Infatuations and 'Crushes'	8
8. Communication with Children and Families	9
9. Social Media	10
10. Personal Mobile Technology	10
11. Online Safety and Working Remotely and Remote Meetings and 'Live' Teaching	10
12. Social Contact Outside the Workplace	10
13. Sexual Contact	11
14. Physical Contact	11
15. Other Activities that Require Physical Contact	13
16. Behaviour Management	13
17. The Use of Control and Physical Intervention	13
18. Children in Distress	14
19. One to One Situations	15
20. Intimate / Personal Care	15
21. First Aid and Medication	15
22. Home Visits	16
23. Transporting Pupils	16
24. Educational Visits	17
25. Photography and Video	18
26. Exposure to Inappropriate Images and Internet Usage	18
27. Curriculum	19
28. Sharing Concerns and Recording Incidents	19
29. Whistleblowing	20
List of Policies Referenced in the Policy	20

**All staff are required to read this Code of Conduct and sign to confirm that they have read it, understand it, and agree to abide by the requirements.**

## Introduction and Underpinning Principles

Peterborough Diocese Education Trust (PDET) is a Multi Academy Trust (the Trust) and this Code of Conduct (**'Code'**) applies to all staff, including those who work with children in the academies but are not directly employed by the Trust, and volunteers (staff).

This Code is based on the national "Guidance for Safer Working Practice for Those Working with Children and Young People in Education Settings" – February 2022 (Guidance for Safer Working Practice) (**'the Guidance'**).

All headteachers should read the Guidance and familiarise themselves with it.

This Code has been produced to help staff establish the safest possible learning and working environments, which safeguard children and reduce the risk of staff being falsely accused of improper or unprofessional conduct.

It is recognised that the vast majority of adults who work with children act professionally and aim to provide a safe and supportive environment which secures the well-being and very best outcomes for children in their care. Achieving these aims is not always straightforward, as much relies on child and staff interactions where tensions and misunderstandings can occur. This Code aims to reduce the risk of these.

**Creating a culture in which all concerns about adults are shared responsibly and with the right person, recorded and dealt with appropriately, is critical.** This includes allegations / concerns that do not meet the harms threshold (low-level concerns) - see - paragraph 28 of this Code; *Keeping Children Safe in Education 2024 (KCSIE)*; the Trust's *Allegations / Concerns Policy in relation to adults*; and the Trust's *Safeguarding / Child Protection Policy (Safeguarding / Child Protection Policy)*. If implemented correctly, this should encourage an open and transparent culture; enable academies to identify concerning, problematic or inappropriate behaviour early; and minimise the risk of abuse.

A culture of vigilance will help to ensure that adults working in or on behalf of the academy are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the academy. Any behaviours that fall short of the guiding principles outlined in the Guidance and this Code must be shared responsibly and with the right person in accordance with the *Allegations / Concerns Policy (also see paragraph 28 of this Code)*.

It must be recognised that some allegations will be genuine as there are people who seek out, create or exploit opportunities to harm children. However, allegations may also be false or misplaced and may arise from differing perceptions of the same event. When they occur, they are inevitably distressing and difficult for all concerned. It is therefore essential that all possible steps are taken to safeguard children and ensure that the adults working with them do so safely.

## Underpinning Principles

- The welfare of the child is paramount
- Staff should understand their responsibilities to safeguard and promote the welfare of children
- All staff have a responsibility to keep children safe and to protect them from abuse (sexual, physical and emotional) and neglect. (There is a wide range of safeguarding issues which constitute abuse - for details of such issues see the [Safeguarding / Child Protection Policy](#))
- Children have a right to be safe and to be treated with respect and dignity. It follows that trusted adults are expected to take reasonable steps to ensure their safety and wellbeing. Failure to do so may be regarded as professional misconduct
- The safeguarding culture of an academy is, in part, exercised through the development of respectful, caring and professional relationships between adults and children and behaviour by the adult that demonstrates integrity, maturity and good judgement
- Staff are accountable for the way in which they: exercise authority; manage risk; use resources; and safeguard children
- Staff should be aware of and understand:
  - the [Safeguarding / Child Protection Policy](#)
  - arrangements for managing concerns or allegations against staff as set out in the [Allegations / Concerns Policy](#)
  - this Code
  - the whistle blowing procedure as set out in the Trust's [Whistleblowing Policy](#)
  - the procedures of the relevant Multi-agency Partnership (*these can be found in the [Safeguarding / Child Protection Policy](#)*)
- 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. They should always consider whether their actions are warranted, proportionate, safe and applied equitably
- Staff should work, and be seen to work, in an open and transparent way including self-reporting if their conduct or behaviour falls short of these principles
- Staff should acknowledge that deliberately invented / malicious allegations are extremely rare and that all concerns should be reported and recorded
- Staff should discuss and / or take advice promptly from their Headteacher (or if the member of staff is the Headteacher, from the Central Executive Team) if they have acted in a way which may give rise to concern
- Staff should apply the same professional standards regardless of culture, disability, gender, language, racial origin, religious belief and sexual orientation
- Staff should not consume or be under the influence of alcohol or any substance, including prescribed medication, which may affect their ability to care for children
- Staff should be aware that breaches of the law and other professional guidelines could result in disciplinary action being taken against them, criminal action and / or other proceedings including barring by the Disclosure & Barring Service (DBS) from working in regulated activity, or for acts of serious misconduct prohibition from teaching by the Teaching Regulation Agency (TRA)
- Staff and managers should continually monitor and review practice to ensure this Code and the Guidance is followed.

This Code cannot provide a complete checklist of what is, or is not, appropriate behaviour for staff. It does highlight, however, behaviour which is illegal, inappropriate or inadvisable. Staff should also read in this respect *Part four of [Keeping Children Safe in Education](#)*, the [Safeguarding / Child](#)

[Protection Policy](#) and the [Allegations / Concerns Policy](#). Individuals are expected to make judgements about their behaviour in order to secure the best interests and welfare of the children in their charge and, in so doing, will be seen to be acting reasonably. These judgements should always be recorded and shared with a manager.

In our capacity as staff and / or volunteers within the Trust, we have a duty to behave in a way that reflects well on the Trust and the academies within it, working at all times within the law and according to our Trust's and academy's policies and procedures. At no time should public confidence in the Trust, or any academy within it, be put at risk by the actions or words of a member of staff or volunteer.

It is important that **all** staff read, understand and sign this Code. If the behaviour of a member of staff falls below the standards in this Code, the Trust's Directors / Chief Executive Officer (CEO) / Headteacher as appropriate, may take disciplinary action, including possible dismissal.

This Code cannot cover every eventuality. Its purpose is to alert staff to some areas of common agreement and potential risks of accusation whilst working in an academy environment. It does not replace the general requirements of the law, common sense and good conduct.

Any reference in this Code to 'Headteacher' includes Executive Headteacher, Principal, Head of School, as appropriate. Where the Code refers to referring / declaring something to 'the Headteacher' and the member of staff concerned is the Headteacher / Principal or the Executive Headteacher, then the matter should be referred / declared to the Central Executive Team.

## **1. Position of Power and Trust & Staff / Pupil Relationships**

- 1.1 As a result of their knowledge, position and / or authority, all those working with children in an academy or other education setting are in a position of trust in relation to the children in their care.
- 1.2 The relationship between a person working with a child / children is one in which the adult has a position of power or influence. It is vital for staff to understand this power; that the relationship cannot be one between equals and the responsibility they must exercise as a consequence.
- 1.3 The potential for exploitation and harm of vulnerable children means that staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.
- 1.4 Staff should always maintain appropriate professional boundaries and avoid behaviour, which might be misinterpreted by others. They should record and report any incident with this potential to the Headteacher / Central Executive Team, as appropriate.

## 2. Confidentiality and Data Protection

- 2.1 The storing and processing of personal information is governed by the [Data Protection Act 2018](#) and the [UK GDPR](#).
- 2.2 Staff should read and adhere to the Trust's [Data Protection and Data Subject Rights Policy](#) and [Records Retention Policy](#).
- 2.3 Staff may have access to special category personal data about children and their families which must be kept confidential at all times and only shared when legally permissible to do so and in the interest of the child. Records should only be shared with those who have a legitimate professional need to see them.
- 2.4 Staff should never use confidential or personal information about a child or their family for their own, or others' advantage (including that of partners, friends, relatives or organisations).
- 2.5 Information must never be used to intimidate, humiliate, or embarrass the child.
- 2.6 Confidential information about a child 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.
- 2.7 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 responsibility to pass this on but only to the Designated Safeguarding Lead (DSL) (or Deputy DSL) or to statutory services – see the [Safeguarding / Child Protection Policy](#).
- 2.8 If a child, or their parent / carer makes a disclosure regarding abuse or neglect, the member of staff should follow the [Safeguarding / Child Protection Policy](#). The member of staff should not promise confidentiality but should give reassurance that the information will be treated sensitively.
- 2.9 If a member of staff is in any doubt about whether to share information or keep it confidential, they should seek guidance from the DSL. Any media or legal enquiries should be passed to the Headteacher / CEO, as appropriate.
- 2.10 Care must be taken to ensure that staff laptops are stored securely and documents are encrypted as appropriate in line with the Trust's [Acceptable Use Policy \(AUP\)](#).
- 2.11 All documents that have pupil / family names, addresses or other such identification details must be kept securely in accordance with the Trust's [Data Protection and Data Subject Rights Policy](#).

### 3. Standards of Behaviour

- 3.1 All staff working with children have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of the children. It is therefore expected that they will all adopt high standards of personal conduct, both in and out of the workplace in order to maintain the confidence and respect of their colleagues, children, parents / carers and the public in general and all those with whom they work.
- 3.2 There may be times, for example, when a member of staff's behaviour or actions in their personal life come under scrutiny from local communities, the media or public authorities, including with regard to their own children, or children or adults in the community. Misuse of drugs, alcohol or acts of violence would be examples of such behaviour. Staff should be aware that their behaviour, either in or out of the workplace, could compromise their position in their work setting in relation to the protection of children, loss of trust and confidence, or bringing the employer into disrepute. Such behaviour may also result in prohibition from teaching by the Teaching Regulation Agency (TRA), a bar from engaging in regulated activity, or action by another relevant regulatory body.
- 3.3 Staff in contact with children should therefore understand and be aware, that safe practice also involves using judgement and integrity about behaviours in places other than the work setting.
- 3.4 The [Childcare \(Disqualification\) Regulations 2018](#) set out grounds for disqualification under the Childcare Act 2006 where the person meets certain criteria set out in the Regulations. A disqualified person is prohibited from providing relevant early or later years childcare as defined in the [Childcare Act 2006](#) or being directly concerned in the management of such childcare. Academies and private childcare settings are also prohibited from employing a disqualified person in respect of relevant early or later years childcare.
- 3.5 The Disqualification under the Childcare Act 2006 (Regulations 2018) states that schools / academies should make clear their expectation that staff should disclose any relationship or association (in the real world or online) that may impact on the school's / academy's ability to safeguard children. **This applies to all staff in all schools / academies, not just those in early or later years childcare.**

### 4. Dress and Appearance

- 4.1 Staff will dress modestly and appropriately for working with children and families.
- 4.2 A person's dress and appearance are matters of personal choice and self-expression. However, staff should dress in ways, which are appropriate to their role, and this may need to be different to how they dress when not at work.
- 4.3 Adults who work with children should take care to ensure they are dressed appropriately for the tasks and the work they undertake.

- 4.4 Those who dress in a manner, which could be considered as inappropriate or offensive, could render themselves vulnerable to criticism or allegation.

## 5. Living Space

- 5.1 No child should be in, or invited into, the home of an adult who works with them (or that of a family member, colleague or friend of such adult) other than in a situation where a member of staff has a personal relationship of a social nature with a family whose children attend the academy. In such circumstances, the member of staff will declare this to the Headteacher and agree that their personal relationship will not affect their professional conduct surrounding the child's learning experience at the academy.
- 5.2 Under no circumstances should children assist with chores or tasks in the home of an adult who works with them either for or without reward. Neither should they be asked to do so by friends or family of that adult.

## 6. Gifts, Rewards and Favouritism

- 6.1 Gifts from suppliers or associates of any academy within the Trust must be declared in accordance with the Trust's Acceptance of [Gifts, Hospitality, Awards, Prizes or Benefits Policy](#).
- 6.2 There are occasions when children or parents / carers may wish to pass small tokens of appreciation to adults e.g. on special occasions or as a thankyou and this is acceptable. However, it is unacceptable to receive gifts on a regular basis or of any significant value.
- 6.3 Care should also be taken to ensure that staff do not accept any gift that might be construed as a bribe by others or lead the giver to expect preferential treatment.
- 6.4 Similarly, it is inadvisable to give personal gifts to children or their families. This could be interpreted as a gesture to either groom or bribe. It might also be perceived that a 'favour' of some kind is expected in return.
- 6.5 Any reward given to a child should be in accordance with agreed practice, consistent with the academy [Behaviour Policy](#), recorded and not based on favouritism.
- 6.6 Staff should also exercise care when selecting children for academy teams, productions, trips and / or specific work tasks in order to avoid perceptions of favouritism or injustice. Similar care should be exercised when children are excluded from an activity. Methods of selection and exclusion should always be subject to clear, agreed criteria.

## 7. Infatuations and 'Crushes'

- 7.1 All staff need to recognise that it is not uncommon for a child or young person to be strongly attracted to a member of staff and / or develop a 'crush' or infatuation. These adults should deal with these situations sensitively and appropriately to maintain the dignity and safety of all



concerned. They should make every effort to ensure that their own behaviour cannot be brought into question and does not appear to encourage the child.

- 7.2 They should ensure that they do not form a “special relationship” with any child and remain aware that such infatuations can carry a risk of words or actions being misinterpreted and should therefore make every effort to ensure that their own behaviour is above reproach.
- 7.3 A member of staff, who becomes aware that a child is developing an infatuation or trying to form a special attachment, should discuss this at the earliest opportunity with the Headteacher.
- 7.4 The Headteacher should give careful thought to those circumstances where the staff member, child and their parents / carers should be spoken to and should ensure a plan to manage the situation is put in place. This plan should respond sensitively to the child and staff member and maintain the dignity of all. This plan should involve all parties, be robust and regularly monitored and reviewed.

## 8. Communication with Children and Families

- 8.1 All forms of communication between children and staff, by whatever method, should take place within clear and explicit professional boundaries.
- 8.2 Staff should not share any personal information with children and should not request personal information from the child (other than that which is appropriate as part of their professional role).
- 8.3 Staff will not give out their personal details, web-based identities, telephone numbers, e-mails or addresses to children or parents / carers. If children or parents / carers locate these by any other means and attempt to contact or correspond with the staff member, they should not respond and must report the matter to the Headteacher. The child should be firmly and politely informed that this is not acceptable.
- 8.4 Staff will ensure that all communications are transparent and open to scrutiny both in the “real world” and through web-based and telecommunication interactions.
- 8.5 Only internal e-mail systems and school / academy web-based communication should be used to contact children and parents / carers and this must be in accordance with the Trust’s [Acceptable Use Policy \(AUP\)](#).
- 8.6 Phone calls to parents / carers must always be made from the academy telephone, not personal phones.
- 8.7 If on an academy trip and staff need to contact parents / carers, they will ring the academy, which will then contact the parent / carer, or, in the case of an emergency, staff will use the academy mobile phone. **Personal mobile phones will not be used to contact parents / carers.**
- 8.8 Pastoral calls using technology such as Zoom, should only be carried out in accordance with the DfE’s guidance [Safeguarding and remote education - GOV.UK \(www.gov.uk\)](#).

## 9. Social Media

- 9.1 Staff must observe the Trust's [Acceptable Use Policy \(AUP\)](#) , which they have signed to state that they have agreed to the terms.
- 9.2 Where relationships with children or their families are already in place, staff must declare these to the Headteacher as outlined in this Code.

## 10. Personal Mobile Technology (Phones, Cameras, Tablets, Smart Watches and Other Handheld Devices)

- 10.1 All staff must read and adhere to the Trust's [Acceptable Use Policy \(AUP\)](#).
- 10.2 Mobile phones must not be used in areas accessed by children including any teaching area in the academy or within children's toilets or changing areas.
- 10.3 Only academy equipment should be used to record classroom activities. Photos and video footage should be put onto the secure academy system as soon as possible and never sent to personal devices.

## 11. Online Safety and Working Remotely and Remote Meetings and 'Live' Teaching

It is recognised that remote working and 'live' teaching are expected to be part of the new way of working. All staff, therefore, need to be familiar with, and at all times adhere to, the DfE guidance - [Safeguarding and remote education - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/safeguarding-and-remote-education).

## 12. Social Contact Outside the Workplace

- 12.1 It is acknowledged that staff may have genuine friendships and social contact with parents / carers of children, independent of the professional relationship. Staff should, however, also be aware that professionals who sexually harm children often seek to establish relationships and contact outside of the workplace with both the child and their parents / carers, in order to 'groom' the adult and the child and / or create opportunities for sexual abuse.
- 12.2 It is also important to recognise that social contact may provide opportunities for other types of grooming such as for the purpose of sexual exploitation or radicalisation.
- 12.3 Staff should recognise that some types of social contact with children or their families could be perceived as harmful or exerting inappropriate influence on children and may bring the Trust / academy into disrepute (e.g. attending a political protest, circulating propaganda).
- 12.4 Staff who work with children should not seek to have social contact with them or their families, unless the reason for this contact has been firmly established and agreed with the Headteacher.
- 12.5 Where staff have personal relationships of a social nature with families whose children attend the academy, as stated in *paragraph 5.1* staff will declare these to the Headteacher and agree

that their personal relationship will not affect their professional conduct surrounding the child's learning experience at the academy.

- 12.6 Where such relationships exist, staff will ensure that no information regarding the Trust, the academy, staff, or children will be discussed.
- 12.7 Under no circumstances should a member of staff visit a child in their home outside agreed work arrangements (*see paragraph 22 below in relation to Home Visits*). If in a very exceptional circumstance, as an exception, such a one-off arrangement is required, a risk assessment must be undertaken as set out in *paragraph 22* and the member of staff must have a prior discussion with the Headteacher and the parents / carers and a clear justification for such arrangement must be agreed and recorded.

### **13. Sexual Contact**

- 13.1 All staff should clearly understand the need to maintain appropriate boundaries in their contacts with children.
- 13.2 Any intimate or sexual relationships between children and staff will be regarded as a grave breach of trust resulting in immediate disciplinary action and local authority Designated Officer (LADO) involvement. The police may also be contacted.
- 13.3 Any sexual activity between a member of staff and a pupil within the Trust will be regarded as a criminal offence and may be a matter for disciplinary action and Police involvement.
- 13.4 Sexual activity involves physical contact including penetrative and non-penetrative acts. However, it also includes non-contact activities, such as involving 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. Sexual abuse can take place online, and technology can be used to facilitate offline abuse.
- 13.5 There are occasions when adults embark on a course of behaviour known as 'grooming' where the purpose is to gain the trust of a child and manipulate the relationship so sexual abuse can take place. All staff should undertake appropriate training so they are fully aware of those behaviours that may constitute 'grooming' and of their responsibility to always report to the Headteacher any concerns about the behaviour of a colleague which could indicate that a pupil is being groomed.

### **14. Physical Contact**

- 14.1 There are occasions when it is entirely appropriate and proper for staff to have physical contact with children, however it is crucial to do so only in ways appropriate to their professional role and in relation to the child's individual needs and any agreed care plan.
- 14.2 Not all children feel comfortable about physical contact, and staff should not make the assumption that it is acceptable practice to use touch as a means of communication.

Wherever possible staff should seek the child's permission before initiating contact and be sensitive to any signs that they may be uncomfortable or embarrassed.

- 14.3 When physical contact is made with a child this should be in response to their needs at the time, of limited duration and appropriate to their age, stage of development, gender, ethnicity and background.
- 14.4 It is not possible to be specific about the appropriateness of each physical contact. Staff should use their professional judgement at all times, observe and take note of the child's reaction or feelings and so far, as is possible, use a level of contact and / or form of communication which is acceptable to the child for the minimum time necessary.
- 14.5 Physical contact, which occurs regularly with an individual child, is likely to raise questions unless there is explicit agreement on the need for, and nature of, that contact.
- 14.6 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 their action could be misinterpreted, or if an action is observed by another as being inappropriate or possibly abusive or inappropriate, the incident and circumstances should be reported to the Headteacher / Chair of Governors, as appropriate, as outlined in the procedures for handling allegations / concerns in the [Allegations / Concerns Policy](#) and an appropriate record made. Parents / carers should also be informed in such circumstances.
- 14.7 Where a child seeks or initiates inappropriate physical contact with a member of staff, the situation should be handled sensitively, and care taken to ensure that contact is not exploited in any way. Careful consideration must be given to the needs of the child and advice and support given to the member of staff concerned.
- 14.8 It is recognised that some children who have experienced abuse may seek inappropriate physical contact. Staff should be particularly aware of this when it is known that a child has suffered previous abuse or neglect.
- 14.9 In all circumstances where a child initiates inappropriate physical contact, it is the responsibility of the member of staff to sensitively deter the child and help them understand the importance of personal boundaries. Such circumstances must always be reported and discussed with the Headteacher and the parent / carer.
- 14.10 A general culture of 'safe touch' should be adopted, where appropriate, to the individual requirements of each child. Children with special educational needs or disabilities 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.

## **15. Other Activities that Require Physical Contact**

- 15.1 In certain curriculum areas, such as PE, drama or music, staff may need to initiate some physical contact with children. For example, to demonstrate technique in the use of a piece of equipment, adjust posture, or support a child so they can perform an activity safely or prevent injury. Such activities should be carried out in accordance with any relevant code of conduct, regulations and best practice.
- 15.2 Physical contact should take place only when it is necessary in relation to a particular activity. It should take place in a safe and open environment, i.e. one easily observed by others and last for the minimum time necessary.
- 15.3 The extent of the contact should be made clear and undertaken with the permission of the child. Contact should be relevant to their age / understanding and staff should remain sensitive to any discomfort expressed verbally or non-verbally by the child.
- 15.4 Any incidents of physical contact that cause concern or fall outside of these protocols and guidance should be reported to the Headteacher and parent / carer and an appropriate record made in accordance with the [Allegations / Concerns Policy](#).
- 15.5 It is good practice that all parties clearly understand at the outset, what physical contact is necessary and appropriate in undertaking specific activities. Keeping parents / carers and children informed of the extent and nature of any physical contact may also prevent allegations of misconduct or abuse arising.

## **16. Behaviour Management**

- 16.1 Behaviour will be managed in keeping with the guidance set out in the [Behaviour Policy](#). Staff will always respect the child's well-being and self-worth and not seek to affect the child's dignity or act in a way which may result in the child feeling shame or humiliation.
- 16.2 The use of sarcasm, demeaning or insensitive comments towards children is completely unacceptable.
- 16.3 Where a child has specific needs in respect of particularly challenging behaviour, a Positive Handling Plan, including assessment of risk, should be drawn up and agreed by all parties. Only in these circumstances should a member of staff deviate from the academy's [Behaviour Policy](#).
- 16.4 See the academy's [Behaviour Policy](#) and [Physical Intervention Policy](#) for further guidance.

## **17. The Use of Control and Physical Intervention**

- 17.1 In no circumstances will a member of staff use any physical force or contact in relation to discipline.

- 17.2 The law and guidance for schools / academies states that staff may reasonably intervene to prevent a child from:
- Committing a criminal offence
  - Injuring themselves or others
  - Causing damage to property
  - Engaging in behaviour prejudicial to good order and to maintain good order and discipline.
- 17.3 Great care must be exercised in order that staff do not physically intervene in a manner which could be considered unlawful.
- 17.4 In all cases where physical intervention has taken place, the incident and subsequent actions should be recorded on MyConcern (the Trust’s safeguarding management system), in the Bound Book and reported to the Headteacher and the child’s parents / carers.
- 17.5 Similarly, where it can be anticipated that physical intervention is likely to be required, a Positive Handling Plan and Risk Assessment should be put in place which the child and parents / carers are aware of and have agreed to. Parental consent does not permit settings to use unlawful physical intervention or deprive a child of their liberty.
- 17.6 For specific detail on an individual academy’s approach to physical intervention, please see the [Physical Intervention Policy](#).

## **18. Children in Distress**

- 18.1 There may be occasions when a distressed child needs comfort and reassurance and this may involve physical contact. Young children, in particular, may need immediate physical comfort, for example after a fall. Staff should use their professional judgement to comfort or reassure a child in an age-appropriate way whilst maintaining clear professional boundaries. An arm around the shoulder (side on contact) is preferable. Under no circumstances should hugs and cuddles and sitting on laps be initiated by any adult worker. However, in the case of pre-school and nursery children it is recognised that hugs and cuddles can sometimes be part of helping children to deal with separation issues. If they are considered to be absolutely necessary in this context, then transparency is key. Therefore, they should only ever be given in response to an emotional need and in a setting where other adults are present.
- 18.2 Early Years Staff play a large role in supporting children to separate from their main carer and find ways to independently engage in learning. If children are unsettled at drop off, staff need to work closely with the child and their family to enable the child to feel safe and secure.
- 18.3 Staff are encouraged to value the voice of the child in situations where children are feeling distressed and provide appropriate levels of comfort for the child to enable them to relax and engage in learning.

- 18.4 Children should not be left feeling distressed at any time during the academy day or during extra-curricular activities, without adult input, even if the child needs some time to themselves. They need to have access to an adult at all times. If staff need to attend to something else, they must ask another member of staff to be with the child and communicate to the child that this handover has happened.

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

- 19.1 Staff working in one-to-one situations with children at the academy, including visiting staff from external organisations can be more vulnerable to allegations or complaints.
- 19.2 To safeguard both children and adults, a risk assessment in relation to the specific nature and implications of one-to-one work should always be undertaken. Each assessment should take into account the individual needs of each child and should be reviewed regularly.
- 19.3 Arranging to meet with children from the academy away from the work premises should not be permitted unless the necessity for this is clear and approval is obtained from a senior member of staff, the child and their parents / carers.

## **20. Intimate / Personal Care**

- 20.1 Staff must read and at all times adhere to the Trust's policy on [Supporting Pupils with Medical Conditions](#).
- 20.2 Children are entitled to respect and privacy at all times and especially when in a state of undress, changing clothes or undertaking any form of personal care. There are occasions where there will be a need for an appropriate level of supervision in order to safeguard children and / or satisfy health and safety considerations. This supervision should be appropriate to the needs and age of the child concerned and sensitive to the potential for embarrassment.
- 20.3 Staff need to be vigilant about their own behaviour, ensure they follow agreed guidelines (Policies and Risk Assessments) and be mindful of the needs of the children with whom they work.

## **21. First Aid and Medication**

- 21.1 Staff must read and at all times adhere to the Trust's [Health & Safety Policy](#), [First Aid Policy](#) and [Supporting Pupils with Medical Conditions Policy](#) which cover first aid and administration of medicines.
- 21.2 Staff should not consume or be under the influence of alcohol or any substance, including prescribed medication, which may affect their ability to care for children. Staff taking medication, which may affect their ability to care for children, should seek medical advice regarding their suitability to do so and Headteachers should ensure that they only work directly with children if that advice confirms that the medication is unlikely to impair their

ability to look after children. Headteachers are also responsible for managing the performance of their employees and for ensuring they are suitable to work with children.

- 21.3 Risk assessment is likely to recommend that staff medication on the premises must be securely stored and out of reach of children at all times.

## **22. Home Visits**

22.1 All work with children and parents / carers should, wherever possible, be undertaken in the academy or other recognised workplace. There are, however, occasions, in response to urgent or specific situations, where it may be necessary to make one-off home visits. In these circumstances, it is essential that appropriate policies and related risk assessments are in place to safeguard children and staff.

22.2 Staff undertaking welfare visits should always try to give parents / carers advance warning unless there is good reason not to, e.g. because the visit has been prompted by safeguarding concerns and / or is at the request of children's social care. In these cases, one of the staff undertaking the visit should be the DSL or deputy DSL. The purpose of the visit should be clarified, and staff should be aware of the circumstances in which emergency services or partner agencies should be contacted. In all other cases, staff must never enter a home without the parent's / carer's consent or when the parent / carer is absent.

22.3 All risk assessments should include an evaluation of any known factors regarding the child, parents / carers and others living in the household. Risk factors such as hostility, child protection concerns, complaints or grievances can make staff more vulnerable to an allegation. Specific consideration should be given to visits outside of school / academy hours or in remote or secluded locations. Following an assessment, appropriate risk management measures should be in place before visits are agreed.

22.4 Visits (other than in a rare emergency situation) should not be made alone and clear procedures for 'reporting into a manager' must be in place. In a rare emergency situation that necessitates a lone visit, this must not be undertaken without the knowledge of the Trust's Central Executive Team.

22.5 When carrying out academy planned Home Visits staff must remain respectful of the children and families and, where possible, respect the protocols within the family home taking account of and being sensitive to any cultural expectations.

22.6 Refer to the Trust's [Health & Safety Policy](#) in relation to lone working and home visits for further information.

## **23. Transporting Pupils**

23.1 In certain situations, staff or volunteers may be required or may offer to transport children as part of their work. As for any other activity undertaken at work, the academy has a duty to



carry out a risk assessment covering the health and safety of their staff and to manage any known risks – for further details see the Trust’s [Health & Safety Policy](#).

- 23.2 Staff, who are expected to use their own vehicles for transporting children should ensure that the vehicle is roadworthy, appropriately insured and that the maximum capacity is not exceeded – for further details see the Trust’s [Health & Safety Policy](#).
- 23.3 Two members of staff must be present in the vehicle at all times so the driver can concentrate while the other adult is able to monitor the children.
- 23.4 It is a legal requirement that all passengers should wear seat belts and it is the responsibility of the staff member to ensure that this requirement is met. Staff should also be aware of current legislation and adhere to the use of car / booster seats for younger children.
- 23.5 It is inappropriate for staff to offer lifts to a child outside their normal working duties, unless this has been brought to the attention of the Headteacher and has been agreed with the parents / carers.
- 23.6 There may be occasions where the child requires transport in an emergency situation or where not to give a lift may place a child at risk. Such circumstances must always be recorded and reported to the Headteacher and parents / carers.

## **24. Educational Visits**

- 24.1 Staff responsible for organising educational visits should be familiar with the Department for Education’s advice on Health and Safety available at <https://www.gov.uk/government/publications/health-and-safety-on-educational-visits> and should seek advice as necessary from Cousins, the Trust’s Health & Safety Partner.
- 24.2 Staff should take particular care when supervising children on visits, where the setting is less formal than the usual workplace. Staff remain in a position of power and trust and need to ensure that their behaviour remains professional at all times and stays within clearly defined professional boundaries.
- 24.3 Where out of academy activities include overnight stays, careful consideration needs to be given to sleeping arrangements. Children, staff and parents / carers should be informed of these prior to the start of the trip.
- 24.4 In all circumstances, those organising trips and outings must pay careful attention to ensuring safe staff / child ratios and to the gender mix of staff especially on overnight stays.
- 24.5 Health and Safety arrangements require members of staff to keep colleagues / Headteacher aware of their whereabouts, especially when involved in activities outside the usual workplace.

24.6 Risk assessments must be understood and strictly followed by all those involved. The Educational Visits Co-Ordinator (EVC) must sign off all Risk Assessments.

## **25. Photography and Video**

25.1 Many educational activities involve recording images. It may be for displays, for evidence of learning, or to celebrate achievement. Any such work should take place with due regard to the law, the Trust's Policies and the need to safeguard the privacy, dignity, safety and well-being of children.

25.2 Staff must read and at all times adhere to the following:

- [Data Protection and Data Subject Rights Policy](#)
- [Acceptable Use Policy \(AUP\)](#)
- [Use of Pupil Images Policy](#)

25.3 Children who have been previously abused in a manner that involved images may feel particularly threatened by the use of photography, filming etc. Staff need to remain sensitive to any children who appear uncomfortable, for whatever reason, and should recognise the potential for such activities to raise concerns or lead to misunderstandings.

25.4 Whilst images are regularly used for very positive purposes, staff need to be aware of the potential for these to be taken and / or misused or manipulated for pornographic or 'grooming' purposes. Particular regard needs to be given when images are taken of young or vulnerable children who may be unable to question why or how the activities are taking place.

## **26. Exposure to Inappropriate Images and Internet Usage**

26.1 There are no circumstances that will justify staff possessing indecent images of children or young people.

26.2 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 academy's / Trust's equipment, or a person's personal equipment, on or off the premises, or making, storing or disseminating such material is illegal. Such actions will lead to criminal investigation and the individual being barred from working with children and young people, if proven.

26.3 If indecent images of children are discovered at the academy or on the academy's / Trust's equipment an immediate referral should be made to the local authority Designated Officer (LADO) and the police contacted if relevant. The images / equipment should be secured and there should 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 academy, a referral should also be made to children's social care in line with local arrangements – see [Safeguarding / Child Protection Policy](#).

- 26.4 Under no circumstances should any member of staff use academy / Trust equipment to access pornography. Neither should personal equipment containing pornography or links to it ever be brought into or used in the workplace. This will raise serious concerns about the suitability of the person to continue working with children.
- 26.5 Staff should keep their passwords confidential and not allow unauthorised access to equipment – see [Acceptable Use Policy \(AUP\)](#). 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 should be secured and isolated from the network, and the LADO contacted immediately. 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. A key consideration is for staff not to view or forward illegal images of a child - see [Safeguarding / Child Protection Policy](#) for more information.

## 27. Curriculum

- 27.1 Many areas of the curriculum can include or raise subject matter which is sexually explicit or of a political or 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 can be supported by developing ground rules with children to ensure sensitive topics can be discussed in a safe learning environment. This plan should highlight particular areas of risk and sensitivity and care should especially be taken in those areas of the curriculum where usual boundaries or rules are less rigorously applied e.g. drama.
- 27.2 The curriculum can sometimes include or lead to unplanned discussion about subject matter of a sexually explicit, political or otherwise sensitive nature. Responding to children's questions requires careful judgement and staff should take guidance in these circumstances from the DSL.
- 27.3 Staff should also comply at all times with the Trust's policy on [Relationships, Sex and Health Education \(RSHE\)](#). It should be noted that parents / carers have the right to withdraw their children from all or part of any sex education provided, but not from the National Curriculum for Science.

## 28. Sharing Concerns and Recording Incidents

- 28.1 All staff should have read the [Allegations / Concerns in relation to adults Policy](#) and the [Safeguarding / Child Protection Policy](#) and should have signed to confirm they have read and understood them. They should therefore be aware of the academy's **procedures for dealing with concerns or allegations against staff, including supply teachers, volunteers and contractors** as set out in the [Allegations / Concerns Policy](#) and the academy's safeguarding procedures.
- 28.2 In the event of an allegation being made by any person, or incident being witnessed, the relevant information should be immediately recorded and reported to the Headteacher / Chair of Governors, as appropriate, in accordance with the [Allegations / Concerns Policy](#).

- 28.3 Members of staff should feel able to discuss with their line manager any difficulties or problems that may affect their relationship with or behaviour towards children, so that appropriate support can be provided and / or action can be taken.
- 28.4 In order to safeguard and protect children and colleagues, where staff have any concerns about someone who works with children, they should immediately report this to the Headteacher / Chair of Governors, as appropriate, in line with the academy's procedures and the Trust's [Allegations / Concerns Policy](#).

## 29. Whistleblowing

- 29.1 Whistleblowing is the mechanism by which adults can voice their concerns, made in good faith, without fear of repercussion.
- 29.2 Staff should recognise their individual responsibilities to bring matters of concern to the attention of senior management and / or relevant external agencies and that to not do so may result in charges of serious neglect on their part where the welfare of children may be at risk.
- 29.3 Staff who use the whistleblowing procedure should be made aware that their employment rights are protected.
- 29.4 See the Trust's [Whistleblowing Policy](#) for further information.

### List of Policies Referenced in this Code

- [Data Protection and Data Subject Rights Policy](#)
- [Records Retention Policy](#)
- [Safeguarding / Child Protection Policy](#) (this includes the [Safeguarding / Child Protection Policy appendices](#))
- [Acceptable Use Policy](#)
- [Allegations / Concerns Policy in relation to adults](#)
- [Acceptance of Gifts, Hospitality, Awards, Prizes or Benefits Policy](#)
- [Behaviour Policy](#)
- [Physical Intervention Policy](#)
- [Supporting Pupils with Medical Conditions Policy](#)
- [Health & Safety Policy](#)
- [First Aid Policy](#)
- [Relationships, Sex and Health Education \(RSHE\) Policy](#)
- [Whistleblowing](#)