



Adult Code of Conduct

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Peterborough Diocese Education Trust's Adult Code of Conduct

All adults are required to have read, understood and abide by the Adult Code of Conduct and sign to confirm their agreement to it.

Signed: _____

Date: _____

CONTENTS

1	Overarching Principles	5
2	Adult Conduct: General Responsibilities	6
3	Adult Conduct: Specific Responsibilities Part A: General Conduct	6
3.1	Alcohol	6
3.2	Smoking / Vaping	6
3.3	Language	6
3.4	Sexual Harassment	6
3.5	Conduct Outside the Workplace	7
3.6	Dress and Appearance	8
3.7	Gifts, Bribery and Use of Trust Property	8
3.8	Disclosing Information	8
4	Adult Conduct Specific Responsibilities Part B: Conduct in Relation to Children	8
4.1	Principles	9
4.2	Allegations / Concerns in Relation to Adult Conduct	9
4.3	Whistleblowing	10
4.4	Childcare Disqualification	11
4.5	Adult Medication	11
4.6	Gifts, Bribery and Favouritism	12
4.7	One to One Situations	12
4.8	Contact with Children	12
4.8.1	Contact Outside the Workplace	12
	Adult Living Spaces	12
	Social Contact	13
	Home Visits	13
4.8.2	Physical Contact	14
	Children in Distress	15
	Other Activities that Require Physical Contact	16
	Intimate / Personal Care	16
	First Aid and Medication	16
4.8.3	Sexual Contact	16
5	Adult Conduct Specific Responsibilities Part C: Adult Conduct in Relation to Children’s Behaviour	17
5.1	Behaviour Management / Regulation	17
5.2	Use of Physical Intervention	17
5.3	Infatuations and ‘Crushes’	17

6	Adult Conduct Specific Responsibilities Part D: Adult Conduct in Relation to Other Circumstances Involving Children	18
6.1	Teaching the Curriculum	18
6.2	Educational Visits	19
6.3	Transporting Pupils	19
6.4	Communications and Data	20
6.4.1	Communication with Children and Families	20
6.4.2	Technology	20
	Social Media	20
	Personal Mobile Technology (Phones, Cameras, Tablets, Smart Watches and Other Handheld Devices)	21
	Photography and Video	21
	Exposure to Inappropriate Images and Internet Usage	21
	Working Remotely - Remote Meetings and 'Live' Teaching	22
6.4.3	Data Protection and Confidentiality	22
7	Legislation and Guidance	23
8	Links with Other Policies	23

Peterborough Diocese Education Trust’s Adult Code of Conduct

Peterborough Diocese Education Trust’s (the Trust) vision is:

‘For every child, within our Trust, to experience an excellent education and to realise their God-given potential to flourish.’

Underpinned by our Christian values of wisdom, respect, belonging, service and hope, the Trust is committed to creating a positive, inclusive culture where all people can flourish in safety, with dignity and respect. This Adult Code of Conduct (Code) sets out the Trust’s approach to adult conduct encompassing general and specific responsibilities in line with overarching principles (see below).

The Code applies to all adults, including those who work with children in the schools but are not directly employed by the Trust, and volunteers.

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

This Code is not exhaustive. If situations arise that are not covered by this Code, the relevant adult will use their professional judgment and act in the best interests of the Trust, the relevant school(s) and its children.

Failure to follow this Code may result in disciplinary action being taken, including possible dismissal, as set out in the Trust’s disciplinary procedures.

1. Overarching Principles

All adults have an influential position in schools / the Trust and therefore all adults must:

- **Act with personal and professional integrity, respecting the safety and well-being of others**
- **Act as role models for children by consistently demonstrating high standards of behaviour**
- **Behave in a way that reflects well on the Trust and the schools within it**, working at all times within the law and according to the Trust’s and school’s policies and procedures. At no time should public confidence in the Trust, or any school within it, be put at risk by the actions or words of adults.

Additionally, teachers must:

- Act in accordance with the personal and professional behaviours set out in the [Teachers’ standards](#).

2. Adult Conduct: General Responsibilities

All adults must:

- Treat all with dignity and respect
- Show tolerance and respect for the rights of others
- Uphold the Trust / school's values
- Maintain high standards in their attendance and punctuality
- Understand the statutory frameworks they must act within.

In addition, all adults in schools must:

- Not express personal beliefs in a way that exploits children's vulnerability or might lead them to break the law
- Demonstrate 'visible positive consistency and visible kindness', 'deliberate botheredness' (daily acts of kindness / care) consistently and positive recognition for all children, in line with the *Trust's Behaviour Policy*.

3. Adult Conduct: Specific Responsibilities

Part A: General Conduct

The following specific responsibilities are in addition to the general responsibilities above.

3.1 Alcohol

Adults must not consume or be under the influence of alcohol or any substance on Trust / school premises.

3.2 Smoking / Vaping

Adults must not smoke or vape on Trust / school premises.

3.3 Language

Adults must not use inappropriate or offensive language around children.

3.4 Sexual Harassment

Adults will help create a positive environment that works to prevent sexual harassment. This includes calling out sexual harassment that they witness. All witnesses will be provided with appropriate support and will be protected from victimisation.

Sexual harassment is any unwanted physical, verbal or non-verbal conduct of a sexual nature that has a purpose or effect of violating a person's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. It also includes treating someone less favourably because they've submitted or refused to submit to unwanted conduct of a sexual nature in the past, or harassment related to sex or gender reassignment.

When this behaviour is unwanted, it includes (but isn't limited to):

- Unwanted physical conduct or “horseplay” including touching, pinching, pushing and grabbing
- Continued suggestions for sexual activity after it has been made clear that such suggestions are unwelcome
- Sending or displaying material that is pornographic or that some people might find offensive
- Unwelcome sexual advances or suggestive behaviour (which the harasser may perceive as harmless)
- Offensive emails, text messages or social media content
- Comments and jokes of a sexual nature
- Sexually suggestive looks and staring
- Sexual propositions and advances
- Promising things in return for sexual favours
- Physical contact such as massaging, hugging or kissing
- Sexual contact on social media.

If an adult is concerned at any point about incidents of sexual harassment (either directed at them or someone else), they should report their concern to the headteacher / line manager (central team). If the concern is about the headteacher / line manager (central team), or it is believed they may be involved in the wrongdoing in some way, the adult should report their concern to the Central Executive Team. The Trust will investigate any complaints in a timely, respectful and confidential manner.

All adults will receive training on recognising and responding to incidents of sexual harassment. The Trust will monitor the treatment and outcomes of any complaints of sexual harassment or victimisation received to ensure that they are properly investigated and resolved; those who report or act as witnesses are not victimized; repeat offenders are dealt with appropriately; cultural clashes are identified and resolved; and workforce training is targeted where needed.

3.5 Conduct Outside the Workplace

There may be times, for example, when an adult'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.

Adults 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 Trust into disrepute. For teachers, 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.

Adults should therefore understand and be aware, that safe practice also involves using judgement and integrity about behaviours in places other than the work setting.

3.6 Dress and Appearance

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

Clothes must not display any offensive or political slogans.

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

3.7 Gifts, Bribery and Use of Trust Property

Adults must maintain high standards of honesty and integrity when handling money, claiming expenses and using the Trust's property and facilities.

Adults will not accept bribes. Gifts from suppliers or associates must be declared and recorded in accordance with the Trust's Acceptance of *Gifts, Hospitality, Awards, Prizes or Benefits Policy*.

3.8 Disclosing Information

With regards to any past or current investigations / cautions related to conduct outside of school / the workplace, adults will ensure that all correct information has been given to the Trust.

Where there are any updates to the information provided, the adult will advise the Trust as such as soon as reasonably practicable. Consideration will then be given to the nature and circumstances of the matter and whether this may have an impact on the adult's

4. Adult Conduct: Specific Responsibilities

Part B: Conduct in Relation to Children

This Code aims to help adults establish the safest possible learning and working environments which reduce the risk of adults being falsely accused of improper or unprofessional conduct and which safeguard children.

As a result of their knowledge, position and / or authority, all those working with children in a school or other education setting are in a position of trust in relation to the children in their care. 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 adults to understand this power; that the relationship cannot be one between equals and the responsibility they must exercise as a consequence.

The potential for exploitation and harm of vulnerable children means that adults have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.

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 this aim is not always straightforward, as much relies on child and adult interactions where tensions and misunderstandings can occur. This Code aims to reduce the risk of these.

Adults 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.

4.1 Principles

The following principles underpin adult conduct in relation to children:

- Adults are accountable for the way in which they: exercise authority; manage risk; use resources; and safeguard children
- Adults 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
- Adults 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
- Adults should apply the same professional standards regardless of culture, disability, gender, language, racial origin, religious belief and sexual orientation
- In terms of their conduct, adults should be aware of and understand:
 - the *Safeguarding / Child Protection Policy*
 - arrangements for managing concerns or allegations against adults as set out in the *Allegations / Concerns Policy*
 - the whistleblowing procedure as set out in the Trust's *Whistleblowing Policy*.

This Code cannot provide a complete checklist of what is, or is not, appropriate behaviour for adults. It does highlight, however, behaviour which is illegal, inappropriate or inadvisable. Adults 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.

4.2 Allegations and Concerns in Relation to Adult Conduct

A culture of vigilance will help to ensure that adults working in or on behalf of the school are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the Trust / school. Any behaviours that fall short of the guiding principles outlined in *Guidance for Safer Working Practice for Those Working with Children and Young People in Education Settings (Guidance for Safer Working Practice) – February 2022* and this Code must be shared responsibly and with the right person in accordance with the *Allegations / Concerns Policy*.

Creating an open and transparent 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 may meet the harm threshold as well as those that do not

meet the harm threshold (low-level concerns). Related systems and processes should be implemented correctly and appropriate training given to enable schools to identify concerning, problematic or inappropriate behaviour early and minimising the risk of abuse.

Adults 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.

Adults 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.

All adults 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 Trust's procedures for dealing with concerns or allegations against adults, including supply teachers, volunteers and contractors as set out in the *Allegations / Concerns Policy* and the school's safeguarding procedures.

In order to safeguard and protect children and colleagues, where adults have any **concerns** about someone who works with children, they should immediately report this to the Headteacher / Central Executive Team, as appropriate, in line with the school's procedures and the Trust's *Allegations / Concerns Policy*.

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 / Central Executive Team, as appropriate, in accordance with the *Allegations / Concerns Policy*.

Allegations may 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.

It must also be recognised that some allegations will be genuine as there are people who seek out, create or exploit opportunities to harm children. Adults 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).

4.3 Whistleblowing

Whistleblowing is the mechanism by which adults can voice their concerns, made in good faith, without fear of repercussion.

Whistleblowing reports wrongdoing that is 'in the public interest'. Examples linked to safeguarding include:

- Children’s or adults’ health and safety being put in danger
- Failure to comply with a legal obligation or statutory requirement
- Attempts to cover up the above, or any other wrongdoing in the public interest.

Adults should consider the examples above when deciding whether their concern is of a whistleblowing nature. Consideration needs to be given to whether the incident(s) was illegal, breached statutory or Trust procedures, put people in danger or was an attempt to cover up any such activity.

Adults 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.

Adults should report their concern to the headteacher. If the concern is about the headteacher, or it is believed they may be involved in the wrongdoing in some way, the adult should report their concern to the Central Executive Team.

Concerns should be made in writing wherever possible. They should include names of those committing wrong-doing, dates, places and as much evidence and context as possible. Adults raising a concern should also include details of any personal interest in the matter. The Trust will then investigate in a timely, respectful and confidential manner.

Adults who use the whistleblowing procedure should be made aware that their employment rights are protected.

See the Trust’s *Whistleblowing Policy* for further detail and information.

4.4 Childcare Disqualification

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. Schools and private childcare settings are also prohibited from employing a disqualified person in respect of relevant early or later years childcare.

The Disqualification under the Childcare Act 2006 (Regulations 2018) states that schools should make clear their expectation that adults should disclose any relationship or association (in the real world or online) that may impact on the school’s ability to safeguard children. This applies to all adults in all schools, not just those in early or later years childcare.

4.5 Adult Medication

Adults should not consume or be under the influence of any substance, including prescribed medication, which may affect their ability to care for children. Adults 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.

A risk assessment is likely to recommend that adult medication on the premises must be securely stored and out of reach of children at all times.

4.6 Gifts, Bribery and Favouritism

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.

Care should also be taken to ensure that adults do not accept any gift that might be construed as a bribe by others or lead the giver to expect preferential treatment.

Similarly, it is unadvisable 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.

Any reward given to a child should be in accordance with agreed practice, consistent with the Trust's *Behaviour Policy*, recorded and not based on favouritism.

Adults should also exercise care when selecting children for school 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.

4.7 One to One Situations

Adults working in one-to-one situations with children at the school, including visiting adults from external organisations can be more vulnerable to allegations or complaints.

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.

Arranging to meet with children from the school 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.

4.8 Contact with Children

4.8.1 Contact Outside the Workplace

Adult's Living Spaces

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 an adult has a personal relationship of a social nature with a family whose children attend the school. In such circumstances,

the adult 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 school.

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.

Social Contact

It is acknowledged that adults may have genuine friendships and social contact with parents / carers of children, independent of the professional relationship. Adults 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.

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.

Adults 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 / school into disrepute (e.g. attending a political protest, circulating propaganda).

Adults 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.

Where adults have personal relationships of a social nature with families whose children attend the school, adults 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 school.

Where such relationships exist, adults will ensure that no information regarding the Trust, the school, adults, or children will be discussed.

Under no circumstances should an adult visit a child in their home outside agreed work arrangements (*see 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 and the adult must have a prior discussion with the Headteacher and the parents / carers and a clear justification for such arrangement must be agreed and recorded.

Home Visits

All work with children and parents / carers should, wherever possible, be undertaken in the school 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 adults.

Adults 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 adults undertaking the visit

should be the DSL or deputy DSL. The purpose of the visit should be clarified, and adults should be aware of the circumstances in which emergency services or partner agencies should be contacted. In all other cases, adults must never enter a home without the parent's / carer's consent or when the parent / carer is absent.

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 adults more vulnerable to an allegation. Specific consideration should be given to visits outside of school hours or in remote or secluded locations. Following an assessment, appropriate risk management measures should be in place before visits are agreed.

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.

When carrying out school planned Home Visits, adults 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.

4.8.2 Physical Contact

There are occasions when it is entirely appropriate and proper for adults 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.

Not all children feel comfortable about physical contact, and adults should not make the assumption that it is acceptable practice to use touch as a means of communication. Wherever possible adults should seek the child's permission before initiating contact and be sensitive to any signs that they may be uncomfortable or embarrassed.

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.

It is not possible to be specific about the appropriateness of each physical contact. Adults 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.

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.

Physical contact should never be secretive, or for the gratification of the adult, or represent a misuse of authority. If an adult 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 / Central Executive Team, 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.

Where a child seeks or initiates inappropriate physical contact with an adult, 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 adult concerned.

It is recognised that some children who have experienced abuse may seek inappropriate physical contact. Adults should be particularly aware of this when it is known that a child has suffered previous abuse or neglect.

In all circumstances where a child initiates inappropriate physical contact, it is the responsibility of the adult 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.

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.

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*.

Children in Distress

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. Adults 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. 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.

Early Years adults 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, adults need to work closely with the child and their family to enable the child to feel safe and secure.

Adults 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.

Children should not be left feeling distressed at any time during the school 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 adults need to attend to something else, they must ask another adult to be with the child and communicate to the child that this handover has happened.

Other Activities that Require Physical Contact

In certain curriculum areas, such as PE, drama or music, adults 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.

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.

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 adults should remain sensitive to any discomfort expressed verbally or non-verbally by the child.

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.

Intimate / Personal Care

Adults must read and at all times adhere to the Trust's policy on *Supporting Pupils with Medical Conditions*.

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.

Adults 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.

First Aid and Medication

Adults must read and at all times adhere to the Trust's *Health & Safety Policy*, *Supporting Pupils with Medical Conditions Policy* and the school's *First Aid Policy* which cover first aid and administration of medicines.

4.8.3 Sexual Contact

All adults should clearly understand the need to maintain appropriate boundaries in their contacts with children.

Any intimate or sexual relationships between children and adults 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.

Any sexual activity between an adult and a child within the Trust will be regarded as a criminal offence and may be a matter for disciplinary action and Police involvement.

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.

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 adults 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 child is being groomed.

5. Adult Conduct: Specific Responsibilities

Part C: Conduct in Relation to Children’s Behaviour

5.1 Behaviour Management / Regulation

Behaviour will be managed / regulated in keeping with the guidance set out in the *Behaviour Policy*. Adults 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.

The use of sarcasm, demeaning or insensitive comments towards children is completely unacceptable.

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. (See the Trust’s *Behaviour Policy* and *Physical Intervention Policy* for further guidance.)

5.2 The Use of Physical Intervention

In no circumstances will an adult use any physical force or contact in relation to discipline.

The law and guidance for schools states that adults 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 maintaining good order and discipline.

Great care must be exercised in order that adults do not physically intervene in a manner which could be considered unlawful.

In all cases where physical intervention has taken place, the incident and subsequent actions must 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.

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.

5.3 Infatuations and ‘Crushes’

All adults need to recognise that it is not uncommon for a child or young person to be strongly attracted to an adult 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.

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.

An adult, 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.

The Headteacher should give careful thought to those circumstances where the adult, 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 adult and maintain the dignity of all. This plan should involve all parties, be robust and regularly monitored and reviewed.

6. Adult Conduct: Specific Responsibilities

Part D: Conduct in Relation to Other Circumstances Involving Children

6.1 Teaching the Curriculum

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.

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 adults should take guidance in these circumstances from the DSL.

Adults 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.

6.2 Educational Visits

Adults 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-educational-visits> and should seek advice as necessary from Plumsun, the Trust's Health & Safety Partner in relation to Educational Visits.

Adults should take particular care when supervising children on visits, where the setting is less formal than the usual workplace. Adults 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.

Where out of school activities include overnight stays, careful consideration needs to be given to sleeping arrangements. Children, adults and parents / carers should be informed of these prior to the start of the trip.

In all circumstances, those organising trips and outings must pay careful attention to ensuring safe adult / child ratios and to the gender mix of adults especially on overnight stays.

Health and Safety arrangements require adults to keep other colleagues / Headteacher aware of their whereabouts, especially when involved in activities outside the usual workplace.

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

6.3 Transporting Pupils

In certain situations, adults may be required or may offer to transport children as part of their work. As for any other activity undertaken at work, the school has a duty to carry out a risk assessment covering the health and safety of their adults and to manage any known risks – for further details see the Trust's *Health & Safety Policy*.

Adults, 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*.

Two adults must be present in the vehicle at all times so the driver can concentrate while the other adult is able to monitor the children.

It is a legal requirement that all passengers should wear seat belts and it is the responsibility of the adults to ensure that this requirement is met. Adults should also be aware of current legislation and adhere to the use of car / booster seats for younger children.

It is inappropriate for adults 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.

There may be occasions where a 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.

6.4 Communications and Data

6.4.1 Communication with Children and Families

All forms of communication between children and adults, by whatever method, should take place within clear and explicit professional boundaries.

Adults 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).

Adults 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 adult, 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.

Adults will ensure that all communications are transparent and open to scrutiny both in the “real world” and through web-based and telecommunication interactions.

Only internal e-mail systems and school 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)*.

Phone calls to parents / carers must always be made from the school telephone, not personal phones.

If on a school trip and adults need to contact parents / carers, they will ring the school, which will then contact the parent / carer, or, in the case of an emergency, adults will use the school mobile phone. **Personal mobile phones will not be used to contact parents / carers.**

Pastoral calls using technology such as O365, should only be carried out in accordance with the DfE’s guidance [Safeguarding and remote education - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/safeguarding-and-remote-education).

6.4.2 Technology

Social Media

Adults must observe the Trust’s *Acceptable Use Policy (AUP)*, which they have signed to state that they have agreed to the terms.

Adults' social media profiles should not be available to pupils. If adults have a personal profile on social media sites, they should not use their full name, as pupils may be able to find them. Adults should consider using a first and middle name instead, and set public profiles to private.

Adults will not make any efforts to find pupils or parents / carers social media profiles.

Where relationships with children or their families are already in place, adults must declare these to the Headteacher as outlined in this Code.

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

All adults must read and adhere to the Trust's *Acceptable Use Policy (AUP)*.

Mobile phones must not be used in areas accessed by children including any teaching area in the school or within children's toilets or changing areas.

Only school equipment should be used to record classroom activities. Photos and video footage should be put onto the secure school system as soon as possible and never sent to personal devices.

Photography and Video

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.

Adults 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*

Children who have been previously abused in a manner that involved images may feel particularly threatened by the use of photography, filming etc. Adults 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.

Whilst images are regularly used for very positive purposes, adults 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.

Exposure to Inappropriate Images and Internet Usage

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

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 school'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.

If indecent images of children are discovered at a school or on the school'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 school, a referral should also be made to children's social care in line with local arrangements – see *Safeguarding / Child Protection Policy*.

Under no circumstances should any adults use school / 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.

Adults 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. Adults 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 adults not to view or forward illegal images of a child - see *Safeguarding / Child Protection Policy for more information*.

Working Remotely - Remote Meetings and 'Live' Teaching

It is recognised that remote working and 'live' teaching maybe be part of the new way of working. All adults, 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-remote-education).

6.4.3 Data Protection and Confidentiality

The storing and processing of personal information is governed by the [Data Protection Act 2018](https://www.gov.uk/guidance/data-protection-act-2018) and the [UK GDPR](https://www.gov.uk/guidance/uk-gdpr). Adults should read and must adhere to the Trust's *Data Protection and Data Subject Rights Policy* and *Records Retention Policy*.

Adults 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.

Adults 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).

Information must never be used to intimidate, humiliate, or embarrass the child.

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.

There are some circumstances in which an adult 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*.

If a child, or their parent / carer makes a disclosure regarding abuse or neglect, the adult should follow the *Safeguarding / Child Protection Policy*. The adult should not promise confidentiality but should give reassurance that the information will be treated sensitively.

If an adult 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.

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)*.

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*.

7. Legislation and Guidance

This Code is based on the national “Guidance for Safer Working Practice for Those Working with Children and Young People in Education Settings” (Guidance for Safer Working Practice) – February 2022 and is in line with the latest edition of the statutory safeguarding guidance - [Keeping Children Safe in Education \(KCSIE\)](#)

All headteachers should read the Guidance and familiarise themselves with it and Adults should read the whole / appropriate parts of KCSIE as set out in the *Trust’s Safeguarding Policy*

The Trust must have a policy on Adults behaviour, as explained in the Department for Education’s [Academy Trust Governance Guide](#)

This Code also complies with the Trust’s funding agreement and articles of association

8. Links with Other Policies

This Code links with the following Trust policies:

- *Acceptable Use Policy*
- *Acceptance of Gifts, Hospitality, Awards, Prizes or Benefits Policy*
- *Allegations / Concerns Policy in relation to adults*

- *Behaviour Policy*
- *Data Protection and Data Subject Rights Policy*
- *First Aid Policy*
- *Health & Safety Policy*
- *Physical Intervention Policy*
- *Records Retention Policy*
- *Relationships, Sex and Health Education (RSHE) Policy*
- *Safeguarding / Child Protection Policy (this includes the Safeguarding / Child Protection Policy appendices)*
- *Adult's Disciplinary Procedures, which will be used if Adults breach this Code. It also sets out examples of what is deemed as misconduct and gross misconduct*
- *Adult's Grievance Procedures*
- *Supporting Pupils with Medical Conditions Policy*
- *Whistleblowing*