Code of Conduct for all Adults
(Staff, Volunteers, Contractors)

Recommended by HR Director:	August 2026
Approved by HR Committee:	October 2026
Ratified by Trustee board:	October 2026
Review Due:	August 2027

Policy Version Control

Date	Version	Amendments/Comments	Reviewer/s
August 2026	1.2, 1.9	Updated with minor amends	MA/AS
December 2025	1.1	Reviewed, no amendments required	RE
June 2025	1.1	Minor amends throughout	ACA
	1.0		

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Code of Conduct for All Adults (Staff, Volunteers, Contractors)

1. Introduction

1.1. The Code sets out the professional standards expected and the duty upon adults to abide by it. All adults have a duty to keep pupils safe, promote their welfare and to protect them from radicalisation (the Prevent Duty), abuse (sexual, physical and emotional), neglect and safeguarding concerns. This duty is, in part, exercised through the development of respectful, caring and professional relationships between adults and pupils and behaviour by adults that demonstrates integrity, maturity and good judgement. Following this Code will help to safeguard adults from being maliciously, falsely or mistakenly suspected or accused of misconduct in relation to pupils.

1.2. For the purposes of this Code, the term and references to 'adult' means the following: Trust Members and Trustees, all Governors, all teaching and other employees (whether or not paid or unpaid, employed or self-employed and whether or not employed directly by the Trust, external contractors providing services to pupils on behalf of the Trust and School or Schools, teacher trainees and other trainees/apprentices, volunteers and any other individuals who work for or provide services on behalf of or for the Trust and School or Schools to include but not limited to all those detailed in the single central record (as amended). For the purposes of this Code 'young person/people', 'pupils' and 'child/ren' includes all those for whom the school provides education or other services.

1.3. This Code takes account of the most recent versions of the following guidance (statutory and non-statutory):

- 'Keeping Children Safe in Education' Department of Education ('DfE') (statutory)
- Working Together to Safeguard Children' HM Government (statutory)
- 'Guidance for Safer Working Practice for those Working with Children and Young People in Education Settings' (non-statutory)

This Code cannot provide an exhaustive list of what is, or is not, appropriate behaviour for adults. However, it does highlight behaviour that is illegal, inappropriate, or inadvisable in relation to the required professional standards. There will be occasions and circumstances in which adults must make decisions or act in the best interests of the pupil where no specific guidance has been given. Adults are expected to make responsible and informed judgements about their own behaviour to secure the best interests and welfare of the pupils.

1.4. Any behaviour in breach of this Code by employees may result in action under our disciplinary procedure. Such behaviour may constitute gross misconduct and, as such, may result in summary dismissal. The Trust will take a strict approach to serious breaches of this Code. Some breaches may be considered low-level concerns which may be dealt with informally or formally under the disciplinary procedure.

1.5. Safeguarding and Child Protection Policy

Adults have a duty to act in accordance with the Safeguarding and Child Protection Policy which is available from any Designated Safeguarding Lead in any of the Trust's schools and report any safeguarding, child protection, welfare or radicalisation concerns about a pupil to the Designated Safeguarding Lead.

1.6. Whistleblowing

Adults must raise concerns they have about the safeguarding or child protection practices by following the Whistleblowing Policy, which is available on the Trust external website. An adult who raises a

matter under the whistleblowing policy or makes a public interest disclosure will have the protection of the relevant legislation.

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

Where it is alleged that an adult has:

- behaved in a way that has harmed a child or may have harmed a child.
- possibly committed a criminal offence against or related to a child.
- behaved towards a child or children in a way that indicates they would pose a risk of harm to children.
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.
- then the Trust will follow the Trust's Procedure for Dealing with Allegations of Abuse Against Teachers and Other Employees and Volunteers, and the guidance set out in Part Four of Keeping Children Safe in Education DfE which is available from HR.

1.8. Low-Level Concerns

1.8.1. In accordance with Part Four of Keeping Children Safe in Education, a low-level concern is defined as behaviour towards a child that does not meet the harm threshold, as outlined in 1.7 above, but is a concern that an adult, working in or on behalf of the Trust, may have acted in a way that:

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

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

1.8.3. If an adult has found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards, the adult should self-refer to those with designated safeguarding responsibilities. The Trust is committed to creating an environment where staff are encouraged and feel confident to self-refer.

1.9. Prevention of Sexual Harassment in the Workplace

We recognise our legal responsibility to take proactive and reasonable steps to prevent sexual harassment in the workplace. Sexual harassment, whether carried out in person, online or through any other form of communication, has no place in the Trust. We encourage colleagues to raise concerns promptly and are committed to responding appropriately, supporting those affected, and taking action where standards are not met.

If you are concerned or feel you need to report a sexual harassment incident/concern please contact the CEO (Kevin Ford, kford@marlowet.org) or HR Director (Anna Summerfield, asummerfield@marlowet.org). If your concerns relate to the CEO or HR Director, please contact the Chair of Trustees (Sarah Cooper, scooper@marlowet.org).

2. Expected Professional Standards

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

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

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

- Part 1 of Keeping Children Safe in Education DfE (statutory)
- Working Together to Safeguard Children HM Government (statutory)
- Prevent Duty Guidance HM Government (statutory)
- 'The Prevent Duty Departmental Advice for Schools and Childcare Providers' DfE
- 'Guidance for Safer Working Practice for those Working with Children and Young People in Education Settings' (non-statutory)

2.3. An employee who fails to bring a matter of concern to the attention of senior management and/or the relevant agencies is likely to be subject to disciplinary action.

3. Confidentiality

3.1. As data controllers, all Schools are subject to the General Data Protection Regulation (GDPR) and Data Protection Act 2018 ("Data Protection Legislation"). In addition, teachers owe a common law duty of care to safeguard the welfare of their pupils. This duty is acknowledged in the provisions governing disclosure of information about pupils.

3.2. Adults may have access to special category personal data about pupils and their families, which must be kept confidential at all times and only shared when legally permissible to do so and in the interests of the child. Records should only be shared with those who have a legitimate professional need to see them. In circumstances where special category personal data needs to be shared, the Data Protection

Legislation contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent. In such cases, adults have a duty to pass the information on without delay to those with designated safeguarding responsibilities. See paragraph 18 below.

3.3. Confidential or personal information about a pupil or their family must never be disclosed to anyone other than on a need-to-know basis and advice should be sought prior to disclosure to ensure such disclosure is in accordance with the Data Protection Legislation, The Education (Pupil Information) Regulations 2005 (Maintained Schools), and the Trust's Privacy Notices. In circumstances where the pupil's identity does not need to be disclosed the information should be used anonymously. The information must never be used to intimidate, humiliate, or embarrass the pupil. The information must never be used by anyone for their own or others advantage (including that of partners, friend's relatives or other organisations).

3.4. Confidential information about pupils must be held securely. Confidential information about pupils must not be held off the School site other than on security protected School equipment. The information must only be stored for the length of time necessary to discharge the task for which it is required. If a pupil or parent/carer makes a disclosure regarding abuse or neglect, the adult must follow the Trust's procedures and the guidance as set out in 'Keeping Children Safe in Education' DfE. Confidentiality must not be promised to the pupil or parent/carer, however, reassurance should be given that the information will be treated sensitively.

3.5. If an adult is in any doubt about the storage or sharing of information, they must seek guidance from the Designated Safeguarding Lead. Any media or legal enquiries must be passed to senior management.

4. Propriety, Behaviour and Appearance

4.1. All adults working with children have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of pupils. They should adopt high standards of personal conduct to maintain the confidence and respect of their colleagues, pupils and the public in general. An adult's behaviour or actions, either in or out of the workplace, must not compromise their position within the work setting, or bring the school into disrepute. Non-exhaustive examples of unacceptable behaviour are contained in our disciplinary procedure/rules.

4.2. Adults are required to notify the Trust and/or school immediately of any allegation/s of misconduct that are of a safeguarding nature made against them (or implicating them), by a child or adult in relation to any outside work or interest (whether paid or unpaid) and, of any arrest or criminal charge whether child-related or not. Where employees fail to do so, this will be treated as a serious breach of this Code and dealt with under our disciplinary procedure.

4.3. Individuals should not:

- Behave in a manner that would lead any reasonable person to question their suitability to work with children or to act as an appropriate role model.
- Make, or encourage others to make sexual remarks to, or about, a pupil.
- Use inappropriate language to or in the presence of pupils.
- Discuss their personal or sexual relationships with or in the presence of pupils.
- Make, or encourage others to make, unprofessional personal comments that scapegoat, demean, discriminate, or humiliate, or might be interpreted as such.

- Behaving in an unsuitable way towards children may result in disqualification from childcare under the Childcare Act 2006, prohibition from teaching by the Teaching Regulation Agency (TRA), a bar from engaging in regulated activity, or action by another relevant regulatory.

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

4.5. Personal property of a sexually explicit nature or property which might be regarded as promoting radicalisation or otherwise inappropriate such as books, magazines, CDs, DVDs or such material on any electronic media including links to such material must not be brought onto or stored on Trust premises or on any Trust equipment.

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

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

5.2. Adults should maintain appropriate professional boundaries and avoid behaviour that might be misinterpreted by others. They should report any incident with this potential to a senior manager. This is as relevant in the online world as it is in the classroom; staff engaging with pupils and/or parents online have a responsibility to always model safe practice.

5.3. Any sexual behaviour or activity, whether homosexual or heterosexual, by an adult with or towards a child/pupil or young person, is illegal. Children and young people are protected by the same laws as adults in relation to non-consensual sexual behaviour. They are additionally protected by specific legal provisions regardless of whether there is consent or not. Where a person aged 18 or over is in a specified position of trust with a child or young person under 18 years, the Sexual Offences Act 2003 makes it an offence for that person to engage in sexual activity with or in the presence of that child or to cause or incite that child to engage in or watch sexual activity.

5.4. Sexual behaviour includes non-contact activities, such as causing a child or young person to engage in or watch sexual activity or the production of indecent images of children. 'Working Together to Safeguard Children', Appendix A defines sexual abuse as "…forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening…"

5.5. Adults must not have sexual relationships with pupils or have any form of communication with a child, which could be interpreted as sexually suggestive or provocative i.e., verbal comments, letters, notes, texts, electronic mail, phone calls, social networking contact or physical contact. The adult should not make sexual remarks to, or about, a child or discuss their own sexual relationships with or in the presence of pupils. Adults should take care that their language or conduct does not give rise to comments or speculations. Attitudes, demeanour, and language all require care and thought.

5.6. There are occasions when adults embark on a course of behaviour known as 'grooming' where the sole purpose is to gain the trust of a child or young person and manipulate that relationship so that sexual abuse can take place. Adults should be aware that conferring special attention without good reason or favouring a pupil has the potential to be construed as being part of a 'grooming' process, which is a criminal offence.

6. Infatuations and Crushes

6.1. A child or young person may develop an infatuation with an adult who works with them. An adult, who becomes aware (may receive a report, overhear something, or otherwise notice any sign, no matter how small or seemingly insignificant) that a pupil has become or maybe becoming infatuated with them or a colleague, must report this without delay to the Headteacher or the most senior manager, so that appropriate action can be taken to avoid any hurt, distress, or embarrassment. The situation will be taken seriously, and the adult should be careful to ensure that no encouragement of any kind is given to the pupil. It should also be recognised that careless and insensitive reactions may provoke false accusations.

6.2. Examples of situations that must be reported are given below:

- Where an adult is concerned that they might be developing a relationship with a pupil which could have the potential to represent an abuse of trust
- Where an adult is concerned that a pupil is becoming attracted to them or that there is a developing attachment or dependency
- Where an adult is concerned that actions or words have been misunderstood or misconstrued by a pupil such that an abuse of trust might be wrongly suspected by others
- Where an adult is concerned about the apparent development of a relationship by another adult or receives information about such a relationship

7. Gifts, Rewards, Favouritism and Exclusion

7.1. It is against the law for public servants to take bribes. Adults need to take care that they do not accept any gift that might be construed by others as a bribe or lead the giver to expect preferential treatment. There are occasions when pupils or parents/carers wish to pass small tokens of appreciation to adults e.g., at Christmas or as a thank you and this is acceptable. However, it is unacceptable to receive gifts on a regular basis or of any significant value.

7.2. Personal gifts must not be given to pupils or their families/carers. This could be misinterpreted as a gesture either to the bride or groom. It might be perceived that a 'favour' of some kind is expected in return. Any reward given to a pupil should be consistent with the school's behaviour or rewards policy, recorded, and not based on favouritism.

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

8. Social Contact and Social Networking

8.1. Communication between pupils and adults, by whatever method, should take place within clear and explicit professional boundaries. This includes the wider use of technology such as mobile phones, tablets, text messages, emails, instant messages, websites, social media such as Facebook, Twitter, Instagram, chatrooms, forums, blogs, apps such as WhatsApp, gaming sites, digital cameras, videos, webcams, and other handheld devices. Adults should not share any personal information with pupils, and they should not request, or respond to, any personal information from the child/young person, other than that which might be appropriate as part of their professional role. They should ensure that all communications are transparent and avoid any communication that could be interpreted as 'grooming behaviour'.

8.2. Adults must not give their personal contact details such as home/mobile phone number; home or personal e-mail address or social networking details to pupils unless the need to do so is agreed upon in writing with senior management. If, for example, a pupil attempts to locate an adult's personal contact details and attempts to contact or correspond with them, the adult should not respond and must report the matter to their manager.

8.3. It is recommended that adults ensure that all possible privacy settings are activated to prevent pupils from making contact on personal profiles and to prevent pupils from accessing photo albums or other personal information which may appear on social networking sites.

8.4. Adults are personally responsible for what they communicate on social media and must bear in mind that what is published might be read by us, pupils, parents and carers, the public, future employers and friends and family for a long time. Adults must ensure that their online profiles are consistent with the professional image expected by us and must not post material that damages the reputation of the school, or which causes concern about their suitability to work with children and young people. Those who post material that may be considered inappropriate could render themselves vulnerable to criticism or, in the case of an employee, allegations of misconduct that may be dealt with under the disciplinary procedure. Even where it is made clear that the writer's views on such topics do not represent those of the school, such comments are inappropriate.

8.5. Adults are advised not to have any online friendships with any young people under the age of 18 unless they are family members or close family friends. Adults are advised not to have online friendships with parents or carers of pupils or members of the /Trustees. Where such online friendships exist, adults must ensure appropriate professional boundaries are maintained.

8.6. It is acknowledged that adults may have genuine friendships and social contact with parents or carers of pupils, independent of the professional relationship. Adults should, however:

- Inform senior management of any relationship with a parent/carer where this extends beyond the usual parent/carer/professional relationship.
- Advise senior management of any regular social contact they have with a pupil or parent/carer, which could give rise to concern.
- Inform senior management of any requests or arrangements where parents/carers wish to use their services outside of the workplace e.g., babysitting, tutoring.
- Always approve any planned social contact with pupils or parents/carers with senior colleagues, for example, when it is part of a reward scheme.
- If a parent/carer seeks to establish social contact, or if this occurs coincidentally, the adult should exercise their professional judgment and should ensure that all communications are transparent and open to scrutiny.
- Some employees may, as part of their professional role, be required to support a parent or carer. If that person comes to depend upon the employee or seeks support outside of their

professional role this should be discussed with senior management and, where necessary, referrals made to the appropriate support agency.

9. Physical Contact, Personal Privacy and Personal Care

9.1. There are occasions when it is entirely appropriate and proper for employees to have physical contact with pupils, but it is crucial that they only do so in ways appropriate to their professional role and in relation to the pupil's individual needs and any agreed care plan. When physical contact is made with pupils this should be in response to their needs at the time, of limited duration and appropriate given their age, stage of development, gender, ethnicity, culture, and background. Employees must always use their professional judgement. It is not possible to be specific about the appropriateness of each physical contact, since an action that is appropriate with one pupil in one set of circumstances may be inappropriate in another, or with a different pupil.

9.2. Physical contact should never be secretive, casual, or for the gratification of the adult, or represent a misuse of authority. Adults should never touch a pupil in a way that may be considered indecent. If an adult believes that an action could be misinterpreted, the incident and circumstances should be reported as soon as possible [to the manager and recorded in the school's incident book, and, if appropriate, a copy placed on the pupil's file].

9.3. Physical contact, which occurs regularly with a pupil or pupils, is likely to raise questions unless the justification for this is part of a formally agreed plan (for example in relation to pupils with SEN or physical disabilities). Any such contact should be the subject of an agreed and open School policy and subject to review. Where feasible, employees should seek the pupil's permission before initiating contact. Adults should listen, observe, and take note of the pupil's reaction or feelings and so far, as is possible, use a level of contact which is acceptable to the pupil for the minimum time necessary.

9.4. There may be occasions when a distressed pupil needs comfort and reassurance. This may include age-appropriate physical contact. Adults should always remain self-aware in order that their contact is not threatening, intrusive or subject to misinterpretation. Adults should always tell a colleague when and how they offered comfort to a distressed pupil.

9.5. Where an adult has a particular concern about the need to provide this type of care and reassurance, they should seek further advice from a senior manager.

9.6. Some employees, for example, those who teach PE and games, or who provide music tuition will on occasions have to initiate physical contact with pupils to support a pupil so they can perform a task safely, to demonstrate the use of a particular piece of equipment/instrument or assist them with an exercise. This should be done with the pupil's agreement. Contact under these circumstances should be for the minimum time necessary to complete the activity and take place in a safe and open environment. Adults should remain sensitive to any discomfort expressed verbally or non-verbally by the pupil.

9.7. All parties should clearly understand from the outset what physical contact is necessary and appropriate in undertaking specific activities. Keeping parents/carers informed of the extent and nature of any physical contact may also prevent allegations of misconduct from arising. Any incidents of physical contact that cause concern or fall outside of these protocols and guidance should be reported to the senior manager and parent/carer.

9.8. Pupils are entitled to respect and privacy when changing clothes or taking a shower. However, there needs to be an appropriate level of supervision to safeguard pupils, satisfy health and safety

considerations and ensure that bullying or teasing does not occur. This supervision should be appropriate to the needs and age of the pupils concerned and sensitive to the potential for embarrassment. Adults who are required as part of their role to attend changing rooms should announce their intention of entering any pupil changing rooms and only remain in the room where the pupil/s needs require this.

9.9. Employees with a job description that includes intimate care duties will have appropriate training and written guidance including a written care plan for any pupil who could be expected to require intimate care. Staff should adhere to the Trust's intimate and personal care and nappy changing policies. No other adult should be involved in intimate care duties except in an emergency and any changes to the intimate care plan should be made in writing and without delay, even if the change in arrangements is temporary. A signed record should be kept of all intimate and personal care tasks undertaken and, where these have been carried out in another room, include times left and returned. Employees should not assist with personal or intimate care tasks that the pupil is able to undertake independently.

10. Behaviour Management and Physical Intervention

10.1. All pupils have a right to be treated with respect and dignity. Adults must not use any form of degrading treatment to punish a pupil. The use of sarcasm, demeaning or insensitive comments towards pupils is not acceptable in any situation. Deliberately intimidating pupils by shouting aggressively, hectoring, or overbearing physical presence is not acceptable in any situation. Any sanctions or rewards used should be part of the Behaviour Management Policy.

10.2. Staff should understand the importance of challenging inappropriate behaviours between peers, including peer on peer sexual violence and sexual harassment. Downplaying certain behaviours (e.g., dismissing sexual harassment as "just banter") can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it. Where pupils display difficult or challenging behaviour, adults should follow the Trust's or setting's behaviour and discipline policy using strategies appropriate to the circumstance and situation.

10.3. Physical intervention can only be justified in exceptional circumstances. Non-statutory guidance is available from the Department of Education website. See 'Use of reasonable force - advice for Head Teachers, Staff and Governing Bodies'. Adults may legitimately intervene to prevent a pupil from committing a criminal offence, injuring themselves or others, causing damage to property, engaging in behaviour prejudicial to good order and maintaining good order and discipline. Adults should have regard for the health and safety of themselves and others. It is always unlawful to use force as a punishment. The use of unwarranted physical force is likely to constitute a criminal offence.

10.4. here a pupil has specific needs in respect of particularly challenging behaviour, a positive handling plan, including a risk assessment, should be put in place and agreed upon by all parties. Where it is judged that a pupil's behaviour presents a serious risk to themselves or others, a robust risk assessment that is regularly reviewed and a physical intervention plan, where relevant, must be put in place. All incidents and subsequent actions should be recorded and reported to a manager and the pupil's parents/carers. Where it can be anticipated that physical intervention is likely to be required, a plan should be put in place that the pupil and parents/carers are aware of and have agreed to. Parental consent does not permit the use of unlawful physical intervention or deprive a pupil of their liberty. The Trust has separate policies on Behaviour Management and the Use of Physical Intervention.

11. First Aid and Medication

11.1. The school has a separate policy on supporting pupils with a medical condition. Employees should have regard to the statutory guidance 'Supporting pupils at school with medical conditions' DfE December 2015, which includes advice on managing medicines. All settings must have an adequate number of qualified first aiders/appointed persons. Employees must have had the appropriate training and achieved the necessary level of competency before administering first aid or medication or taking on the responsibility to support pupils with medical conditions. If an adult is concerned or uncertain about the amount or type of medication being given to a pupil this should be discussed with the Designated Safeguarding Lead.

11.2. Adults taking medication that may affect their ability to care for children should seek medical advice regarding their suitability to do so and should not work with pupils whilst taking medication unless medical advice confirms that they are able to do so. Adult medication on the premises must be securely stored out of the reach of children.

12. One to One Situations and Meetings with Pupils

12.1. One-to-one situations have the potential to make children/young persons more vulnerable to harm by those who seek to exploit their position of trust. Adults working in one-to-one settings with pupils may also be more vulnerable to unjust or unfounded allegations being made against them. Adults must recognise this possibility and plan and conduct such meetings accordingly. Every attempt should be made to ensure that the safety and security needs of both adults and pupils are met. Managers should undertake a risk assessment in relation to the specific nature and implications of one-to-one work for each adult and pupil, which should be reviewed regularly. Where such a meeting is demonstrably unavoidable, it is advisable to avoid remote or secluded areas and to ensure that the door of the room is left open and/or visual/auditory contact with others is maintained. Where staff are expected to work on one to one with a pupil on a virtual platform, clear expectations should be set out for all those involved that are reflective of the settings safeguarding policies and procedures. Any arrangements should be reviewed on a regular basis.

12.2. Pre-arranged meetings with pupils away from the premises or on the School site when the School is not in session are not permitted unless written approval is obtained from their parent/carer and the Headteacher or another senior colleague with delegated authority.

12.3. No pupil should be in or invited into, the home of an adult who works with them unless they are family members or close family friends, in which case adults are advised to notify their line manager. Pupils must not be asked to assist adults with jobs or tasks at or in their private accommodation or for their personal benefit.

12.4. There are occasions during exam periods when timetables clash and arrangements need to be made to preserve the integrity of the examination process. In these circumstances, exam boards may allow candidates to take an exam the following morning, including Saturdays. The examination board requires the centre to determine a method of supervision on journeys to and from the centre and overnight, which ensures the candidate's wellbeing. This supervision may be undertaken by a parent/carer or, employees may be asked to volunteer to supervise pupils, which may with prior approval be in their own home.

12.5. Other than in an emergency, an adult must not enter a pupil's home if the parent/carer is absent. Always make detailed records including times of arrival and departure and ensure any behaviour or situation that gives rise to concern is discussed with a senior manager/Headteacher. A risk assessment should be undertaken, and appropriate risk management measures put in place prior to any planned

home visit taking place. In the unlikely event that little or no information is available, home visits should not be made alone. The Trust has a separate home visit and lone-working policy.

13. Transporting Pupils

13.1. In certain situations, e.g., out of school activities, adults may agree to transport pupils. Transport arrangements should be made in advance by a designated employee who will be responsible for planning and overseeing all transport arrangements and responding to any concerns that may arise. Wherever possible and practicable, transport should be provided other than in private vehicles, with at least one adult additional to the driver acting as an escort.

13.2. Adult should ensure that their behaviour is safe and that the transport arrangements and the vehicle meet all legal requirements. They must ensure that the vehicle is roadworthy and appropriately insured and that the maximum capacity is not exceeded. It is a legal requirement that all passengers wear seatbelts and the driver should ensure that they do so. The driver should be aware of the current legislation concerning the use of car seats for younger children where applicable. It is illegal to drive using hand-held phones or similar devices and the driver must ensure that they adhere to all driving regulations.

13.3. It is inappropriate for adults to offer lifts to a pupil, unless the need has been agreed with a manager and, if this falls outside their normal working duties, has been agreed with parents/carers.

13.4. There may be occasions where a pupil requires transport in an emergency or where not to give a lift may place a pupil at risk. Such circumstances must always be recorded and reported to a senior manager and parents/carers.

14. Educational Visits and School Clubs

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

15. Curriculum

15.1. Some areas of the curriculum can include or raise a subject matter which is sexually explicit, of a political, cultural, religious, or otherwise sensitive nature. Care should be taken to ensure that resource materials cannot be misinterpreted and clearly relate to the learning outcomes identified by the lesson plan. This plan should highlight areas of risk and sensitivity.

15.2. The curriculum can sometimes include or lead to an unplanned discussion about the subject matter of a sexually explicit, political, cultural, religious, or otherwise sensitive nature. Responding to pupils' questions can require careful judgement and adults must take guidance in these circumstances from the Designated Safeguarding Lead. Adults must not enter or encourage inappropriate discussion about sexual, political, or religious activity or behaviour or, discussions that may offend or harm others. Adults should take care to protect children from the risk of radicalisation and should act in accordance with the advice given under Part 1 of Keeping Children Safe in Education DfE and accordingly must not express any prejudicial views or attempt to influence or impose their personal values, attitudes, or beliefs on pupils.

15.3. Please refer to the Trust and School's policy on sex and relationships education (SRE) and, the policy on spiritual, moral, social, and cultural development (SMSC), which promotes fundamental British values. Care should be taken to comply with these policies and ensure they are consistently applied.

16. Photography, Videos, and other Creative Arts

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

16.2. Many educational activities involve the taking or recording of images. This may be undertaken as part of the curriculum, extra school activities, for displays, publicity, to celebrate achievement or, to provide evidence of the activity. An image of a child is personal data, and it is, therefore, a requirement under Data Protection Legislation that explicit consent is obtained from the parent/carer of a child before any images are made such as those used for the Trust or School websites, notice boards, productions, or other purposes, unless an alternative legal justification for processing this data is applicable.

16.3. Adults need to be aware of the potential for such images to be taken and/or misused to create indecent images of children and/or for 'grooming' purposes. Careful consideration should be given as to how these activities are organised and undertaken. There should be an agreement as to whether the images will be destroyed or retained for further use, where these will be stored and who will have access to them.

16.4. Adults should remain sensitive to any pupil who appears uncomfortable and should recognise the potential for misinterpretation. It is also important to consider the wishes of the child, remembering that some children do not wish to have their photographs taken.

16.5. Adults should only use equipment provided or authorised by the school to make/take images and should not use personal equipment, mobile telephones, or any other similar devices to make/take images.

16.6. The following guidance should be followed:

- If a photograph is used, avoid naming the pupil.
- If the pupil is named, avoid using the photograph.
- Photographs/images must be securely stored and used only by those authorised to do so.
- Be clear about the purpose of the activity and about what will happen to the photographs/images when the lesson/activity is concluded.
- Only retain images when there is a clear and agreed purpose for doing so.
- Ensure that a senior colleague is aware that the photography/image equipment is being used and for what purpose.
- Ensure that all photographs/images are available for scrutiny to screen for acceptability.
- Be able to justify the photographs/images made.
- Do not take images of pupils for personal use.
- Only take images where the pupil consents to this.
- Do not take photographs in one-to-one situations.
- Do not display or distribute photographs/images of pupils unless there is consented to do so from the parent/carer.

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

17. Use of technology for online/virtual teaching

17.1. Staff should use Trust devices and contact pupils only via the pupil school email address/log in. This ensures that the school's filtering and monitoring software is enabled.

17.2. In deciding whether to provide virtual or online learning for pupils, senior leaders will consider issues such as accessibility within the family home, the mental health and wellbeing of children, including screen time, the potential for inappropriate behaviour by staff or pupils, staff access to the technology required, etc. Virtual lessons will be timetabled and senior staff, DSL and/or heads of department will be able to drop into any virtual lesson at any time – the online version of entering a classroom.

17.3. Staff engaging in online learning should display the same standards of dress and conduct that they would in the real world; they should also role model this to pupils and parents. The following points should be considered: -

- think about the background; photos, artwork, identifying features, mirrors – ideally the backing should be nondescript.
- staff and pupils should be in living / communal areas – no bedrooms.
- staff and pupils should be appropriately dressed.
- filters at a child's home may be set at a threshold which is different to the school.
- resources/videos must be age appropriate – the child may not have support immediately to hand at home if they feel distressed or anxious about content.

17.4. It is the responsibility of the staff member to act as a moderator; raise any issues of suitability (of dress, setting, behaviour) with the child and/or parent immediately and end the online interaction if necessary. Recording lessons does not prevent abuse. Staff will adhere to the school's policy on recording of online lessons. If a staff member believes that a child or parent is recording the interaction, the lesson should be brought to an end or that child should be logged out immediately.

17.5. If staff need to contact a pupil or parent by phone and do not have access to a work phone, they should discuss this with a senior member of staff and, if there is no alternative, always use 'caller withheld' to ensure the pupil/parent is not able to identify the staff member's personal contact details.

18. Use of ICT Facilities and Monitoring

18.1. This section should be read in conjunction with the Trust's Acceptable Use of ICT Facilities Policy/social media Policy]. Posting, creating, accessing, transmitting, downloading, uploading, or storing any of the following material (unless it is part of an authorised investigation) is likely to amount to gross misconduct and result (where the adult is employed) in summary dismissal (this list is not exhaustive):

- Pseudo-images of children (child abuse images), pornographic or sexually suggestive material or images of children or adults which may be construed as such in the circumstances (that is, writing, texting, pictures, films, and video clips of a sexually explicit or arousing nature)

- Any other type of offensive, obscene or discriminatory material, criminal material or material which is liable to cause distress or embarrassment to the school or others.

18.2. If indecent images of children are discovered at the premises or on the Trust's equipment/devices, an immediate referral should be made to the school's designated Safeguarding Lead and Headteacher and CEO (unless they are implicated) and the external Designated Officer (DO) and, if relevant, the police contacted. The images/equipment should be secured, should not be used by others, and should be isolated from the network. There should be no attempt to view, tamper with or delete the images as this could jeopardise any necessary criminal investigation. If the images are of children are known to the school, a referral should also be made to children's social care in accordance with local arrangements.

18.3. The contents of our ICT resources and communications systems are our property. Therefore, adults should have no expectation of privacy in any message, files, data, document, facsimile, telephone conversation, social media post, conversation or message, or any other kind of information or communications transmitted to, received, or printed from, or stored or recorded on our electronic information and communications systems. We reserve the right to monitor, intercept and review, without prior notification or authorisation from adults. Usage of our IT resources and communications systems, including but not limited to telephone, e-mail, messaging, voicemail, CCTV, internet and social media postings and activities are monitored to ensure that our rules are being complied with and for the following purposes:

- To monitor whether the use of the e-mail system or the internet is legitimate and in accordance with this Code.
- To assist in the investigation of alleged wrongful acts
- To comply with any legal obligation

18.4. Personal data will be stored in accordance with the Trust's Privacy Notices. We may store copies of data or communications for a period of time after they are created and may delete such copies from time to time without notice. If necessary, information may be handed to the police in connection with a criminal investigation.

18.5. A CCTV system monitors the school 24 hours a day. This data is recorded and may be used as evidence of any alleged wrongdoing.

18.6. Cyberbullying can be experienced by adults as well as pupils. Adults should notify their line manager if they are subject to cyber-bullying. The Trust will endeavour to protect adults and stop any inappropriate conduct.

19. Reporting Concerns and Recording Incidents

19.1. All adults must report concerns and incidents in accordance with the guidance set out in Keeping Children Safe in Education DfE and the Managing Allegations of Abuse Against Staff and Volunteers Policy. In the event of an allegation being made, or an incident being witnessed, the relevant information should be immediately recorded and reported to the Headteacher, Senior Manager, CEO or Designated Safeguarding Lead, as appropriate. If any concerns are raised via a third party, the Headteacher, Senior Manager or Designated Safeguarding Lead should collect as much evidence as possible. Where low-level concerns are raised the Headteacher, Senior Manager, CEO or Designated Safeguarding Lead should speak to the individual involved and any witnesses and consider the matter under the Disciplinary Procedure which may result in informal or formal action. An employee who fails to bring a matter of concern to the attention of senior management and/or the relevant agencies will be subject to disciplinary action.

19.2. In addition to behaviours outlined elsewhere in this Code and, the types of abuse and neglect set out in Keeping Children Safe in Education DfE, the following is a non-exhaustive list of some further behaviours which would be a cause for concern:

An adult who:

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

20. Monitoring and Review

20.1. The Headteacher is responsible for monitoring the implementation, use and effectiveness of this policy within their School and will report on these matters annually to the CEO and HR or more frequently if necessary. For Central Service based teams, their Line Manager is responsible for monitoring the implementation, use and effectiveness of this policy.

20.2. This policy will be reviewed by the HR Committee as necessary.

Appendix A

Further guidance for individuals who are also Parents of Students attending a School within the Trust

The following guidance is intended to mitigate against conflicts of interest that may occur when the child of a member of Staff, Governor or Trustee is a student at a school with the Trust, and to ensure that each child receives an equitable experience, developing responsibility for themself and their property.

Staff/Governors/Trustees whose child is a student at the school:

- Should identify another adult to be the primary contact for all school issues (except when this contact is not available). Contact must be made via established email addresses for parent/carer communications.
- Should keep contact with your child to a minimum during the working day.
- Should avoid speaking to other staff about their child during the school day. If you need to speak to a member of staff about your child, an appointment should be made, ideally by the other adult contact.
- Should address other members of staff by their title and surname (e.g. Mrs/Mr Bloggs) when meeting with their child and their teacher (e.g. at Parents' Evenings)
- Should not enter into a discussion with mutual colleagues if they have a particular issue with any of their child's teachers. The parent identified as the primary contact should raise any issue with the school via the available channels.
- Should respect that offices, team spaces, and the Staff room facilities are for the sole use of staff before, during and after school.
- Should follow the normal processes with regard to student matters e.g. reporting daily absence, Leave of Absence requests, not entering the exam room unless invited, issuing of examination results, use of Student Welfare for medical issues.
- Staff/governors/trustees will inevitably have contact out of school with other students/parents. Staff/governors/trustees should be aware of the need for discretion and confidentiality within the work and home environment as comments may be overheard or misconstrued by others; staff need to be particularly aware of issues surrounding the use of social media.
- In the event of making contact with other students/parents out of school, staff/governors/trustees must make it clear whether the contact is as a member of staff/governor/trustee or as a parent. During school time contact should only be made as a member of staff/governor/trustee. This is to avoid confusion in the minds of those students or their parents as to whether the contact is as a teacher or a parent.
- Staff/governors/trustees should not participate in educational visits involving their own child, especially when these are residential. If this is unavoidable, a protocol will be devised in advance of the visit with regard to how their child/party is to be managed if an incident arises and noted on the risk assessment.
- Must remain mindful of their responsibility to support the school in safeguarding all students.
- Where applicable, should make sure they declare any examination conflict of interest using the form sent out to staff by the exams officer - for example if they have a child doing an NEA in a subject that they also teach.

The Trust and School will:

- Endeavour to ensure that staff are not asked to teach or support their own child, except when the parent is the sole teacher of a particular subject. In this event, safeguards will be put in place regarding marking and assessments by the Headteacher.

- Avoid a parent having pastoral oversight of their child.
- Endeavour to ensure that staff/governors/trustees do not participate in educational visits involving their own child, especially when these are residential. If this is unavoidable, a protocol will be devised in advance of the visit with regard to how their child/party is to be managed if an incident arises and will be noted on the risk assessment.