

**The Corsham School Academy Group**  
**Staff Code of Conduct Policy**

This document provides a guide for adults working and volunteering in Corsham School Academy Group (TCSAG) regarding acceptable and desirable conduct to **safeguard both adults and pupils**.

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<b>Key Personnel The Corsham School</b>			
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<b>The key safeguarding responsibilities within each of the roles above are set out in Keeping Children Safe in Education 2023</b>			

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The key safeguarding responsibilities within each of the roles above are set out in Keeping Children Safe in Education 2023			
Designated Officer for Allegations			0300 456 0100
Children’s Social Care referrals:			
Multi-Agency Safeguarding Hub (MASH):			0300 456 0108
Out of hours:			0845 607 0888
If you believe a child is <b>at immediate risk</b> of significant harm or injury, you <b>must</b> call the police on 999.			

## Introduction

TCSAG is committed to providing positive academic, social and emotional outcomes for our children, underpinned by a strong safeguarding ethos. We are equally committed to the welfare of our staff, who are expected to adhere to the highest standards of professional behaviour to maintain confidence and respect of the general public and colleagues.

TCSAG has a Code of Conduct that outlines these professional behaviours applicable to all staff. The document seeks to ensure that the duty of care towards students and staff is promoted by raising awareness of illegal, unsafe and unwise behaviour. It should assist staff to monitor their own standards and practice. The policy supports TCSAG in giving a clear message that unlawful or unsafe behaviour will not be tolerated and that where appropriate, legal or disciplinary action is likely to follow, including dismissal.

Staff have a crucial role to play in shaping the lives of young people. They have a unique opportunity to interact with students and young people in ways that are both affirming and inspiring. This guidance has been produced to help staff establish the safest possible learning and working environments which safeguard young people and reduce the risk of staff being falsely accused of improper or unprofessional conduct. This means that these guidelines apply to all adults working in education settings whatever their position, roles, or responsibilities.

The board of trustees and directors of TCSAG (**TCSAG Board**) and its local governing bodies (**LGBs**) will make sure that this policy reflects national and local requirements to protect and support the children and adults in our school.

We will fulfil our local and national responsibilities as laid out in the following key documents:

- Working Together to Safeguard Children (2018)
- Keeping Children Safe in Education (2023)
- The procedures of Safeguarding Vulnerable People Partnership (SVPP)

This policy:

- is based on the Guidance for Safer Working Practice for those working with children and young people in education settings (May 2019 with April 2020 Addendum).
- aims to provide a guide for adults about acceptable and desirable conduct to ensure that staff maintain safe working practice and so **safeguard both children and adults**.
- does not provide a complete checklist of appropriate behaviour for staff in every circumstance. Whilst every attempt has been made to cover a wide range of situations, it is recognised that any such guidance cannot cover all eventualities. There may be times when professional judgements are made in situations not covered by this document, or which directly contravene the guidance given by their employer. It is expected that in these circumstances staff will always advise their senior colleagues of the justification for any such action already taken or proposed. Staff must make judgements about their behaviour to secure the best interests and welfare of the children in their charge and, in so doing, will be seen to be acting reasonably.

In *very exceptional* circumstances where a member of staff believes it is the best interest of a child to breach these guidelines, that person **must** tell the headteacher (of their academy or the Executive Headteacher of TCSAG) of the justification for any proposed, or action already taken, at the earliest opportunity. The headteacher/Executive Headteacher will make a written record of that discussion including any areas of disagreement and actions taken.

## Scope

This policy is consistent with all other policies adopted by the governors and should be read alongside the **Child Protection and Safeguarding policy** as well as the following documents relevant to the safety and welfare of our children:

- |                                          |                                                   |                                                  |
|------------------------------------------|---------------------------------------------------|--------------------------------------------------|
| • Behaviour policy                       | • SEND policy                                     | Online Safety Policy                             |
| • Health and safety policy               | • Whistleblowing policy                           | PSHEE/Learn for Life Policy<br>(Primary Academy) |
| • Safer Recruitment policy               | • Anti Bullying Policy                            | IT/Computer User Policy                          |
| • Intimate Care Policy (Primary Academy) | • Staff and Volunteer Handbooks (Primary Academy) |                                                  |

**This policy applies to all staff and volunteers working at our school.**

For the purposes of this policy:

- 'Staff' refers to all those working at any school in TCSAG, full time or part time, in a paid or voluntary capacity.

- 'Volunteer' is a person who performs an activity that involves spending time, unpaid in this school (except for approved expenses).
- A 'position of trust' is one in which one party is in a position of power or influence over another, due to their work or the nature of their activity.
- 'Child' refers to all children up to the age of 18. All adults are in positions of trust in relation to every child (and student over the age of 18) at our school.
- 'Duty of Care' is the duty which rests upon an individual or organisation to ensure that all reasonable steps are taken to ensure the health and safety, and welfare of a child or young person involved in any activity or interaction for which that individual or organisation is responsible. Any person in charge of, or working with children and young people in any capacity is considered, both legally and morally to owe them a duty of care.
- 'Allegation' means any information that suggests an adult has caused or may cause hurt or harm to a student or young person.

**It does not apply to** employees of external contractors and providers of services (eg contract cleaners).

Such staff are covered by the relevant Code of Conduct of their employing body.

## Expectations

All staff:

- are familiar with this policy and have an opportunity to contribute to its review.
- understand their responsibilities to safeguard and promote the welfare of children.
- are aware that failure to meet the standards of behaviour and conduct in this policy may result in disciplinary action. This includes dismissal, criminal action and/or other proceedings including barring by the Disclosure & Barring Service (DBS) from working in regulated activity.

## Mandatory Procedures

### Confidentiality

The sorting and processing of personal information is governed by GDPR (General Data Protection Regulations 2018) - see Data Protection Policy

Child records are shared with those who have a professional need to see them. When staff have access to confidential information about colleagues, children or their parents/carers, the staff must treat such information in a sensitive and confidential way, sharing it only in the interests of a child and when legally permitted to do so.

Staff will not use their position to gain access to information for their own advantage and/or a child's or family's detriment.

If a member of staff is concerned that a child is being abused, is at risk of being abused or may have been abused in the past, they will follow the agreed procedure set out in the flowchart 'What to do if you are worried about a child', displayed in the staffroom and in other staff areas and offices around the school. See Safeguarding and Child Protection Policy

If a member of staff is ever in any doubt about whether to share information or not, they should get advice from the designated safeguarding lead.

## Contents

1. Staff relationships with children and parents
2. Communication with children and parents, including social contact outside of the workplace

3. Infatuations and 'Crushes'
4. Health & Safety (Duty of Care)
5. Exercise of Professional Judgement
6. Power and Positions of Trust and Authority
7. Confidentiality & Data Protection
8. Standards and Behaviour
9. Dress and Appearance
10. The use of personal Living Space
11. Business Ethics (Gifts, Rewards and Favouritism and Exclusion)
12. Photography, Video and other Creative Arts
13. Inappropriate Images
14. Physical Contact/Touching Children
15. Students in Distress
16. Other Activities which require Physical Contact
17. Showers & Changing
18. Intimate Care / Personal Care
19. Care, Control and Physical Intervention
20. Sexual Contact
21. One to One Situations
22. Home Visits
23. Overnight Supervision and Examinations
24. Transporting Students and Young People
25. Educational Visits and After School Clubs
26. First Aid and Administration of Medication
27. Curriculum
28. Whistle blowing (Safeguarding & Finance)
29. ID Badges
30. Sharing Concerns and Recording Incidents

## **1. Staff relationships with children and parents**

### **Staff responsibilities**

All staff know that:

- they are in positions of trust in relation to all children (and students over the age of 18) on roll. They ensure that the power imbalance is never used for personal advantage or gratification. They avoid behaviour which might be interpreted by others as an abuse of the position of trust, and report any incident with this potential to the manager. This includes sharing personal contact details with children or families.
- they have a legal duty to protect the interests of children and accept the obligations inherent in that responsibility.
- it is important that they determine how best to build trusted relationships with children and young people which facilitate communication, using professional curiosity and speaking to the DSL if they have concerns about a child.
- they must not establish or seek to establish social contact with children to secure a friendship or to pursue or strengthen a relationship.
- they must inform the headteacher of any pre-existing (prior to the member of staff or child starting at the school) or new relationship with a child or close family member, which they feel, might compromise the school or their own professional standing.
- they should disclose any relationship or association (in the real world or online) that may impact on the school's ability to safeguard pupils.
- it is an offence (Sexual Offences Act 2003) for a member of staff in a position of trust to engage in **any** form of sexual activity with a child under the age of 18.

Certain behaviours are at odds with a position of trust. These include, but are not limited to:

- Harassment or discrimination based on any characteristic protected by the Equality Act 2010
- Loss of personal civility including, personal attacks or insults, displays of temper (such as throwing objects), unwanted physical contact (pushing, shoving, hitting) or the threat of the same.
- Staff must not swear, blaspheme or use offensive language in front of pupils, nor use language which is discriminatory and demeaning in any way.

Such behaviours are disciplinary offences and may be referred to the Local Authority and/or the police.

### **Staff who are also parents at the school**

Staff who are also parents of children in the school should be particularly mindful over any issue concerning their own child which may compromise their professional relationship with other members of staff, parents or students. If they become aware of such an issue, they should highlight it with a member of the Leadership Team at an early stage to ensure that any potential conflicts of interest are discussed and a plan agreed.

## **2. Communication with children and parents, including social contact outside of the workplace (including the acceptable use of technology)**

Staff must use their professional judgement when requesting or accepting any social contact (including through social media). This means that they must:

- not accept any request from pupils for contact via any social media platform.
- make a judgement about whether to maintain the connection in any cases where contacts were made before the child started at the school (e.g. teacher being friend with a parent). Staff must discuss any decision to maintain such contact with the headteacher of their academy.

We acknowledge that staff may have friendships and social contact with parents of children outside of school. Staff will not engage in conduct outside work that could damage their professional reputation or the reputation of the school community.

Any contact between staff and children and/or parents that is deemed to bring the school into disrepute or that might lead a reasonable person to question the staff member's motivation or intentions will always be investigated and could lead to disciplinary action.

Staff must not make sexual innuendos or any comments of a sexual nature to any pupil (other than in the context of sex and relationship education in the PSHE curriculum), nor make any comments trivialising alcohol or drug abuse.

Staff must inform the headteacher of their academy of any proposed or pre-existing arrangements between them and the families of children on roll that take place outside school eg baby-sitting, sports coaching, music tuition.

### **The acceptable use of technologies (including the use of mobile devices)**

The IT/Computer User Policy refers

Staff must not engage in inappropriate use of social network sites which may bring themselves, the school, school community or employer into disrepute. Staff should ensure that they adopt suitably high security settings on any personal profiles they may have.

Staff must be circumspect in their use of **all** social media or any other web-based presence that they may have, including written content, videos or photographs, and views expressed directly or by association with websites/pages or posts established by others (eg 'liking', reposting or forwarding). This includes the use of dating websites where staff could encounter parents or students either with their own profile or acting covertly.

They must consider the long-term implications of any content published by them online, specifically how it might ever have an adverse effect:

- on their reputation as an individual working in an education setting
- their ability to maintain good professional boundaries with parents and with children
- on the reputation of TCSAG/any of its academies.

Staff must not access any content from the internet on personal device during school hours or on a school computer or device at any time that could bring the school into disrepute or that might lead a reasonable person to question the staff member's motivation or intentions.

Communication with students and adults, by whatever method, should take place within professional boundaries and staff should avoid any personal subject matter. This includes the wider use of technology such as mobile phones, text messaging, e-mails, digital cameras, videos, web- cams, websites, blogs and any forms of social media.

Staff should be circumspect in their communications with students so as to avoid any possible misinterpretation of their motives or any behaviour which could be construed as grooming.

Staff should not give their personal contact details to students for example, e-mail address, home or mobile telephone numbers, social media information, or details of web based identities. If students locate these by any other means and attempt to contact or correspond with the staff member, they should not respond, report the matter to the Headteacher of their academy and the student and their parents should be firmly and politely informed that this is not acceptable.

Staff should, in any communication with students, also follow the guidance in section 5 'Standards of Behaviour'.

Staff should adhere to TCSAG's/its academies policies, including those with regard to communication with parents and information they share when using the worldwide web, email and social media sites.

This means that staff should:

- only use equipment provided by school to communicate with students
- only make contact with students for professional reasons and in accordance with any school policy
- recognise that text messaging students is rarely an appropriate response to a student in a crisis situation or at risk of harm. It should only be used as a last resort when other forms of communication are not possible

- ensure that, when it is considered necessary for staff to use equipment to communicate with students, this is provided by the school
- wait until after an ex-pupil's 18th birthday before accepting any request on social media.

### **Social Networking (eg Facebook, Twitter)**

All staff

- will not add any student at the school (including members of the 6<sup>th</sup> Form) as 'Friends' to their social networking site
- will not allow students, or their parents, to add them as 'friends' on their sites
- will not disclose any confidential information relating to students, staff or the work of TCSAG through any social networking sites, or elsewhere via the internet
- will not make any defamatory comments about TCSAG, The Corsham School or Corsham Regis Primary Academy, its students and/or its employees on any social networking site, or elsewhere via the internet.

If staff become aware of misuse by another member of staff (in or out of school), they should escalate those concerns using the concerns and allegations against staff (including supply teachers, volunteers and contractors) procedures.

### **Exceptional operating circumstances**

If the school is required to change the way we offer our provision to children due to exceptional circumstances eg during a pandemic lockdown, staff safeguarding responsibilities to children will continue to apply, in line with the safeguarding policy.

The DSL will ensure staff, children, and families are provided with written:

- temporary changes to procedures for working with children eg online.
- timescales for such changes so that all children, families and staff understand when such arrangements will end, and arrangements revert to those in place prior to the events leading to the need for the temporary changes.

### **3. Infatuations and 'Crushes'**

Occasionally, pupils may develop an infatuation for a member of staff. In such situations, the advice of the Head/Deputy Head of that staff member's academy must be sought. Staff should deal with these situations sensitively and appropriately to maintain the dignity and safety of all concerned. They should remain aware, however, that such infatuations carry a high risk of words or actions being misinterpreted and should therefore make every effort to ensure that their own behaviour is beyond reproach.

Any member of staff who receives a report, overhears something, or otherwise notices any sign, however small or seemingly insignificant, that a young person has or may be becoming infatuated with them or a colleague, should immediately report this to a senior member of staff. In this way appropriate, early intervention can be taken which can prevent escalation and avoid hurt, embarrassment or distress for those concerned.

The Headteacher should give careful thought to those circumstances where the staff member, student and their parent should be spoken to and a plan to manage the situation put in place which responds sensitively to the student and staff member and maintains the dignity of all. Any such plan should involve all parties, be robust and regularly monitored and reviewed.

***This means that staff should report any indications (verbal, written or physical) that suggest a student may be infatuated with a member of staff***

### **4. Health and Safety (Duty of Care)**

Teachers and other education staff are accountable for the way in which they exercise authority; manage risk; use resources; and protect students from discrimination and avoidable harm.

All staff, whether paid or voluntary, have a duty to keep young people safe and to protect them from sexual, physical, emotional harm and neglect. Students and young people have a right to be safe and to be treated with respect and



dignity. It follows that trusted adults are expected to take reasonable steps to ensure the safety and well-being of students. Failure to do so may be regarded as professional neglect/misconduct. The duty of care is, in part, exercised through the development of respectful, caring and professional relationships between staff and students and behaviour by staff that demonstrates integrity, maturity and good judgement.

*This means that staff should:*

- *understand the responsibilities, which are part of their employment or role, and be aware that*
- *sanctions will be applied if these provisions are breached*
- *always act, and be seen to act, in the student's best interests*
- *avoid any conduct which would lead any reasonable person to question their motivation and intentions*
- *take responsibility for their own actions and behaviour*

Schools, Local Authorities, parents and the public, have legitimate expectations about the nature of professional involvement in the lives of students. When individuals accept a role that involves working with students and young people, they need to understand and acknowledge the responsibilities and trust inherent in that role. Employers have a duty of care towards their employees under Health and Safety legislation which requires them to provide a safe working environment for staff and guidance about safe working practices. Thus, employers have a duty of care for the well-being of employees and to ensure that employees are treated fairly and reasonably in all circumstances. Staff who are subject to an allegation should therefore be supported and the principles of natural justice applied.

*This means that TCSAG will:*

- *foster a culture of openness and support*
- *ensure that systems are in place for concerns to be raised by staff members*
- *ensure that staff are not placed in situations which render them particularly vulnerable*
- *ensure that all staff are aware of expectations, policies and procedures*

Health and Safety legislation also imposes a duty on employees to take care of themselves and anyone else who may be affected by their actions or failings. An employer's duty of care and the staff duty of care towards students should not conflict. This 'duty' can be demonstrated through the use and implementation of these guidelines.

TCSAG Board controls the use of the schools' premises both during and outside school hours.

Where TCSAG Board provides services or activities directly under the supervision or management of TCSAG staff, the relevant school's arrangements for safeguarding must be followed.

*Please refer to TCSAG Health & Safety Policy for more information.*

## **5. Exercise of Professional Judgement**

This guidance cannot provide a complete checklist of what is, or is not, appropriate behaviour for staff. It does highlight however, behaviour that is illegal, inappropriate or inadvisable. There will be occasions and circumstances in which staff have to make decisions or take action in the best interests of the student or young person which could contravene this guidance or where no guidance exists.

*This means that Governing Bodies [TCSAG Board] should:*

- *ensure that appropriate safeguarding and child protection policies and procedures are adopted, implemented and monitored in school*
- *ensure that, where services or activities are provided by another body, the body concerned has appropriate safeguarding policies and procedures*

*This means that where no specific guidance exists staff should:*

- *discuss the circumstances that informed their action, or their proposed action, with a senior colleague. This will help to ensure that the safest practices are employed and reduce the risk of actions being misinterpreted*
- *always discuss any misunderstanding, accidents or threats with a senior manager*
- *always record discussions and actions taken with a student with their justifications*

Individuals are expected to make judgements about their behaviour in order to secure the best interests and welfare of the students in their charge and in so doing, will be seen to be acting reasonably. When exceptional circumstances occur these judgements should be recorded and shared with a member of the relevant school's Leadership Team. Staff should always consider whether their actions are warranted, proportionate, and safe and applied equitably. They should ensure that they are not exercising any favouritism, nor scapegoating or 'picking-on' any student.

## **6. Power and Positions of Trust and Authority**

As a result of their knowledge, position and/or the authority invested in their role, all adults working with students and young people in education settings are in positions of trust in relation to the young people in their care. A relationship between a member of staff and a student cannot be a relationship between equals. The potential for exploitation and harm of vulnerable young people means that staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification. Staff should always maintain appropriate professional boundaries, avoid behaviour which might be misinterpreted by others, and report and record any incident which could have been misinterpreted.

Where a person aged 18 or over is in a position of trust with a student under 18, it is an offence for that person to engage in sexual activity with or in the presence of that student, or to cause or incite that student to engage in or watch sexual activity.

*This means that staff should not:*

- *use their position to gain access to information for their own advantage and/or a student's or family's detriment*
- *use their power to intimidate, threaten, coerce or undermine students*
- *use their status and standing to form or promote relationships with students, which are of a sexual nature, or which may become so*

## **CONDUCT OUTSIDE WORK**

Staff must not engage in conduct outside work which could seriously damage the reputation and standing of the school or the employee's own reputation or the reputation of other members of the school community.

In particular, criminal offences that involve violence or possession or use of illegal drugs or sexual misconduct are likely to be regarded as unacceptable.

Staff must exercise caution when using information technology and be aware of the risks to themselves and others. Staff must not engage in inappropriate use of social network sites which may bring themselves, the school, school community, or employer into disrepute.

*Please refer to the E/Online-Safety Policy and Guidelines for more information.*

Staff may undertake work outside school, either paid or voluntary, provided that it does not conflict with the interests of the school nor be to a level which may contravene the working time regulations or affect an individual's work performance.

## **7. Confidentiality & Data Protection**

Members of staff may have access to confidential information about students in order to undertake their everyday responsibilities. Where staff have access to confidential information about students or their parents or carers, staff must not reveal such information except to those colleagues who have a professional role in relation to the student.

All staff are likely at some point to witness actions which need to be confidential. For example, where a student is bullied by another student (or by a member of staff), this needs to be reported and dealt with in accordance with the appropriate school procedure. It must not be discussed outside the school, including with the student's parent or carer,

nor with colleagues in the school except when the relevant information is necessary to be shared to help safeguard/pastorally care for the individual concerned.

However, staff have an obligation to share with their manager or the school's Designated Safeguarding Lead (DSL) any information which gives rise to concern about the safety or welfare of a student. Staff must never promise a student that they will not act on information that they are told by the student.

In some circumstances staff may be given highly sensitive or private information. Staff should never use confidential or personal information about a student or her/his family for their own, or others' advantage (including that of partners, friends, relatives or other organisations). Information must never be used to intimidate, humiliate, or embarrass the student.

This means that staff:

- are expected to treat information they receive about students and young people in a discreet and confidential manner
  - should never disclose to anyone unless required by law or with consent from the relevant party or parties
- should seek advice from a senior member of staff if they are in any doubt about sharing information they hold or which has been requested of them
- need to be cautious when passing information to others about a student/young person
- need to know the procedures for handling allegations against staff and to whom any concerns or allegations should be reported
- need to know the name of those with delegated child protection responsibilities in school and be familiar with local child protection arrangements

This does not overrule staff's duty to report child protection concerns to the appropriate channel where staff believe a child has been harmed or is at risk of harm, as detailed further in our child protection and safeguarding policy.

Confidential information about a student or young person should never be used casually in conversation or shared with any person other than on a need-to-know basis. In circumstances where the student's identity does not need to be disclosed the information should be used anonymously.

There are some circumstances in which a member of staff may be expected to share information about a student, for example when abuse is alleged or suspected. In such cases, individuals have a duty to pass information on without delay, but only to those with designated child protection responsibilities.

If a member of staff is in any doubt about whether to share information or keep it confidential he or she should seek guidance from a senior member of staff. Any media or legal enquiries should be passed to a member of the senior leadership team.

The storing and processing of personal information about students is governed by the Data Protection Act 1998. Employers should provide clear advice to staff about their responsibilities under this legislation.

***Please refer to TCSAG Data Protection Policy and Guidance for Confidentiality for more information.***

## **8. Standards and Behaviour**

All staff have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of students and young people. They should adopt high standards of personal conduct in order to maintain the confidence and respect of their peers, students and the public in general.

The Teachers Standards Part Two states that a Teacher is expected to demonstrate consistently high standards of personal and professional conduct.

An individual's behaviour, either in or out of the workplace, should not compromise her/his position within the work setting. There may be times, for example, where an individual's actions in their personal life come under scrutiny from

the community, the media or public authorities, including with regard to their own children, or children or adults in the community.

Staff should be aware that their behaviour, either in or out of the workplace, could compromise their position within the work setting in relation to the protection of children, loss of trust and confidence, or bringing the employer into disrepute. Such behaviour may also result in disqualification from childcare by Ofsted or a bar from working with children by the DBS or the relevant regulatory body.

The Childcare (Disqualification) regulations 2009 and Sec 75 and 76 Childcare Act 2006 sets out grounds for disqualification where the person, a person living with them, a person who works with them and cares for children, or lives and works on the premises where childcare is provided has either committed a relevant offence against a child; been subject to an order or determination removing a child from their care or preventing a child living with them; committed certain serious sexual or physical offences against an adult; been charged with certain offences against an adult; been included on the DBS children's barred list; been made subject to a disqualification order by the court; previously been refused registration as a childcare provider or provider or manager of a children's home or had such registration cancelled.

This means that staff should not:

- behave in a manner which would lead any reasonable person to question their suitability to work with students or act as a role model
- make sexual remarks to, or about, a student (including email, text messages, phone or letter)
- discuss their own sexual relationships with or in the presence of students
- discuss a student's sexual relationships in inappropriate settings or contexts
- make (or encourage others to make) unprofessional personal comments which scapegoat, demean or humiliate, or might be interpreted as such

Staff will ensure that all information given to the school is correct. This should include:

- Background information (including any past or current investigations/cautions related to conduct outside of school)
- Qualifications
- Professional experience

Where there are any updates to the information provided to the school, the member of staff will advise the school 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 member of staff's employment.

## **9. Dress and Appearance (Also applies to online and virtual teaching)**

There is an expectation for staff to act as professionals and as role models for the young people on site.

A person's dress and appearance are matters of personal choice and self-expression and some individuals will wish to exercise their own cultural customs. However staff should select a manner of dress and appearance appropriate to their professional role and which may be necessarily different to that adopted in their personal life. Staff should ensure they are dressed decently, safely and appropriately for the tasks they undertake.

When working with students and their parents, dress should be a style broadly sympathetic to the aims of the student dress code and our 'ready for learn' philosophy. The school expects students to wear smart uniform we must be prepared to conform to that standard and to lead by example.

*TCSAG endeavours to ensure staff wears clothing that:*

- *promotes a positive and professional image*
- *is appropriate to their role*

- *is not likely to be viewed as offensive, revealing, or sexually provocative*
- *does not distract, cause embarrassment or give rise to misunderstanding*
- *is absent of any political or otherwise contentious slogans*
- *is not considered to be discriminatory*
- *is not considered to be discriminatory and is culturally sensitive*

### **The Corsham School**

With the exception of Site Staff and PE staff, all staff, teaching, teaching assistants, support and office staff, are to adopt a style of dress described as 'business casual wear'. This would be a suitable combination of smart dress, skirt, blouse/smart top, trousers, tailored (not jeans style) cropped trousers, cardigan, shirt (tie preferred), jumper, etc. Having established the direction we want to go in it should not be necessary to be overly prescriptive. This will allow colleagues to make individual decisions according to circumstances and budget.

Staff with chronic medical conditions, disability, or who are pregnant should adapt the dress code according to their individual needs.

Protective clothing, such as aprons or overalls, lab coats, should be worn where appropriate. For Health & Safety reasons lab technicians should wear lab coats.

Staff are asked to note that the following are **not appropriate** in contributing to a professional, 'business casual' look:

Any clothing that is inherently 'casual' in nature including leggings/footless tights, jeans/ jeans style trousers, overly tight fitting, revealing or low-cut clothing, beach style flip- flops, short skirts, strappy tops (unless worn with cardigan or jacket), excessive jewellery, excessive facial or body piercings.

### **Corsham Regis Primary Academy**

As above with the exception that those staff working with the younger Primary age students are permitted to wear leggings

Visible tattoos should be covered.

Footwear should also conform to a professional and not a casual appearance. Staff should give due regard to Health & Safety issues when selecting footwear for a busy school environment.

Accommodation for Health and Safety issues in practical subjects may be a necessary exception to this principle during lesson time only. All staff have a responsibility to ensure that personal hygiene and grooming is properly attended to prior to presenting yourself at work.

For some members of staff, you will be supplied with personal protective equipment and/or a uniform or other apparel - it is expected you will wear this at all times when required to do so; it is your responsibility to ensure that this is clean and presentable.

## **10. The use of personal living space**

No student or young person should be in or invited into the home of a member of a staff, unless the reason for this has been firmly established and agreed with parents/carers and senior managers or the home has been designated by the organisation or regulatory body as a work place e.g. child-minders, foster carers.

It is not appropriate for any other organisations to expect or request that private living space be used for work with students and young people. Under no circumstances should students or young people assist with chores or tasks in the home of a member of staff who works with them. Neither should they be asked to do so by friends or family of that adult.

In other circumstances, where a student at the school is known to a member of staff in a non-professional context (eg where he or she is the friend of a member of staff own children) the above guidance may not apply but consideration should still be given to the personal reputation of the member of staff and the school. For teachers, the expectations of personal and professional conduct set out in Part 2 of the Teacher Standards will apply.

### **11. Gifts, rewards, favouritism and exclusion**

Staff need to take care that they do not accept any gift that might be construed as a bribe by others, or lead the giver to expect preferential treatment, as they need to remain impartial.

*This means that staff should:*

- *ensure that gifts received or given in situations which may be misconstrued are declared.* This does not include small tokens of appreciation such as at Christmas or the end of the year.
- *generally, only give gifts to an individual young person as part of an agreed reward system*
- *where giving gifts other than as above, ensure that these are of insignificant value and given to all students equally*
- *ensure that all selection processes are fair and that wherever practicable these are undertaken and agreed by more than one member of staff*
- *advise the headteacher about the offer of any gift or hospitality, from outside or inside the school, which might be interpreted as an attempt to influence staff conduct towards children, parents or other employees.*

### **Honesty and Integrity**

Staff must maintain high standards of honesty and integrity in their work. This includes the handling and claiming of money and the use of school property and facilities. Staff must comply with the Bribery Act 2010. A person may be guilty of an offence of bribery under this act if they offer, promise or give financial advantage or offer advantage to someone; or if they request, agree or accept, or receive a bribe from another person. If you believe that a person has failed to comply with the Bribery Act, you should refer to the Business Ethics policy.

Gifts from suppliers or associates of the school must be declared to the Headteacher with the exception of one off token gifts from students of parents under the value of £20. Personal gifts from individual members of staff to students are inappropriate and could be misinterpreted.

### **12. Photography, Video and other Creative Arts**

#### **Staff need to have read and be aware of the Schools' E Safety Policy & Guidance**

*This means that staff should:*

- *be clear about the purpose of the activity and about what will happen to the photographs when the lesson/activity is concluded*
- *ensure that a senior member of staff is aware that the photography/image equipment is being used and for what purpose*
- *ensure that all images are available for scrutiny in order to screen for acceptability*
- *be able to justify images of students in their possession*
- *avoid making images in one to one situations*

*This means that staff should not:*

- *take, display or distribute images of children unless they have consent to do so*
- *take images of children using personal mobile telephones*

### **13. Inappropriate Images**

Staff should take extreme care to ensure that students and young people are not exposed, through any medium, to inappropriate or indecent images.

Under no circumstances should any adult use school or college equipment to access such material, including adult pornography. Personal equipment containing these images, or links to them should never be brought into or used in the workplace. This will raise serious concerns about the suitability of the adult to continue working with students and young people. Schools should have clear policies about access to and use of the Internet, and have regard to DfE guidance. Accessing indecent images of children on the internet, whether using school or personal equipment, on or off school premises and making, storing or disseminating such material is illegal. If proven this will lead to criminal proceedings and the individual being barred from work with children and young people.

Staff should keep their passwords confidential and not allow unauthorised access to school equipment. In the event of any indecent images of children or unsuitable material being discovered on a school computer, the equipment should not be tampered with in any way, secured and isolated from the network, and the designated LA officer contacted without delay. Staff should not attempt to investigate the matter or evaluate the material themselves as this may lead to a contamination of evidence and a possibility they will be at risk of prosecution themselves.

***This means that staff should follow the school policy on the use of IT equipment and ensure that students are not, through the use of any medium, exposed to indecent or inappropriate images.***

#### **14. Physical contact including intimate/personal care and behaviour management**

It is not possible to be specific about the appropriateness of each physical contact, since an action that is appropriate with one child, in one set of circumstances, may be inappropriate in another, or with a different child. Any physical contact will be in response to the child's needs, of limited duration and appropriate to their age, stage of development, gender, background and any agreed support or care plan.

The use of physical intervention including the use of reasonable force will always be in line with the following policies (Special Needs policy, Supporting children with medical needs policy, Behaviour policy, Physical Intervention policy/procedures)

Staff understand that:

- they have a responsibility to ensure the way they offer comfort to a distressed child is age appropriate.
- they must never touch a child in a way which may represent a misuse of authority or be considered indecent.
- physical contact must never be secretive, or for the gratification of the adult.
- they should be aware of cultural or religious views about touching and be sensitive to the issues of gender.

If a member of staff believes that an action by them or a colleague could be misinterpreted, or if an action is observed which is possibly abusive, the incident and circumstances will be immediately reported to the relevant headteacher/DSL and recorded in writing. If appropriate, the headteacher will consult with the Designated Officer for Allegations (DoFA).

Staff understand that a child who has suffered previous abuse or neglect may associate physical contact with such experiences. They recognise that such a child may seek out inappropriate physical contact and know to deter the child sensitively to help them to understand the importance of personal boundaries. Staff know that they must never indulge in play that involves rough-and-tumble or fun fights.

Children with disabilities may require more physical contact to assist their everyday learning. The arrangements are understood and agreed by all concerned, justified in terms of the child's needs, consistently applied and open to scrutiny. Staff always allow/encourage children, where able, to undertake self-care tasks independently.

If a child's behaviour presents a serious risk to themselves or others, a robust risk assessment and, where relevant, a physical intervention plan is always put in place and reviewed regularly. In all cases where physical intervention takes place, staffs record the incident and subsequent actions and report these to the relevant headteacher/DSL and the child's parents.

#### **Behaviour Management**

All students have a right to be treated with respect and dignity. Equally, staff should not use any form of degrading treatment to punish a student. The use of humour can help to defuse a situation but the use of sarcasm, demeaning or an insensitive comment towards students is not acceptable in any situation. Where students display difficult or challenging behaviour, staff must follow the behaviour policy and use strategies appropriate to the circumstance and situation. The use of physical intervention can only be justified in exceptional circumstances and must be used as a last resort when other management strategies have failed. All use of physical intervention should be reasonable, proportionate and necessary.

This means that staff should:

- not use force as a form of punishment
- try to defuse situations before they escalate
- keep parents informed of any sanctions
- adhere to the school's behaviour management policy

The use of isolation or seclusion in managing challenging behaviour must be carefully assessed and managed and form part of a planned intervention. Care must be taken to avoid conditions that could result in it being unlawful imprisonment.

## **15. Students in Distress**

There may be occasions when a distressed student needs comfort and reassurance. This may include age - appropriate physical contact. Staff should remain self-aware at all times in order that their contact is not threatening, intrusive or subject to misinterpretation.

Where a member of staff has a particular concern about the need to provide this type of care and reassurance she/he should seek further advice from a member of the Senior Leadership Team.

*This means that adults should:*

- *consider the way in which they offer comfort to a distressed student*
- *always tell a colleague when and how they offered comfort to a distressed student*
- *record situations which may give rise to concern*

## **16. Other activities which require Physical Contact**

Some staff, for example, those who teach PE and games, or who offer music tuition will, on occasions, have to initiate physical contact with students in order to support a student 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 student's agreement.

Contact under these circumstances should be for the minimum time necessary to complete the activity and take place in an open environment. Staff should remain sensitive to any discomfort expressed verbally or non-verbally by the student.

It is good practice if all parties clearly understand at the outset, what physical contact is necessary and appropriate in undertaking specific activities. Informing parents/carers, students and young people of the extent and nature of any physical contact may also prevent allegations of misconduct or abuse arising.

*This means that staff should:*

- *consider alternatives, where it is anticipated that a student might misinterpret any such contact, perhaps involving another member of staff, or a less vulnerable student in the demonstration.*
- *be familiar with and follow recommended DfE guidance*
- *always explain to a student the reason why contact is necessary and what form that contact will take*



## **17. Showers and Changing**

Young people are entitled to respect and privacy when changing clothes or taking a shower. However, there needs to be an appropriate level of supervision in order to safeguard young people, satisfy health and safety considerations and ensure that bullying or teasing does not occur. This supervision should be appropriate to the needs and age of the young people concerned and sensitive to the potential for embarrassment. Staff therefore need to be vigilant about their own behaviour, ensure they follow agreed guidelines and be mindful of the needs of the students.

*This means that staff should:*

- *avoid any physical contact when students are in a state of undress*
- *avoid any visually intrusive behaviour*
- *where there are changing rooms announce their intention of entering*
- *avoid remaining in the room unless student needs require it*

*This means that staff should not:*

- *change in the same place as students*
- *shower with students*

## **18. Intimate Care / Personal Care**

Arrangements for intimate care should be open and transparent and accompanied by recording systems and agreed plans with parents.

Students should be encouraged to act as independently as possible and to undertake as much of their own personal care as is practicable. When assistance is required, staff should try to ensure that another appropriate adult is in the vicinity who is aware of the task to be undertaken and that, wherever possible, they are visible and/or audible. A record should be kept of all intimate care tasks undertaken and, where they have been carried out in another room, include a record of times left and returned. Any vulnerability that may arise from a physical disability or learning difficulty should be considered with regard to individual care plans for each student. The views and/or emotional responses of students with special educational needs, regardless of age and ability must be actively sought in regular reviews of these arrangements.

*This means that staff should:*

- *adhere to their organisation's intimate care and nappy changing policies*
- *make other adults aware of the task being undertaken*
- *explain to the student what is happening*
- *consult with colleagues where any variation from agreed procedure/care plan is necessary*
- *record the justification for any variations to the agreed procedure/care plan and share this information with parents*
- *avoid any visually intrusive behaviour*

*This means that staff should not assist with personal care tasks which the student can undertake themselves.*

## **19. Care, Control and Physical Intervention**

The circumstances in which staff can intervene with a student are covered by the 1996 Education Act (section 550A added in 1997 Education Act). Staff may legitimately intervene to prevent a student from committing a criminal offence, injuring themselves or others, causing damage to property, engaging in behaviour prejudicial to good order and to maintain good order and discipline. Staff should have regard to the health and safety of themselves and others and staff must have regard to DfE guidance (Behaviour and Discipline Guidance January 2016).

*This means that schools should:*

- *regularly acquaint staff with relevant school policy and DfE Guidance*
- *ensure that relevant staff are provided with British Institute of Learning Disabilities (BILD) and Team Teach accredited training*

Under no circumstances should physical force be used as a form of punishment. The use of unwarranted physical force is likely to constitute a criminal offence. In all cases where physical intervention is deemed necessary, the incident and subsequent actions should be documented and reported to the Headteacher and the student's parents.

*This means that staff should:*

- *adhere to the school's Control and Restraint Guidance Policy*
- *always seek to defuse situations*
- *always use minimum force for the shortest period necessary*

## **20. Sexual Contact**

Any sexual behaviour by a member of staff with or towards a child or young person is both inappropriate and 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 the child or young person consents or not. This includes the prohibition on adults in a position of trust. The sexual activity referred to does not just involve physical contact including penetrative and non- penetrative acts. It may also include non-contact activities, such as causing children to engage in or watch sexual activity or the production of pornographic material. 'Working Together to Safeguard Children', defines sexual abuse as "forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening".

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 young person, and manipulate that relationship so sexual abuse can take place. Staff should be aware that conferring special attention and favour upon a student might be construed as being part of a 'grooming' process, which is an offence.

*This means that staff should:*

- *not pursue sexual relationships with children and young people either in or out of school*
- *avoid any form of communication with a child or young person which could be interpreted as sexually suggestive or provocative i.e. verbal comments, letters, notes, electronic mail, phone calls, texts, social media posts, physical contact*

## **21. One to One Situations**

Staff working in one to one situations with students and young people may be more vulnerable to allegations. Teachers and others should recognise this possibility and plan and conduct such meetings accordingly. Every attempt should be made to ensure the safety and security needs of both staff and students are met. Schools need to consider these issues in drawing up their school policies and offer clear training and guidance for the use of any areas of the school which place staff or students in vulnerable situations e.g. photographic darkrooms, counselling rooms.

Managers should undertake a risk assessment in relation to the specific nature and implications of one to one work for each worker. In addition, each assessment should take into account the individual needs of each student. Any arrangements should be reviewed on a regular basis.

Pre-arranged meetings with students away from the school premises should not be permitted unless approval is obtained from their parent and the Headteacher or other senior colleague with delegated authority.

Staff must carefully consider the welfare needs of children when with them in a one to one situation. All spaces in the school are set up to allow any activity to be easily observed by other staff in the school. Windows and doors are kept clear from display materials to allow rooms to be overlooked. Internal doors remain open when practicable.

*This means that staff should:*

- *avoid meetings with students in remote, secluded areas of school*
- *ensure there is visual access and/or an open door in one to one situations*
- *inform other staff of the meeting beforehand, assessing the need to have them present or close by*
- *avoid use of 'engaged' or equivalent signs wherever possible. Such signs may create an opportunity for secrecy or the interpretation of secrecy*
- *always report any situation where a student becomes distressed or angry to a senior colleague*
- *consider the needs and circumstances of the young person(s) involved*

## **22. Home Visits**

All work with students and parents should, wherever possible, be undertaken in the school or other recognised workplace. There are however occasions, in response to an urgent or specific situation i.e during changes in operating practice due to a pandemic where it is necessary to make one-off or regular home visits. It is essential that appropriate school policies and related risk assessments are in place to safeguard both staff and students, who can be more vulnerable in these situations. In such situations, these activities will only be undertaken with the knowledge and consent of senior leadership and parents/carers (unless there is a good reason not to, eg. Safeguarding concern). Where possible staff will work in pairs. A risk assessment will be undertaken and school will ensure staff understand the purpose and limitations of their home visit. Staff, need to read and be aware of the School Home Visits Guidelines.

*These means that staff should:*

- *agree the purpose for any home visit with senior management*
- *adhere to agreed risk management strategies*
- *avoid unannounced visits wherever possible*
- *ensure there is visual access and/or an open door in one to one situations*
- *always make detailed records including times of arrival and departure and, work undertaken*
- *ensure any behaviour or situation which gives rise to concern is discussed with their manager and, where appropriate referred to other agencies*

A risk assessment should include an evaluation of any known factors regarding the student, parents and others living in the household. Risk factors such as hostility, child protection concerns, complaints or grievances can make staff more vulnerable to an allegation.

Specific consideration should be given to visits outside of 'office hours' or in remote or secluded locations. Following the assessment, appropriate risk management measures should be in place before the visit is undertaken. Where little or no information is available, visits should not be made alone.

Where a programme of work is to be undertaken in the home an appropriate works space should be provided and a written work plan/contract should be agreed with the student and parent. This should include: clear objectives; content; timing; and duration of sessions; ground-rules; child protection and confidentiality statements. The plan should take into account the preferences of student and parent. There should also be an agreement that the parent or other suitable adult will remain in the home throughout the session. Where changes are unavoidable, these should be reported to the line manager and recorded. Staff may need to negotiate, assess any risk, and if necessary terminate the session, unless to do so could put the student at risk of harm. Emergency situations should be immediately reported to the line manager, police or social care as appropriate.

*This means that the school should:*

- *ensure that they have home visit and lone-working policies of which all staff are made aware. These should include arrangements for risk assessment and management*
- *ensure that all visits are justified and recorded*
- *ensure that staff are not exposed to unacceptable risk*
- *ensure that staff have access to a mobile telephone and an emergency contact person*

## **23. Overnight Supervision and Examinations**

There are occasions during exam periods when timetables clash and arrangements need to be made to preserve the integrity of the examination process. Where there are no staff volunteers, the examination awarding bodies allow for alternative supervisory arrangements to be made. When staff do volunteer, efforts should be made to balance the purpose of the arrangement with the need to safeguard and protect the wellbeing of all parties.

*This means that:*

- *a full health and safety risk assessment should have been undertaken*
- *all members of the household should have the appropriate checks made.*
- *all arrangements should be made in partnership and agreement with the student and parents/carers*
- *arrangements involving one to one supervision should be avoided wherever possible.*
- *staff should have regard to any guidance that exists*
- *as much choice, flexibility and contact with ‘the outside world’, should be incorporated into any arrangement so far as is consistent with appropriate supervision*
- *whenever possible, independent oversight of arrangements should be made*
- *any situation which gives rise to complaint, disagreement or misunderstanding should be reported*

## **24. Transporting Students**

In certain situations e.g. out of school activities, staff or volunteers may agree to transport students. A designated member of staff should be appointed to plan and provide oversight of all transporting arrangements and respond to any difficulties that may arise. Wherever possible and practicable it is advisable that transport is undertaken other than in private vehicles, with at least one adult additional to the driver acting as an escort. It is a legal requirement that all passengers wear seatbelts and the adult driver should ensure that they do so. They should also be aware of and adhere to current legislation regarding the use of car seats for younger children. Staff should ensure that their behaviour is safe and that the transport arrangements and the vehicle meet all legal requirements. They should ensure that the vehicle is roadworthy and appropriately insured and that the maximum capacity is not exceeded.

*This means that adults should:*

- *plan and agree arrangements with all parties in advance, responding sensitively and flexibly to disagreements*
- *ensure that they are alone with a student for the minimum time possible*
- *be aware that the safety and welfare of the student is their responsibility until this is safely passed over to a parent/carer*
- *report the nature of the journey, the route and expected time of arrival in accordance with agreed procedures*
- *ensure that their behaviour and all arrangements ensure vehicle, passenger and driver safety*
- *take into account any specific needs that the student may have*
- *have the appropriate vehicle insurance for business use*
- *have the correct ratio of children/adults*
- *ensure that all passengers wear seat belts*

## **25. Educational Visits and After School Visits**

Staff should take particular care when supervising students in the less formal atmosphere of a residential setting or after-school activity. During school activities that take place off the school site or out of school hours, a more relaxed discipline or informal dress and language code may be acceptable. However, staff remain in a position of trust and need to ensure that their behaviour cannot be interpreted as seeking to establish an inappropriate relationship or friendship.

Where out of school activities include overnight stays, careful consideration needs to be given to sleeping arrangements. Students, staff and parents should be informed of these prior to the start of the trip. Health and

Safety arrangements require members of staff to keep colleagues/employers aware of their whereabouts, especially when involved in an out of school activity. Staff must be aware of and follow guidance. ***Please refer to the School Educational Visits Guidance for more information.***

*This means that adults should:*

- *always have another adult present in out of school activities, unless otherwise agreed with senior staff in school*
- *undertake risk assessments*
- *have parental consent to the activity*
- *ensure that their behaviour remains professional at all times*

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

All schools must have trained and appointed first- aiders. Teachers may volunteer to undertake this task but it is not a contractual requirement. Staff should receive appropriate training before administering first aid or medication. Students may need medication during school hours. In circumstances where students need medication regularly a health care plan should be drawn up to ensure the safety and protection of students and staff. Students self-administer medication or treatment including, for example any ointment, sun cream or use of inhalers.

If a member of staff is concerned or uncertain about the amount or type of medication being given to a student, this should be discussed with the School First Aider at the earliest opportunity. When administering first aid, wherever possible, staff should ensure that another adult is present, or aware of the action being taken. Parents should always be informed when first aid has been administered.

*This means that staff should:*

- *adhere to the school's Health & Safety policies surrounding students' welfare including administration of medication guidance*
- *make other staff aware of the task being undertaken*
- *explain to the student what is happening.*
- *always act and be seen to act in the students best interest*

Staff taking medication which may affect their ability to care for students should seek medical advice re their suitability to do so, and managers must ensure that they only work directly with students if that advice confirms that the medication is unlikely to impair their ability to look after students properly. Staff medication on the premises must be securely stored and out of reach of students at all times.

## **27. Curriculum**

Many areas of the curriculum can include or raise subject matter which is sexually explicit, or of an otherwise sensitive nature. Care should be taken to ensure that resource materials cannot be misinterpreted and clearly relate to the learning outcomes identified by the lesson plan. This should highlight particular areas of risk and sensitivity. *This means that staff should have clear written lesson plans following the planned schemes of learning.*

The curriculum can sometimes include or lead to unplanned discussion about subject matter of a sexually explicit or otherwise sensitive nature. Responding to students' questions can require careful judgement and staff may wish to take guidance in these circumstances from a senior member of staff. *This means that staff should not enter into or encourage inappropriate offensive discussion about sexual activity.*

## **28. Whistle Blowing (Safeguarding & Finance)**

Whistle blowing is the mechanism by which staff can voice their concerns, made in good faith, without fear of repercussion. Each employer should have a clear and accessible whistle blowing policy that meets the terms of the

Public Interest Disclosure Act 1998. This means that all staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school safeguarding regime (or whistleblowing).

All staff within the school who wish to raise an issue relating to the organisation with someone in confidence can use the following whistleblowing procedures:

In the first instance, concerns about poor or unsafe practice within TCSAG must be raised with a member of the Leadership Team of the relevant academy. Where a staff member feels unable to raise an issue with the Leadership Team or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them:

Designated Contacts, Corsham Regis

- Mrs Sarah Truelove, Governor and Director/Trustee
- Miss Emma Stagg,

Designated Contacts, The Corsham School

- Mrs Sarah Truelove – Governor and Director/Trustee
- Samantha Pritchard – Finance & HR Assistant
- Mr Simon Williams – Teaching Assistant
- Ms Rebecca Richards, Lead Teacher Science
- The [NSPCC whistleblowing helpline](https://www.nspcc.org.uk/keeping-children-safe/whistleblowing/) is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 or email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk) if:
  - they think the concern will not be dealt with properly or
  - may be covered up or
  - if they raised a concern but it has not been acted upon or if they are worried they are being treated unfairly.

#### **Allegations against staff (including supply teachers and volunteers)**

If a member of staff is concerned about the behaviour of a person working or volunteering at a school in TCSAG, they will follow the agreed procedure set out in the flowchart 'Allegation against adults', displayed in the staff room and in other offices around the school See Safeguarding and Child Protection Policy. If staff have safeguarding concerns or an allegation is made against a member of staff then: this should be reported to the headteacher. Where the allegation is about the Headteacher, this should be referred to the chair of governors.

Staff should acknowledge their individual responsibilities to bring matters of concern to the attention of senior management and/or relevant external agencies. This is particularly important where the welfare of students may be at risk.

***Please refer to the Whistleblowing policy for more information.***

## **29. ID Badges**

For Safeguarding purposes, ID badges must be worn and visible at all times whilst on school site. This protects staff, our students and ensures safety around the school site. Care and safe keeping of staff ID badge is of critical importance for security and safeguarding reasons. Lost badges may incur a charge.

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

All staff should be aware of TCSAG's child protection procedures, including procedures for dealing with allegations against staff policy. Staff who are the subject of allegations are advised to contact their professional association. In the event of an incident occurring, which may result in an action being misinterpreted and/or an allegation being

made against a member of staff, the relevant information should be clearly and promptly recorded and reported to senior staff. Early discussion with a parent or carer could avoid any misunderstanding.

This means that staff:

- should be familiar with their school/service system for recording concerns
- should take responsibility for recording any incident, and passing on that information where they have concerns about any matter pertaining to the welfare of an individual in the school or workplace.

Members of staff should feel able to discuss with their line manager any difficulties or problems that may affect their relationship with students so that appropriate support can be provided or action can be taken. It is essential that accurate and comprehensive records are maintained wherever concerns are raised about the conduct or actions of adults working with or on behalf of students and young people. *This means that school has an effective, transparent and accessible system for recording and managing concerns raised by any individual in school or the workplace.*

All adults working in education settings should know the name of their school's Designated Safeguarding Lead (DSL), and deputy equivalent individual (s), and know and follow relevant child protection policy and procedures. All staff have a duty to report any child protection concerns to the designated person for child protection or the Headteacher if the concern relates to a member of staff. If the concern relates to the Headteacher, the Chair of Governors must be informed.

### **Low-level concerns about members of staff**

A low-level concern is a behaviour towards a child by a member of staff that does not meet the harms threshold, is inconsistent with the staff code of conduct, and may be as simple as causing a sense of unease or a 'nagging doubt'. For example, this may include:

- Being over-friendly with children
- Having favourites
- Taking photographs of children on a personal device
- Engaging in one-to-one activities where they can't easily be seen
- Using inappropriate language

Low-level concerns can include inappropriate conduct inside and outside of work.

All staff should share any low-level concerns they have using the reporting procedures set out in our child protection and safeguarding policy. We also encourage staff to self-refer if they find themselves in a situation that could be misinterpreted. If staff are not sure whether behaviour would be deemed a low-level concern, we encourage staff to report it.

All reports will be handled in a responsive, sensitive and proportionate way.

Unprofessional behaviour will be addressed, and the staff member supported to correct it, at an early stage.

This creates and embeds a culture of openness, trust and transparency in which our values and expected behaviour are constantly lived, monitored and reinforced by all staff, while minimising the risk of abuse.

Reporting and responding to low-level concerns is covered in more detail in our child protection and safeguarding policy. This is available on Sharepoint at The Corsham School and from the School Main Reception at Corsham Regis Primary Academy. All staff in school will be provided with a copy.

## **31. Staff Computer User Policy**

Users should not use a computer on the School networks without the prior agreement of their manager or a member of the IT department.

The IT Manager is responsible for the management of the IT systems and is available for advice on all aspects of this policy.

Failure to follow the guidelines in this policy could result in disciplinary action.

### **31.1 New starters and leavers**

The school secretary will inform IT when a new staff member is starting and what initial IT set up requirements they have, such as access to email and fileserver and an induction should be arranged.

At the IT induction, further training requirements should be explored. Training needs should be arranged in conjunction with HR and IT. Basic training will be given if required.

At the end of a contract, all IT equipment, (iPads, etc) must be returned to the IT dept. and any School data must be removed. Email accounts and cloud data will also be automatically disabled at this point and deleted after 30 days.

### **31.2 Back-up and management of work**

It is the responsibility of all staff to ensure their work is managed effectively. This means working on the file servers & SharePoint as the IT department DOES NOT backup data held locally on a PC or School tablets.

Personal data may NOT be stored on the file servers. Laptop users should upload changed files to the fileserver on return to site. Users are also responsible for managing their files effectively on the fileserver to limit duplication of data and to allow other department members to access work in case of sickness or absence.

All staff will maintain their area in proper order and maintain proper file hygiene measures by regularly deleting unwanted files, especially large files from their own and shared drives.

Please contact IT for advice with regards to data security and securely allowing shared staff access.

### **31.3 Copying of copyright material and use of cracked/illegal software.**

Making copies of copyright material without permission e.g. software, music and video content not owned by the School or the individual or downloading and attempting to use cracked and illegal software or to use software designed to crack licenses on legitimate software is illegal and is forbidden. This includes scraping video or audio content from sites such as YouTube, which explicitly breaches terms of use.

### **31.4 Digital Media Players**

This covers the use of Digital Media Player software including iTunes, Windows Media Player, etc. and any other programs which can be used to accomplish any of the following actions on School computer equipment:

This only applies to 3<sup>rd</sup> party content. Media legitimately purchased by the School will be exempt from these restrictions, therefore you can make use of School owned content across all digital media.

#### **What you can do:**

- **Play MP3's:** You can play CDs using iTunes if you don't rip them (i.e. import the CD into iTunes) to your computer in any format (MP3, AAC etc.).
- **Online media stores:** You can view the iTunes or similar store if you don't purchase any items for personal use.
- **Listen to podcasts:** You can subscribe and listen to podcasts. These are exempt from copyright issues currently and can be freely downloaded and listened to if necessary.

#### **What you can't do:**



- **Rip (or import to iTunes) CD's or store personal MP3s on your work PC:** You cannot rip personal CD's to a work computer. This potentially has legal implications. Personal music files - MP3s, AACs etc. should not be stored on any work computer equipment, including servers.
- **Scrape audio or video content from YouTube or other similar streaming sites:** This breaches Terms and Conditions of these sites as well as the copyrights of the material. (Legal information available from IT on request).

### **31.5 Installation of software programs**

This must only be carried out by a member of the IT department. All PC's are regularly audited for software content and license compliance. In some circumstances, it may be possible for users to install software programs, but only with prior approval from a member of the IT department. The terms and conditions of the software must be read and understood, only software that is defined as legal for commercial use can be loaded onto School computers. It is not permitted to install School software on personal computers.

### **31.6 Anti-virus software**

This is installed on all computers and is automatically configured to detect all known viruses (unfortunately new viruses are being devised all the time, so this is not a 100% protection). You must not under any circumstances attempt to disable or remove this software, as this puts the School at serious risk of compromise.

### **31.7 Passwords**

Users will be given passwords to access many School systems. Users must not disclose passwords to any others, internally or externally. Auditing software on the network tracks usage of computers by username, therefore if a username and password has been used it will be assumed to have been used by the owner and any consequences will be deemed to be the responsibility of that owner. Passwords should be at least 8 characters and contain upper and lower-case characters and numbers, the password should also be changed on a 3-monthly basis if possible. Users must report to the IT Manager any suspicion that someone else might have accessed their account or know their password.

### **31.8 School Email, Data and Internet etiquette**

The use of e-mail and the internet, if used inappropriately, can cause many problems ranging from minor distractions to legal claims against the School. This part of the Computer User policy sets out the School's view on the correct use of this technology, and explains how this can be achieved, as well as the School's response to inappropriate use.

#### **Authorised use**

E-mail, internet and VPN are available for communication on matters directly concerned with the business of this School. Employees using the e-mail system should give attention to the following points:

**Presentation** - the style and content of messages must be consistent with the standards that the School expects from written communications.

**Circulation** – messages should only be sent to those employees for whom they are particularly relevant. Schoolwide emails should be avoided.

**Appropriateness** – e-mail should not be used as a substitute for face-to-face communication. "Flame-mails" (e-mails that are abusive) can be a source of stress and damage work relationships, they also constitute bullying and should not be sent. Hasty messages, sent without proper consideration can cause unnecessary misunderstandings and waste management time.

**Visibility** – if the message is confidential, the user must ensure that the necessary steps are taken to protect confidentiality. The School will be liable under GDPR for personal information circulated either within the School or to external users of the system.

**Contracts** – offers or contracts, explicit or implied, transmitted via e-mail are as legally binding as those sent on paper. Prior to making any offer on email, employees should have first obtained the relevant authority to do so.

**Personal use** – the School allows reasonable personal use of e-mail and the internet, provided it does not interfere with employees' work, is not at any cost to the School and does not breach any of the School's other policies e.g. Diversity, Bullying and Harassment. It should not be presumed that personal use of the School's systems is private.

### **Access to e-mail and internet**

All staff may access the internet. Non-desk-based staff may use hot desks in the staff work rooms and their iPads.

All staff have an email account. This account will be automatically disabled at contract end or termination of employment.

Due to the online nature of the school's email system, emails and attached school data may be accessed on personal and home devices. It is the responsibility of the staff member to ensure that this data is not accessible to anyone other than themselves. Care must be especially taken if viewing email, etc. on shared family devices as this could easily cause a data protection breach. Do not leave email or documents open where they could be accessed by others at any time. Accessing School Data on shared devices should be avoided wherever possible and provided equipment (iPad, laptop, etc.) used instead.

### **School data and GDPR**

The new regulations are an extension of the Data Protection Act and outline the Schools (and its employees) responsibility to protect personal data. Staff should always;

- Lock screens when leaving the PC for any time, (win key + L). Automatic 15 min lockout will be enforced by IT policy.
- Be careful when accessing School data on home / personal devices (see above).
- Do not leave USB keys containing School data lying around.
- Not share PC accounts with other staff members.
- Not leave themselves logged in to PC's between lessons or after school.
- Inform IT / Management if they notice any pupil data being used inappropriately or being publicly displayed.

### **Unauthorised use**

The School will not tolerate the use of the system for any of the following (this list is non-exhaustive):

- Any content that could constitute bullying or harassment (e.g. on the grounds of race, sex, disability etc.), or otherwise offend or embarrass the reader or the School.
- Excessive personal use, e.g. social media, personal messages, non-work-related sites, etc. Please refer to the Authorized Use section for more details.
- On-line gambling, including legal gambling sites such as Ladbrokes, bet365 etc. or entering on-line chat sites or facilities.
- Accessing pornography or material which may be deemed offensive.
- Downloading & distributing copyright information, images or software that is not owned by the School.
- Posting confidential information about other employees, the School or its clients or suppliers
- Using internet sites or software explicitly designed to bypass School firewall systems or hide browsing activity.

Where an employee is the receiver of unauthorized or unsuitable material they must delete it immediately and if the sender is known, the sender should be asked to refrain from sending unsuitable material in future.

### **Pupil data security**

Pupils requiring password resets to access their data must present ID or teacher authorization, (phone call, email, etc.) to IT to verify their identity before being given a new password which could potentially give them access to another pupil's data (which may or may not contain personal data). This is to protect the pupil and the School from a potential data protection breach.

#### **Implementation of the policy.**

All e-mail users will be issued with a unique individual password, which should be changed at regular intervals and is confidential to the user. Access to the e-mail system using another employee's password without prior authorization could result in disciplinary action.

Users must ensure that critical information is not stored solely within the e-mail system. This should be stored separately on the file servers / SharePoint, or hard copies kept. Where possible, such documents should be password protected.

Users are required to be familiar with the Data Protection policy and GDPR and to ensure that they operate in accordance with the requirements of the policy.

Users must ensure that steps are taken to prevent unauthorised access to their computer whilst away from their desk. Users must not use colleague's computers whilst they are logged on, unless authorised to do so.

Users must activate an Out of Office message when absent from the office. The message must indicate who should be contacted in the employee's absence, if appropriate.

Employees who feel that they have cause for complaint because of e-mail communications directed at them should raise the matter initially with their immediate manager and/or the HR manager. If necessary, the complaint can then be raised through the grievance bullying/harassment procedures. Any failure to follow these guidelines satisfactorily can result in disciplinary action.

#### **Personal Email Use for Business Purposes**

It is prohibited to use personal email accounts to conduct School business, to do so gives the School considerable legal, 'Business continuity' and data protection issues. The only exception to this is if urgent business communications need to be undertaken and the School email system is not available.

It is prohibited to forward School email to personal email accounts as this presents a significant security and legal risk.

### **31.9 Social Media**

Social media such as Twitter and Facebook etc. is unrestricted on a reasonable level of personal use. It can however present significant legal, security and reputational risk to the School if used inappropriately in our name.

When using social media, you need to be aware of the following: -

- Only use the standard applications to access the site (3<sup>rd</sup> party applications can compromise the School sites and cause us to be hacked)
- Ensure you have a strong password policy and don't hand this out to anyone else.
- Spend some time configuring the security and visibility of the site as appropriate.
- Don't accept friend requests from people you do not actually know.
- On personal site, be careful what School/personal information you make public as this may present a security or legal risk to the School as well as yourself.
- Be careful what personal information you present on your public facing site, this can be used by criminal elements for financial gain, i.e. don't publicize the fact that you are on holiday, that tells people your house is empty, it is not difficult to get an address for you on the internet...
- Don't leave your site logged on unattended, a humorous edit by a 'Friend' can cause you serious reputational damage which can be difficult to recover from and could cause serious distress to you or others.

### **31.10 Monitoring of e-mail and internet**

The effectiveness of our systems and networks are monitored both automatically and routinely by IT staff. URLs of web sites that users visit will be seen during routine network security monitoring and a log of all web sites visited is kept as part of our network security monitoring. This log is identifiable to individual users. If IT become aware of a system performance or security problem, they will need to perform analysis of the cause which could lead to IT seeing email content and/or websites viewed. This may lead to the sanctioning or further investigation of a user's activity in conjunction with a manager or member of HR.

If a manager becomes concerned about the level or type of usage of these systems by an employee or worker, the manager may investigate this with the HR department and IT will be asked to access the individual's usage activity.

Copies of email messages will be retained as appropriate. Hard copies of email messages and details of internet sites accessed will be used as evidence in performance, disciplinary or legal proceedings.

### **31.11 BYOD/Remote access**

Remote access to email and the School's networks is available for all School Owned equipment, the terms of use set out in this policy apply in full whether connected to the School networks or not.

#### **Connection of non-School owned equipment to the School network**

Staff and visitors may use their own equipment on the School network to access email under the following conditions;

- The system must be fully patched to current levels for the operating system.
- The system must be checked by a member of IT prior to being connected.
- It is the user's obligation to ensure that any software used for work at the School is suitably licensed. The use of illegal software is strictly prohibited, and appropriate action may be taken if discovered.
- User must still comply in full with the terms set out in this policy and the policy must be signed.
- All peer to peer file/content sharing software must be removed prior to connection (Bit torrent, Spotify etc.)
- IT reserve the right to block any device exhibiting suspicious or malicious activity with or without the user's knowledge.

#### **VPN access**

This can be requested for external access to School internal networks for file sharing and internal applications usage such as SIMS.

Due to the security implications of using a VPN this will only be allowable on School owned and managed PC's.

VPN access is not allowed on Smart phones or iPad tablets, etc. due to the insecure nature of these devices.

For security reasons VPN access is regularly monitored by the IT security team.

### **Training**

All members of staff and volunteers have read and signed to confirm they understand this Staff Code of Conduct Policy.

All staff are required to complete the relevant and appropriate Child Protection training as advised by The Corsham School Academy Group. This will include Keeping Children Safe in Education annually.

**Induction**

The welfare of all children on roll is of paramount importance. All staff including volunteers are informed of this policy at induction and given the chance to question and discuss the expectations set out.

**Staff support**

Work in schools is both rewarding and demanding. We support staff by prioritising time to discuss the challenges of their role linked to any aspect of this Staff Behaviour Policy with their line manager and seek further support as appropriate.

**Monitoring and review**

This policy is reviewed annually or earlier as required by changes to legislation or statutory guidance. Our governing board will ensure this code of conduct is implemented effectively, and will ensure appropriate action is taken in a timely manner to safeguard children and deal with any concerns.