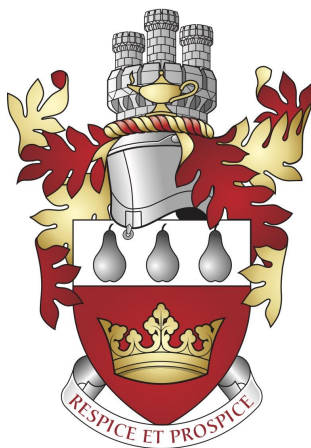




## CODE OF CONDUCT

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| ISI CODE:                        | 7E CODE OF CONDUCT – FOR STAFF |
| DATE REVIEWED BY AUTHOR:         | JUNE 2022                      |
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## RGSW Code of Conduct

### Overview

The RGSW Code of Conduct relates to all members of staff and those defined as 'workers', including volunteers.

RGSW seeks to provide a safe and supportive environment, which secures the well-being and very best outcomes for pupils in their care. Our values are set out in our statement of Ethos and Aims.

This code seeks to ensure that the responsibilities of the Senior Leaders towards children and staff are discharged by raising awareness of illegal, unsafe, unprofessional and unwise behaviour. It should assist staff to monitor their own standards and practice and reduce the risk of allegations being made against them. It is also recognised that not all people who work with children work as paid or contracted employees. The principles and guidance outlined in this document still apply and should be followed by any person whose work brings them into contact with children.

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

This Code should clarify what is expected in terms of professional behaviour; it gives clear advice about what constitutes illegal behaviour and what might be considered as misconduct. It also describes safe practice and behaviours that should be avoided.

This Code takes into account 'Guidance for Safer Working Practice for Those Working with Children and Young People in Education settings', October 2015 (Updated May 2019 and April 2020), which is endorsed by the Safer Recruitment Consortium and Keeping Children Safe in Education (KCSIE) 2022. It is expected that teaching staff employed by RGSW will conduct themselves in accordance with the standards set out by the DfE Teachers' Standards (DfE Teachers' Standards). This Code of Conduct should be read in conjunction with; the Whistleblowing Policy, Staff Disciplinary Procedure, Anti-Harassment, Discrimination and Bullying in the Workplace Policy and the Policy on Violence, Threatening Behaviour and Abuse and with reference to the Staff with Children at RGS Guidance. These policies support the processes for addressing behaviours.

If a member of staff does not follow this Code of Conduct, disciplinary procedures may be invoked.

### Definitions

References made to 'child' and 'children' refer to children and young people under the age of 18 years. However, the principles of the document apply to professional behaviours towards all pupils, including those over the age of 18 years. 'Child' should therefore be read to mean any pupil at the education establishment.

References made to adults and staff refer to all those who work with pupils in an educational establishment, in either a paid or unpaid capacity. This would also include, for example, those who are not directly employed by the school or setting, e.g. local authority staff, supply teachers, sports coaches, governors, or trustees.

The term 'allegation' means where it is alleged that a person who works with children has

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child; or
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children.
- behaved or may have behaved in a way that indicates they may not be suitable to work with children

The term 'low level concern' means any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Further guidance on allegations of abuse and low level concerns may be found in the Safeguarding Children Policy (paras. 21 and 22) and in Part 4 of Keeping Children Safe in Education 2022.

All concerns about the behaviour of a member of staff should be reported to the Heads and DSLs, including self-referral. Staff do not need to be able to determine in each case whether their concern is a low-level concern or meets the threshold of an allegation. Once staff share their concern, that determination will be made by the DSL and Head.

Low-level concerns about a member of staff, including self-referral, should be reported to the Head at the relevant RGS School. Staff do not need to be able to determine in each case whether their concern is a low-level concern, or if it is in fact serious enough to consider a referral to the LADO, or meets the threshold of an allegation. Once staff share what they believe to be a low-level concern, that determination should be made by the Head. If the concern raised is about a Head or Governor it should be shared with Mr John Pitt, Executive Head of The RGS Worcester Family of Schools. If the concern is about Mr John Pitt, it should be raised with the Chair of Governors.

## Core Principles

1. The welfare of pupils is paramount. Staff have a responsibility for their own actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motivation and intentions at all times whilst in the employ of or representing as a volunteer RGSW.
2. Staff are also responsible for the relatives or friends that they have invited to attend School events, or are hosting on school premises at any time. In these circumstances staff should exercise their professional judgement when considering who they invite, and know that they are responsible for their guests, and their guests' behaviour, during their visit.
3. Staff should behave and dress appropriately at all times.
4. Staff should work, and be seen to work, in an open and transparent way.
5. Staff should not consume or be under the influence of alcohol or any substance, including prescribed medication, which may affect their ability to care for children.
6. Staff should acknowledge that deliberately invented/malicious allegations are extremely rare and that all concerns should be reported and recorded.
7. Staff have a duty to consider and act on any concerns for the welfare of any fellow members of staff or volunteers.
8. Staff should discuss and/or take advice promptly from their Line Manager or another senior member of staff over any incident, which may give rise to concern.
9. Staff should apply the same professional standards that are in keeping with the School's Equal Opportunities Policy, regardless of culture, disability, gender, language, racial origin, religious belief and sexual orientation.
10. All staff should know the name of their Designated Safeguarding Lead (DSL), be familiar with safeguarding children arrangements and understand their responsibilities to safeguard, promote the welfare of and protect pupils.
11. Staff should be aware that breaches of the law, and other professional guidelines could result in disciplinary action being taken against them, criminal action and/or other proceedings including barring by the Disclosure & Barring Service (DBS) from working in regulated activity, or for acts of serious misconduct prohibition from teaching by the Teaching Regulation Agency (TRA).
12. Staff and managers should continually monitor and review practice to ensure this guidance is followed.
13. Staff should be aware of and understand their establishment's child protection policy, arrangements for managing allegations against staff, staff behaviour policy, whistle blowing procedure and the procedures set out by the West Midlands Safeguarding Procedures as required by the Worcestershire Safeguarding Children Partnership (WSCP).

# Safe Working Practices for the Protection of Pupils and Staff at RGSW

## 1. Introduction

RGSW works to create and embed a culture of openness, trust and transparency in which the School's values and expected behaviour which are set out in the Safeguarding Children Policy and the Staff Code of Conduct are constantly lived, monitored and reinforced by all staff.

Adults have a crucial role to play in the lives of children. This guidance has been produced to help all staff establish the safest possible learning and working environments. The aims are to safeguard young people and reduce the risk of staff being falsely accused of improper or unprofessional conduct.

Staff should read this policy alongside other School policies and in particular, but not exclusively, be aware of the information in the Safeguarding Children Policy, **Child on Child Abuse Policy** and Antibullying Policy.

This Staff Code of Conduct Policy outlines the behaviour expected of all staff. In particular it is important to remember the guidance and advice given not just in this policy, but also in the Safeguarding Children Policy. In our Safeguarding Children Policy there is detailed guidance of staff behaviour which constitutes abuse against children. In particular such behaviours by adults are not just those that 'meet the harms thresholds' but also those that do not and are referred to as 'low level' concerns.

The guidance given in the Safeguarding Children Policy along with the guidance in this policy will assist staff in better understanding what the professional behaviour required of them looks like, and when a DSL and/or Head needs to be made aware of behaviour that falls short of these standards, either by another member of staff or, if they feel that their own behaviour may have fallen below the expected standard, and they need to self-refer. Self-referral is supported and the School will ensure they create an environment where staff are encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards. Staff may also find useful the further information, guidance and case studies on low-level concerns, which can be found in '[Developing and implementing a low-level concerns policy \(farrer.co.uk\)](http://farrer.co.uk)'.

## ***This means that these guidelines:***

- *apply to all adults working in education and Early Years settings whatever their position, roles, or responsibilities.*

## 2. Duty of Care

Teachers and other staff are accountable for the way in

## ***This means that staff should:***

which they exercise authority; manage risk; use resources; and safeguard children.

All staff have a responsibility to keep pupils safe and to protect them from abuse (sexual, physical and emotional), neglect and safeguarding concerns. Pupils have a right to be safe and to be treated with respect and dignity. It follows that trusted adults are expected to take reasonable steps to ensure their safety and well-being. Failure to do so may be regarded as professional misconduct.

The safeguarding culture of a school is, in part, exercised through the development of respectful caring and professional relationships between adults and pupils and behaviour by the adult that demonstrates integrity, maturity and good judgement.

When individuals accept a role working in an education setting, they should understand and acknowledge the responsibilities and trust involved in that role.

Employers have duties towards their employees and others under Health and Safety legislation which requires them to take steps to provide a safe working environment for staff.

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 Health and Safety duties and the adults' responsibilities towards children should not conflict. Safe practice can be demonstrated through the use and implementation of these guidelines.

There are legitimate high expectations about the nature of the professional involvement of staff in the lives of pupils. When individuals accept a role that involves working with children and young people, they need to understand and acknowledge the responsibilities and trust inherent in that role.

If a member of staff wants to invite a visiting speaker or another adult to speak to any pupil or group of pupils either on or off School premises they should, in the first instance, discuss the matter with the relevant Head of Faculty or relevant member of SLT.

In line with Safeguarding requirements and The Prevent Duty Strategy, the Head, Deputy Head and DSL must be informed about any visiting speaker that a member of staff intends to invite into school.

### 3. 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

- *understand the responsibilities, which are part of their employment or role, and be aware that sanctions will be applied if these provisions are breached*
- *understand how to raise a concern and contact designated staff or partner agencies if they have a concern about a child, particularly if the normal arrangements have been amended*
- *always act, and be seen to act, in the child'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.*

#### ***This means that RGSW should:***

- *promote a culture of openness and support*
- *ensure that safeguarding procedures are in place and reviewed*
- *ensure that systems are in place for concerns to be raised*
- *ensure that staff are not placed in situations which render them particularly vulnerable.*
- *ensure that appropriate safeguarding and child protection policies and procedures are distributed, adopted, implemented and monitored.*
- *update or amend their CP policy and other safeguarding policies in the light of DfE guidance on safeguarding children during the COVID pandemic.*
- *ensure that if there is no trained DSL on site, a senior member of staff is identified to lead on safeguarding issues*

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

- *discuss the circumstances that informed their action, or their proposed action, with*

circumstances in which staff have to make decisions or take action in the best interests of the pupils which could contravene this guidance or where no guidance exists. Individuals are expected to make judgments about their behaviour in order to secure the best interests and welfare of the children in their charge, and in so doing, will be judged to be acting reasonably. These judgments should always be recorded and shared with the employee's Line Manager.

Adults should also consider whether their actions are warranted, proportionate, safe and applied equitably.

#### 4. Power and Positions of Trust

All adults working with pupils in education settings are in positions of trust in relation to the young people in their care. The relationship between a person working with a child/ren is one in which the adult has a position of power or influence. It is vital for adults to understand this power; that the relationship cannot be one between equals and the responsibility they must exercise as a consequence.

There is potential for exploitation and harm of vulnerable young people; 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 professionalism and, wherever possible, they should avoid behaviour which might be misinterpreted by others, and report and record any incident with this potential to the DSL or a member of SLT. This is as relevant in the online world as it is in the classroom; staff engaging with pupils and/or parents online have a responsibility to model safe practice at all times. (see also Section 12a, below).

Where a person aged 18 or over is in a position of trust with a child under 18 or still at school, it is an offence for that person to engage in sexual activity with or in the presence of that child, or to cause or incite that child to engage in or watch sexual activity. Where a person aged 18 or over is in a position of trust established with a person who has only recently left the school, any attempt to engage in sexual activity with that person will be a cause for concern and will be treated as a breach of trust established in that prior relationship.

#### 5. Confidentiality

The storing and processing of personal information is governed by the General Data Protection Regulations 2017 (GDPR) and Data Protection Act 2018. Employers should provide clear advice to staff about their responsibilities under this legislation so that, when

*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 leader*
- *always record discussions and actions taken with their justifications*
- *record any areas of disagreement and always make the DSL aware and if necessary, refer to another agency, the DSL or other regulatory body.*

#### ***This means that staff should not:***

- *use their position to gain access to information for their own advantage and/or a pupils' or family's detriment*
- *use their power to intimidate, threaten, coerce or undermine pupils*
- *use their status and standing to form or promote a relationship with a pupil, which is of a sexual nature.*

#### ***This means that RGSW should:***

*Ensure that all staff who need to share 'special category personal data' are aware that the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share*

considering sharing confidential information, those principles should apply.

Staff may have access to special category personal data about pupils and their families which must be kept confidential at all times and only shared when legally permissible to do so and in the interest of the child.

Records should only be shared with those who have a legitimate professional need to see them.

Staff should never use confidential or personal information about a pupil 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 child. Confidential information should never be used casually in conversation or shared with any person other than on a need-to-know basis. In circumstances where the pupil'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 pupil, for example when abuse is alleged or suspected. In such cases, individuals have a responsibility to pass information on without delay, but only to those with designated safeguarding responsibilities or to statutory services.

If a child – or their parent/carer – makes a disclosure regarding abuse or neglect, the member of staff should follow the setting's procedures. The adult should not promise confidentiality to a child or parent, but should give reassurance that the information will be treated sensitively.

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 the Designated Safeguarding Lead. Any media or legal enquiries should be passed to a member of the Senior Leadership Team without delay.

Additionally, concerns and allegations about adults should be treated as confidential and passed to a senior leader without delay.

## 6. Propriety and Behaviour

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

An individual's behaviour, either in or out of the workplace, should not compromise her/his position within the work setting so it is important to exercise due care and attention when outside of the school environment. Staff are also responsible for the relatives or friends that they have invited to attend School

*information without consent, if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent or if to gain consent would place a child at risk*

### ***This means that staff:***

- *need to know the name of their Designated Safeguarding Lead (DSL), and be familiar with and West Midlands Safeguarding Children child protection procedures and guidance as described in the Safeguarding Policy and other related School Policies*
- *are expected to treat information they receive about pupils in a discreet and confidential manner*
- *should seek advice from the DSL, the Heads or the Data Protection Officers (see Data Protection Policy) if they are in any doubt about sharing information they hold or which has been requested of them*
- *need to be clear about when information can/must be shared and in what circumstances*
- *need to know the procedures for responding to allegations against staff and to whom any concerns or allegations should be reported*
- *need to ensure that where personal information is recorded using modern technologies that systems and devices are kept secure*
- *The DSL is the first point of contact if staff have concerns about sharing confidential information. In the absence of the DSL being available, staff should refer to the Heads or Data Protection Officers.*

### ***This means that staff should not:***

- *behave in a manner which would lead any reasonable person to question their suitability to work with pupils or act as a role model*
- *make, or encourage others to make sexual remarks to, or about, a pupil*
- *make inappropriate remarks to a pupil (including email, text messages, phone or letter etc)*
- *use inappropriate language to or in the presence of pupils*
- *discuss their personal or sexual relationships with or in the presence of*

events, or are hosting on school premises at any time. In these circumstances staff should exercise their professional judgement when considering who they invite, and know that they are responsible for their guests, and their guests' behaviour, during their visit.

Membership of organisations whose goals are in conflict with the values and equality policies of the school is not acceptable.

There may be times 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 prohibition from teaching by the Teacher Regulation Agency, a bar from engaging in regulated activity, or action by another relevant regulatory body.

All staff who are employed to and/or provide early years childcare to children of younger years (up to the 1 September following the child's fifth birthday) or who outside of normal school hours at the school, provide childcare to children above this age but under the age of eight years are required to complete a self-declaration form in compliance with The Childcare Act 2006 and supporting the Disqualification under the Childcare Act 2009, updated August 2018.

This includes those that are directly concerned in the management of such provision.

The Childcare (Disqualification) Regulations 2018 set out grounds for disqualification under the Childcare Act 2006 where the person meets certain criteria set out in the Regulations. For example, an individual will be disqualified where they have committed a relevant offence against a child; been subject to a specified order relating to the care of a child; committed certain serious sexual or physical 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. A disqualified person is prohibited from providing relevant early or later years childcare as defined in the Childcare Act 2006 or being directly concerned in the management of such childcare. Schools and private childcare settings are also prohibited from employing a disqualified person in respect of relevant early or later years childcare.

*pupils*

- *discuss a pupil'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 (face to face, written or in any electronic format)*
- *on school trips or on other occasions when pupils are under their supervision, staff must ensure that there are sufficient members of suitable staff available and able to respond appropriately to any emergency that might occur.*

***This means that staff must:***

- *be aware that their behaviour in their personal lives may impact upon their work with pupils*
- *understand that a person who provides Early Years Education or childcare may be disqualified as a result of committing a relevant offence against a child*
- *inform the relevant Head of any cautions, convictions, or relevant orders accrued during their employment, and/or if they are charged with a criminal offence*
- *be aware that behaviour by themselves, those with whom they have a relationship or association, or others in their personal lives, may impact on their work with children.*
- *Be aware of the Staff with Children at RGS Guidance whether or not they themselves have a child attending one of our Schools.*

***This means that RGSW will:***

- *have a clear expectation that staff will discuss with their manager any relationship/association (in or out of school or online) that may have implications for the safeguarding of children in school*
- *create a culture where staff feel able to raise these issues*
- *safeguard employees' welfare and contribute to their duty of care towards their staff identify whether arrangements are needed to support these staff*
- *Consider whether there are measures that need to be put in place to safeguard children (e.g. by putting arrangements in place to stop or restrict a person coming into school where a potential risk to children has been identified).*



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

## **7. Use of Alcohol and Medication and Smoking**

At RGSW, we are committed to providing a safe, healthy and productive working environment for both pupils and staff, free from alcohol and drug misuse. It is unacceptable for staff to be under the influence of alcohol or drugs whilst discharging their duties and working in the presence of children.

All staff and volunteers whilst discharging their duties for and on behalf of RGSW must not be under the influence of alcohol or any other substance which may affect their ability to care for or respond to the needs of children. If staff are taking any medication which may affect their ability to care for children, those staff must seek medical advice. The School must ensure that staff and volunteers only work directly with children if medical advice confirms that the medication is unlikely to impair that member of staff's or volunteer's ability to care for and respond to the needs of children. Staff medication when on School premises must be stored securely, and out of reach of children at all times. Any staff carrying out school business away from School premises must ensure that any medication they need to have with them is safely secured and out of the reach of children at all times.

In order to execute our duty of care to our pupils the School reserves the right to conduct searches for alcohol or drugs on any School premises, including, but not limited to, searches of lockers, desks, cars, filing cabinet, bags and clothing. Any search will be conducted with at least two members of the SLT present. Any alcohol or drugs found as a result of a search will be confiscated and action may be taken under the School's Disciplinary Policy.

In cases where there is reasonable cause to suspect that any member of staff's performance is impaired as the result of drug or alcohol misuse, they will be asked to participate in a drug screening programme which is likely to involve the School Nurse liaising with Occupational Health.

If any member of staff arrives at work and is reasonably believed to be under the influence of alcohol or drugs, they shall immediately be sent to the HR Manager so that an investigation can be undertaken. All matters of

### ***This means that RGSW will not:***

- *Ask intrusive questions of staff regarding those they live with or have relationships/associations with.*

### ***This means that staff and volunteers should:***

- *Inform the School if they need to take any medication which may affect their ability to care for children*
- *Store any medication safely and out of the reach of children*
- *On school trips or on other occasions when pupils are under their supervision, staff must ensure that there are sufficient members of staff available and able to respond appropriately to any emergency that might occur.*

### ***The School must:***

*Ensure that staff and volunteers only work in the presence of children if any medication they are taking does not impair their ability to care for children.*

alcohol or drugs misuse shall be dealt with in line with the School's Disciplinary Policy.

If any member of staff notices a change in a colleague's pattern of behaviour, they should seek immediate assistance and advice through their Line Manager, DSL or the HR Manager. No member of staff should attempt to cover up for a colleague whose work or behaviour is suffering as a result of an alcohol or drug-related problem.

RGSW is a non-smoking site.

Smoking constitutes a fire hazard and can be unpleasant and dangerous for the smoker and colleagues.

Smoking on the premises (in any form, including the smoking of e-cigarettes) is against the code of conduct and therefore an offender will be subject to the disciplinary procedures.

Employees discovered smoking in an area where there is a particular fire risk will be liable to dismissal without notice.

Alcohol will only be served at a School event with the prior approval of the Head.

## 8. Dress and Appearance

Staff should consider the manner of dress and appearance appropriate to their professional role. We require pupils to be smart in their uniform. Smart and professional appearance is expected at all times for staff. Staff should ensure they are dressed decently, safely and appropriately for the tasks they undertake; this also applies to online or virtual teaching or when working with small groups on site (in the case of the school remaining open to vulnerable children or those of critical workers).

Those who dress or appear in a manner which could be considered as inappropriate could render themselves vulnerable to criticism or allegation. Appropriate personal presentation is expected of staff.

## 9. Gifts

RGSW has a Policy in place regarding the giving of gifts or rewards to pupils and the receiving of gifts from them or their parents/carers and staff and these are available in the Staff Handbook [online area of the School Intranet](#).

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.

Similarly, it is inadvisable to give such personal gifts to

### ***This means that staff should ensure their appearance and clothing:***

- *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 compliant with professional standards.*
- *In online engagement, is similar to the clothing they would wear on a normal school day.*

### ***This means that staff should:***

- *be aware of and understand their School's relevant policies*
- *ensure that gifts received or given in situations which may be misconstrued are declared*
- *ensure that gifts of significant value are declared*
- *generally, only give gifts to an individual young person as part of an agreed reward*

pupils or their families. This could be interpreted as a gesture either to bribe or groom. It might also be perceived that a 'favour' of some kind is expected in return.

There are occasions when pupils or parents wish to pass small tokens of appreciation to staff e.g. at Christmas or as a thank-you and this is usually acceptable. However, it is unacceptable to receive gifts on a regular basis or of any significant value. Any member of staff concerned about whether they or their colleagues may be at risk of giving or receiving a bribe (financial or otherwise) should contact the Director of Finance and Operations. Any member of staff receiving gifts or entertainment valued at more than £20 must disclose this to the Director of Finance and Operations.

Members of staff may not give personal gifts to pupils. It is acceptable for staff to offer prizes of small value in certain tasks or competitions.

Any reward given to a pupil should be in accordance with agreed practice, consistent with the School or setting's Behaviour Policy, recorded and not based on favouritism.

Adults should exercise care when selecting children for specific activities, jobs or privileges in order to avoid perceptions of favouritism or injustice. Similar care should be exercised when pupils are excluded from an activity. Methods of selection and exclusion should always be subject to clear, fair, agreed criteria.

## 10. Infatuations and 'crushes'

All staff need to be aware that it is not uncommon for pupils to be strongly attracted to a member of staff and/or develop an infatuation. Staff should be aware that such circumstances always carry a high risk of words or actions being misinterpreted and for allegations to be made against staff.

A member of staff who becomes aware that a pupil may be infatuated with him/herself or a colleague should discuss this at the earliest opportunity with a senior colleague so that appropriate action can be taken. In this way, steps can be taken to avoid hurt and distress for all concerned.

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 become or may be becoming infatuated with either themselves or a colleague, should immediately report this to the Heads or most senior manager. In this way appropriate early intervention can be taken which can prevent escalation and avoid hurt, embarrassment or

system

- where giving gifts other than as above, ensure that these are of insignificant value and given to all pupils equally
- ensure that all selection processes of pupils are fair and these are undertaken and agreed by more than one member of staff
- ensure that they do not behave in a manner which is either favourable or unfavourable to individual pupils
- where giving gifts other than as above, ensure that this is done with the full knowledge of their Line Manager.

### ***This means that staff should:***

- report any indications (verbal, written or physical) that suggests a pupil may be infatuated with a member of staff
- always maintain professional boundaries

### ***This means that Senior Managers should inform the DSL:***

- put action plans in place where concerns are brought to their attention as appropriate

distress for those concerned.

The Heads (or senior manager) should give careful thought to those circumstances where the staff member, pupil and their parents/carers should be spoken to and should ensure a plan to manage the situation is put in place. This plan should respond sensitively to the child and staff member and maintain the dignity of all. This plan should involve all parties, be robust and regularly monitored and reviewed.

## 11. Personal Living Space

No pupil should be in or invited into, the home of an adult who is employed or volunteers at the School, unless the reason for this has been firmly established (e.g. babysitting) and in all such instances this **must** be agreed with the pupils' parents and the Head and/or DSL.

No member of staff or volunteer may visit the home of a pupil at the School, undertake work for a pupil's family, either paid or voluntarily, without first seeking permission from the Head and/or DSL. Under no circumstances must a member of staff or volunteer visit the home of a pupil without that pupil's parents' knowledge and agreement.

## 12. Communication with pupils (including the use of technology)

See also Section 12a, below.

In order to make best use of the many educational and social benefits of new and emerging technologies, pupils need opportunities to use and explore the digital world. Online risks are posed more by behaviours and values than the technology itself.

Staff should ensure that they establish safe and responsible online behaviours, working to local and national guidelines and acceptable use policies which detail how new and emerging technologies may be used.

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

Communication with children both in the 'real' world and through web-based and telecommunication interactions should take place within explicit professional boundaries. This includes the use of computers, tablets, phones, texts, e-mails, instant

### ***This means that staff should:***

- *be vigilant in maintaining their privacy and mindful of the need to avoid placing themselves in vulnerable situations*
- *be mindful of the need to maintain professional boundaries.*

### ***This means that staff should:***

- *not give out their personal details except where it has been specifically agreed that they can do so with the Head and DSL.*
- *communicate with pupils in an appropriate and professional manner, making sure that parents have given permission for this form of communication to be used.*
- *only make contact with pupils for professional reasons.*
- *use only equipment and Internet services provided by the school or setting.*
- *turn off 3G/4G/5G data access on school premises*
- *not to have images of pupils stored on personal cameras, devices or home computers.*
- *not make images of pupils available on the internet, other than through the school network/website, without permission from parents and senior teachers.*
- *be cautious in their contact with ex-pupils, as there is still a professional relationship and there may be contact with current*

messages, social media such as Facebook and Twitter, chat-rooms, forums, blogs, websites, gaming sites, digital cameras, videos, web-cams and other hand-held devices. (Given the ever-changing world of technology it should be noted that this list gives examples only and is not exhaustive.)

Staff should not request nor respond to any personal information from children other than which may be necessary in their professional role. They should ensure that their communications are open and transparent and avoid any communication which could be interpreted as 'grooming behaviour'

Staff should not give their personal contact details to children for example, e-mail address, home or mobile telephone numbers, details of web-based identities. If children locate these by any other means and attempt to contact or correspond with the staff member, the adult should not respond and must report the matter to their manager. The child should be firmly and politely informed that this is not acceptable.

Staff should, in any communication with children, also follow the guidance in section 6 'Propriety and Behaviour'.

Staff should adhere to RGSW policies, including those with regard to communication with parents and carers and the information they share when using the internet.

Communication with ex-pupils who are over 18 is left to staff discretion. Please be conscious of the fact that ex-pupils may be in contact with current pupils.

Be aware that actions that bring the school into disrepute could lead to disciplinary procedures being taken.

#### 12a. Use of technology for online/virtual teaching

RGSW 'Remote Schooling and the DLP Protocol: Guidelines for Staff' contains resources and guidance to support effective remote teaching, for periods in which on-line teaching is required. Staff are also reminded of Appendix 10 of the Safeguarding Children Policy 'COVID-19 School Arrangements for Safeguarding and Child Protection'. In addition to this guidance Staff should also refer to the '#RemoteTeaching – Handy Hints!' which RGSW has in place and there is additional document specifically to guide and assist Peripatetic Teachers.

When selecting a platform for online teaching, RGSW will satisfy itself that the provider has an appropriate

pupils.

- not seek to communicate/make contact or respond to contact with pupils outside of the purposes of their work.
- only use software provided by the School when undertaking School business.
- follow their School Acceptable Use Policy
- ensure that their use of technologies could not bring their RGSW into disrepute.
- not discuss or share data relating to children/parents/carers in staff social media groups or on any forum that is not part of RGSW

#### ***This means RGSW:***

- will wherever possible, provide school devices such as cameras and mobile phones rather than expecting staff to use their own (e.g. on school trips).

#### ***This means that senior leaders should:***

- review and amend their online safety and acceptable use policies to reflect the current situation
- ensure that all relevant staff have been briefed and understand the policies and the standards of conduct expected of them
- have clearly defined operating times for virtual learning
- consider the impact that virtual teaching may have on children and their parents/carers / siblings
- determine whether there are alternatives to virtual teaching in 'real time' – e.g. using audio only, pre-recorded lessons, existing online resources
- be aware of the virtual learning timetable and ensure they have the capacity to join a range of lessons

level of security. Wherever possible, staff should use school devices and contact pupils only via the pupil school email address/log in. This ensures that the setting's filtering and monitoring software is enabled.

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

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

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

It is the responsibility of the staff member to act as a moderator; raise any issues of suitability (of dress, setting, behaviour) with the child and/or parent immediately and end the online interaction if necessary. Recording lessons does not prevent abuse. If staff wish to record the lesson they are teaching, consideration should be given to data protection issues; e.g. whether parental/pupil consent is needed and retention/storage. If a staff member believes that a child or parent is recording the interaction, the lesson should be brought to an end or that child should be logged out immediately. The Online Safety & Acceptable Use of Smart Devices Policy clearly states the standards of conduct required.

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

- *take into account any advice published by the local authority, MAP or their online safety/monitoring software provider*

***This means that staff should:***

- *adhere to their establishment's policy and guidance*
- *be fully dressed*
- *ensure that a senior member of staff is aware that the online lesson/meeting is taking place and for what purpose*
- *avoid one to one situations – gain permission from their line-manager first and make the DSL aware. Consideration will also be given to asking a parent to be present in the room for the duration, or ask a colleague or member of SLT to join the session*
- *only record a lesson or online meeting with a pupil where this has been agreed with the head or another member of SLT and the pupil and their parent/carer have given explicit written consent to do so*
- *be able to justify images of pupils in their possession*

***This means adults should not:***

- *contact pupils outside the operating times defined by senior leaders*
- *take or record images of pupils for their personal use*
- *record virtual lessons or meeting using personal equipment (unless agreed and risk assessed by senior staff)*
- *engage online while children are in a state of undress or semi-undress*

### 13. Social Contact outside the workplace

Staff should not establish or seek to establish social contact with pupils for the purpose of securing a friendship or to pursue or strengthen a relationship. Even if a young person seeks to establish social contact, or if this occurs coincidentally, the member of staff should exercise her/his professional judgement in making a response but should always discuss this with a senior leader. Staff must be aware that social contact, in certain situations, could be misconstrued as grooming.

Staff should not give their personal details such as their home or e-mail address; social network sites, gamer tags or web pages to pupils unless the need to do so is agreed with senior leadership. If pupils do become aware of your gamer tag you must change it.

### 14. Social Networking Sites and Online Gaming

RGSW staff may use social networking sites for personal use. However, the School requires that profile and photos of the member of staff are 'locked down' as private so that pupils or parents do not have access to your personal data or images.

Staff must deny current or recent pupils access to your profile so you do not put yourself in a vulnerable position.

Staff should be aware that they leave themselves open to a charge of professional misconduct if images of a member of staff in a compromising situation are made available on a public profile by anyone.

If a pupil does gain access to the profile of a member of staff by fraudulent means (impersonation or hacking) senior leadership should be informed immediately.

Where relationships exist between staff and those who are also parents at the School, or personal friends who are parents at the School, social networking is acceptable but caution must be exercised so that professional standards are maintained and staff do not compromise themselves or the School.

As soon as a member of staff becomes aware that they are in an online game with a pupil of RGSW, the member of staff should cease to play against that pupil and should not enter any games containing that player as part of the group. Under no circumstances should staff seek out pupils and/or share their own gamer tags/ID with pupils or use School equipment to play online games.

#### ***This means that staff should:***

- *have no secret social contact with pupils, consider the appropriateness of the social contact according to their role and nature of their work.*
- *always approve any planned social contact with senior colleagues, for example, when it is part of a reward scheme or pastoral care programme*
- *advise senior leadership of any regular social contact they have with a pupil or parent which may give rise to concern*
- *report and record any situation, which they feel might compromise the school or their own professional standing.*

#### ***This means that staff should:***

- *Staff and volunteers are advised to lock down their profile to ensure that data and images are not freely available and seek advice if you are unsure how to do this.*
- *Do not permit current and recent pupils or parents to have access to your profile.*
- *Ensure all your passwords are kept strong and secure.*
- *Be aware that images of others should be protected and be treated as carefully as you would your own.*

## 15. Physical Contact

There are occasions when it is entirely appropriate and proper for staff to have physical contact with pupils, but it is crucial that they only do so in ways appropriate to their professional role and in relation to the pupil's individual needs and any agreed care plan.

A 'no touch' approach is impractical for most staff and may in some circumstances be inappropriate. When physical contact is made with pupils this should be in response to their needs at the time, of limited duration and appropriate.

In the EYFS and early prep age groups where children may be particularly tactile and require physical reassurance, staff should use their professional judgement about how they respond to an individual child's needs and actions.

Staff should use their professional judgement at all times about the appropriateness of any physical contact.

Physical contact, which occurs regularly with an individual pupil, is likely to raise questions unless the justification for this is part of a formally agreed plan (for example in relation to pupils with SEN or physical disabilities). Any such contact should be the subject of an agreed and open School policy and subject to review. Not all children feel comfortable about certain types of physical contact; this should be recognised and, wherever possible, adults should seek the pupil's permission before initiating contact and be sensitive to any signs that they may be uncomfortable or embarrassed. Staff should acknowledge that some pupils are more comfortable with touch than others and/or may be more comfortable with touch from some adults than others. Staff should listen, observe and take note of the child's reaction or feelings and, so far as is possible, use a level of contact and/or form of communication which is acceptable to the pupil.

It is not possible to be specific about the appropriateness of each physical contact, since an action that is appropriate with one pupil, in one set of circumstances, may be inappropriate in another, or with a different child.

Any physical contact should be in response to the child's needs at the time, of limited duration and appropriate to their age, stage of development, gender, ethnicity and background. Adults should therefore, use their professional judgement at all times.

### **This means that staff should:**

- *be aware that even well-intentioned physical contact may be misconstrued by the pupil, an observer or by anyone to whom this action is described.*
- *never touch a pupil in a way which may be considered indecent.*
- *always be prepared to explain actions and accept that all physical contact be open to scrutiny.*

### **This means that RGSW should:**

- *ensure they have a system in place for recording serious incidents and the means by which information about incidents and outcomes can be easily accessed by senior leadership.*
- *provide staff, on a "need to know" basis, with relevant information about vulnerable pupils in their care.*



Physical contact should never be secretive, or for the gratification of the adult, or represent a misuse of authority. If a member of staff believes that an action by them or a colleague could be misinterpreted, or if an action is observed which is possibly abusive, the incident and circumstances should be immediately reported to the manager and recorded. Where appropriate, the manager should consult with the Local Authority Designated Officer (the LADO).

Extra caution may be required where it is known that a child has suffered previous abuse or neglect. Staff need to be aware that the child may associate physical contact with such experiences. They also should recognise that these pupils may seek out inappropriate physical contact. In such circumstances staff should deter the child sensitively and help them to understand the importance of personal boundaries.

A general culture of 'safe touch' should be adopted, where appropriate, to the individual requirements of each child. Pupils with disabilities may require more physical contact to assist their everyday learning. The arrangements should be understood and agreed by all concerned, justified in terms of the pupil's needs, consistently applied and open to scrutiny.

## **16. Physical Education and 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 pupils in order to support a pupil so they can perform a task safely, to demonstrate the use of a particular piece of equipment/instrument or assist them with an exercise. This should be done with the pupil's agreement. Contact under these circumstances should be for the minimum time necessary to complete the activity and take place in an open environment (see section 19, one-to-one situations, below). Staff should remain sensitive to any discomfort expressed verbally or non-verbally by the pupil.

## **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 pupils, satisfy health and safety considerations and ensure that bullying or teasing does not occur. This supervision should be appropriate to the needs and age of the pupils concerned and sensitive to the potential for embarrassment.

### **This means that staff should:**

- *consider alternatives, where it is anticipated that a pupil might misinterpret any such contact, perhaps involving another member of staff, or a less vulnerable pupil in the demonstration*
- *always explain to a pupil the reason why contact is necessary and what form that contact will take unless their safety is at immediate risk.*

### **This means that staff should:**

- *avoid any physical contact when pupils are in a state of undress.*
- *avoid any visually intrusive behaviour and where there are changing rooms.*
- *remain in or near the room when groups are changing, and ensure sensitive pupils are offered the opportunity to change privately.*

Staff therefore need to be vigilant about their own behaviour, ensure they follow agreed guidelines and be mindful of the needs of the pupils.

## 18. Pupils in Distress

There may be occasions when a distressed pupil 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 senior leader.

## 19. Behaviour Management

All pupils have a right to be treated with respect and dignity. Staff should not use any form of degrading treatment to punish a pupil. The use of humour can help to diffuse a situation. The use of sarcasm, demeaning or insensitive comments towards pupils is not acceptable in any situation.

## 20. Care, Control and Physical Intervention

Staff may legitimately intervene to prevent a pupil from committing a criminal offence, injuring themselves or others, causing damage to property, engaging in behaviour prejudicial to good order and to maintain good order and discipline. Staff should have regard to the health and safety of themselves and others.

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.

## 21. Sexual Contact with Pupils

Any sexual behaviour by a member of staff with or towards a pupil is unacceptable. It is an offence for a member of staff in a position of trust to engage in sexual activity with a pupil under 18 years of age<sup>1</sup> and sexual activity with a child could be a matter for criminal and/or disciplinary procedures.

Pupils are protected by the same laws as adults in relation to non-consensual sexual behaviour. They are additionally protected by specific legal provisions depending on their age and understanding. This

### **This means that staff should not:**

- *change in the same place as pupils.*
- *shower with pupils.*

### **This means that staff should:**

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

### **This means that staff should:**

- *not use force as a form of punishment.*
- *try to diffuse situations before they escalate.*
- *always seek to diffuse situations;*
- *always use minimum force for the shortest period necessary.*
- *Follow the RGSW Care and Control of Pupils Policy.*

### **This means that staff should:**

- *always seek to diffuse situations*
- *always use minimum force for the shortest period necessary*
- *Follow the RGSW Care and Control of Pupils Policy.*

### **This means that staff should:**

- *not have any form of sexual contact with a pupil from the school or setting*
- *avoid any form of touch or comment which is, or may be considered to be, indecent*
- *avoid any form of communication with a pupil which could be interpreted as sexually suggestive, provocative or give rise to speculation e.g. verbal comments, letters, notes, by email or on social media, phone calls, texts, physical contact*

includes the prohibition of sexual activity with children by adults in a position of trust.

Sexual activity involves physical contact including penetrative and non-penetrative acts, however it also includes non-contact activities, such as causing pupils to engage in or watch sexual activity or the production of pornographic material.

There are occasions when adults embark on a course of behaviour known as 'grooming' where the purpose is to gain the trust of a child, and manipulate the relationship so sexual abuse can take place. All staff should undertake appropriate training so they are fully aware of those behaviours that may constitute 'grooming' and of their responsibility to always report to a senior manager any concerns about the behaviour of a colleague which could indicate that a pupil is being groomed.

<sup>1</sup>*Sexual Offences Act 2003: abuse of a position of trust.*

## **22. One to One Situations**

Staff working in one to one situations with children and young people are 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 pupils are met.

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

If the school needs to be closed at any time because of the COVID-19 pandemic and there is only one vulnerable child or child of a critical worker then the school will consider closing and liaise with the local authority to identify alternative provision e.g. at a hub school. If the school must remain open with only one or two children, there should be more than one member of staff to meet fire safety, first aid, supervision or other emergency procedures.

- *not make sexual remarks to or about a pupil*
- *not discuss sexual matters with or in the presence of pupils other than within agreed curriculum content or as part of their recognised job role.*

### ***This means RGSW should:***

- *keep pupil numbers under constant review*
- *ensure that risk assessments and emergency procedures are reviewed in the event of lone working/very small numbers on site*
- *liaise with the LA on suitable alternative provision if the school needs to close due to very low pupil numbers*

### ***This means that staff should:***

- *work one to one with a pupil only where absolutely necessary and with the knowledge and consent of a member of SLT and parents/carers*
- *avoid meetings with pupils in remote, secluded areas of the 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 child becomes distressed, anxious or angry to a senior colleague*
- *consider the needs and circumstances of the child/children involved.*

## 23. Transporting Pupils

In certain situations, for example out of school activities, staff or volunteers may agree to transport pupils as part of their work. As for any other activity undertaken at work, the employer has a duty to carry out a risk assessment covering the health and safety of their staff and to manage any known risks<sup>1</sup>.

Consideration must be given to the potential distraction of the driver and the supervision of the passengers. A judgement should be made about the likely behaviour and individual needs of the child/ren. If any of them may require close supervision, then another adult should travel in the vehicle so that the driver is not distracted or compromised<sup>2</sup>.

Staff should not offer lifts to pupils unless the need for this has been agreed by a manager. A designated member of staff should be appointed to plan and provide oversight of all transport arrangements and respond to any concerns that may arise.

Wherever possible and practicable it is advisable that transport is undertaken other than in private vehicles, with at least one additional adult acting as an escort. If there is no alternative other than to transport a pupil in a private vehicle and without an escort then that pupil should sit in the rear of the vehicle. Wherever possible parents should be made aware that a pupil is being transported and permission gained from them. In all instances, reasonable measures must be taken to ensure that the Head and/or DSL are aware. If it is deemed safer to transport the pupil in a private vehicle than to not do so and the Head and/or DSL cannot be contacted, then staff must do all they can to ensure that at least one other member of staff is aware. The driver must also have appropriate insurance.

It is a legal requirement that all passengers wear seatbelts and the driver should ensure that they do so. They should also be aware of and adhere to current legislation regarding the use of car seats/booster 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.

Staff should never offer to transport pupils outside of their normal working duties, other than in an emergency or where not doing so would mean the child may be at risk. In these circumstances the matter should be recorded and reported to both their manager and the child's parent(s). The school's health and safety policy and/or educational visits policy should set out the

### This means that staff should:

- *plan and agree arrangements with all parties in advance, responding sensitively and flexibly to disagreements*
- *ensure that they are alone with a child for the minimum time possible*
- *be aware that the safety and welfare of the child 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 child may have.*

arrangements under which staff may use private vehicles to transport pupils.

<sup>1</sup><https://www.gov.uk/government/publications/health-and-safety-advice-for-schools>

<sup>2</sup>OEAP updated guidance (July 2018)  
<https://oeapng.info/3618-transporting-young-people-in-private-cars/>

## 24. Co-curricular activities

Staff should take particular care when supervising pupils 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.

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.

## 25. First Aid and Administration of Medication

The school has Medical Policies, which must be adhered to at all times.

If any of the Schools have no trained first aider due to COVID-19, it is the responsibility of senior leaders to identify a senior member of staff on that site each day to lead on any crisis or serious incident including the provision of first aid. This should be supported by a risk assessment that takes into account the number of staff, children and/or other visitors on site, the proximity of emergency services, any particular risks presented, etc. Risks should be minimised as much as possible, for example by not undertaking high risk or adventurous activities.

For the EYFS pupils there may need to be at least one person trained in paediatric first aid at all times when children are on site.

### ***This means that staff should:***

- *undertake a risk assessment*
- *have parental consent to the activity*
- *ensure that their behaviour remains professional at all times.*

### ***This means RGSW should:***

- *ensure there are trained and named individuals to undertake first aid responsibilities, including paediatric first aid if relevant*
- *if there is no member of staff available who has completed 'first aid at work' training, identify a senior person to be responsible each day*
- *review and update first aid, medicines in school and crisis / emergency policies and relevant risk assessments*
- *refer to local and national First Aid guidance and guidance on meeting the needs of children with medical conditions.*

### ***This means that staff should:***

- *adhere to the school or setting's health and safety and supporting pupils with medical conditions policies*
- *make other staff aware of the task being undertaken*
- *have regard to pupils' individual healthcare plans*

## 26. Intimate Care

All children have a right to safety, privacy and dignity when contact of an intimate nature is required (for example assisting with toileting in EYFS or removing wet/soiled clothing).

Children 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 ensure that another appropriate adult is in the vicinity and is aware of the task to be undertaken.

Additional vulnerabilities that may arise from a physical disability should be considered with regard to individual teaching and care plans for each child. As with all arrangements for intimate care needs, agreements between the child, their parents and the organisation must be negotiated, agreed and recorded. Any changes to the personal care procedures care plan should be made in writing and without delay, even if the change in arrangements is temporary; e.g. staff shortages, changes to staff rotas during the pandemic etc.

Intimate and personal care should not be carried out by an adult that the child does not know. Anyone undertaking intimate / personal care in an education setting is in regulated activity and must have been checked against the relevant DBS barred list, even if the activity only happens once; this includes volunteers. Volunteers and visiting staff from other schools should not undertake care procedures without appropriate training.

Pupils are entitled to respect and privacy at all times and especially when in a state of undress, including, for example, when changing, toileting and showering. However, there needs to be an appropriate level of supervision in order to safeguard pupils, satisfy health and safety considerations and ensure that bullying or teasing does not occur. This supervision should be appropriate to the needs and age of the children

- *always ensure that an appropriate health/risk assessment is undertaken prior to undertaking certain activities*
- *explain to the pupil what is happening.*
- *always act and be seen to act in the pupil's best interest*
- *make a record of all medications administered*
- *not work with pupils whilst taking medication unless medical advice confirms that they are able to do so.*

### ***This means that staff should:***

- *make other staff aware of the task being undertaken*
- *explain to the child what is happening*
- *consult with colleagues where a variation from agreed procedure is necessary*
- *record the justification for any variations to the agreed procedure and share this information with parents*
- *Update care plans where appropriate e.g. if there are changes to staff rotas*
- *ensure that pupils, when old enough to engage and understand, are actively consulted about their own care plan*
- *ensure that intimate/personal care is provided by staff known to the child*
- *ensure that only individuals that have been checked against the relevant DBS barred list are permitted to engage in intimate or personal care*
- *ensure that temporary or visiting staff have been trained in intimate and personal care procedures*

### ***This means staff should:***

- *adhere to their organisation's intimate and personal care and nappy changing policies*
- *make other staff aware of the task being undertaken*
- *always explain to the pupil what is happening before a care procedure begins*
- *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 the pupil and their parents/carers*
- *avoid visually intrusive behaviour*
- *where there are changing rooms announce their intention of entering*
- *always consider the supervision needs of the pupils and only remain in the room where their needs require this*

concerned and sensitive to the potential for embarrassment.

## 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 plan should highlight particular areas of risk and sensitivity.

The curriculum can sometimes include or lead to unplanned discussion about subject matter of a sexually explicit or otherwise sensitive nature. Responding to pupils' questions can require careful judgement and staff should take guidance in these circumstances from the Designated Safeguarding Lead.

Care should be taken to comply with the school's policy on spiritual, moral, social and cultural (SMSC) development, which promotes fundamental British values and is rigorously reviewed to ensure it is lawful and consistently applied. Staff should also comply at all times with the policy for Personal, Social, Health and Citizenship Education and the policy for Sex and Relationships and Education (SRE). Please consult with the SRE policy for further guidance on the fact that parents have the right to withdraw their children from all or part of any sex education provided but not from the National Curriculum for Science.

## 28. Photography, Videos and other Creative Arts

Many school activities involve recording images. These may be undertaken as part of the curriculum, out of school activities, for publicity, or to celebrate achievement. Under no circumstances should staff be expected or allowed to use their personal equipment to take images of pupils at or on behalf of the school.

Staff need to be aware of the potential for these aspects of teaching to be misused for pornographic or grooming purposes. Careful consideration should be given as to how these activities are organised and undertaken. Further information is given in the School's

### ***This means adults should not:***

- *change or toilet in the presence or sight of pupils*
- *shower in the same area as pupils*
- *allow any adult to assist with intimate or personal care without confirmation from a member of SLT that the individual is not barred from working in regulated activity*
- *assist with intimate or personal care tasks which the pupil is able to undertake independently*

### ***This means that staff should:***

- *have clear written lesson plans*
- *take care when encouraging pupils to use self-expression, not to overstep person and professional boundaries*
- *be able to justify all curriculum materials and relate these to clearly identifiable lesson plans.*

### ***This means that staff should not:***

- *enter into or encourage inappropriate or discussions which may offend or harm others*
- *undermine fundamental British values*
- *express any prejudicial views*
- *attempt to influence or impose their personal values, attitudes or beliefs on pupils.*

### ***This means that staff should:***

- *adhere to relevant RSGW Policies at all times*
- *only publish images of pupils where*
- *their parent(s) have given explicit written consent to do so*
- *only take images where the pupil is happy for them to do so*
- *only retain images when there is a clear and agreed purpose for doing so*
- *store images in an appropriate secure*
- *place in the school or setting*
- *be clear about the purpose of the activity*

Safeguarding Policy which informs this Policy.

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

Pupils who have been previously abused in a manner that involved images may feel particularly threatened by the use of photography, filming etc. Staff should remain sensitive to any pupil who appears uncomfortable and should recognise the potential for misinterpretation.

**Therefore, if a pupil expresses that they do not give their consent for a photograph to be taken, or shared, or displayed, then this will be respected and the DSL at the relevant school will be informed.**

Making and using images of children for the school's publicity purposes has already had the consent of parents through the Consent Form (Appendix 1 of the Images Policy). Images should not be displayed on other websites, in publications or in a public place without such consent. The definition of a public place includes areas where visitors to the setting have access. In addition to parental consent being required staff must also, in the first instance, consult with the Marketing Manager (Mrs Sharon Dyer) in the first instance who will consult with the DSL and SLT at the relevant school.

For the protection of children, it is recommended that when using images for publicity purposes that the following guidance should be followed:

- if the image is used, avoid naming the child, (or, as a minimum, use first names rather than surnames)
- if the child is named, avoid using their image
- The school should establish whether the image will be retained for further use, where and for how long
- images should be securely stored and used only by those authorised to do so (if there is doubt about this please consult with the DSL and Data Protection Officer at the relevant School).

These directives must be followed by all staff, in keeping with the RGSW Safeguarding Children Policy, Images Policy and Data Protection Policy.

*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 children in their possession*
- *avoid making images in one-to-one situations.*

***This means that staff should not:***

- *take images of pupils for their personal use*
- *display or distribute images of pupils unless they are sure that they have parental consent to do*
- *take images of children using personal equipment*
- *take images of children in a state of undress or semi-undress*
- *take images of a child's injury, bruising or similar (e.g. following a disclosure of abuse) even if requested by children's social care*
- *make audio recordings of a child's disclosure*
- *take images of children which could be considered as indecent or sexual*
- *have images of pupils stored on personal cameras, devices, home computers or personal accounts not regulated by the Schools' Data Protection Officers*
- *make images of pupils available on the internet, other than through the School network/website with permission from parents and senior staff*

## **29. Internet Use**

RGSW has a clear policy about access to and the use of the Internet. Please refer to the Online Safety &



Acceptable Use of Smart Devices Policy for further guidance.

Under no circumstances should adults in the school access or attempt to access inappropriate images. Accessing child pornography or indecent images of children on the internet, and making, storing or disseminating such material, is illegal and, if proven, will invariably lead to the individual being barred from work with children and young people.

Using school equipment to access inappropriate or indecent material, including adult pornography, would normally lead to disciplinary action, particularly if, as a result, pupils might be exposed to inappropriate or indecent material.

### 30. Whistleblowing

Whistleblowing is the mechanism by which staff can voice their concerns, made in good faith, without fear of repercussion. Please refer to the school Whistleblowing Policy.

Staff should acknowledge their individual responsibilities to bring matters of concern to the attention of the Head at the relevant RGS School. If the concern is about a Head or Governor it should be reported to Mr John Pitt, Executive Head of The RGS Worcester Family of Schools. If the concern is about Mr John Pitt, it should be raised with the Chair of Governors. Relevant external agencies will be consulted as deemed necessary. This is particularly important where the welfare of children may be at risk.

#### ***This means that staff should:***

- *report any behaviour by colleagues that raises concern not least because this could enable a member of staff in crisis to get the support they need.*

#### ***This means that RGSW should have:***

- *a Whistleblowing Policy in place which is known to all and which has been reviewed in light of the current pandemic*

### 31. Sharing Concerns, Recording Incidents and Staff Obligations

All staff should be aware of the School's Safeguarding procedures, including procedures for dealing with allegations against staff. 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 the relevant Head as detailed in Section 30 'Whistleblowing' and within 'Definitions' above. Early discussion with a parent could avoid any misunderstanding.

Members of staff should feel able to discuss with their line manager any difficulties or problems that may affect

#### ***This means that staff:***

- *should be familiar with RGSW Safeguarding Children Policy and Whistleblowing Policy.*
- *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.*
- *should inform the Head or Director of Finance and Operations immediately if they have any reasons for suspecting that they may no longer be deemed suitable to work with children*

***Please see Safeguarding Children Policy for further information***

their relationship with pupils so that appropriate support can be provided or action can be taken.

All staff in our School are required to notify the School immediately if there are any reasons why they should not be working with children. This includes any staff who are disqualified from childcare or registration (please see a list of the relevant offences which can be found via the link at the end of this Policy).

The Childcare (Disqualification) Regulations apply to those providing Early Years childcare or Later Years childcare, including before and after school clubs, to children who have not attained the age of 8 AND to those who are directly concerned in the management of that childcare.

The school takes its responsibility to safeguard children very seriously and any staff member who is aware of anything that may affect his/her suitability to work with children must notify the Head or Director of Finance and Operations immediately. This will include notification of any convictions, cautions, court orders, reprimands or warnings he/she may receive.

Staff who are disqualified from childcare or registration, may apply to Ofsted for a waiver of disqualification. Such staff may not be employed in the areas from which they are disqualified, or involved in the management of those settings, unless and until such waiver is confirmed. Please speak to the Head or Director of Finance and Operations for more details.

We recognise that it is a key role of the school to support children and that school may provide stability in the lives of children who may be at risk of harm. We also recognise that our pupils can be vulnerable and exploited by others. Staff will be alert to the signs of vulnerability and/or susceptibilities to any extremist indoctrination.

Staff acknowledge the need for a culture of vigilance to be present in the school to support safeguarding. This includes awareness and sensitivity to attitudinal changes of pupils which may indicate they are at risk of radicalisation.

The school will monitor all pupil absences from school and promptly address concerns about irregular attendance with the parent or guardian.

## **32. Work outside School and External Examination Marking**

Staff are reminded that, under their contracts, they are required to request permission in advance from the Head of their school (for Teachers) or the Director of Finance and Operations (DFO) (for all other staff) for work they might take on outside school. This applies to

any meaningful work and two specific areas are explained in more detail below.

### **Private Tuition**

Private Tuition can assist pupils and can be particularly effective for a limited period of time to increase their understanding of a subject through one-to-one teaching. At the same time, Private Tuition takes time and is an additional commitment for staff.

If staff are approached by parents about Private Tuition, they should consider carefully the time commitment and discuss this with their Line Manager. Any Private Tuition that falls outside the normal teaching role of the teacher concerned should only take place with the written approval from the Head of the member of staff's school and after the DSL has been informed. If any part of this Private Tuition is to take place remotely then this should be made clear when permission is sought and granted and must be in-line with all of the requirements for remote teaching that are given in this Policy and in the current version of the RGSW 'Remote Schooling and the DLP Guidelines for Staff'

Staff are not permitted to provide Private Tuition or advise pupils who are preparing for an RGS School's Entrance or Scholarship examination as to do so could be seen to compromise the professionalism of the teacher and the transparency of how the examinations are processed by the School.

Private Tuition is a private arrangement between the member of staff and the parents of the pupil and it is important that parents accept that the School carries no liability and is not involved in setting fees or arranging payment. Staff may not advise parents to consider taking on Private Tuition with them. It is up to the member of staff to consider any personal tax implications or insurance requirements. If Private Tuition takes place at school this must be approved by the Head and the DSL must be informed. The Private Tuition must occur outside normal school hours. If Private Tuition takes place in school, staff are reminded to follow normal safeguarding requirements and advice for one-to-one meetings or teaching, including teaching on a main thoroughfare, in a room with a window in the door or with the door open. Staff should also consider their positioning in the classroom and it is advised that staff do not sit close to a pupil and that they ensure they have a desk in between the teacher and pupil. It is also a requirement that the Line Manager is informed of dates and times as well as venue when the member of staff is providing Private Tuition for the pupil, if it is at school. These measures are all for staff safety and protection.

If Private Tuition occurs outside school, permission is still required from the Head and the DSL must be informed. Staff are reminded to ensure they follow standard safeguarding procedures, including regarding appropriate communication with the pupil and security of any data in line with GDPR regulations.

If Private Tuition continues for longer than an academic year, then the member of staff must request permission again from the Head and inform the DSL. Permission for Private Tuition will only be granted if it has no impact on a member of staff's teaching and co-curricular commitments and any other responsibilities they have at RGS and the member of staff's Line Manager will be consulted to ensure that this is the case.

### **Public Examination Marking**

Marking for Examination Boards is encouraged at RGS, especially when such marking could be of benefit to a department in understanding the requirements of the examination. At the same time, staff who are considering taking on Public Examination marking, including setting of examination papers and scrutineering, do need to consider the time commitment required.

**Any Public Examination work should only take place with the written approval from the Head of the member of staff's school and after the DSL has been informed.** The member of staff should discuss this prior to seeking such permission with their Line Manager and with the Deputy Head (Academic). During this discussion, they must include consideration of any time required out of school for moderation meetings and the amount of, and time commitment to, the marking or other work required.

Once permission has been granted by the Head, the member of staff must follow the requirements of the Examination Board at all times, especially relating to the security of papers.

Any member of staff involved in the setting of Public Examination papers or scrutineering of questions must seek permission from the Head and ensure that such information is kept entirely confidential.

Staff need to be aware that their involvement in Public Examinations should demonstrate best practice at all times and the reputation of the School is at stake since their actions will be linked to the School, regardless of the fact that any Public Examination work is a private arrangement between the member of staff and the Examination Board. At the same time, their involvement is highly valued by the School and the experience of Public Examination marking can inform the department and teaching for the benefit of the pupils.

If any member of staff takes on Public Examination work and finds that they are having difficulties, then they are strongly encouraged to seek assistance from the Academic or Pastoral leaders in their school for advice and support.

### **33. Home Visits**

All work with pupils and parents should usually be undertaken in the school or setting or other recognised workplace. There are however occasions, in response to an urgent, planned or specific situation or job role, where it is necessary to make one-off or regular home visits.

In the event of the school needing to close, it may be decided, in consultation with the DSL and Head, that staff undertake welfare visits, particularly in the EYFS settings or for preparatory age pupils. The School will take into account the advice of the local authority Early Years Service and/or Multi-Agency Planning when deciding whether these home visits are proportionate and desirable. Staff will normally undertake home visits with a colleague. Staff undertaking welfare visits should always try to give parents/carers advance warning unless there is good reason not to; e.g. because the visit has been prompted by safeguarding concerns and/or is at the request of children's social care. In these cases, one of the staff undertaking the visit should be a Designated safeguarding lead or deputy safeguarding person. The purpose of the visit should be clarified and staff should be aware of the circumstances in which emergency

services or partner agencies should be contacted.

It is essential that appropriate policies and related risk assessments are in place to safeguard both staff and pupils, who can be more vulnerable in these situations.

**No home visit must be undertaken by any member of staff without the express permission of the relevant Head and the DSL being informed.**

A risk assessment should be undertaken prior to any planned home visit taking place. The assessment should include an evaluation of any known factors regarding the pupil, parents/carers and any others living in the household. Consideration should be given to any circumstances which might render the staff member becoming more vulnerable to an allegation being made e.g. hostility, child protection concerns, complaints or grievances. Specific thought should be given to visits outside of 'office hours' or in remote or secluded locations. Following the assessment, appropriate risk management measures should be put in place, before the visit is undertaken. In the unlikely event that little or no information is available, visits should not be made alone.

#### ***This means that staff should:***

- *always agree the purpose for any home visit with the relevant Head and DSL*
- *have a clear understanding of the actions that should be taken if it is believed that a pupil or parent is at immediate risk of harm, including when to contact emergency services and/or partner agencies*
- *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*
- *ensure any behaviour or situation which gives rise to concern is discussed with their manager.*

#### ***This means that RGSW should:***

- *ensure that they have home visit and lone-working policies which all adults are made aware of. 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 and understand the purpose and limitations of welfare visits*
- *make clear to staff that, other than in an emergency, they should not enter a home if the parent/carer is absent*
- *ensure that staff have access to a mobile telephone and emergency contact.*
- *agree the purpose for any home visit with the DSL and Head*
- *Where possible two members of staff will conduct such visits*
- *have a clear understanding of the actions that should be taken if it is believed that a pupil or other person in the house, is at immediate risk of harm, including when to*

- contact the emergency services and/or partner agencies*
- *Always make detailed recordings of the visit including arrival and departure and discuss any behaviour or situation which gives rise to concern with the DSL and Head*
- *Observe social distancing at all times*
- *Ensure there is visual access and/or an open door in one-to-one situations*
- *Except in an emergency, never enter a home without the parent or carer's consent or when the parent is absent*

### **34. Review**

This policy will be reviewed at least annually by the Assistant Head (Pastoral)

Sponsor: Assistant Head (Pastoral)

Created and Endorsed by the Chair of Governors: June 2014

3 March 2015, 18 August 2015, 20 May 2016, August 2016

Reviewed and Endorsed by the Governor with Safeguarding Responsibility on: August 2017, August 2018, 15 February and 15 August 2019 to include updated guidance from Safer Recruitment Consortium 2019 and further guidance for working outside School.

Reviewed, updated (to reflect further guidance for working during the COVID-19 period as given by Safer Recruitment Consortium Addendum 2020) and Endorsed: August 2020

Reviewed and Endorsed by the Governor with Safeguarding Responsibility: September 2021

**Reviewed and updated to reflect Keeping Children Safe in Education 2022: June 2022**