

## Staff code of conduct

Tring Park School wants its staff to enjoy working with our pupils. We urge you to consider your role thoughtfully so that you may fulfil your duty of care and avoid any misunderstanding. To meet and maintain our responsibilities towards pupils we need to agree standards of good practice which form a code of conduct or behaviour policy for all staff.

The aim of this code of conduct is to provide clear guidance about behaviour and actions and to help you think about appropriate boundaries so as not to place pupils or staff at risk of harm or of allegations of harm to a pupil. It applies to all staff who are employed by the School and exists for the protection of staff and pupils alike. Staff should be aware that failure to meet the standards of behaviour in this code of conduct may result in disciplinary action, including dismissal.

This code does not form part of any contract of employment or contract to provide services and we may amend it at any time.

The following are examples of good practice that should be considered a set of general guiding principles for staff:

- promoting the wellbeing of pupils and colleagues;
- treating all pupils and staff with respect;
- setting a good example by conducting ourselves appropriately and professionally;
- involving pupils in decisions that affect them;
- encouraging positive, respectful and safe behaviour among pupils;
- being a good listener;
- being alert to changes in pupils' behaviour and to signs of abuse and neglect;
- exercising professional curiosity and speaking to the DSL if they have any concerns about a pupil;
- recognising that challenging behaviour may be an indicator of abuse or poor mental health;
- reading, understanding and following the school's safeguarding policy and guidance documents on wider safeguarding issues, for example bullying, behaviour, physical contact and information-sharing;
- asking the pupil's permission before initiating physical contact, such as assisting with dressing, physical support in vocational lessons or administering first aid;
- maintaining appropriate standards of conversation and interaction with and between pupils and avoiding the use of sexualised or derogatory language;
- ensuring that staff/pupil relationships are professional at all times;
- being aware that the personal and family circumstances and lifestyles of some pupils lead to an increased risk of abuse;

- applying the use of reasonable force only as a last resort and in compliance with school and LSP (Local Safeguarding Partners) procedures (see Use of Reasonable Force and Physical Restraint policy for further information on this);
- referring all concerns about a pupil's safety and welfare to the DSP, or, if necessary directly to police or children's social care;
- following the school's rules about communication with pupils and use of social media and online networking, to ensure that these are always professional; and
- being familiar with and following the school's Whistleblowing policy, which is available in the Staff Handbook and in the Policies folder on staff resources, and of the importance of reporting any concerns you might have about a safeguarding or welfare matter.

Please read this guidance in conjunction with other relevant School policies, procedures and handbooks:

- Safeguarding (Child Protection) Policy;
- Safeguarding Policy Annex: Covid-19;
- Distance Learning Agreement;
- Behaviour Policy;
- Anti-Bullying Policy;
- Acceptable Contact Policy;
- Use of Reasonable Force and Physical Restraint Policy;
- First Aid Policy;
- E-Safety and Acceptable Use Policy;
- Social Media Policy;
- Educational Visits Policy;
- Minibus Policy;
- Anti-Corruption and Bribery Policy;
- Whistleblowing Policy;
- Safeguarding Children Quick Reference Guide;
- Departmental Handbooks;
- The Teachers' Standards 2011 Part 2 – Personal and Professional Conduct (revised June 2013).

### **The importance of confidentiality**

All staff are expected to treat information about our pupils in a discreet and confidential manner. You should seek advice from your line manager or a member of the SLT if you have any doubts about sharing information. You should not promise to keep secrets or make such a request as you may need to pass on information for child protection reasons.

### **You are in a position of trust**

In your role, you are in contact with young people. They and their families will look to you to safeguard and promote their interests and it is likely that strong and meaningful relationships may be forged. It may also mean that you will become an important

Last updated by SA Law June 2022

person in their lives. Such a position can be personally highly rewarding but also brings some very important responsibilities and some potential risks. You are in a position of trust. It is important you are clear that the relationship is professional, not personal. You must understand the potential power and influence of your position; you should always maintain appropriate professional boundaries and avoid inappropriate behaviour, including that which might be misinterpreted by others.

### **Propriety and Behaviour**

You should aim to maintain high standards of personal conduct in all areas of your life, both inside and outside of school, to maintain the confidence and respect of the public in general and of those with whom you work. A member of staff's behaviour or actions in his or her personal life, such as misuse of drugs, alcohol or acts of violence, may attract public scrutiny and be considered to compromise his or her position in working with pupils.

### **Honesty and Integrity**

Staff must maintain high standards of honesty and integrity in their work, including the handling and claiming of money and the use of school property and facilities.

### **Fundamental British Values**

Tring Park School is committed to supporting and actively promoting fundamental British values. Staff must not undermine fundamental British values, nor discriminate against pupils on the basis of protected characteristics as set out in the Equality Act 2010. This ethos is embedded in our community and should be underlined wherever appropriate, both during lessons and outside of lessons.

### **Preventing Radicalisation**

All staff have a duty to help prevent the risk of radicalisation and must have due regard to the need to prevent people from being drawn into terrorism. In order to fulfil the *Prevent* duty, it is essential that staff are able to identify children who may be vulnerable to radicalisation, and know what to do when they are identified. Protecting children from the risk of radicalisation is part of the school's wider safeguarding duties, and is similar in nature to protecting children from other harms, whether they come from within the family or are the product of outside influences. Full details of what to do if you have any such concerns relating to a pupil are available in the school's Safeguarding policy.

### **Female Genital Mutilation**

FGM, which is a form of honour based violence, is a deeply rooted tradition, widely practised mainly amongst specific ethnic populations in Africa and parts of the Middle East and Asia. It serves as a complex form of social control of women's sexual and reproductive rights.

Section 5B of the Female Genital Mutilation Act 2003 places a statutory duty upon teachers, along with social workers and healthcare professionals, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils, but the same definition of what is

Last updated by SA Law June 2022

Last updated by AB 12<sup>th</sup> August 2022

Date of next review Summer 2023

meant by “to discover that an act of FGM appears to have been carried out” is used for all professionals to whom this mandatory reporting duty applies.

FGM is an illegal act performed on a female, regardless of her age. Anyone who has concerns about a child’s welfare should report this following the same procedures as for any other safeguarding concern and the DSP will make a referral to the local authority children’s social care; anybody can make a referral if necessary.

If staff discover that an act of FGM appears to have been carried out, it is mandatory for them to report this to the police. Unless there is good reason not to, staff should still consider and discuss such a case with the DSP and involve children’s social care as appropriate. Further details about FGM can be found in the school’s Safeguarding policy.

### **Serious violence**

All staff should be aware of indicators which may signal that children are at risk from, or are involved in, serious crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs. All staff should be aware of the associated risks and report any concerns to the DSP team. Further information is available in the school’s Safeguarding policy, the Home Office’s guidance ‘Preventing youth violence and gang involvement’ and ‘Criminal exploitation of children and vulnerable adults: county lines’.

### **Child-on-Child Abuse: children with harmful behaviour**

All staff should be aware that children can abuse other children or young people. This is often referred to as child-on-child abuse. It is most likely to include, but may not be limited to, bullying and cyberbullying, physical abuse, sexual harassment, sexual violence, upskirting, sexting or initiation/hazing type violence and rituals. Details about child-on-child abuse and how to respond are in the School’s Safeguarding policy.

### **Dress and Appearance**

Tring Park offers a more relaxed code of dress than some schools, in keeping with the practices of the performing arts industry and some of the activities involved in vocational training. However, dress and appearance at all times should be professional, neat and appropriate for the tasks you undertake so that you set a good example to pupils.

### **Personal Living Space**

You should never invite pupils into your home and you should be vigilant in maintaining your privacy. Any contact or meeting between staff and pupils should be entirely professional, and not personal, in nature. Therefore, staff should not meet with pupils in personal or private areas and all contact should take place in public at school, or elsewhere only when on school business that has been authorised in advance by your line manager.

## **Access to Boarding areas**

Only Pastoral staff and those other staff authorised to work in boarding areas at particular times such as Housekeeping and Estates Services are authorised to enter boarding areas. There will be times when other staff need to visit boarding areas. At such times, staff must arrange this in advance with the Senior Housemistress/master and/or the Pastoral Manager.

## **Gifts, Rewards and Favouritism**

You should not accept any gift, or gift in kind, that might be construed as a bribe, or lead the giver to expect preferential treatment. All staff must comply with the Bribery Act 2010 and should be familiar with the School's Anti-Corruption and Bribery policy.

## **Infatuations**

It is possible, given the close work that teachers have with pupils, that a pupil may become infatuated with or develop a crush on a member of staff. You should respond sensitively in such situations, maintain the dignity and safety of all concerned and try to avoid any misinterpretation, hurt, distress or embarrassment. You should maintain professional boundaries at all times and report the matter immediately to your line manager.

## **Use of email**

It is the School's policy that staff use and regularly check their school email account. Personal email addresses should never be used for matters of school business. Staff should use school email accounts only when corresponding with pupils and parents. Email correspondence does not have the nuance of spoken conversation and can easily be misinterpreted or come across as blunt or rude. To avoid misunderstanding, email correspondence should be brief, polite and factual.

## **Communication with pupils using technologies**

You need to take care when using electronic and social media such as mobile phones, text messaging, e-mails, social networking sites, digital cameras, videos, web-cams, websites and blogs. You must first obtain the agreement of your line manager where it is part of your job. Do not give out personal contact details. In personal use of social networking sites, you should ensure that details are not shared with pupils and privacy settings are set at maximum. All email communication with pupils should be via the school's email system. All communications should be transparent, open to scrutiny and within clear and explicit professional boundaries. You should not share, request, or respond to personal information which is not relevant to your professional role. You should not give or exchange with pupils any personal details such as home or mobile telephone numbers or personal emails for any reason. When teaching or otherwise communicating with pupils virtually during a pandemic situation, you should use the school's approved Microsoft Teams platform and adhere to the guidance set out in the school's Distance Learning Agreement. The school's Online Safety, IT and Acceptable Use policy and its Social Media policy set out in greater detail the school's guidelines on the acceptable and responsible use of technologies. Staff are required to follow these guidelines at all times. Failure to do so could lead to disciplinary action up to and including dismissal.

## **Access to Inappropriate Images and Internet Usage**

Last updated by SA Law June 2022

It is illegal to access, make and store indecent images of children on the internet. As set out in the school's Online Safety, IT and Acceptable Use policy, staff who access or introduce adult pornography at work will raise serious concerns about their suitability to continue to work with children and will be subject to disciplinary action. Pupils should be protected from exposure to inappropriate images or web links.

### **Photography and Video recording**

This should always be for clear work purposes, and be carefully planned with the agreement of pupils and parents/guardians. Arrangements for access, retention and storage, or destruction of photographs or videos need to be specified. It is not appropriate to use personal mobile phones or other personal devices to record images.

### **Social Contact**

Where social contact is an integral part of work or made through interests outside of school or through family or personal networks, you should maintain appropriate personal and professional boundaries, keep appropriate records and ensure your line manager is aware.

### **Sexual activity with children**

Such behaviour, including physical contact or exposure to inappropriate materials, is a grave breach of trust which will always lead to disciplinary action and may lead to a criminal conviction. Under section 16 of the Sexual Offences Act 2003, it is an offence for a person aged 18 or over, such as a teacher, to have a sexual relationship with a person under the age of 18 where that person is in a position of trust in respect of that child, even if, in the case of those over 16, the relationship is consensual. This means that any sexual activity between a member of the school staff and a pupil under 18 may be a criminal offence, even if that pupil is over the age of consent. The school considers it a moral abuse of the position of trust if a member of staff enters into a relationship with a pupil even if the pupil is aged 18 or over. Because of the position and influence that a member of staff holds while a pupil is at school, this position of trust is considered still to exist after a pupil has recently left the school.

### **Physical Contact**

It is a misconception that physical contact is unlawful. In your role, physical contact with a pupil may be necessary, for example, with medical staff dealing with an injury, or in practical vocational lessons. Physical restraint or contact may also be necessary if a pupil is in imminent danger or physically dependent for care needs. It may also be appropriate at times when reassurance or comfort is required, for example, in the case of bereavement. Physical contact must, however, always be acceptable to the student and never in a way which might be construed as sexual or overly familiar. You must take into account the student's own signals and make a judgement on factors such as age, cultural differences and maturity so that the physical contact is not unwelcome or misunderstood. All staff should be familiar with and follow the School's Acceptable Contact policy.

### **Behaviour Management**

Last updated by SA Law June 2022

Last updated by AB 12<sup>th</sup> August 2022

Date of next review Summer 2023

Pupils should always be treated with dignity and respect. You must follow the School's Behaviour and Anti-Bullying policies, and use appropriate strategies. Physical intervention should only be used as a last resort in exceptional circumstances. Force should never be used as a punishment.

### **Use of Control and Physical Intervention**

The use of physical intervention should be avoided and only used in exceptional circumstances to manage a pupil's behaviour if necessary to prevent personal injury to the pupil, other pupils or an adult, or to prevent serious damage to property. All incidents and subsequent actions should be recorded (including written and signed accounts of those involved, including the student) and reported. Parents/guardians should be informed on the same day, subject to the caveat mentioned in section six of the school's Behaviour Policy.

### **Personal Care**

Where there is a need for an appropriate level of supervision, you should avoid any physical contact when pupils are in a state of undress, avoid any visually intrusive behaviour and, where required, announce your intention of entering any changing rooms or dormitories. You must not change in the same place as pupils, shower or bathe with pupils or assist with any personal care task which pupils can undertake themselves.

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

There are trained and named individuals to undertake First Aid. All staff should understand the extent of their role in applying basic care and hygiene for minor abrasions and where an injury requires more experienced intervention. Where pupils need medication, procedures should be regularly reviewed. All staff should be familiar with the School's First Aid Policy.

### **One-to-One Situations and Performing Arts Settings**

As a school that offers specialist performing arts training and one-to-one tuition, staff must recognise and follow additional measures that are necessary to safeguard children. Where there is a need for a member of staff to be alone with a pupil it should be risk assessed and agreed with a line manager, with clear procedures and safeguards in place including training and using as open a setting as appropriate. Individual lessons must take place only in official school teaching rooms as timetabled and published by that tutor's head of department. Any change of time, location or the scheduling of additional lessons may be made only with the prior approval of the head of department. All teaching rooms have windows in the doors and staff who teach regularly in one-to-one settings should follow the guidance specific to their subject as set out in their departmental handbook. If staff do not regularly teach on a one-to-one basis but have the need to do so on occasion, this must be logged in advance with the member of staff's head of department. At times, some performing arts lessons involve necessary physical contact between the member of staff and the pupil. All staff must follow the guidelines set out in the Acceptable Contact policy in any lesson or other situation with a pupil that involves either physical contact or a one-to-one situation.

### **Trips, Educational Visits and Transporting Children and Young People**

Last updated by SA Law June 2022

Last updated by AB 12<sup>th</sup> August 2022

Date of next review Summer 2023

Proper arrangements must be in place to ensure vehicle, passenger and driver safety, including correct licensing and insurance for the type of vehicle being driven, planning and recording of journeys, and knowledge of safe use of seat belts and car seats.

It is not the school's normal policy for a member of staff to transport a pupil or pupils without another member of staff present, but there may be times when this is necessary for practical reasons. When this is the case, the member of staff should log details of the trip in advance with his or her line manager. Any impromptu or emergency arrangements of lifts should be recorded, reported and justified if questioned.

Thorough planning, including appropriate risk assessment, communication with parents/guardians and adequate staffing levels, is essential. Where activities include overnight stays, careful consideration needs to be given to separate sleeping arrangements. All staff should be familiar with the School's Educational Visits policy and Minibus policy as appropriate.

It is inadvisable for a member of staff to give a lift in a car to a pupil alone. It is advisable that transport is undertaken in the school minibus, with at least one adult additional to the driver acting as an escort. If there are exceptional circumstances that make unaccompanied transportation of pupils unavoidable, e.g. an emergency trip to the hospital, the journey should be made known to a senior member of staff. Regulations regarding the use of car seats must be obeyed in these situations.

- Children must use a child car seat until they are 12 years old or 135 centimeters tall, whichever comes first.
- Backless booster seats - also known as booster cushions – can only be used for children taller than 125cm and weighing more than 22kg (3st 6.5lbs).
- Children over 12 or more than 135cm tall must wear a seat belt.

### **Safeguarding concerns about the behaviour of a member of staff working with pupils**

If you have any concerns about a member of staff, then you should raise them with the Principal. The School has a clear and accessible Whistleblowing policy, with which all staff should be familiar, which meets the terms of the Public Interest Disclosure Act 1998 and your anonymity is guaranteed. The Whistleblowing policy is available in the Staff Handbook and in the Policy folder on staff resources.

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding regime. All staff have a responsibility to speak up about safeguarding and welfare matters within the school and to external agencies where necessary. Full details regarding the reporting of safeguarding and child protection concerns can be found in the Safeguarding policy, which is available in the Staff Handbook, on the website and in the Policies folder. If a member of staff has concerns about how child protection concerns are being handled, either by the school or another organisation, he or she can contact the NSPCC Whistleblowing Advice Line for free advice and support on 0800 028 0285 or [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

### **Concerns that do not meet the harm threshold (low-level concerns)**

It is critical for all staff to promote an open and transparent culture in which all concerns about all adults are shared responsibly and with the right person, recorded and dealt with promptly and appropriately. This will enable the school to identify



concerning behaviour early, minimise the risk of abuse and ensure that adults working in or on behalf of the school are clear about professional boundaries and act within these boundaries, in accordance with the ethos and values of the school.

A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ – that an adult may have acted in a way that is inconsistent with the staff code of conduct and does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO. This includes inappropriate conduct outside of work. Just because a concern is a low-level one, that does not make it insignificant. Some examples of such behaviour could include being over-friendly with children, having favourites, taking photos of children on their mobile phones, engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or humiliating pupils.

Low-level concerns could arise for a number of reasons such as through suspicion, complaint, disclosure made by a child/parent/other person outside or inside the school, or as a result of vetting checks. Such behaviour can exist on a wide spectrum from the inadvertent, thoughtless or misunderstood, to that which is ultimately intended to enable abuse. If staff find themselves in a situation which could be misinterpreted, might appear compromising to others, or on reflection they believe they have behaved in a way that they consider to have fallen below the expected professional standards, they should self-refer. This is for their own protection and in order to help the school provide them with any necessary advice, support or training in the spirit of openness, trust and transparency.

Any low-level concern about a member of staff should be reported to the Principal. Staff should feel confident to self-refer. Where a low-level concern is raised about the Principal, it should be reported to the Chair of Governors, in accordance with paragraph 74 of KCSIE. If a low-level concern relates to a contractor or supply agency worker, it should be shared with the Principal, recorded and their employer notified about the concern so that any patterns of inappropriate behaviour can be identified.

The Principal will record all low-level concerns in writing. This will include:

- the details of the concern;
- the context in which the concern arose;
- evidence collected by the DSL where the concern has been raised via a third party;
- the decision categorising the type of behaviour;
- action taken;
- the rationale for decisions and action taken;
- the name of the individual sharing the concerns (respecting any wishes to remain anonymous as far as possible).

Where a third party has raised the concern, the Principal should collect as much evidence as possible by speaking directly to the person who raised the concern (if known) as well as to the individual involved and any witnesses.

Staff may also share low-level concerns directly with the DSL, who will inform, and liaise with, the Principal. In the absence of the Principal, staff should report any low-level concerns to the Deputy Principal, who is also the DSL. The DSL will inform the Principal immediately upon his return.

If there is any doubt as to whether information is a low-level concern or an allegation that may meet the harm threshold, the Principal will consult with the LADO.

Last updated by SA Law June 2022

All records of low-level concerns will be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR). The records will be reviewed to identify any potential patterns of concerning, problematic or inappropriate behaviour. Where such a pattern is identified, appropriate action will be taken, either through the school's disciplinary procedures or, where a pattern moves from a concern to meeting the harms threshold, it should be referred to the LADO. Consideration should also be given to whether there are wider cultural issues within the school that enabled the behaviour to occur so that policies can be revised or extra training delivered to minimise the risk of it occurring again. These records will be retained until the individual leaves the employment of the school. Learning lessons applies to all cases (allegations and low-level concerns) not just those which are concluded and found to be substantiated.

In accordance with KCSIE, schools should only provide substantiated safeguarding allegations in references. Therefore, low-level concerns will not be included in references unless they relate to issues which would normally be included in a reference such as incidents involving misconduct or poor performance. If a low-level concern, or pattern of concerns, has met the threshold for referral to the LADO and found to be substantiated, it will be included in a reference.

## **Recording Incidents**

All allegations must be taken seriously, be clearly and promptly recorded and reported without delay, and be properly investigated in accordance with local procedures and statutory guidance. Staff who are the subject of allegations are advised to contact their professional association.

## **Information Sharing**

The Data Protection Act 2018 (Including GDPR May 2018) should not be seen as a barrier for sharing information in respect of child protection but should be used as a framework to ensure that information is shared appropriately and legally. Be open and honest with the person and/or family about why, what, how and with whom information will or could be shared. Seek their agreement, unless it is unsafe or inappropriate to do so. Always seek advice first, without disclosing the identity of the person, if you feel that sharing information with a parent might put the child at risk. The child's safety must always come first. You may still share information without consent if, in your judgement, the lack of consent can be overridden in the public interest. Base information sharing decisions on considerations of the safety and well-being of the person and others who may be affected by their actions. Ensure the information you share is necessary, accurate and up to date. Share it only with the people who need to have it. Share the information securely and in a timely fashion. You have a statutory duty to share information where abuse is suspected. Keep a record of your decision to share or not to share and the reasons for it. If you are unsure about sharing information in specific situations, seek advice from your line manager, the DSP or DDSPs, or the Principal as appropriate. Whenever child protection issues might be involved, follow procedures as set out in the school's Safeguarding policy.

## **What should you do if you are unsure what is expected of you?**

The School is committed to safeguarding both its pupils and its staff. Whilst warm and friendly relations are important in your role and a key element of the School's ethos,

Last updated by SA Law June 2022

Last updated by AB 12<sup>th</sup> August 2022

Date of next review Summer 2023

overly familiar relationships can be misunderstood and may lead to difficulties. If you have concerns about these matters, or feel that you might find yourself in a difficult position because of the way something might appear, you must raise this immediately with your line manager. Do not be afraid to raise such matters: it is better to discuss them openly and frankly so that you receive support and guidance. All employees need to be aware that inappropriate relationships or behaviour with or towards pupils are unacceptable and may be unlawful.