Broomwood Hall School Limited and Northcote Lodge School Limited

STAFF CODE OF CONDUCT

Broomwood – Boys, Girls & Pre-Prep

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This code of conduct has been informed by:

DfE statutory guidance: 'Keeping Children Safe in Education (most recent addition – published annually)

Guidance for safer working practice for those working with children and young people in education settings: Safer Recruitment Consortium (February 2022)

HM Gov guidance: 'Working together to safeguard children' (July 2018),

DfE advice: 'The Prevent Duty' (June 2015) from The Counter-Terrorism and Security Act (2015)

DfE: Teachers' Standards (June 2021)

The Sexual Offences Act 2003

Dukes Teachers' Standards

Other school policies underpin the Staff Code of Conduct. Also see:

Anti- Bullying Policy, Behaviour Policies, Equal Opportunities Policy, First Aid & Medicines Policy, Intimate Care Policy, ICT and E-Safety Policy, Alcohol Consumption Policy, Fire Safety Policy, Health & Safety Policy, Child Protection and Safeguarding Policy, RSE Policy, Whistleblowing Policy.

1. Introduction

This Staff Code of Conduct applies to all members of staff. Whenever the word 'staff' is used, it includes all employees; supply staff; staff employed by a third party; self-employed staff; contractors; volunteers and proprietors.

The aim of the code is to safeguard pupils and give clear guidance on the standards of behaviour all staff are expected to observe thereby also reducing the risk of anyone being falsely accused of improper or unprofessional conduct.

This guidance cannot possibly cover every eventuality which may arise in a school setting; however, it does make clear behaviour which is illegal, inappropriate or inadvisable. There may be a circumstance when staff will be required to make decisions or take action in the best interests of a pupil where no specific guidance exists. It is expected that in these circumstances, staff will always seek advice in advance if possible, and advise senior colleagues of the justification for any such action already taken.

The school's ethos and aims underpin the school's culture, that is, to develop a happy, friendly and safe environment, and to encourage a caring, respectful and trusting relationship between all children and adults. The welfare of the child always being paramount.

2. Key Principles

a) Staff must always act in the best interests of the child.
b) Staff must work, and be seen to work, in an open and transparent way.
c) All staff must ensure they understand the policies and procedures of the school, including those which support the safeguarding of pupils.
d) If staff ever have any doubts about the correct course of action, they must always seek the advice of a member of the SLT/EMC.
e) Staff are responsible for their own actions and behaviour, and must avoid any conduct which would lead any reasonable person to question their motives and intentions.
f) All concerns about the conduct of staff, however minor, must be reported and recorded. (see Section 24)
g) Staff must uphold the same professional standards regardless of culture, disability, gender, language, racial origin, religious belief and sexual orientation.
h) Staff should not be under the influence of alcohol or any other substance, including prescribed medication, which may affect their ability to care for children.
i) Staff should be aware that failure to follow this code may result in disciplinary action being taken against them, including dismissal.
j) Failure to follow this code may also lead to criminal action and/or other proceedings including barring by the Disclosure & Barring Service (DBS). For those engaged in teaching it could also lead to prohibition from teaching by the Teaching Regulation Agency (TRA).

3. Setting an Example

School staff are role models and are in a unique position of influence; therefore, they must demonstrate behaviour that sets a good example to all members of the school community. All staff have an individual responsibility to maintain their personal reputation, and the reputation of the school, whether inside or outside working hours.

4. Duty of care

a) All members of staff have a duty to ensure pupils are safe and to protect them from physical and emotional harm.
b) This duty is reflected in the development of respectful, caring and professional relationships between staff and pupils and behaviour by staff that demonstrates integrity, maturity and good judgement.
c) The school also has a duty of care towards its employees which requires the provision of a safe working environment for staff and guidance about safe working practices. Staff are expected to follow all guidance for their own safety and for the safety of other members of the school community.

5. Power and positions of trust

a) All staff working in school are in a position of trust in relation to pupils.
b) The relationship between staff and pupils is one in which the adult always has a position of power or influence. Therefore, a relationship between a member of staff and a pupil can never be a relationship of equals.
c) There is potential for exploitation and harm of vulnerable young people and staff have a responsibility to ensure that an unequal balance of power is never used for personal advantage or gratification.
d) Staff must never use their power to intimidate, threaten, coerce or undermine pupils.
e) Staff must never use their status to form or promote inappropriate relationships with pupils, including relationships which are of a sexual nature, or which may become so.

6. Professional conduct

a) Staff must always maintain appropriate professional boundaries as outlined in this code, in order to secure the best interests and welfare of the pupils.
b) All staff are expected to uphold high standards of personal and professional conduct both within and outside school. For teachers, specific standards are also laid down in the DfE Teachers' Standards and Dukes' Teachers' Standards.
c) This means that all staff must:
   - safeguard pupils' well-being at all times;
   - treat pupils with dignity, building relationships rooted in mutual respect;
   - observe appropriate professional boundaries with pupils;
   - use clear and professional language when talking to pupils, parents and colleagues;

- not swear, blaspheme or use any sort of offensive language;
- not shout when reprimanding pupils;
- show tolerance of and respect for the rights of others;
- not discriminate, bully, harass or intimidate;
- actively promote and not undermine fundamental British values, which are defined as comprising: democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs;
- not discriminate against pupils or other staff on the basis of protected characteristics, which include: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex, sexual orientation;
- uphold the school's values and ethos and challenge any attitudes or behaviours which undermine them e.g. the use of misogynistic or racist language;
- must avoid any behaviour which could be misinterpreted by pupils or by others;
- must self-refer if they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or if on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards; this includes online behaviour. (see Section 24).

7. Safeguarding

a) Staff have a duty to safeguard children from all forms of abuse and neglect, including through the use of technology
b) Staff must treat all children with respect and dignity and must not demean or undermine pupils, their parents, carers, or colleagues in any way.
c) Safeguarding pupils includes the duty to report any concerns whatsoever about a pupil to the school's Designated Safeguarding Lead (DSL) as outlined in the school Safeguarding Policy.
d) Safeguarding pupils also includes the duty to report any concerns whatsoever about the conduct of an adult to the Principal/Head as outlined in the school Child Protection and Safeguarding Policy. This includes conduct out of school. (Also see Paragraphs 16 -20 below)

8. Dress and Appearance

All staff must dress in a manner which promotes a professional image.=

Appropriate dress complies with the following expectations:

- Appropriate attire for the role;
- clothing is not likely to be viewed as revealing, sexually provocative or offensive;
- Attire is free of any political or otherwise offensive or contentious slogans or logos;
- Workwear is not deemed to be discriminatory and is culturally sensitive;

- Outfits should not place them or others at risk and comply with any health and safety requirements.

Appropriate Clothing

Examples of appropriate clothing include a mixture of:

- Blouses/shirts (long or short sleeve);
- Suitable length skirts or trousers;
- Jumpers, jackets, dresses, business suits, ties
- Sports wear when leading games or other physically demanding subjects;
- Personal Protective Equipment including lab coats and role-specific clothing (maintenance and catering staff must wear uniform supplied by the school and comply with relevant health and safety regulations regarding clothing and hygiene).

Examples of inappropriate clothing include:

- Mini-skirts;
- Jeans, other than on certain trips and residentials;
- Leggings;
- Leisure shorts unless for PE or sports;
- Tracksuits unless for PE or sports;
- Flip-flops or sliders – shoes need to be supportive enough to run after a child;
- Offensive badges, emblems or logos on clothes;
- Indoor wearing of baseball caps;
- See-through clothing;
- Clothing with tears, holes and rips or that is not clean;
- Low cut tops, crop/vest tops etc.

Personal Appearance

All colleagues should ensure that they appear clean and hygienic. Male staff should be clean-shaven, or maintain a neatly trimmed beard or moustache. Body art (piercings, tattoos etc) must be discreet and appropriate and must not be a health and safety hazard.

9. Confidentiality

a) Due to their role in school, staff will inevitably have access to confidential information about pupils and/or their parents or carers. They may also be aware of additional highly sensitive or private information in order that they may discharge their duties effectively.
b) All information must be treated in a discreet and confidential manner and staff must not discuss or mention such information elsewhere, except to those colleagues who have a professional role in relation to the matter.
c) Staff may also be privy to confidential information about their colleagues e.g a colleague leaving the school or a colleague with a health issue which similarly must

not be discussed or shared outside the school or with the wider school community.

d) To ensure online information is suitably protected, staff are expected to use strong passwords which are always kept private.
e) Any mobile devices must also be protected with a password or PIN, whether in or out of school, to protect access to content.
f) Staff must report any loss or compromise of data (e.g. losing a laptop or phone, losing hard copy documents relating to the school, suspected hacking, compromised password) immediately to the head, data officers[1] and (in the case of electronic data) the IT Manager.
g) Any e-safety issues relating to pupils must also be reported to the DSL.
h) 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).
i) Information must never be used to intimidate, humiliate, or embarrass.
j) Staff must be aware that should they meet socially after school in local pubs, restaurants or other public places, their conversations may be overheard and so they must be extremely careful that confidential information about the school, the parents or the pupils does not leak in this way or otherwise inadvertently.
k) Staff must never make any statement, whether oral or written, to any representative of any newspaper, publisher, television, radio or film company nor write any article or other literary work for the press or otherwise for publication about the school, pupils or parents. Any media enquiries should be directed to the Head.
l) Staff must not discuss or comment on the school, pupils, colleagues or parents/carers on any social or professional networking websites or other similar media.
m) Staff must understand that if they discuss a problem of a personal nature with any other member of staff, the confidant(e) may in some instances have a professional duty to report what he or she has been told, e.g. where there are child protection, alcohol or drug abuse issues.
n) Staff must not promise confidentiality to a pupil if he/she makes a disclosure related to safeguarding. (See Child Protection and Safeguarding Policy) Staff must never promise a pupil that they will not act on information that they are told by the pupil
o) Staff including the Head, DSL and Deputy DSL will be required to share confidential information with other agencies to safeguard children. The school follows the DfE guidance in Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers (July 2018).

10. Working with pupils one to one

a) Working or dealing with pupils one-to-one requires additional safeguards to be in place as staff are more vulnerable to unfounded or malicious allegations being made against them when working alone.
b) One-to-one situations also have the potential to make the child more vulnerable to harm by those who seek to exploit their position of trust.

[1] Deborah Kind and Suzanne Thompson

c) Every attempt should be made to always ensure the safety and security needs of both staff and pupils.

d) Members of staff teaching one pupil or conducting a one-to-one meeting with a pupil for any reason should take particular care in the following ways:

- use a room that has a viewing panel in the door so the occupants can be seen easily, and/or keep the door open;
- all window blinds should be up;
- ensure a colleague knows that the lesson/meeting is taking place;
- arrange the meeting during normal school hours when there are plenty of other people about;
- not continue the meeting for any longer than is necessary to achieve its purpose;
- not sit or stand in very close proximity to the pupil, except as necessary to check work;
- avoid all unnecessary physical contact and apologise immediately if there is accidental physical contact;
- avoid any conduct, language or humour that could be interpreted as over familiar or a sexual advance;
- report immediately (see Section 24) anything which causes concern, could be misinterpreted or any situation where a pupil becomes distressed, anxious or angry;
- report any safeguarding concerns about a child to the DSL in accordance with the Child Protection and Safeguarding Policy.

11. Physical contact

a) The school accepts that there are occasions when physical contact with a pupil may be necessary such as:

- when comforting a distressed pupil;
- when a pupil is being congratulated or praised;
- to demonstrate how to use a musical instrument;
- to demonstrate exercises or techniques during PE lessons or sports coaching;
- to support learning in dance lessons;
- to give first aid;
- if pupils soil themselves.

b) Whenever physical contact is made with pupils this should be in response to their needs at the time, of limited duration and appropriate to their age, stage of development, gender, ethnicity and background.

c) Staff should remain self-aware at all times, in order that their contact is not threatening, intrusive or subject to misinterpretation.

d) Staff should observe the following guidelines (where applicable):

- explain the intended action to the pupil;
- ask the pupil's permission if appropriate e.g. to examine an injury if sustained in school and for which medical treatment may be needed;
- do not proceed with the action if the pupil appears to be apprehensive or reluctant, or if you have other concerns about the pupil's likely reaction;
- ensure that the door is open and, if you are in any doubt, ask a colleague or

another pupil to be present;
- if intimate care is needed two members of staff should be present although the dignity and privacy of the pupil must always be considered;
- particular care must be taken in instances which involve the same pupil over a period of time;
- some children may seek out inappropriate physical contact. In such circumstances, staff should deter the child sensitively by helping them to understand the importance of personal boundaries, and if appropriate also self-refer the incident (see Section 24);
- if a pupil's behaviour causes concern, or continues, the member of staff should inform the DSL, as this may be an indicator the pupil is a victim of abuse.

12. Intimate / Personal Care

Intimate care involves one of the following:

- Supporting a pupil with dressing/undressing (this may be necessary in Early Years but staff should always encourage children to dress and undress unaided).
- Providing comfort or support for a distressed pupil.
- Assisting a pupil requiring medical care, who is not able to carry this out unaided.
- Cleaning a pupil who has soiled him/herself, has vomited or feels unwell.

a) When touching a child, staff must always be aware of the possibility of invading a child's privacy and must respect the child's wishes and feelings.
b) If a child needs to be cleaned, staff must make sure that:
    - protective gloves are worn
    - the procedure is discussed in a friendly and reassuring way with the child throughout the process
    - the child is encouraged to act as independently as possible and to undertake as much of their own personal care as is possible and practicable.
    - the child is encouraged to care for him/herself as far as possible
    - physical contact is kept to the minimum possible to carry out the necessary cleaning.
    - privacy is given appropriate to the child's age and the situation
c) Staff need to have regard to the danger of allegations being made against them and take precautions to avoid this risk. This should include:
    - gaining verbal agreement from another member of staff that the action being taken is necessary
    - allowing the child, wherever possible, to express a preference to choose his/her carer
    - being aware of and responsive to the child's reactions
    - assistance should normally be undertaken by one member of staff, however, he/she should try to ensure that another appropriate adult is in the vicinity who is aware of the task to be undertaken and that, wherever possible, they are visible and/or audible.

d) A record should be kept of all intimate and personal care tasks undertaken and parents informed the same day.
e) Volunteers must not carry out intimate care procedures.

13. Changing areas

a) Pupils are entitled to respect and privacy at all times, and especially when in a state of undress, including when changing, toileting and showering.
b) However, there also needs to be supervision which is appropriate to the needs and age of the pupils concerned to ensure health and safety and to ensure that poor behaviour does not occur.
c) General guidelines staff should observe:
    - avoid any visually intrusive behaviour;
    - knock and announce the intention to enter the changing area if supervision is required;
    - consider the necessary level of supervision and only remain in the room when pupils' needs require this;
    - only assist with intimate or personal care tasks which the pupil is unable to undertake independently;
    - never change in the presence or sight of pupils;
    - never use pupils' toilets or shower with pupils;
    - when using external facilities for sport or other trips, time spent in shared public changing rooms or toilets should be kept to a minimum. Staff-pupil use of such facilities should be deliberately staggered so as not to coincide.
d) For pupils in Little Broomwood to Year 2 staff may remain in changing areas as younger pupils need a greater level of supervision and it is more likely they will need some help to dress and/or undress. However, staff must still respect the privacy of pupils and only assist if a pupil is unable to complete a personal task independently.
e) For pupils in Years 3 to 8, staff may be supervising in the changing area to ensure safety or address a concern about a pupil's welfare.

14. Behaviour management

a) Staff are responsible for managing children's behaviour in an appropriate way in accordance with the Behaviour Policies.
b) Rewards and sanctions must be appropriate to the age and understanding of the pupils and in line with the school's policy and procedures.
c) All forms of corporal punishment are unlawful and corporal punishment must never be threatened.
d) Staff must not use any form of degrading or humiliating treatment to punish a pupil.
e) Staff must not shout when reprimanding pupils.
f) The use of sarcasm, demeaning or insensitive comments towards pupils is completely unacceptable.
g) If the behaviour of a pupil(s) causes concern, staff must seek advice from a senior colleague. In addition to speaking to a senior member of staff, they will record this concern in CPOMS.

15. Physical intervention

(Also see DfE non-statutory advice document: Use of reasonable force (July 2013).

a) Teaching staff, and other staff who are authorised by the Head to have control or charge of pupils, may use such force or physical contact as is reasonable in the circumstances to prevent a pupil from doing, or continuing to do, any of the following:
    - committing a criminal offence;
    - injuring him/herself or others;
    - causing damage to property, including their own;
    - engaging in any behaviour prejudicial to good order and discipline at the school or among any of its pupils, whether that behaviour occurs in a classroom or elsewhere.
b) This applies when a teacher, or other authorised person, is on school premises and when he or she is in control or charge of the pupil elsewhere, for example on a field trip or other authorised out of school activity.
c) It only applies where no other form of control is available and where it is necessary to intervene physically.
d) 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
e) There is no legal definition of "reasonable force". It will always depend on the circumstances. Note that:
    - physical force could not be justified to prevent a pupil from committing a trivial misdemeanour;
    - any force should always be the minimum needed to achieve the desired result;
    - whether it is reasonable to use force and the degree of force that could be reasonably employed may also depend on the age and understanding of the pupil.
f) Reasonable force covers a wide range of actions which may be used by staff e.g. guiding a child to safety by the arm to more extreme circumstances such as breaking up a physical fight. Reasonable force is only appropriate where no other form of control or restraint is available.
g) Any force used must always be the minimum needed to achieve the desired result and must be appropriate for the age and understanding of the pupil and in keeping with the Behaviour Policies.
h) Before intervening physically, staff should always seek to defuse the situation and avoid the use of physical intervention wherever possible.
i) Staff should tell the pupil to desist and what will happen if he or she does not.
j) The member of staff should continue attempting to communicate with the pupil throughout the incident and should make it clear that physical contact or restraint will stop as soon as it ceases to be necessary.
k) Members of staff should never act in a way that might reasonably be expected to

cause injury.

l) Staff involved must inform the Head immediately following an incident where force has been used. This is to help prevent any misunderstanding or misrepresentation of the incident.

m) Parents should also be informed.

16. Educational visits and off-site activities (Also see Educational Visits PP (EYFS) and Offsite Visits and Residential Trips Policies)

a) All educational visits and off site activities must be risk assessed in accordance with the Educational Visits PP (EYFS) and Offsite Visits and Residential Trips Policies.

b) Staff should take particular care when supervising pupils in the less formal atmosphere of an educational visit where a more relaxed discipline or informal dress and language code may be acceptable.

c) Staff remain in a position of trust and must uphold the same professional standards of conduct which pertain within school, following school policies and ensuring that their behaviour remains professional and cannot be interpreted as seeking to establish an inappropriate relationship or friendship.

d) Staff organising trips and activities should pay careful attention to ensuring there is a safe staff/child ratio and suitable gender mix of staff.

e) Where out of school activities include overnight stays, careful consideration must be given to sleeping arrangements. Pupils, adults and parents must be informed of these prior to the start of the trip.

f) Staff must always be accommodated in separate rooms to pupils, with access to separate washing and toilet facilities.

g) Staff must not allow a pupil or pupils to enter their own accommodation nor should pupils be able to witness a member of staff getting showered, dressed or changed.

h) Members of staff should refrain from being in bathrooms, changing rooms, showers or toilets when pupils are, or might be, in a state of undress and should follow the guidance above relating pupils changing or showering.

i) The staff should generally not enter beyond the doorway of a pupil's bedroom. Where there is a safety or welfare reason why the staff member must enter the room, the door must be kept open and the pupil/s within must have signalled that they are happy for the member of staff to enter. The member of staff must respect and bear in mind the privacy and personal space of the pupil/s concerned and should leave the room as soon as possible. Another member of staff should also be present if at all possible. Time spent with a pupil in a room in this way should be noted with the Trip Leader.

j) During residential trips, if a member of staff has an evening which is specifically designated as off duty, permission may be given by the trip leader for a very moderate amount of alcohol to be consumed. For further details please see Alcohol Consumption Policy.

17. Conduct outside work

a) Staff have a professional duty to set a responsible example and should not put themselves in a position which may compromise their professional status.
b) Staff must not engage in conduct outside work which could damage the reputation and standing of the school, the member of staff's own reputation or the reputation of other members of the school community.
c) Any additional work undertaken outside school, either paid or voluntary, must not conflict with the interests of the school nor be to a level which may contravene the working time regulations or affect an individual's work performance in the school. Permission from the Head needs to be sought in advance of taking up additional work out of school hours.
d) Staff must exercise extreme caution when using information technology, including social networking sites, and be aware of the risks to themselves and others. Maximum privacy settings should always be utilised.
e) Staff must inform the Head immediately if they are arrested or subject to a criminal conviction or caution.

18. Communication & the use of technology (See Digital Usage Policy and Technology Policy - Staff)

a) Staff must not give pupils their home address, home telephone number, mobile number or email address (other than the school internal email address).
b) School mobile phones, or a central school contact number, should be used in situations where staff/pupils may require an emergency contact number, such as during a school fixture, day trip or residential trip.
c) The ICT and E-Safety Policy and the Technology Policy - Staff (see appendix) must be understood by all staff before starting work and must be followed at all times.
d) Staff must not take video footage or photographs of pupils except for school purposes.
e) Cameras, mobile phones or other devices are not allowed in any areas where pupils may be washing or changing, nor should photography be used in a manner that may offend or cause upset.
f) Staff should ensure that pupils are appropriately dressed and are comfortable that their image is being recorded.
g) Any images captured which might be considered sexually suggestive, demeaning, or otherwise inappropriate in any way must be permanently deleted.
h) Wherever possible, school devices should be used to photograph or video images of pupils. Any digital/video images of pupils taken on a personal device must be uploaded to the school network and permanently deleted from the personal device within one working day.
i) The use of personal mobile devices should be limited to emergency use, unless specific authorisation from the Head has been granted, other than where necessary due to 2-factor authentication requirements.
j) Staff must not take images of a child's injury, bruising or similar (e.g. following a disclosure of abuse or suspicion of abuse) or make audio recordings of a child's disclosure.
k) No photograph or film taken in school may be published (this includes on any social

media platform such as Instagram, Facebook, Twitter, YouTube or Vimeo - regardless of privacy settings - or in any other way) without the explicit consent of the Head.

l) Staff should keep their passwords confidential and not allow unauthorised access to equipment.

m) There should be no communications between staff and pupils on personal social media.

n) Any electronic communications between staff and pupils must be conducted on school systems, such as school email or designated school apps. and be strictly for educational reasons.

o) If a member of staff is contacted by a pupil by an inappropriate route, staff should report the contact to the Head immediately.

p) Any communication should be written carefully so it cannot be misinterpreted and must avoid any displays of affection or over familiarity.

q) Staff must be aware of the potential for a relationship with a pupil to be misunderstood or misrepresented by the pupil or misrepresented by the terminology or interface of an online platform.

r) Staff must exercise caution in their use of all social media or any other web-based presence that they may have, including written content, videos or photographs, and views expressed either directly or by 'liking' certain pages or posts established by others.

s) Staff should ensure that they understand the IT tools they are using and utilise the highest privacy settings. They must be aware that pupils will be naturally curious about staff and their life outside the school and nothing should be in the public domain which would bring them or the school into disrepute.

t) It is advised that staff ensure their social media settings prohibit others from tagging them in any photos or updates without their permission and be proactive in asking others to remove any undesirable content related to them.

u) A school email address should never be used for any personal use including on social media.

v) All staff are prohibited from accepting or requesting pupils to connect via social media (such as Facebook and Instagram).

w) Email, messaging or use of social media between staff and pupils outside agreed protocols may lead to disciplinary action and/or criminal investigations.

x) Similarly, all staff are prohibited from accepting or requesting requests from the parents of current pupils and should limit contact to more formal channels.

y) Staff who have children who are pupils in the school will inevitably have social contact with parents through their child(ren). Such staff must be very aware of confidentiality and must ensure that neither the school nor themselves is brought into disrepute.

z) Staff must ensure they do not claim or appear to claim to represent or speak in the name of the school except where specific permission to do so has been given by the Head.

aa) If staff have concerns about a pupil's behaviour online, including if they feel they are the victim of cyberbullying or have received inappropriate comments, photos or posts, they must contact the DSL immediately. Any such posts should not be deleted and a record of them kept to facilitate any subsequent investigation.

bb) Under no circumstances should staff make, download, possess or distribute indecent images or pseudo-images of children. This is illegal and, if proven, will lead

to the individual being barred from working with children and young people.

cc) In the event of any indecent images of children or unsuitable material being discovered on a device, the equipment should not be tampered with in any way. It should be confiscated, secured and isolated from the network, and the DSL contacted without delay, who will contact the police. If the images are of children known to the school, a referral will also be made to Children's Services.

dd) Staff must not attempt to investigate the matter, forward the images or search for further images as this may lead to a contamination of evidence and a possibility that they will be at risk of prosecution themselves.

ee) If staff believe their own actions may be misinterpreted, they should immediately make a self referral (see Section 24).

19. Social contact with parents and/or pupils

a) Members of staff should avoid all contact with pupils outside school.
b) Staff must decline any invitation to attend a pupil's home unless this has been specifically sanctioned in advance by the Head.
c) Staff should not make arrangements to meet pupils, individually or in groups, outside school other than on school trips or fixtures authorised by the Head.
d) Staff must not invite pupils (groups or individuals) to their home.
e) Staff should avoid forming 'out of school' friendships with current parents, as it can cause issues with other parents and such relationships blur professional boundaries.
f) Members of staff who are already friends with parents of pupils; whose own children are pupils of the school; or staff who may work/volunteer in other organisations attended by pupils, will inevitably have contact outside school and pupils may visit their homes. However, such staff must still respect the advice within this code and should ensure that pupils do not see anything in their home that may cause embarrassment or that might become the subject of inappropriate gossip or rumour.
g) Staff must declare to the Head any relationships that they may have with pupils outside of school, such as family connections or friendships with parents of pupils at the school.
h) Members of staff should not establish, or seek to establish, social contact with former pupils while they remain of school age. If a pupil seeks to establish social contact, or if this occurs coincidentally, the member of staff should exercise professional judgement in making a response and be aware that such social contact could be misconstrued.
i) Please not that this section relates to *social* contact which is separate from professional contact, including that by which Broomwood acts solely as a source of introduction rather than employer (such as tutoring or babysitting) and as such requires staff and parents to proceed at own risk.

20. Sexual contact with young people

a) Any sexual behaviour by a member of staff with or towards a pupil is both inappropriate and illegal.
b) Forming inappropriate relationships or friendships with any children under the age of 18 will be viewed as inappropriate and impact upon the school's ability to trust the member of staff to maintain professional boundaries with pupils at the school.
c) The Sexual Offences Act (2003) makes it an offence for any person aged 18 or over to have a sexual relationship with a child under 18, where that person is in a position of trust in respect of that child, even if the relationship is consensual. This applies, even if the person does not teach the child.
d) It is also an offence to involve children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet).
e) Forming inappropriate relationships with pupils or young people who are pupils at another school will also be regarded as gross misconduct. Such behaviour gives rise to concern that the member of staff involved cannot be trusted to maintain appropriate boundaries with pupils or young people.

21. Grooming and sexual communication with children

a) Grooming is the process by which an individual prepares a child, including significant adults around the child and the environment, for abuse of that child.
b) All staff should be aware of grooming type behaviours.
c) All staff should try as far as possible not to do anything (such as conferring special attention and favour upon a child, gift giving, inappropriate social contact) which might be construed as being part of a grooming process.
d) Staff should also avoid any form of communication with a child which could be interpreted as sexually suggestive or provocative, either in verbal comments, letters, notes, electronic mail, phone calls, texts, social media, or through inappropriate physical contact.
e) If staff suspect that another member of staff is behaving in a way which could be perceived as grooming, this must be reported following procedures as set out in Section 24.

22. Infatuations and 'crushes'

a) All staff need to recognise that it is not uncommon for pupils to be attracted to a member of staff and/or develop a 'crush' or infatuation.
b) Staff should make every effort to ensure that their own behaviour cannot be brought into question, does not appear to encourage this and be aware that such infatuations may carry a risk of their words or actions being misinterpreted.
c) Any member of staff who receives a report, overhears something, or otherwise notices any sign, however small or seemingly insignificant, that a pupil has become or may be becoming infatuated with either them or a colleague, should

immediately report this to the Head.

d) The Head will 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.

23. Gifts, Hospitality rewards and favouritism

a) Broomwood expects the highest level of honesty and integrity for all of its staff; there is an expectation that each staff member will maintain high standards of professionalism in all their associations, ensuring that they are free from a conflict of interest within their job role.

b) Members of staff must not accept any gift that might be construed as a bribe by others, or lead the giver to expect preferential treatment or in some way create a perception that their personal integrity is being compromised

c) There are often 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 acceptable. However, it is unacceptable to receive gifts on a regular basis or of any significant value.

d) A gift will be considered as any item or service that you receive free of charge. It also includes any goods or services which you personally are offered at a discounted rate or on terms not available to the general public.

e) Hospitality is the offer of food, drink, accommodation or entertainment or the opportunity to attend any cultural or sporting event on terms not available to the general public.

f) Broomwood holds a Gifts and Hospitality register. All gifts/ hospitality over the value of £100 must be logged in the register which is overseen by HR. In the case of gifts which are presented from a group of parents or pupils, these should be referred to the Head who will use his/her judgement but may to refer the matter to HR should the value be over £250. Where a more valuable gift, benefit or service is offered which is to the good of the school, rather than an individual, it must be referred to the Head teacher, Director of HR and Compliance, or to the Financial Controller and Operations Manager for approval within their discretion; if acceptable, these items must be recorded in the register.

g) Hospitality such as working lunches, coffees etc. are perfectly acceptable where it is appropriate to offer or receive these in support of good relationships with visiting staff or business colleagues. Modest hospitality, provided it is reasonable in the circumstances, should be similar to the scale of hospitality which Broomwood, as an employer, would be likely to offer. These would not be added to the register. Hospitality received above this level should be recorded in the register.

h) Where a gift is received on behalf of Broomwood or one of its schools, the gift remains the property of Broomwood. The gift may be required for departmental display or it may, with the Principal's approval, remain in the care of the recipient. Unless otherwise agreed, the gift should be returned to the Department on or before the recipient's last working day.

i) Gifts are sometimes offered by suppliers with the purchase of items. All such special offer gifts are the property of the school and must be used accordingly.

Any reward, commendation, recognition given to a pupil should be in accordance with agreed practice and consistent with the school's Behaviour Policy, and not based on favouritism.

j) Any gifts to pupils must be of insignificant value and given to all pupils equally. e.g. a small token to all the class at Christmas time and/or at the end of the academic year.

k) All members of staff must ensure that they do not behave in a manner which is either favourable or unfavourable to individual pupils

l) Staff must also exercise care when selecting children for specific activities, jobs or privileges in order to avoid perceptions of favouritism. Similar care should be exercised when pupils are excluded from an activity.

m) Methods of selection and exclusion should always be subject to clear and fair criteria.

n) If a member of staff, is offered a gift or hospitality whilst involved in the procurement of goods and services, tenders for work or when liaising with anyone conducting business with the school (other than light refreshments) it is their responsibility to discuss this with the Financial Controller and Operations Manager immediately.

o) If not accepting a gift would be regarded as causing offence (such as a sudden and unexpected gift or one where refusal could cause cultural offence) the item should be accepted. The matter should then be brought to the attention of the Head, Director of HR and Compliance, or Financial Controller and Operations Manager as soon as possible who may decide to return the gift, or may donate it to a school raffle/ fair or a charitable cause.

p) The following must never be accepted:
- gifts or hospitality offered to your husband, wife, partner, family member or friend;
- gifts or hospitality from a potential supplier or tenderer in the immediate period before tenders are invited or during the tender process;
- Lavish or extravagant gifts or hospitality, even if they relate to activities in your own time.

q) Non-Compliance: in the case where it is believed a member of staff or governor has not declared a gift or hospitality then a formal investigation will be instigated by the Executive Management Committee. If misconduct is indicated, this may take the form of disciplinary procedures in the case of employees.

24. Transport

Members of staff should not transport pupils in a private vehicle, or in their own vehicle without express consent from the Head.

a) If a private vehicle is used staff must:
- ensure that the vehicle used is roadworthy, has a valid MOT and appropriate insurance cover
- be aware that the safety and welfare of the child is their responsibility until safely discharged to a parent / carer;
- ensure that when travelling in a car, pupils are situated in the back seats whenever possible

- ensure seatbelts are always used.

25. Neutral notification

Allegations against staff, low level concerns and self-referral (also see Child Protection and Safeguarding Policy for further detail on allegations which meet the threshold of harm and for all contact details for the relevant personnel detailed below.)

a) The school aims at all times to promote an open and transparent culture in which all concerns about staff are reported and dealt with promptly and appropriately.
b) A member of staff receiving an allegation of abuse or with a concern about another member of staff should report this immediately to the Head. If the Head is absent, the report should be made to the Safeguarding Governor.
c) An allegation or concern about the Head should be reported to the Safeguarding Governor, without the Head first being informed.
d) In any instance where there may be a conflict of interest about reporting an allegation or concern to the Head or to the Safeguarding Governor, the Wandsworth LADO should be contacted directly and without hesitation.

26. Allegations against staff, low level concerns and self-referral

a) There may be occasions when something occurs which causes a member of staff to have doubts about the behaviour of another adult towards a pupil, or another child outside school, or concerns about how their own behaviour may be interpreted. This may be considered a low level concern.
b) 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 working in or on behalf of the school may have acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and does not appear to meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO. Please see Child Protection and Safeguarding Policy for further information.
c) Examples of such behaviour could include, but are not limited to:
d) being over friendly with children;
e) having favourites;
f) taking photographs of children on their mobile phone/other device;
g) engaging with a child on a 1:1 basis in a secluded area or behind a closed door;
h) using inappropriate sexualised, intimidating or offensive language,
i) email, messaging, use of social media sites or other communication between adults and pupils outside agreed protocols.
j) any incident where a member of staff feels that his/her actions or behaviour towards a pupil or that of another adult, may have been misinterpreted or may have given rise to a risk or misinterpretation
k) Staff must report any such low-level concerns to the Head (or to the Safeguarding Governor if it concerns the Head)
l) Notifications may be made in person or submitted by email. If the notification is

made in person in the first instance, staff will be required to complete a written account later.

m) Staff are also encouraged, and to feel confident if the need arises, for them 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.
n) Reporting of these types of concerns is a neutral act, and the Head will, on receipt of a report, determine how to best approach the issue.
o) In the vast majority of cases, there will be a perfectly innocent explanation for what has occurred, and staff should not feel that making a report, or being the subject of a report, will cause them to suffer any detriment or stigma where this is the case.
p) All such concerns will be dealt with as outlined in the Child Protection and Safeguarding Policy and Part 4 of KCSIE.
q) The purpose of low level reporting is to protect both pupils and the staff working with them, and allows a system for a simple record to be kept in case events are later referred to or any patterns emerge.
r) Low level concerns relating to supply staff and staff employed by a third party will be reported to the agency/employer in order that any patterns of behaviour may be identified.
s) A staff member who reports a low level concern, or a more serious allegation, in good faith will suffer no detriment as a result, and will benefit from the protection set out in the Whistleblowing Policy.

27. Whistleblowing (also see Whistleblowing Policy)

Whistleblowing is the procedure by which staff can voice concerns, made in good faith, without fear of repercussion. This may include actions which are

- potentially or actually unlawful, or
- involves a miscarriage of justice, or
- compromises an individual's health and safety, or
- might cause environmental damage, or
- contravenes any school or relevant local authority policy, or
- might be considered improper, or
- falls below the normal standards of conduct in the school or any deliberate concealment of such actions

- involves potential fraud, corruption or financial irregularity
- involves suspicion of actual or potential abuse of children

All staff should be aware of their responsibility to raise concerns. All members of the school community have a duty to protect children and should they have concerns must make these concerns known to the Head or Safeguarding Governor.

28. Support for staff

The school recognises that staff who have become involved with a pupil who has suffered harm, or appears to be likely to suffer harm, and/or has raised a concern about a member of staff, may find the situation stressful and upsetting. The school will support such staff by providing an opportunity to talk through the matter with the DSL and will be helped to seek further support as appropriate.

The NSPCC helpline is also available if staff have concerns about the way a concern is being handled by the school. Staff can call 0800 028 0285 or email help@nspcc.org

29. Personal Relationships

a. Introduction

The following sets out our organisation's approach to personal relationships at work.

We recognise that individuals who work together may form close personal relationships. Personal relationships at work are a normal part of life and you are entitled to a private life. At the same time, we are committed to promoting a working environment based on dignity, trust and respect.

It is important for us to ensure that staff behave in an appropriate, professional and responsible manner at work and that any personal relationship does not compromise this.

The policy does not form part of your contract of employment and we reserve the right to amend it at any time.

b. Scope

This policy applies to anyone working for us. This includes employees, workers, contractors, volunteers, interns and apprentices.

c. Conduct at work

If you are involved in a close personal relationship with a colleague, contractor, client, customer or supplier, you must not allow that relationship to influence your conduct while at work.

You must ensure that any personal relationship at work does not have an adverse effect on your work, give rise to a conflict of interest, or provide any other workplace advantage.

Intimate behaviour during work time, such as holding hands, kissing, other close physical contact and discussions of a sexual nature is not permitted. For the avoidance of doubt, this applies during any period that you are working, whether that is on site, at home, at any other remote location, or if you are visiting a clients' premises.

You must ensure that any confidential information that you have access to is protected at all times. Any breach of confidentiality will be treated very seriously, and even inadvertent disclosure will be dealt with under our Disciplinary procedure.

d. Declaring a personal relationship

If you enter into a personal relationship with a colleague working in the same department, an individual that you supervise, a manager, or with any individual which may give rise to a conflict of interest, you must declare your relationship to your Head/manager and the HR department.

Any information that you disclose will be treated sensitively and in confidence.

e. Conflict of interest

Where one party has access to confidential information or is in a position of authority over the other, or there is a potential conflict of interest situation, we reserve the right to transfer one or both of the individuals involved in a personal relationship to an alternative post either temporarily or permanently.

In such circumstances, we will consult both of the individuals and seek to reach a satisfactory agreement regarding the transfer of one or both of them.

These principles apply to an individual who begins a close personal relationship with a client, customer, contractor or supplier.

f. Complaints

We are committed to promoting a working environment based on dignity, trust and respect, and one that is free from all forms of bullying, harassment, including sexual harassment, victimisation and discrimination.

For further information on the proactive measures that we take to prevent bullying and harassment (including sexual harassment) in the workplace, you should refer to our Anti-harassment and anti-bullying policy.

If you find yourself in a situation where you are bullied or harassed while you are at work, including where a personal relationship has broken down, we encourage you to raise a complaint under our Anti-harassment and anti-bullying policy.

If you have any other complaint about unfair treatment at work due to a personal relationship breakdown, you should raise this with the HR department, or you can raise it formally under our grievance procedure (found within 'Staff Employment Policies and Procedures' on bob) if it applies to you.