

Forres Sandle Manor (Non-Academic) Policy

Policy Title	Staff Code of Conduct
Policy Lead (Appointment (& Initials))	Head (MH)
Date of Last Review	January 2026
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STAFF CODE OF CONDUCT

INTRODUCTION

This policy has been developed in accordance with the government publications: Keeping Children Safe in Education – Statutory Guidance for Schools and Colleges (September 2025), Working Together to Safeguard Children (2023) Revised Prevent Duty Guidance: for England and Wales (2023) and Guidance for safer working practice for adults who work with Children and Young People in Education (2019) and follows the procedures laid down by the Hampshire Safeguarding Children's Partnership (HSCP).

PRINCIPLES

- The welfare of the child is paramount (Children Act 1989).
- Staff should understand their responsibilities to safeguard and promote the welfare of children.
- Staff are responsible for their own actions and behaviour and should avoid any conduct which could lead any reasonable person to question their motivation and intentions.
- Staff should work, and be seen to work in an open and transparent way.
- Staff should discuss and/or take advice promptly from their line manager if they have acted in a way which may give rise to concern.
- Staff should behave professionally, treat all pupils with respect and ensure that their behaviour does not inadvertently lay them open to allegations of abuse.
- The same professional standards should always be applied regardless of culture, disability, gender, language, racial origin, religious belief or sexual identity.
- 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). Staff should continually monitor and review their practice to ensure they follow the guidance contained in this code.

- Staff should be aware of requirements on the School and process to investigate, record and respond to any low-level concerns raised.
- Staff should be aware of and understand FSM's Child Protection and Safeguarding and Welfare policies and procedures, arrangements for managing allegations against staff and the Whistleblowing Policy.
- Staff should avoid behaviour which goes against these principles, record any incident with this potential and report it to the DSL.

RELATED POLICIES

- FSM Aims, Values & Ethos (2a).
- Statement of Fundamental British Values (5a).
- Safeguarding Policy (7a).
- Keeping Children Safe in Education (2025).
- Children Missing in Education Policy (7c).
- Staff Induction, Training and Development Programme (7d).
- Whistleblowing Policy (7f).
- E-Safety Policy (7g).
- EYFS Use of Mobile Phones and Cameras Policy (7h).
- Use of Reasonable Force Policy (7i).
- Searching Pupils Policy (7k).
- Pupil Behaviour Management Policy (9a).
- Health and Safety Policy (11a).
- Fire Risk (Prevention) Policy (12b).
- Supervision of Pupils Policy (14a).
- Supervision of EYFS Pupils Policy (14b).
- Trips Policy & Procedures (14c).
- Missing Child Policy (14d).
- Registration Policy (15b).
- Safer Recruitment Policy (18a).

PROPRIETY AND BEHAVIOUR

Cordial relations between staff and pupils are at the heart of a happy and thriving school. At the same time, staff are accountable for the way in which they: exercise authority; manage risk; use resources; and safeguard children. In the interests of all parties, professional boundaries must be observed on all occasions.

As a result of their knowledge, position and/or the authority invested in their role, all those working with children at FSM are in a position of trust in relation to all pupils on the roll. Staff should ensure that their relationships with pupils clearly take place within the boundaries of a respectful professional relationship and avoid behaviour which might be misinterpreted by others.

The relationship between a person working with children is one in which the adult has a position of power or influence. It is vital for staff to understand this power; that the relationship cannot be one between equals and the responsibility they must exercise as a consequence.

The potential for exploitation and harm of vulnerable pupils means that adults have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.

- Staff are expected to adopt high standards of personal conduct in order to maintain the confidence and respect of all those with whom and for whom they work.
- Staff have an individual responsibility at all times to ensure appropriate use of school property and resources.
- Staff should understand the need to act as good role models for pupils. They also have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of pupils.
- Staff should understand and be aware that safe practice also involves using judgement and integrity about behaviours outside the work setting. Behaviour in their personal lives may impact on their work with pupils and the reputation of the school.
- Staff conduct and performance must not be adversely impacted by alcohol or drugs when undertaking their duties. Illegal drugs are prohibited on site. Consumption of alcohol is not permitted at work except at school functions or when otherwise agreed by the Head that very modest amounts of alcohol may be consumed. During term time, when children are resident, Resident staff should consume only modest quantities of alcohol in private accommodation. Smoking is not permitted on site.

CURRICULUM

The curriculum can sometimes include or lead to unplanned discussion about subject matter of a sexually explicit, political or otherwise sensitive nature. Responding to children's questions requires careful judgement and staff should take guidance in the circumstances from the Designated Safeguarding Lead. This means that care should be taken to comply with FSM's policy on spiritual, moral, social, and cultural (SMSC) education (Lifeskills & RSE Policy – 2c) which should promote fundamental British values and be rigorously reviewed to ensure it is lawful and consistently applied.

HEALTH AND SAFETY AND FIRST AID

All staff have a duty to ensure that a safe working environment exists. Fire and evacuation procedures must be adhered to and staff are required to familiarise themselves with the procedures and their responsibilities as set out in all relevant policies relating to the health, safety and wellbeing of pupils.

ACCIDENT AND INCIDENT REPORTING

- An accident report form should be completed for all accidents on site. A copy of the form should be given to the Director of Operations, Head and other staff as appropriate to the circumstances.
- In the case of a serious accident or incident the school is aware of the need to report it following 'Reporting of Injuries, Diseases and Dangerous Occurrences Regulations' (RIDDOR).

EXTERNAL ACTIVITY

Any outside work or activity which may conflict with the interests of the school or which makes use of FSM resources or property must always be agreed in advance with the Head. The use of school resources and property for personal purposes is not permitted unless agreed by the Head.

CONFIDENTIAL REPORTING

Staff must adhere to FSM's **Whistleblowing Policy (7f)**. Where a member of staff has good reason for concern regarding the conduct or competence of a colleague, they should follow the procedures in the policy. This is particularly important where the welfare of children may be at risk.

Staff should:

- Report any behaviour by colleagues that raises concern.
- Report allegations against staff and volunteers to the Head.
- Where they have concerns about the Head's response, report these directly to the Local Authority Designated Officer (LADO).
- All staff have a duty to report themselves if there is any reason why they may not be able to carry out their duties effectively or if there is anything that may affect their ability to work safely with children.
- Staff need to be aware of their responsibilities under PREVENT. Any worries about pupils should be viewed as safeguarding issues and reported to the DSL following the procedures set out in the Child Protection and Safeguarding and Welfare Policies. Any worries about colleagues should be reported under Whistleblowing Policy.

LOW-LEVEL CONCERNS POLICY

Allegations that do not meet the ‘harms test’ should be addressed separately. This policy is a framework whereby staff are expected to report concerns, no matter how small, about their own behaviour or that of another member of staff, volunteer, supply teacher, contractor or other person working in school. Its purpose is to help create and embed a culture of openness, trust and transparency in which the clear values and expected behaviour set out in this Policy and the Safeguarding Policy are lived, monitored, and reinforced. This should be read in conjunction with the current statutory guidance – KCSiE 2024.

Who does the policy apply to?

The policy applies to all staff and other individuals who work or volunteer at FSM.

Definition of a low-level concern

A low-level concern is any concern, no matter how small, even if no more than causing a sense of unease or a ‘nagging doubt’, that a person working in or on behalf of the school may have acted in a way that:

- is inconsistent with the school’s Staff Behaviour and Code of Conduct, and
- does not meet the allegations threshold (harms test) or is otherwise not considered serious enough to make a referral to the LADO

Examples of behaviour that could require reporting of a low-level concern include, but are not limited to:

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating or offensive language.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

It is crucial that any such concerns, including those which do not meet the harms test threshold, are shared responsibly and with the right person, and recorded and dealt with appropriately.

Ensuring they are dealt with effectively should also protect those working in or on behalf of the Schools from potential false allegations or misunderstandings.

Reporting low-level concerns

Where a low-level concern has been identified, this will be reported as soon as possible to the Head. However, it is never too late to share a low-level concern if this has not already happened. Where the Head is not available, the information will be reported to the DSL (or Deputy), i.e. the most senior member of SLT acting in this role.

Where the low-level concern has been reported to the DSL, they will inform the Head of the details as soon as possible. Low-level concerns about the Designated Safeguarding Lead will be reported to the Head and those about the Head will be reported to the Director responsible for Safeguarding (Toby Mullins – tmullins@fsmschool.com).

Where the low-level concern relates to an agency worker, supply staff or contractor, the Head will notify the employer so any potential patterns of inappropriate behaviour can be identified.

Recording concerns

A summary of the low-level concern should be written down, signed, timed, dated and shared by the person bringing the information forward. Where concerns are reported verbally to the Head a record of the conversation will be made by the Head which will be signed, timed, and dated.

Responding to low-level concerns

Where a low-level concern has been raised this will be taken seriously and dealt with promptly. The Head will:

- Speak to the person reporting the concern to gather all the relevant information
- Speak to the individual about the concern raised to ascertain their response, unless advised not to do so by the LADO or police

- When a low-level concern is raised by a third party, the Head should collect as much evidence as possible with the person who raised the concern, to the individual involved and any witnesses.

Where necessary further investigation will be carried out to gather all relevant information. This may involve speaking to any potential witnesses. The information reported and gathered will then be reviewed to determine whether the behaviour:

- is consistent with the school's Code of Conduct: no further action will be required
- constitutes a low-level concern: no further action is required, or additional training/guidance/support may be required to rectify the behaviour via normal day to day management processes. The staff member, volunteer or contractor should understand that failure to improve or a repeat of the behaviour may lead to further action being taken, e.g. via the Disciplinary Procedures.
- is serious enough to consult with or refer to the LADO: a referral should be made to the LADO and HR advice taken from the Head.

Allegations procedure within the Child Protection Policy and Disciplinary Policy/Procedure will be followed:

- when considered with any other low-level concerns that have previously been raised about the same individual, should be reclassified as an allegation and referred to the LADO or Police: a referral should be made to the LADO and HR advice taken from the Head. In this case, the school's Child Protection Policy and Disciplinary Policy/Procedure will be followed

When considered with any other low-level concerns that have previously be made, records will be made of:

- all internal conversations including any relevant witnesses
- all external conversations, e.g. with the LADO
- the decision and the rationale for it
- any action taken.

Can the reporting person remain anonymous?

The person bringing forward the concern will be named in the written record. Where they request to remain anonymous, this will be respected as far as possible. However, there may be circumstances where this is not possible, e.g. where a fair disciplinary investigation is needed or where a later criminal investigation is required.

Should staff report concerns about themselves (ie self-report)?

It may be the case that a person finds themselves in a situation which could be misinterpreted, or might appear compromising to others; or they may have behaved in a manner which on reflection they consider falls below the standard set out in the Staff Code of Conduct. In these circumstances they should self-report. This will enable a potentially difficult situation to be addressed at an early opportunity if necessary.

Where behaviour is consistent with the Staff Behaviour and Code of Conduct

Feedback will be given to both parties to explain why the behaviour was consistent with the Code of Conduct.

Should the low-level concerns file be reviewed?

The records will be reviewed periodically, and whenever a new low-level concern is added, so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and referred to the LADO if required. A record of these reviews will be retained. Where a pattern of behaviour is identified the School will decide on the following course of action:

- Internal disciplinary procedures if the harms test threshold is not met.
- Referral to the LADO if the harms test threshold is met.

The School will consider any wider cultural issues that enabled the behaviour to occur and if appropriate policies could be revised or extra training delivered to minimize the risk of reoccurrence.

The rationale for all decisions and actions taken will be recorded.

References

Low-level concerns will not be included in references unless a low-level concern, or group of concerns, has met the harms test threshold for referral to the LADO and found to be substantiated.

What is the role of the Directors?

The Head will regularly inform the Directors about the implementation of the low-level concerns policy including any evidence of its effectiveness, e.g. with relevant data. The Director responsible for Safeguarding may also review an anonymised sample to ensure that these concerns have been handled appropriately.

CONFIDENTIALITY

- Staff members should never give absolute guarantees of confidentiality to pupils or adults wishing to tell them about something serious. They should guarantee only that they will pass on information to the minimum number of people who must be told in order to ensure that the proper action is taken to sort out the problem and that they will not tell anyone who does not have a clear need to know. They will also take whatever steps they can to protect the informing pupil or adult from any retaliation or unnecessary stress that might be feared after a disclosure has been made.
- Staff may have access to confidential or personal information about pupils or colleagues in the process of undertaking their everyday responsibilities. They should never use this information for their own or others' advantage (including that of partners, friends, relatives or other schools/services). Confidential information about a pupil should never be used casually in conversation or shared with any person other than on a need-to-know basis and never be used to intimidate, humiliate or embarrass the pupil.
- Information about pupils, parents or colleagues must never be disclosed to telephone enquirers. Staff should ask the enquirer to put the request in writing so that it can be dealt with appropriately.
- Staff should be aware that the Data Protection Act (DPA) contains 'safeguarding of children and individuals at risk' as a processing condition which allows practitioners to share information without consent, if it is not possible to gain consent or if to gain consent would place a child at risk.
- There are also 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 duty to pass on information without delay, but only to those with designated child protection responsibilities. If in doubt about whether to share information or keep it confidential, staff should seek guidance from the Head.

GOOD PRACTICE

Staff must be prepared to provide support and comfort to children during times when there may be stress at school, worry about problems at home or homesickness. We need to attend to a child's welfare and needs without becoming unduly concerned that we may be doing the wrong thing. Nevertheless, the boundaries of what is acceptable without being over-intimate need to be clear, and the following guidance is offered to staff:

COMMUNICATION AND CONTACT WITH PUPILS

- All communication and contact between pupils and adults should take place within clear and explicit professional boundaries. Staff should not request or respond to requests regarding 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 also be circumspect in their communications and contact with pupils so as to avoid any possible misinterpretation of their motives or any behaviour which could be construed as grooming.
- Staff should not give their personal contact details to 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 the DSL. The child should be firmly and politely informed that this is not acceptable.

LANGUAGE

- Staff should not swear, blaspheme or use offensive language in front of pupils.
- Staff should not use language which is discriminatory and demeaning in relation to gender, religion, ethnicity, sexual orientation, disability or age.
- Staff should not make sexual innuendos or any comments of a sexual nature (other than in the context of RSHE in the Life Skills (PSHE) curriculum, nor make any comments trivialising alcohol or drug abuse.
- The use of sarcastic, demeaning or insensitive comments towards young people can also be regarded as a form of abuse which is potentially very damaging and must be avoided.
- It is recognised that, in order to discharge particular pastoral responsibilities, staff may from time to time need to engage in conversation with children which covers sensitive matters. Staff must use their professional judgement to ensure that they are not drawn into areas inappropriate to their duties or their relationship with the pupils concerned. In circumstances where such conversations occur, staff must let the Head and/or Deputy Head know immediately.
- The display of any materials internally should similarly reflect these points.

ELECTRONIC COMMUNICATIONS AND STORAGE OF IMAGES

- **All staff must sign that they have read, understood and will follow the Staff Acceptable Use Agreement.**
- Staff must ensure that they establish safe and responsible behaviours in their use of electronic communications and when online.
- Staff should have a thorough knowledge of the school's E-Safety Policy.

- Staff must log off when they leave a computer.
- Staff must never allow visitors to use their log on details.
- Staff should keep social networking profiles private and refrain from joining groups that are directly linked to FSM.
- Staff should refrain from making comments about FSM or discussing FSM on their personal social media networks.
- Pupils and ex pupils under the age of 18 should not be ‘friends’ or ‘contacts’ on personal devices. Staff should have no online contact with ex pupils under the age of 18, other than through the school network.
- Staff with their own website should keep private details off the website and guard against giving out information which could bring the school into disrepute.
- Email exchanges with pupils should be for professional purposes only, using the school email system alone, with the use of appropriate formal language and salutations. Staff should be aware that any email can be forwarded (or if deleted can be retrieved), so should think before sending.
- When using e-mail, Staff need to be aware of the less formal style that can characterise this form of communication and ensure that e-mails do not convey an inappropriate tone.
- It is not appropriate for staff to take images of pupils for their personal use. However, working with pupils may involve the taking or recording of images. Any such work should take place with due regard to the law and the need to safeguard the privacy, dignity, safety and well-being of pupils.
- When taking photographs, staff need to remain sensitive to pupils who appear uncomfortable and should recognise the potential for such activities to raise concerns or lead to misunderstandings.
- Images should be stored securely only on school hardware or on the school’s password protected electronic drive) and be used only by staff authorised to do so. Images should not be stored on any personal devices at any time.
- FSM will only publish images of pupils where they or their parent/carer have given explicit written consent to do so.
- When images are used with the above permissions, only first names should be shared/used.

USE OF PERSONAL MOBILE PHONES

At no time can images of any FSM children (including those in EYFS) be taken with personal phones or cameras. It is also not permitted for any member of staff to store any images of FSM children on their personal device(s) or storage media, except those which have been made publicly available, for example on FSM’s social media channels.

In line with the Staff Acceptable Use Agreement, should the Head (or DSL in their absence) have reasonable grounds to suspect a member of staff has breached the above, personal phones and devices can be searched.

Breach of these guidelines could result in criminal and/or disciplinary action being taken.

ONE-TO-ONE SITUATIONS

One-to-one situations have the potential to make pupils more vulnerable to harm by those who seek to exploit their position of trust. Staff may also be more vulnerable to unjust or unfounded allegations being made against them.

Staff should:

- When one-to-one situations occur, for example, in an instrumental music, Learning Centre or sports coaching lesson, take reasonable and sensible precautions to ensure the safety and security of pupils and staff alike.
- Ensure that wherever possible there is visual access and/or an open door in one to one situations.
- 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 pupil becomes distressed or angry.
- Consider the needs and circumstances of the pupil involved.

Teachers of individual lessons should endeavour to ensure that their teaching takes place where visual contact with others or being within earshot can be maintained. Where possible, a gap or barrier should be maintained between teacher and child at all times.

INTERVIEWING CHILDREN AND DEALING WITH AN UNHAPPY CHILD

- If it is necessary to be alone with a child, this should, ideally, be in a place in full view of others.
- If a child is injured or upset, appropriate comforting is a natural reaction. In full view of others, this is fine but staff should be aware that in a one-to-one situation, such comforting may be open to misinterpretation.
- Be aware that an upset child might readily misconstrue a situation and, if possible, always ensure that the child is accompanied by a friend.
- When investigating allegations of e.g. bullying, it is wise to invite another pupil to attend, so that the child feels supported. This will also act as protection from misinterpretation.
- In responding to individual children's distress, staff will need to consider carefully whether they should offer advice, sympathy or counselling if a discussion enters a sensitive area or, alternatively, refer them to a colleague or agency better placed to offer appropriate advice.

AVOIDING MISINTERPRETATION

Staff should:

- Try to model appropriate boundaries regarding personal space.
- Avoid special relationships or rumours of having 'favourites.'
- Avoid spending unequal amounts of time with a given child or group of children.
- Be wary of forming 'special' relationships with particular children's families that might compromise them professionally.
- Be aware of how their actions may be interpreted by others looking in from outside.

- Be observant of the behaviour of colleagues and, if they feel that their actions could be seen by others as inappropriate, tell them or the Designated Safeguarding Lead.

BEHAVIOUR MANAGEMENT

- All pupils have a right to be treated with respect and dignity even in those circumstances where they display difficult and challenging behaviour.
- Staff should not use any form of degrading treatment to punish a pupil. The use of sarcasm, demeaning or insensitive comments is not acceptable in any situation. Any sanctions or rewards used should be part of recognised systems and procedures as set out in the Pupil Behaviour Management Policy.
- Any incidents of bullying should be dealt with swiftly in accordance with the Anti-Bullying Strategy and E-Safety Policy.

PHYSICAL CONTACT WITH PUPILS

Given the age of the pupils, physical contact between pupils and staff may be appropriate. 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.

Staff should:

- Be aware of their own vulnerability and that even well-intentioned physical contact may be misconstrued by the pupil, an observer or any person 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.
- Avoid all unnecessary physical contact with children, especially when not in the presence of others.
- Remain sensitive to any discomfort expressed verbally or non-verbally by the child. Staff should never have any physical contact with a child which could be misinterpreted.
- Ensure the way they offer comfort to a distressed pupil is age appropriate.
- Always tell a colleague when and how they offered comfort to a distressed pupil.
- Establish the preferences of pupils.
- Consider alternatives, where it is anticipated that a pupil might misinterpret or be uncomfortable with physical contact.
- Always explain to the pupil the reason why contact is necessary and what form that contact will take.
- Situations which may give rise to concern should be recorded and reported to the DSL.

Be aware of cultural or religious views about touching and be sensitive to issues of gender. Staff must exercise common sense when with the children in their care and

should make sure any physical contact is appropriate to the situation and their professional role. Contact under these circumstances should be for the minimum time necessary to complete the activity and take place in an open environment. This should be done with the pupil's agreement.

Some incidences where physical contact may be necessary/unavoidable are:

- Contact in PE/Swimming. It should, however, be seen as appropriate by others.
- Physical contact may be necessary in Drama and in some forms of skills coaching – e.g. in instrumental music lessons. Any such contact should likewise be seen as appropriate.
- First Aid; staff who administer first aid should, where possible, ensure that another adult is present if there is any doubt over the possibility of any physical contact being misconstrued.
- Teachers of individual instrumental music lessons should teach only in the designated space where all teaching rooms are clearly visible from the outside and should avoid unnecessary physical contact.
- Comforting a child who is upset or unwell.
- Helping a child who has soiled their clothing.

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 recorded as soon as possible, the Designated Safeguarding Lead (DSL) informed and, if appropriate, a copy placed on the pupil's file.

PHYSICAL INTERVENTION

- Corporal punishment and the threat of corporal punishment are prohibited.
- Staff must follow the guidelines set out in the Use of Reasonable Force Policy.
- By law, teaching staff 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 themselves or others.
 - Causing significant damage to property, including their own
 - Engaging in behaviour prejudicial to good order and to maintain good order and discipline
- This applies when a teacher 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.
- It only applies where no other form of control is available and where it is necessary to intervene. Any force used must always be the minimum needed to achieve the desired result and must be appropriate for the age, sex and understanding of the pupil.

Before intervening physically, a teacher must, wherever practicable, tell the pupil to stop and what will happen if he or she does not.

Another member of staff should, if possible, be present to act as a witness. The member of staff must continue attempting to communicate with the pupil throughout the incident and must make it clear that physical contact or restraint will stop as soon as it ceases to be necessary.

Staff must always avoid touching or holding a pupil in a way that might be considered indecent.

- All incidents of the use of physical restraint should be recorded in writing on a Report of Use of Reasonable Force Form immediately (and certainly within 12 hours of the incident) and handed to the DSL. Where this relates to FSM's nursery/EYFS setting, parents will be informed of any physical restraint used on their child the same day or as soon as reasonably practicable. This is to help prevent any misunderstanding or misrepresentation of the incident, and it will be helpful in the event of a complaint.
- The DSL should also be informed of incidents where (i) a teacher considered the use of force may have been necessary or where (ii) a teacher threatened a pupil with the use of force.

See Use of Reasonable Force Policy

ACTION TAKEN IN SELF-DEFENCE OR IN AN EMERGENCY

The law allows anyone to defend themselves against an attack provided they do not use more force than is necessary. Similarly, where a pupil is at risk of immediate injury or on the point of inflicting injury on someone else, any member of staff would be entitled to intervene.

CHANGING

- PE, Games or other changing supervision needs to be visible and protective but also non-intrusive and discreet.
- Staffing arrangements should, where possible, allow for same gender supervision of changing of Prep School pupils.
- Where possible, more than one member of staff should be in charge of changing, to avoid the potential for compromising circumstances and to remove as far as possible any opportunity for abuse.
- When it is not possible for more than one member of staff to be in attendance, staff need to be particularly alert to the potential hazards of being the sole member of staff in charge of changing. At such times, a member of staff should ensure that a group of children are present and should avoid being alone in the changing room with an individual child.
- Any concerns with regard to the supervision of changing should be addressed to the Director of Sport and/or to one of the designated persons.
- Any other events – e.g. theatrical productions – that require changing arrangements should follow the above guidance.

- Staff should avoid changing in the presence of children. The staff changing room should be used.

SEARCHING AND CONFISCATION

There may be times when a member of staff needs to search a pupil or a pupil's belongings because something has gone missing, or pupils are believed to be in possession of items that are banned or have been misused, and there are reasonable grounds to conduct a search. In such circumstances staff must follow the guidelines set out in the **Searching Pupils Policy**.

INTIMATE CARE

There may be occasions when a member of staff needs to undertake personal care tasks with children but particularly to those who are in the Early Years and Foundation Stage. The normal range of development for this group of children indicates that they may not be fully toilet trained. In addition to this there are other vulnerable groups of children that may require support with personal care on either a short, longer term or permanent basis due to SEN and disability, medical needs or a temporary impairment. Examples of these may be children who have limbs in plaster or are temporarily wheelchair bound.

In such circumstances staff must follow the guidelines set out in the **EYFS Intimate Care Policy**.

SOCIAL CONTACT WITH PUPILS

- 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.
- If a pupil or parent seeks to establish social contact, or if this occurs coincidentally, the member of staff should exercise his or her professional judgement in making a response.
- Some social contacts will be easily recognised and openly acknowledged, for example when the parent and staff are part of the same social circle. Nevertheless, staff should be aware that some social contacts which are not common knowledge can be misconstrued as being part of a grooming process.
- It is recognised that staff can support a parent who may be in particular difficulty; however, care needs to be exercised in situations where the parent comes to depend on the member of staff for support outside their professional role. These situations should be discussed with the Head and the Deputy Head and, where necessary, referrals made to the appropriate support agency.

CONTACT WITH PUPILS OUT OF SCHOOL

- Staff should not communicate with pupils outside of the context of their work.
- Staff should not make arrangements to meet pupils, individually or in groups, outside school other than on school trips authorised by the Head or Deputy Head.
- Staff should never take children on overnight trips alone.
- Staff should not arrange private tuition of any of FSM's pupils, in school or beyond, during term time or holiday time, without the prior approval of the Head.

- Staff should not arrange tuition on the school's premises of any pupil from beyond the school without the prior approval of the Head.
- Staff should not give pupils their home address, home telephone number, mobile phone number, or non-school e-mail address.
- Staff are advised not to attend private pupil parties and should be aware of their professional standing and responsibilities when attending parties arranged by parents at which pupils are also present.
- Staff should not discuss or share data relating to children, parents or carers in staff social media groups.

Members of staff who are parents of pupils, friends with parents of pupils or who, for example, are voluntary workers in youth organisations attended by pupils, will of course have contact with pupils outside school. However, they should still use their professional judgement to respect the spirit of this code.

GIFTS, REWARDS AND FAVOURS

- Staff should be aware that consistently conferring special attention and favour upon a child might be construed as being part of a 'grooming' process and as such will give rise to concerns about their behaviour.
- Staff should not give presents to an individual pupil outside of the school rewards system. This could be a form of grooming.
- Staff should take care to ensure they do not accept any gift that might be construed as a bribe or lead the giver to expect preferential treatment.
- It is unacceptable to receive gifts on a regular basis or of any significant value.
- Gifts given or received in situations which may be misconstrued must be declared to the School Accountant.
- Staff should exercise care when selecting pupils for school teams, productions, trips and/or specific work tasks in order to avoid perceptions of favouritism or injustice.
- Similar care should be exercised when pupils are excluded from an activity. No child should be excluded from an activity without prior consultation with the Head or Deputy Head.

INFATUATIONS

- Occasionally, pupils may develop an infatuation for a member of staff. In such situations the advice of the DSL or Deputy DSL **must** be sought.
- Staff should deal with these situations sensitively and appropriately to maintain the dignity and safety of all concerned. They should remain aware, however, that such infatuations carry a high risk of words or actions being misinterpreted and should therefore make every effort to ensure that their own behaviour is beyond reproach.
- Other members of staff have a part to play in alerting a colleague to the possibility of an infatuation in order that appropriate steps can be taken to minimise hurt and distress and the risk to the member of staff concerned.
- Whilst the risk of infatuation is not limited to younger members of staff, they must recognise their particular vulnerability to adolescent infatuation. If a member of staff is concerned that he/she is developing a friendship with a pupil which would have

the potential to become an unacceptable relationship, he/she must ensure that the relationship does not develop further.

- Staff have a responsibility to 'confidentially report' on themselves or a colleague immediately in such circumstances.

SEXUAL CONTACT

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. Sexual activity with a child could be a matter for criminal and/or disciplinary procedures.

- Staff should not have any form of communication with a pupil which could be interpreted as sexually suggestive or provocative i.e. verbal comments, letters, texts, emails or physical contact.
- Staff should not make sexual remarks to, or about a pupil, discuss their own sexual relationships with or in the presence of pupils or have sexual relationships with pupils. It is an offence for a member of staff to engage in sexual activity with or in the presence of a pupil or to cause or incite that pupil to engage in or watch sexual activity.
- Any sexual activity between a member of staff and a pupil will be regarded as a criminal offence and will always be a matter for disciplinary action.

TRANSPORTING PUPILS

- Wherever possible and practicable, transport should be in a vehicle other than a private vehicle, with at least one adult additional to the driver acting as an escort.
- If staff use their own vehicle on approved FSM business, permission should be sought from the Director of Operations.
- Members of staff should avoid being alone in a vehicle with a pupil. If there are exceptional circumstances that make unaccompanied transportation of pupils unavoidable, such as visits to the doctors, the journey should be made known to a senior member of staff and parental permission always sought. Staff should report and record the nature of the journey, the route and expected time of arrival.
- Staff should ensure they are fit to drive and free from any drugs, alcohol or medicine which is likely to impair judgement and/ or ability to drive.
- Ensure that their behaviour and all arrangements ensure vehicle, passenger and driver safety. This includes having proper and appropriate insurance for the type of vehicle being driven
- 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 the DSL and the child's parent(s).

BOARDING HOUSE

Within a school context, the risks of and opportunities for abuse by staff are evidently greater within a boarding setting. In addition to observing the above guidelines, boarding

staff must adhere to the relevant boarding policies and procedures, including the **Boarding Staff Handbook** and these further procedures to promote a positive ethos:

- The boarding house duty rotas are so defined as to avoid the need for a member of staff to be in sole charge at any time, to avoid the potential for compromising circumstances and to remove as far as possible any opportunity for abuse. The system is, as such, intended to be self-checking.
- There are always male and female members of staff on duty.
- The children have opportunities, through their day school tutors, through the Deputy Head or Head, or through academic staff to speak to an adult they trust should they so wish.
- There is also an ‘independent listener’ and the numbers for Childline and the Children’s Commissioner are all advertised clearly in the boarding house. The numbers are always brought to the attention of the children at the beginning of each term and at other times too.
- Supervising showering and washing should be the shared responsibility of staff involved in the bedtime routine and the children’s right to privacy should at all times be respected.
- On becoming resident, staff must sign a ‘Licence to Occupy’ form and must comply with the terms stated therein.
- Staff must not entertain children in their private residences unless part of a planned activity. It is expected that the Head of Boarding and Designated Safeguarding Lead would always know about this. Any breach of this guidance without appropriate justification will be considered a disciplinary matter.
- Boarding House staff must particularly avoid spending unequal amounts of time with a given child or group of children and be wary of forming ‘special’ relationships with particular children’s families that might compromise them professionally.
- Staff must ensure that there are no initiation ceremonies carried out by the boarders, intended to cause pain, anxiety or humiliation.
- Staff must follow the procedures for searching for and reporting a missing child (**Children Missing in Education Policy**). The incident should be recorded with the action taken and the reasons given by the child for being missing.
- Staff supervising in a remote location should carry a mobile phone.

GROOMING

A child abuser may spend a great deal of time and energy ‘grooming’ a child and thereby creating an opportunity for abuse. Such grooming will involve gaining the child’s confidence and trust and may also involve gaining the trust of the child’s family and/or of other adults associated with the child.

Within the context of a school, it is essential to be aware of possible warning signs of grooming and to raise any concerns in this regard with the Interim Head. Such warning signs may include spending excessive amounts of time with a particular child or group of children, arranging to meet with children outside of school, albeit in the company of their parents or e.g. by arranging holiday tuition (often with the parents’ full support), breaching guidelines with regard to being alone with children or using inappropriately sexual language with children. All of these behaviours are dealt with in the guidance above and

staff should feel comfortable that, by following the guidance, they will avoid arousing unjustified suspicions.

In recent times, internet grooming has become an increasing concern. FSM's ICT policies provide safeguards against such activity within school but staff should take seriously and report to the Designated Safeguarding Lead any concern that a child may at home be engaged in unsuitable internet activity. Staff who identify a pupil who is at risk of being drawn into terrorism must challenge extremist ideas and pass their concerns on immediately to the Designated Safeguarding Lead.

PROFESSIONAL JUDGEMENT

On very rare occasions, there may be a time when staff must make a judgement in the best interests of the pupils in their charge which contravenes this guidance or for which no guidance exists. Such judgements should always be recorded and shared with the Head or Deputy Head. The parent or carer must also be informed where necessary. In doing so, individuals will be seen to be acting reasonably. Staff should always consider whether their actions are warranted, proportionate and safe, and applied equitably. Staff who contravene any of the above guidelines or, in retrospect, feel that an action could be seen as inappropriate, should discuss the matter immediately with the Deputy Head or the Head so that notes can be made and securely kept should reference need to be made to them in the future.

The Designated Safeguarding Lead and Prevent Lead is Mrs Lauren Marks.

The Behaviour and Disciplinary Lead is Mr William Peak (Deputy Head).

The EYFS Designated Safeguarding Lead and Behaviour and Disciplinary Lead is Mrs Tracy Spottiswood (Head of Pre-Prep).

This is a whole school policy and relates to EYFS and Boarding.