6. Code of conduct for Staff

6.1. Purpose and application

6.1.1. Purpose

Relationships with fellow Staff, pupils and their parents, guardians or carers must be reasonable and mutually respectful at all times. The purpose of this Code is to:

- place the welfare of children at the centre of the School and its culture;
- confirm and reinforce the professional responsibilities of all Staff;
- clarify the legal position in relation to sensitive aspects of Staff / pupil relationships and communication including the use of social media;
- set out the expectations of standards and behaviour to be maintained within the School; and
- help adults establish safe practices and reduce the risk of false accusations or improper conduct.

6.1.2. Application

The Code of Conduct (Code) applies to all Staff working in the School, whether paid or unpaid, whatever their position, role or responsibilities. Staff includes employees, governors, contractors, work experience/placement students and volunteers (**Staff**). All Staff will be expected to familiarise themselves with this code on an annual basis.

6.1.3. Relationship with other policies and guidance

This Code must be read in conjunction with the School's policies including but not limited to the safeguarding and child protection policy and procedures, the low-level concerns policy, the whistleblowing policy at section 21, and the guidance set out at section 6.14.

6.2. Key duties

6.2.1. General duty

It is the contractual duty of every member of Staff to observe the rules and obligations in this Code. You must also follow the Guidance. The School also has a duty of care to its Staff, parents, guardians or carers and pupils and the implementation of the practices in this Code will help to discharge that duty.

6.2.2. Duty to report wrongdoing

All Staff are under a duty to report their own wrongdoing, or any wrongdoing or proposed wrongdoing of any other member of Staff or any conduct which they may suspect to be inappropriate. This duty applies even if the concern is based only on a sense of unease or a nagging doubt. Staff should not feel that they need to have evidence or certainty before raising a concern. See also the School’s low-level concerns policy.

Staff are under a duty to report suspected, known or proposed wrongdoing in conjunction with the School’s policies including Appendix 4 of the School’s safeguarding and child protection policy, raising allegations and low-level concerns and the whistleblowing policy contained within this Handbook at section 21. This includes suspected, known or proposed wrongdoing brought to the attention of a member of Staff by a pupil, parent or other adult.

6.2.3. Self-referral

Should a member of Staff find themselves in a situation where, for whatever reason, they have not been able to follow best safeguarding practice, they should inform the Designated Safeguarding Lead, or in their absence the Head as soon as practically possibly.

6.2.4. Duty to report potential abuse

Some of the behaviours contained in this Code (and in particular at section 6.15) may indicate that a child has been, or is currently being, abused, exploited or neglected. Any incident involving children that could give cause for concern, must always be reported promptly in accordance with the School's safeguarding and child protection policy and procedures.

6.2.5. Record keeping

Comprehensive records are essential. All concerns, discussions and decisions made and the reasons for those decisions must be recorded in writing. Records must include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved, a note of any action taken, decisions reached and the outcome. Information must be kept confidential and stored securely. Any incident involving children that could give cause for concern, must always be reported promptly to the Designated Safeguarding Lead in accordance with the School's safeguarding and child protection policy and procedures. If there is any doubt about recording requirements this must be discussed with the Designated Safeguarding Lead.

6.3. Guiding principles for Staff

6.3.1. Principles

The School prioritises the welfare of children, its diverse and inclusive culture, and the maintenance of positive and professional relationships between Staff and fellow Staff, pupils and their parents, guardians and / or carers. All Staff must follow the guiding principles set out in this paragraph (Principles) and refer to the Appendices for further detail of the application of the Principles.

6.3.2. Public trust and confidence

All Staff must maintain public trust and confidence in the School and in their profession by:

- demonstrating honesty and integrity;
- understanding and upholding their duty to safeguard the welfare of children and young people;
- understanding and demonstrating fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs;
- maintaining reasonable standards of behaviour whether inside or outside of normal school hours and whether on or off the School's site; and
- maintaining an effective learning environment.

6.4. Appropriate pupil relationships

All Staff must put the well-being, development and progress of all pupils first by:

- taking all reasonable steps to ensure the safety and well-being of pupils under their supervision, taking particular account of the detailed guidance at section 6.15;
- using professional expertise and judgment to protect the best interests of pupils in their care;
- following the guidance at section 6.156 to ensure they maintain appropriate, professional and effective pupil-staff relationships at all times;

- following the guidance at section 6.17 to ensure all communication with pupils and former pupils (including where technology is used) remains appropriate and professional at all times;
- ensuring all interactions with pupils about political matters are conducted in a balanced and impartial way without promoting partisan political views, taking into account the guidance at section 6.17;
- following the guidance at section 6.18 in any situation where you are taking photo or video camera footage of a pupil or pupils;
- demonstrating self-awareness and taking responsibility for their own actions and for providing help and support to pupils;
- raising concerns about the practices of teachers or other professionals where these may have a negative impact on pupils' learning or progress, or may put pupils at risk;
- being familiar with the School's safeguarding and child protection policy and procedures and the pupil behaviour management policy;
- All staff must read and understand Part One of Keeping Children Safe in Education (September 2026).
- Staff who work directly with pupils, including teachers and other pupil-facing staff, must also read Annex A of Keeping Children Safe in Education (September 2026).
- All staff should be familiar with the non-statutory guidance What to Do if You're Worried a Child Is Being Abused (March 2015) and understand how to recognise concerns and report them in accordance with the school's safeguarding procedures.
- knowing the role, identity and contact details of the current Designated Safeguarding Lead and their Deputies;
- knowing the role, identity and contact details of the Nominated Safeguarding Governor; and
- being aware that they are in a position of trust (i.e. the adult is in a position of power or influence over the pupil due to his or her work); that the relationship is not a relationship between equals and that this position must never be used to intimidate, bully, humiliate, coerce or threaten pupils.

6.5. Guidance for staff when working with pupils on a 1:1 basis

Sometimes it is necessary for a member of Staff to work with a pupil on a 1:1 basis, e.g., when offering academic or pastoral support, or when mentoring a pupil. Staff must ensure that they give due regard to safeguarding in such situations, meeting the pupil in a classroom or office with the door open whenever possible. The member of Staff should record any 1:1 meetings in their planner or Outlook diary, including the date, time, and reason for the meeting. If, for any reason, a member of staff meets with a pupil and is not able to follow best practice as outlined above, they should follow the self-referral process set out at section 6.2.3 and inform the Designated Safeguarding Lead.

Whilst some pupils may require greater support at times, it is expected that in most cases, 1:1 sessions would not continue for extended periods of time. Should a member of Staff have any concern about the nature of 1:1 meetings between a colleague and a pupil, they should inform the Head or use the low-level concerns policy.

6.6. Diversity, equality and inclusion

All Staff must demonstrate respect for diversity and take steps to promote equality by:

- acting appropriately and in accordance with this Code and other relevant policies including the School's anti-bullying policy, equality, diversity and inclusion policy and harassment and bullying policy;
- addressing issues of discrimination and bullying whenever they arise; and

- helping to create a fair and inclusive school environment.

6.7. United Staff body

All Staff must work as part of a united staff body by:

- developing productive and supportive relationships with colleagues;
- exercising any management responsibilities in a respectful, inclusive and fair manner;
- complying with all School policies and procedures;
- participating in the School's development and improvement activities;
- recognising the role of the School in the life of the local community; and
- upholding the School's reputation and standing within the local community and building trust and confidence in it.

6.8. Language and appearance

6.8.1. Language

You must use appropriate language at all times. You must:

- avoid words or expressions that have any unnecessary sexual content or innuendo; avoid displays of affection either personally or in writing (e.g. messages in birthday cards, text messages, emails etc);
- avoid any form of aggressive or threatening words;
- avoid any words or actions that are over-familiar;
- not swear, blaspheme or use any sort of offensive language in front of pupils;
- avoid the use of sarcasm, discriminatory or derogatory words when punishing or disciplining pupils and avoid making unprofessional personal comments about anyone. Any sanctions must be in accordance with the School's behaviour and discipline policies; and
- be aware that some parts of the curriculum may raise sexually explicit subject matters. Care must be taken in subjects where rules / boundaries are relaxed (e.g. drama or art). Staff must have clear lesson plans and must take care to avoid overstepping personal and professional boundaries.

6.8.2. Dress

You must dress appropriately and in a professional manner. The School’s staff dress code provides details (section 28).

6.9. Gifts and rewards

Anti-bribery and corruption policy: Before accepting or giving any gifts or rewards, Staff must familiarise themselves with and follow the anti-bribery and corruption policy contained in this handbook.

6.10. General conduct

6.10.1. School property

You must take proper care when using School property and you must not use School property for any unauthorised use or for private gain.

6.10.2. Use of premises

You must not carry out any work or activity on School premises other than pursuant to your terms and conditions of employment without the prior permission of the Head, Head of Junior School or Bursar.

6.11. Behaviour of others

You must be aware that the behaviour of your partner or other family members or any member of your household may raise concerns which could affect the welfare of a member of the School community, a member of the public, or bring the School into disrepute and you must bring any such behaviour to the immediate attention of the School. Such concerns will be given careful consideration as to whether they constitute a potential risk to children at the School or its reputation.

6.12. Additional principles for teachers

Teachers must take responsibility for maintaining the quality of their teaching practice by:

- meeting the professional standards for teaching applicable to their role and position within the School;
- reflecting on their current practice and seeking out opportunities to develop knowledge, understanding and skills;
- helping pupils to become confident and successful learners; and
- establishing productive relationships with parents, guardians or carers by:
    - providing accessible and accurate information about their child's progress;
    - involving them in important decisions about their child's education; and
    - complying with this Code.

6.13. Breach of this Code

6.13.1. Consequences of breach

The School will take appropriate action in accordance with its policies and procedures in the event of a breach of this Code.

6.13.2. Reporting obligations

If a breach of this Code places the School under any reporting obligations, the guidance contained at section 6.22 will apply.

6.14. Relevant policies and guidance

This Code has regard to the School's safeguarding and child protection policy and procedures and the following (collectively referred to in this Code as the **Guidance**):

- *Keeping children safe in education* (September 2026 (which refers to the non-statutory advice for practitioners: *What to do if you're worried a child is being abused* (March 2015));
- *Disqualification under the Childcare Act 2006* (August 2018);
- *Working together to safeguard children 2026: statutory guidance* (updated March 2026) (**WT**):
    - WT refers to the non-statutory advice: *Information sharing* (May 2024);
- *Prevent duty guidance: England and* Wales (2023) (March 2024) (**Prevent**). Prevent is supplemented by:
    - *The Prevent duty: safeguarding learners vulnerable to radicalisation* (*published October 2022, updated* September 2023)*;*
    - *Channel duty guidance: protecting people susceptible to radicalisation* (October 2025);
    - *The use of social media for online radicalisation* (July 2015).
- Guidance on female genital mutilation, to include:

  - *Multi-agency statutory guidance on female genital mutilation* (July 2020);
  - Home Office statutory guidance *Mandatory reporting of female genital mutilation: procedural information* (October 2015, updated January 2020);
  - guidance published by the Department for Health which provides useful information and support for health professionals which will be taken into account by the School's medical staff.
- Guidance on mental health, to include:
  - *Preventing and tackling bullying* (July 2017);
  - *Mental health and behaviour in schools* (November 2018);
  - *Promoting children and young people's mental health and wellbeing* (March 2015, updated September 2021
  - *Supporting mental health and wellbeing in schools and colleges (*June 2021, updated July 2025)
- *Political impartiality in schools* (March 2025).
- *restrictive interventions, including use of reasonable force, in schools, guidance for schools in England* (April 2026).

6.15. Protecting children from abuse, exploitation or neglect

All Staff should know what to do if they suspect or are told a child is being abused, exploited or neglected. This section provides more information on the kinds of abuse children may suffer both within and outside the home, and how Staff should respond.

The School encourages an open and transparent culture in which it may identify concerning, problematic or inappropriate behaviour early, minimise the risk of abuse and ensure that all Staff working in or on behalf of the School are clear about professional boundaries and act within these boundaries. All Staff should be aware of their responsibility in relation to even low-level concerns which should be reported in accordance with the School's safeguarding and child protection policy and procedures, the low-level concerns policy and the guidance in Part 1 of KCSIE, September 2026.

If you are involved in a situation where no specific guidance exists, you should discuss the circumstances with the Designated Safeguarding Lead but always act within the spirit of these guidelines. A written record should be kept that includes justification for any action taken.

6.15.1. General guidance

You should be aware of the general guidance that will apply in all cases. In particular you:

- must be familiar with procedures for reporting concerns in accordance with the School's whistleblowing policy and be aware that if Staff raise concerns about working practices at the School to the Designated Safeguarding Lead or an appropriate senior member of Staff that they will be protected from detriment under the whistleblowing policy;
- must be familiar with the local reporting guidelines and the Local Safeguarding Partners reporting threshold document in respect of any concerns relating to children;
- must be familiar with procedures for handling allegations against Staff as set out in the School's safeguarding and child protection policy and procedures;
- must seek guidance from the Designated Safeguarding Lead if you are in any doubt about appropriate conduct; and
- must report to the Designated Safeguarding Lead any accident, misunderstanding or incident involving you and a pupil, and any action of yours which could be misinterpreted.

Pupils who may need additional care and attention
Some pupils will need more from you than others, and the way a pupil presents can itself be a sign that something is wrong. Take particular care, and speak to the Designated Safeguarding Lead, where a pupil:

- appears distressed, withdrawn or otherwise vulnerable;
- seeks a level of attention, affection or reassurance beyond what you would expect, or is markedly over-familiar with adults;
- behaves in a way that is sexualised or otherwise developmentally inappropriate;
- has become hostile towards you, or where your working relationship with them has broken down.

Any of these may indicate that a child has been, or is being, abused, exploited or neglected, or that they are struggling for another reason. None of them is a reason to withdraw from the pupil or to treat them with suspicion. Report the concern under the School's safeguarding and child protection policy and procedures, continue to support the pupil, and follow the practice guidance at section 6.16 so that your contact with them remains open and recorded.

Protecting yourself as well as the pupil
Working closely with children carries a risk that words or actions will be misunderstood, and occasionally that an allegation will be made which is later found to be unsubstantiated. The protection against this is consistent professional practice, not distance from pupils. Follow the guidance at section 6.16 on meetings, communication and physical contact; record what you do; and use the self-referral route at 6.2.3 as soon as you are aware that you have been unable to follow best practice. If you are concerned about how an interaction may have been perceived, raise it early with the Designated Safeguarding Lead. Early reporting protects the pupil and it protects you.
The School will support any member of Staff who becomes the subject of an allegation or a low-level concern. The applicable procedure is set out in Part 4 of KCSIE and in the School's safeguarding and child protection policy and procedures.

6.15.2. Disclosures of abuse, exploitation or neglect
All Staff should know what to do if a child tells them that they are being abused, exploited or neglected. All Staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Staff should know how to manage the requirement to maintain an appropriate level of confidentiality. This means only involving those who need to be involved, such as the Designated Safeguarding Lead (or deputy) and children’s social care. Staff should never promise a child that they will not tell anyone about a report of any form of abuse, as this may ultimately not be in the best interests of the child.

Staff should follow the appropriate School procedure, including the safeguarding and child protection policy, and / or the whistleblowing policy, to report a concern or an allegation that has been made.

6.15.3. Suspicions of abuse, exploitation or neglect

Staff may from time to time suspect a child is suffering abuse exploitation or neglect within or outside the home. Staff should follow the appropriate School procedure, including the safeguarding and child protection policy (and particularly Appendix 4 of the safeguarding and child protection policy, raising allegations and low-level concerns), and / or the whistleblowing policy at section 21 of this Handbook, in order to report any such concerns.

6.15.4. Child-on-child abuse

Staff must be aware of the risks of child-on-child abuse and be familiar with procedures for handling allegations against other children and bullying as set out in the School's safeguarding and child protection policy and procedures. Examples of child-on-child abuse are bullying (including cyberbullying), physical abuse, sexual violence and sexual harassment, upskirting, the consensual and non-consensual sharing of nudes and semi-nudes images and videos (also known as sexting or youth produced sexual imagery) and initiation and hazing (which could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may include an online element especially around chat groups, and the sharing of abusive images and pornography).

6.15.5. Mental health concerns

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

It is key that Staff are aware of how experiences such as abuse, neglect or other potentially traumatic adverse childhood experiences can impact on a child's mental health, behaviour and education. All Staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

If Staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following the School's safeguarding and child protection policy and procedures.

6.15.6. Extra-familial harm

All Staff should be aware that safeguarding incidents and / or behaviours can be associated with factors outside the School and / or can occur between children outside of the School environment. All Staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

All Staff must be aware of indicators that children are at risk from or are involved with serious violent crime. These may include being male, increased absence from school or having been frequently absent or permanently excluded from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, having experienced child maltreatment, having been involved in offending such as theft or robbery, signs of self-harm or a significant change in wellbeing or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

6.15.7. Terrorism and extremism

All Staff should understand that the School has a legal duty to have regard to the need to prevent people from being drawn into terrorism, and consequently should be aware of:

- what extremism and radicalisation mean and why people - including pupils and fellow Staff members - may be vulnerable to being drawn into terrorism as a consequence of it;
- what measures are available to prevent people from becoming drawn into terrorism and how to challenge the extremist ideology that can be associated with it; and
- how to obtain support for people who may be being exploited by radicalising influences.

6.15.8. "Honour" based abuse and female genital mutilation (FGM)

All Staff should raise any concerns relating to so-called "honour" based abuse (to include FGM and forced marriage) with the Designated Safeguarding Lead and involve children's social care as appropriate in accordance with the School's safeguarding and child protection policy and procedures. Teachers must also report to the police cases where they discover (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a girl under the age of 18. The report should be made orally by calling 101, the single non-emergency number. It will be rare for teachers to see visual evidence, and they should not be examining pupils but those failing to report such cases will face disciplinary sanctions.

6.16. Guidance on staff / pupil relationships

6.16.1. Application

Allegations of unprofessional conduct or improper contact or words can arise at any time. Professionalism and vigilance are required so as to ensure the safety of children in our care, and to reduce the risk of an allegation of impropriety against a member of staff. This guidance applies to all Staff.

6.16.2. Staff / pupil rapport

The School supports and encourages the establishment and maintenance of positive working relationships between Staff and pupils in order to maintain a healthy school environment. Staff should build good rapport with pupils, whilst at the same time always maintaining professional boundaries by following the guidance in this Code.

6.16.3. Good order and discipline

Staff in charge or control of pupils must maintain good order and discipline at all times when pupils are present on School premises and whenever pupils are engaged in authorised school activities, whether on School premises or elsewhere.

6.16.4. Meetings with pupils

One-to-one meetings

If you are teaching one pupil, or conducting a one-to-one meeting or teaching session with a pupil, you should take particular care in the following ways:

- When working alone with a pupil is an integral part of your role, conduct and agree full risk assessments with the Head/Senior Deputy Head/Designated Safeguarding Lead;
- use a room that has sufficient windows onto a corridor so the occupants can be seen, or consider keeping the door open, or if appropriate inform a colleague that the lesson / meeting is taking place;

- arrange the meeting during normal school hours when there are plenty of other people about;
- do not continue the meeting for any longer than is necessary to achieve its purpose;
- avoid sitting or standing in close proximity to the pupil, except as necessary to check work;
- avoid using "engaged" or equivalent signs on doors or windows;
- avoid idle discussion;
- avoid all unnecessary physical contact and apologise straight away if there is accidental physical contact;
- avoid any conduct that could be taken as a sexual advance;
- report any incident that causes you concern to the Designated Safeguarding Lead under the School's safeguarding and child protection policy and procedures, and make a written record (signed and dated); and
- report any situation where a pupil becomes distressed or angry to the Designated Safeguarding Lead.

6.16.5. Contact with pupils outside school

Pre-arranged meetings
Pre-arranged meetings with pupils outside School should not be permitted unless approval is obtained from their parents, guardians or carers and the Head/Senior Deputy Head/Designated Safeguarding Lead. If you are holding such a meeting, you should inform colleagues before the meeting.

Contact outside school
You should avoid unnecessary contact with pupils outside School. You should:

- not give pupils your home address, home telephone number, mobile telephone number or email address;
- not send personal communications (such as birthday cards or faith cards, text messages etc) to children unless agreed with the Head/Senior Deputy Head/Designated Safeguarding Lead;
- not make arrangements to meet pupils, individually or in groups, outside School other than on School trips authorised by the Head/Senior Deputy Head/Designated Safeguarding Lead;
- avoid contacting pupils at home unless this is strictly necessary, and you should keep a record of any such occasion;
- not give a pupil a lift in your own vehicle other than on School business and with permission from the Head/Senior Deputy Head/Designated Safeguarding Lead;
- avoid inviting pupils (groups or individuals) to your home unless there is a good reason and it has been approved by Head/Senior Deputy Head/Designated Safeguarding Lead. This prohibition also applies if you have on site accommodation;
- report and record any situation which may place a child at risk, or which may compromise the School's or your professional standing;
- ensure that pupils do not see anything in your home that may cause embarrassment or that might become the subject of inappropriate gossip or rumour; and
- never engage in secretive social contact with pupils or their parents, guardians or carers.

There may be times when a member of Staff is also a parent which may lead to conflict with the above guidelines. Staff should use the self-referral process at section 6.2.3 if they have concerns.

Home visits
The Schools' policy is that home visits should not normally be necessary. If unavoidable, you should:

- first discuss the necessity and purpose of any visit with the Head/Senior Deputy Head/Designated Safeguarding Lead and adhere to any agreed work plan / contract;
- ensure appropriate risk assessments are in place. Where there is insufficient information to complete a risk assessment, ensure that you are accompanied by a colleague;
- not visit unannounced if this can be avoided;
- leave the door open where you will be alone with pupils;
- keep records detailing times of arrival and departure, and work undertaken;
- ensure that any behaviour or situation that gives rise to a concern is reported and actioned;
- discuss with the Designated Safeguarding Lead anything that gives cause for concern in accordance with the School's safeguarding and child protection policy and procedures; and
- have a mobile telephone and an emergency contact.

Social contact
You should be aware that where you meet children or parents, guardians or carers socially, such contact could be misinterpreted as inappropriate, an abuse of a position of trust or as grooming. Any social contact that could give rise to concern should be reported to the Head/Senior Deputy Head/Designated Safeguarding Lead, as per section 6.2.3.

Friendships with parents, guardians or carers and pupils
Members of Staff who are friends with parents, guardians or carers of pupils or who, for example, are voluntary workers in youth organisations attended by pupils, will of course have contact with those pupils outside school. However, members of Staff should still respect the above advice wherever possible and should keep the Head/Senior Deputy Head/Designated Safeguarding Lead informed of such relationships.

Scope of application
The same guidelines should be applied to after School clubs, School trips, and especially trips that involve an overnight stay away from the School. There are separate, more detailed guidelines for School trips in the offsite trips and visits policy. The principles of this guidance also apply to contact with children or young people who are pupils at another school.

6.16.6. Transport, after School activities and educational visits

Transporting pupils
There may be some situations when Staff are required to transport pupils. You should:

- ensure that you are fit to drive and free from any substances that may impair your judgement or ability to drive;
- be aware that until the pupil is passed over to a parent / carer, you have responsibility for that pupil's health and safety;
- record the details of the journey;
- record and be able to justify impromptu or emergency lifts and notify the Head/Senior Deputy Head/Designated Safeguarding Lead
- ensure that there are proper arrangements in place to ensure vehicle, passenger and driver safety, including appropriate insurance, seat belts, adherence to maximum capacity guidelines etc; and
- wherever practicable, you should avoid using private vehicles and should try and have one adult additional to the driver to act as an escort.

After School activities
When taking part in after School activities, you should:

- be accompanied by another adult unless otherwise agreed with the Head/Senior Deputy Head/Designated Safeguarding Lead;
- Ensure a risk assessment has taken place and understand any risk mitigations prior to undertaking the activity;
- obtain parental consent where relevant.

Educational visits
When taking part in educational visits, you should:

- follow the School's offsite trips and visits policy;
- be accompanied by another adult unless otherwise agreed with the Head/Senior Deputy Head/Designated Safeguarding Lead;
- undertake a risk assessment; and
- obtain parental consent.

6.16.7. Overnight supervision
Where overnight supervision is required:

- you should ensure that a risk assessment has been undertaken and that appropriate members of the household have had the appropriate checks;
- arrangements should be made with and agreed by parents, guardians or carers and the pupil;
- one to one supervision should be avoided where possible;
- choice, flexibility and contact with "the outside world" should be incorporated, so far as it is consistent with appropriate supervision and the School's guidelines;
- whenever possible, independent oversight of the arrangements should be made; and
- any misinterpretation, misunderstanding or complaint should be reported.

6.16.8. Inappropriate relationships

Sexual contact
Staff must not:

- have any type of sexual relationship with a pupil or pupils;
- have sexually suggestive or provocative communications with a pupil;
- make sexual remarks to or about a pupil; and
- discuss their own sexual relationships in the presence of pupils.

Abuse of a position of trust and inappropriate relationships with pupils of the School
Sexual relationships or sexual contact with any pupils, or encouraging a relationship to develop in a way which might lead to a sexual relationship or any relationship just considered inappropriate with any pupil at the School is a grave breach of trust that will usually lead to disciplinary action and may also lead to criminal prosecution. It is the criminal offence of an abuse of a position of trust to have any sexual relationship with any School pupil under the age of 18, and whilst not a criminal offence, it is a breach of this Code and considered to be gross misconduct to have a sexual relationship with any pupil of this School, even if over the age of 18.

Inappropriate relationships with pupils at other schools
Forming inappropriate personal relationships with children or young people who are pupils or students at another school will be a criminal offence if they are under 16 but may also be a criminal offence if under the age of 18 and will be regarded as gross misconduct. Such behaviour tends to bring the School into disrepute and gives rise to concern that the Staff involved cannot be trusted to maintain professional boundaries with pupils and students at the School. Whilst not necessarily a criminal offence, the School considers it unacceptable for Staff to form inappropriate personal relationships with a pupil of any school, irrespective of their age.

6.17. Communication with pupils and former pupils (including the use of technology)

6.17.1. Communicating with children and parents, guardians or carers
All communication with children, former pupils or parents, guardians or carers should conform to School policy and be limited to professional matters. Except in an emergency communication should only be made using School property and systems.

6.17.2. Application
These rules apply to any form of communication including new technologies (including 3G / 4G / 5G technologies) such as mobile telephones, web-cameras, social networking websites and blogs. You should also ensure you comply with the more detailed IT policy and social media policy.

6.17.3. Dealing with "crushes"
Crushes, fixations or infatuations are part of normal adolescent development. However, they need sensitive handling to avoid allegations of exploitation. Such crushes carry a high risk of words, actions and expressions being misinterpreted; therefore, the highest levels of professionalism are required. If you suspect that a pupil or a former pupil has a crush on you or on another colleague, you should bring it to the attention of the Designated Safeguarding Lead at the earliest opportunity. Suggestions that a pupil or a former pupil may have developed a crush should be recorded. Staff should avoid being alone with pupils who have developed a crush on them and if the pupil sends personal communications to the member of Staff, this should be reported to the Designated Safeguarding Lead and recorded.

6.17.4. Acceptable use
Adults must establish safe and responsible online behaviours and must comply with the IT policy, social media policy, and the mobile telephone protocol. Adults should report to senior colleagues, any new and emerging technologies which may have a bearing on School practices and on the review of the IT policy. Local and national guidelines on acceptable user policies should be followed. Staff should also:

- ensure that your own personal social networking sites are set as private and ensure that pupils and former pupils are not approved contacts (unless they are your relatives);
- ensure that you do not use any website or application, whether on a School or personal device, which publicly identifies your location while on School premises or otherwise in the course of your employment;
- never use or access social networking sites of pupils or former pupils, and do not use internet or web-based communication channels to send personal messages to pupils;
- never use your own equipment (e.g. mobile telephones) to communicate with pupils or former pupils - use equipment and systems provided by the School and ensure that parents, guardians or carers have given permission;
- only make contact with pupils or former pupils for professional reasons; and

- recognise that text messaging should only be used as part of an agreed protocol and only when other forms of communication are not possible.

6.17.5. AI

The School permits the use of approved generative AI tools for educational purposes, and you remain professionally responsible for anything you produce with them. Use only tools approved by the School and follow any guidance issued by the School. Do not enter pupil, parent or staff personal data, or any confidential or safeguarding information, into a generative AI tool, and do not use one to generate or alter images of pupils or colleagues. Check the accuracy of any output before relying on it or sharing it. Be aware that pupils have access to the same tools, that illegal, inappropriate or harmful content can be created by generative AI as well as encountered online, and that this includes sexual imagery generated or altered from images of real children. Treat any such report or discovery as a safeguarding matter and report it to the Designated Safeguarding Lead. The School's expectations of pupils are set out in the IT Acceptable Use Policy for pupils, and the wider framework, including filtering and monitoring, is in the Online Safety Policy. You will receive training on the safe use of generative AI at induction and at regular intervals thereafter, as set out in that policy.

6.17.6. Personal details

Adults must not give their personal contact details to pupils or former pupils, including email addresses, home or mobile telephone numbers, unless the need to do so is also agreed with the Head/Senior Deputy Head/Designated Safeguarding Lead and parents, guardians or carers (as appropriate).

6.17.7. Personal mobile telephones and electronic devices

It is understood that Staff may need to check text messages and / or personal emails in the case of an emergency or during break times. Personal use must not interfere with your work commitments (or those of others). It is a privilege and not a right. Staff shall set an example and shall never use their own mobile telephones or other electronic devices whilst they are on duty (whether in a classroom or otherwise) and any such mobile devices should be kept out of sight of parents or pupils.

6.17.8. Communicating outside the agreed protocols

Email or text communications between an adult and any pupil or former pupil outside agreed protocols may lead to a report to external agencies in accordance with the School's Safeguarding and child protection policy and procedures, disciplinary action and / or criminal investigations. This also includes communications through internet-based websites.

6.17.9. Political impartiality

You must not promote partisan political views to pupils, whether as part of the curriculum, in any extra-curricular activity or in general conversation or other interaction inside or outside school. This means you must not encourage pupils to support or adopt particular political views and must present any political views in a balanced way that ensures opposing views are aired.

6.17.10. Communicating about shared principles that underpin society

Although you must not promote partisan political views to pupils, there are some concepts and views that are shared principles that underpin our society, rather than political views. These shared values include fundamental rights, tolerance and challenging discrimination and prejudice. Shared values must be reinforced by all staff.

6.17.11. Questions about political impartiality
If you are in any doubt about whether a particular topic is a political issue or a shared value, you should seek guidance from your line manager in the first instance.

6.17.12. Communication with former pupils
The School is aware that as a result of its strong sense of community, former pupils may wish to keep in touch with us after they leave. This is supported through the School's alumni organisation as the School wishes to support the growth of an ever-stronger community. As a precaution and to protect you however, the guidance in this policy also applies to contact with former pupils. To the extent that it is necessary to have contact with former pupils (for example if arranging a careers fair or writing a future reference), you must use your School email address and ensure that communication remains professional at all times. Using personal social media and email accounts creates risk of allegations about the abuse of power in a former Staff/pupil relationship, or even of a former pupil being groomed. This risk is not time limited and may be alleged at any time. Indeed, the sector is increasingly aware of former pupils making allegations at other schools.

To protect yourself, you are strongly advised not to use your personal social media or email to maintain contact with former pupils of the School. This is designed to protect you from potentially career-ending allegations. Should any former pupil make personal contact with you, you must notify the Designated Safeguarding Lead immediately and follow guidance issued to you in order to ensure the School email system is used for a professional response.

6.18. Photographs and videos

6.18.1. Permission

You must only use a **school device** to take photographs or video footage of pupils. Personal devices, including mobile phones and tablets, must never be used for this purpose.

It is permissible to take photographs or video footage of pupils carrying out normal school activities in class, at any School events, or on a trip. You should seek permission before displaying these photographs, other than as part of normal in-school displays (including displays in your own classroom).

Any image used in the public domain must not be able to identify the pupil by full name — where a name is used, this must be the pupil's **first name only**; surnames must never be used, and pupils must not be identified by their full name.

Before taking or using any images of pupils, check the **Photo Permissions Report**, available on SharePoint and also displayed in the staff room. This report shows which category each pupil falls into:

- **Use for everything** – no restrictions apply.
- **Internal use only** – images may be used within school (e.g. displays, newsletters) but not externally (e.g. website, social media).

- **No use at all** – images must not be used publicly or internally for promotional purposes. However, in line with GDPR, these pupils' photos can still be used for normal day-to-day school administration, such as class lists.

If a parent or pupil has not consented to their photograph being used on the website or social media, and you have a query about this, email **communications@exeterschool.org.uk**.

6.18.2. Consent

Subject to below, appropriate consents for taking and displaying photographs should be obtained from parents, guardians, carers and from the pupils themselves if sufficiently mature (most pupils are seen as being sufficiently mature from the age of 12 years). Consent must be freely given so it must be a genuine choice. Unless you have been told otherwise, the Director of External Relations and/or Marketing Manager is responsible for obtaining the appropriate consent. Please see the Guidance for Staff on the use of Photographs and Videos by the School for further information.

6.18.3. Use of photographs/videos

Where the use of a photograph or video is less privacy intrusive (e.g. used in an internal display), it is sufficient for parents and pupils to have been informed about this in the School's privacy notices, in which case consent is not required. However, where a parent has explicitly stated that they do not consent to their child's image being used, this must be respected — their child's image should not be used even for unobtrusive internal displays. Please speak to the Director of External Relations if you have any questions.

6.18.4. Pupils who must not be photographed

Some pupils cannot be featured in photographs or videos under any circumstances (for example, because of safeguarding concerns). Please check the Photo Permissions Report, available on SharePoint and also displayed in the staff room or speak to the Director of External Relations/Marketing Manager if you are unsure to which pupils this applies.

6.18.5. Guidance where permission obtained

Where permission and consent (if appropriate) has been obtained, the following should be considered:

- the purpose of the activity should be clear as should what will happen to the photographs or videos. You must be able to justify images in your possession;
- images should not be made during one-to-one situations;
- ensure that the pupil is appropriately dressed;
- ensure that the pupil understands why the images are being taken and has agreed to the activity;
- only use equipment provided and authorised by the School;
- if a photograph or video is to be displayed in a place to which the public have access (e.g. on the School's website) it should not display the pupil's name unless specific consent has been obtained. Surnames should never be used. If the use of a photograph or video is more privacy intrusive consent may need to be obtained even if the pupil's name is not used (e.g. using an unnamed photograph of a pupil in an advertisement). Consent should be obtained from the pupil and / or their parents as appropriate. Please see paragraph 6 below for further guidance on consent;
- all images of children should be stored securely and only accessed by those authorised to do so; and
- images must not be taken secretively.

6.18.6. Consent

Children are usually considered mature enough to exercise their own data protection rights when they are aged 12 years or older. Whether consent should be obtained from the parents, the pupil or both will depend on the age of the pupil. The School's policy is that when consent is required it should be obtained as follows:

- where the pupil is in Year 6 or below, consent should be sought from a parent, guardian or carer;
- where the pupil is in Year 7, 8, 9, 10 or 11 then consent should be sought from both the pupil and their parent, guardian or carer;
- where the pupil is in Year 12 or 13 then only the pupil's consent will need to be obtained.

6.18.7. Personal social media

You must not publish anything which could identify pupils, parents or guardians on any personal social media account, personal webpage or similar platform without the prior consent of the Head in writing. This includes photos, videos, or other materials such as pupil work.

6.18.8. Appropriate material

The School recognises that many children have unlimited and unrestricted access to the internet via the mobile network. You must ensure children are not exposed, as a result of your actions or carelessness, to inappropriate or indecent images. Viewing, retrieving or downloading of pornographic, terrorist or extremist material, or any other material which the School believes is unsuitable is strictly prohibited and constitutes gross misconduct. This includes at any time when on School premises or otherwise in the course of your employment, including using the School's ICT network (including Wi-Fi) or the mobile network, whether or not on a School or personal device. You should not allow unauthorised access to School equipment and should keep your computer passwords safe. If you discover material that is potentially illegal or inappropriate, you must isolate the equipment and contact the Designated Safeguarding Lead in accordance with the School's Safeguarding and child protection policy and procedures immediately. Pupils must not be exposed to unsuitable material on the internet and Staff should ensure that any film or material shown is age appropriate.

6.18.9. Youth produced imagery

Where safeguarding incidents involve youth produced sexual imagery, staff must not intentionally view or forward sexual imagery reported to them and will follow the School's policy on sharing actual, digitally manipulated or AI-generated nudes and semi-nude images and videos as set out in the School's safeguarding and child protection policy and procedures and searching, screening and confiscation: advice for schools (DfE, July 2022).

6.19. The use of force or physical restraint

6.19.1. Physical restraint

Restrictive interventions: There are circumstances when it is appropriate for staff to use restrictive interventions, including reasonable force, seclusion or restraint, to safeguard pupils and others. All members of school staff have a legal power to use reasonable force in certain circumstances. Any use of restrictive interventions, including the use of reasonable force will be in accordance with the DfE guidance *Restrictive interventions, including use of reasonable force, in schools* (DfE, December 2025, in force from 1 April

2026).

Exceptional measures: Restrictive interventions are exceptional measures used only when other less restrictive strategies (such as de-escalation and behaviour support planning) have been ineffective or are inappropriate, and where it is necessary, proportionate and in the best interests of the pupil and / others.
Please refer to the School's behaviour and discipline policy for more information.

6.20. Physical contact with pupils

You are referred to the School's Behaviour Management Policy for specific guidance on the use of force or physical restraint against pupils. The guidance in this section concerns physical contact in other circumstances.

6.20.1. When physical contact may be appropriate

Physical contact with a pupil may be necessary and beneficial in order to demonstrate a required action, or a correct technique in, for example, singing and other music lessons or during PE, sports and games. Any physical contact should be in response to the pupil's needs, of limited duration and appropriate to the pupil's age, stage of development, gender, ethnicity and background. Physical contact can be easily misinterpreted and should be limited. Staff should use professional judgement.

6.20.2. Guidance on using physical contact

You should observe the following guidelines (where applicable):

- explain the intended action to the pupil;
- 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 the physical contact continues for as short a time as possible;
- ensure that the door is open and if you are in any doubt, ask a colleague or another pupil to be present during the demonstration; and
- consider alternatives if it appears likely that the pupil might misinterpret the contact.

6.20.3. Report concerns

If you are at all concerned about any instance of physical contact, inform the Head/Senior Deputy Head/Designated Safeguarding Lead without delay, and make a written record on CPOMS.

6.20.4. Offering comfort to distressed pupils

Touching may be appropriate where a pupil is in distress and needs comforting. You should use your own professional judgement when you feel a pupil needs this kind of support and should be aware of any special circumstances relating to the pupil. For example, a child who has been abused may find physical contact particularly difficult. You should always notify the Head/Senior Deputy Head/Designated Safeguarding Lead when comfort has been offered, record the action and should seek guidance if unsure whether it would be appropriate in a particular case.

6.20.5. Administering first aid

When administering first aid you should explain to the child what is happening and ensure that, where possible, another adult is present or is aware of the action being taken. The treatment must meet the School's health and safety at work rules and intimate care guidelines, and parents, guardians or carers should be informed. Staff should:

- adhere to the School's policies on first aid and administering medication;
- comply with the necessary reporting requirements;
- make other adults aware of the task that is being undertaken;
- explain what is happening;
- report and record the administration of first aid;
- have regard to any health plans; and
- ensure that an appropriate health / risk assessment is undertaken prior to undertaking certain activities.

6.20.6. Pupils' entitlement to privacy

Children are entitled to privacy when changing or showering. However there still must be an appropriate level of supervision to ensure safety. You should:

- avoid physical contact or visually intrusive behaviour when children are undressed;
- announce yourself when entering changing rooms and avoid remaining unless required;
- not shower or change in the same place as children; and
- not assist with any personal care task which a pupil can undertake themselves.

6.20.7. Intimate care

Sometimes intimate care is required, for example when assisting with toileting or removing wet clothes. You should:

- comply with the School's intimate care guidelines;
- advise other Staff of the task being undertaken and consult where there is any change from the agreed procedure. A record should be kept of the justification for any variations and this information should be shared with parents, guardians or carers;
- explain to the child what is happening;
- comply with applicable professional codes of practice, as appropriate; and
- comply with regularly reviewed, formally agreed plans, as appropriate.

6.20.8. Where a child has been abused

Where a child has previously been abused, Staff should be informed on a "need to know" basis and should be extra cautious when considering the necessity of physical contact. Some children may seek inappropriate physical contact. Staff should sensitively deter the pupil and help them understand the importance of personal boundaries. Such incidents should be reported and discussed with the Designated Safeguarding Lead and where appropriate parents, guardians or carers.

6.20.9. Children with special educational needs or disabilities

Some children may need more physical contact to assist their everyday learning, which should be agreed and understood by all concerned, justified, openly applied and open to scrutiny. The Designated Safeguarding Lead and Learning Support Coordinator will establish whether any reasonable adjustments are required for such pupils.

6.21. Childcare Disqualification

6.21.1. Offence

The Childcare Act 2006 and the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 state that it is an offence for the School to employ anyone to provide childcare in connection with our early years provision (EYP) or

later years provision (LYP) who is disqualified, or for a disqualified person to be directly involved in the management of EYP or LYP (a Relevant Role).

- EYP includes usual school activities and any other supervised activity for a "young child" which takes place on the school premises during or outside of the normal school day (a child is a "young child" during the period between birth and up to 1 September following their fifth birthday).
- LYP includes provision for children not in EYP and under the age of 8 which takes place on school premises outside of the normal school day, including, for example breakfast clubs, after school clubs and holiday clubs. It does not include extended school hours for co-curricular activities such as sports activities.
- "Childcare" means any form of care for a child, which includes education and any other supervised activity for a "young child". "Childcare" in LYP does not include education during school hours but does cover before and after school clubs.

6.21.2. Grounds for disqualification

The grounds on which a person will be disqualified from working in connection with EYP or LYP are set out in the School's recruitment, selection and disclosure policy and procedures. Staff working directly with children are required to familiarise themselves with this document.

6.21.3. Duty of disclosure

Staff in a Relevant Role are under an ongoing duty to immediately notify the School if their circumstances change so that they meet any of the criteria for disqualification at any point during their employment with the School. Any failure to disclose relevant information will be treated as a serious disciplinary matter.

6.21.4. Ofsted

Where the School receives disqualification information about a member of Staff working in a Relevant Role and is satisfied that the member of Staff may be disqualified as a consequence, the School is under a duty to report the circumstances of the disqualification to Ofsted.

6.21.5. Waiver

A member of Staff who discloses information which appears to disqualify them from working in a Relevant Role may apply to Ofsted for a waiver of the disqualification.

6.22. Reporting obligations

6.22.1. The School's position

It is a contractual requirement as well as in your interests to follow the Code of Conduct so as to maintain appropriate standards of behaviour and your own professional reputation. A breach of this Code may be treated as misconduct and will render you liable to disciplinary action including in serious cases, dismissal.

6.22.2. Exit interviews

All staff are trained so that they understand they are expected and encouraged to raise concerns they have, whether related to the safeguarding and welfare of pupils, the conduct of staff or other matters, during the course of their employment in accordance with the School's polices (including the whistleblowing policy, the safeguarding and child protection policy and procedures and this Code). Safeguarding children is at the centre of the School's culture and is accordingly considered

formally during staff performance development reviews and appraisal and finally at exit interviews which are held with all leavers.

6.22.3. Childcare disqualification

The School is prohibited from employing anyone to provide childcare in connection with our early years provision (EYP) or later years provision (LYP) who is disqualified, or for a disqualified person to be directly involved in the management of EYP or LYP.

6.22.4. Termination of employment

If the School ceases to use the services of a member of staff because they are unsuitable to work with children, a settlement agreement (formerly known as a compromise agreement) will not be used and a referral to the Disclosure and Barring Service will be made promptly if the criteria for a referral are met. Any such incidents will be followed by a review of the safeguarding procedures within the School, with a report being presented to the Governors without delay. The School may also need to consider a referral to the Disclosure and Barring Service if a member of Staff is suspended or deployed to another area of work that is not regulated activity.

6.22.5. Resignation

If a member of Staff tenders their resignation or ceases to provide their services to the School at a time when child protection concerns exist in relation to that person, those concerns will still be investigated in full by the School and a referral to the Disclosure and Barring Service will be made promptly if the criteria for a referral are met.

6.22.6. Teaching Regulation Agency (TRA)

Separate consideration will also be given to making a referral to the TRA where a teacher has been dismissed (or would have been dismissed had they not resigned) because of unacceptable professional conduct, conduct that may bring the profession into disrepute, or a conviction at any time for a relevant offence. An interim referral to the TRA may also be considered and made if appropriate.

7. Guidance for staff parents/carers

7.1 Introduction

The following guidance is designed to assist staff parents/carer with managing their professional and personal relationships to avoid compromising and challenging situations, and at all times to focus on safeguarding all children who are part of the school community.

7.2 Application

In circumstances where members of staff are also parents or carers of pupils at the School, they will have a dual role: they will be employees of the school, working within the school's policies and procedures, and also parents seeking to obtain the best educational outcomes for their child(ren). This guidance applies to all members of staff of the school who are parents/carers of current or prospective pupils at the School. The school asks staff members who leave the school's employment, but whose children remain at the School, to continue to comply with the principles of this guidance.

7.3 General considerations

The usual boundaries for employees working with pupils and their families in School and having contact outside school or school-organised events are understandably different.

In situations where a member of staff might develop a social relationship with an existing parent outside of school, that member of staff must always avoid discussion of any professional matters relating to the School and should not express opinions pertaining to the school's provision. Comments regarding other (school) parents should also be avoided. This is particularly pertinent for any member of staff who engages on social media or other digital means with a parent or parents of existing pupils.

At all times, Staff should look to act professionally and any concerns they have regarding this matter should be immediately directed to a member of the leadership team or self-referred through the self-referral process.

Wherever practicable the School will attempt to ensure members of staff do not teach their own children nor act as their form tutor (or in other positions of pastoral responsibility). Furthermore, when on school trips efforts will be made to ensure members of staff are not directly responsible for their child(ren), for example when grouping pupils.

An employee who is also a parent / carer of a (school) pupil must remember that the following principles still apply. They will always:

- adhere to all aspects of the Safeguarding and Child Protection policy
- not allow any family member, to use or access school IT devices in any way
- be conscious of the need to maintain confidentiality with regard to information about pupils and their families as well as with regard to all aspects of school business
- remember that they are in a "position of trust" whether in school or at home (or elsewhere)
- ensure that the same professional boundaries exist when in school as with all other pupils
- ensure that no actions in or out of school might be described as bringing the school into disrepute
- ensure that no actions in or out school might question their professional judgment or behaviour, as per the school code of conduct and national professional standards for teachers (in the case of teaching staff).

8. Anti-bribery and corruption policy

8.1. Introduction

8.1.1. Commitment

The School and Governors are committed to implementing effective measures to prevent, monitor and eliminate the risks of bribery and enforcing effective systems to counter bribery, of the facilitation of tax evasion and to enforce effective systems to counter bribery and the facilitation of tax evasion.

8.1.2. Application

This policy applies to all staff, subcontractors or volunteers working in the School, whether paid or unpaid, whatever their position, role or responsibilities and Staff includes employees, Governors, contractors, and volunteers. It also applies to any person or body, acting on its behalf.

8.1.3. Conduct

The School conducts its business activities in the UK and overseas in an honest and ethical manner. The School will not tolerate any form of bribery and/or corruption by, or of, its Staff.