



Staff Code of Conduct

This policy applies to the whole school including the EYFS

See also the *Safeguarding and Child Protection Policy, Whistleblowing Policy and Procedures* and *Taking, Storing and Using Images of Pupils Policy, Low Level Concerns Policy*

Failure to comply with this Staff Code of Conduct may be regarded as gross misconduct and subject to disciplinary action.

Definitions of abbreviations used in this policy

DSL: Designated Safeguarding Lead – person responsible for safeguarding in school

Deputy DSL: Deputy Designated Safeguarding Lead – deputy person responsible for safeguarding in school

DBS: Disclosure and Barring Service checks (formerly - Criminal Records Bureau)

NCT: Non-contact time

SCR: Single Central Register of Appointments

At Kew College

DSL: Laura Liguori

Deputy DSL and Head: Jane Bond

Second Deputy DSL and EYFS Safeguarding Lead: Stephanie Aird

1. GENERAL

The aim of this Staff Code of Conduct is to provide clear guidance about staff behaviour and actions in order that staff do not place pupils or themselves at risk of harm, of allegations of harm to a pupil or allegations of a Low Level Concern as stated in the Low Level Concerns Policy. Their conduct towards pupils must be beyond reproach so the following guidelines should be followed:

a) Teachers should not invite an individual pupil to stay alone with them in a classroom for any reason that is not directly involved with their education. Such occurrences should be brief **and the door should remain open (if there is no glass panel)**. Should a child start to request permission to stay in the classroom with the teacher on a regular basis they should be kindly reminded of the rule that they should play outside.

b) Should there be the necessity for a pupil to receive one to one tuition outside of classroom hours, for example, in preparation for an examination or to catch up work missed, the following should be observed:

- Subject and class teachers should only give one to one tuition after permission from the Head
- One to one tuition should take place in a setting where the teacher and pupil can be observed by others

- There should always be a glass panel in the door of the classroom and sufficient traffic passing the door to allow informal supervision
- One to one tuition should never take place in a classroom after or before school where there is no other adult present nearby
- If a member of staff has any indication that a child being taught, either one to one or otherwise, is bringing up inappropriate topics or behaving inappropriately then the Head and the DSL or in her absence the Deputy DSL must be informed immediately. If this happens during a one to one session between staff member and child, then the lesson should cease immediately.

c) Instrumental Music teachers should pay particular attention to the above. Due to their relationship with their pupils it is also possible that an instrumental teacher may be the first to hear of a child's concerns or to suspect that they are being abused. Instrumental Music teachers must be sure to follow the procedures in the policy carefully.

d) Physical Contact -There are occasions when it is entirely appropriate and proper for staff to have physical contact with pupils, but it is crucial that they only do so in ways appropriate to their professional role.

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

Physical contact which occurs regularly with an individual child or young person is likely to raise questions unless the justification for this is part of a formally agreed plan (for example in relation to pupils with physical disabilities).

Some staff, for example those who teach PE and games, or who offer music tuition will, on occasion, have to initiate physical contact with pupils in order to support a child so they can perform a task safely or to demonstrate the use of a particular piece of equipment/instrument or assist them with an exercise. e.g. adjusting the angle of a bowler's arm. This should be done with the pupil's agreement. Contact under these circumstances should be for the minimum time necessary to complete the activity and take place in an open environment. Staff should remain sensitive to any discomfort expressed verbally or non-verbally by the child.

Likewise, children may be comforted when they are distressed but staff must avoid any inappropriate physical contact with children.

e) Staff should not convey any pupil by car without permission from the Head (e.g. to attend a sports fixture). Permission will not be granted for one teacher to convey one child.

f) Where Out-of-School activities include overnight stays, careful consideration needs to be given to sleeping arrangements. Pupils, staff and parents should be informed of these prior to the start of the trip. Staff on the trip should ensure that checking arrangements do not place them in a position of vulnerability.

g) Staff should only administer personal care to any child in the Early Years or elsewhere in the school when another adult is present or near enough to maintain the child's dignity (see *Intimate Care Policy.*)

h) If a member of staff finds themselves in a social situation with parents or pupils outside of a School function, their behaviour and discretion should be impeccable and uphold all values of the School.

1.1. Acceptable Physical Intervention

Section 93 of the Education and Inspections Act 2006 enables School staff to use such force as is reasonable in the circumstances to prevent a pupil from doing, or continuing to do, any of the following: committing an offence; causing personal injury or damage to the property of any person (including the pupil them self); prejudicing the maintenance of good order and discipline at the School, or among any pupils receiving education at the School, whether during a teaching session or otherwise.

Reasonable force is generally accepted as meaning the *minimum* force required in a given situation. As is set out in the Kew College Terms and Conditions, parents give their consent to such physical contact as may accord with good practice and be appropriate and proper for teaching and instruction and for providing comfort to a pupil in distress or to maintain safety or good order, or in connection with a pupil's health or welfare. Staff are trained in safer restraint on a cyclical basis.

1.2. Infatuations

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

1.3. Inappropriate Relationships

Particular attention is drawn to the provisions of the *Sexual Offences Act 2003*, which states that it is an offence for a person aged 18 or over (e.g. teacher, youth worker) to have a sexual relationship with a child under 18 where that person is in a position of trust in respect of that child, even if the relationship is consensual. A situation where a person is in a position of trust could arise where the child is in full-time education and the person looks after children under 18 in the same establishment as the child, even if s/he does not teach the child.

1.4. Inappropriate Images

Staff should take extreme care to ensure that children and young people are not exposed, through any medium, to inappropriate or indecent images. This includes the showing of films that are not age appropriate. Pupils should not watch anything above a U rated film in school.

Under no circumstances should any adult use School equipment to access such material, including adult pornography. Personal equipment containing such images, or links to them, should never be brought into or used in the workplace. This will raise serious concerns about the suitability of the adult to continue working with children and young people.

2. STAFF INTERNET GUIDANCE

The following must be noted and carefully observed. Failure to do so will result in disciplinary proceedings and possible dismissal, with referral to the DBS (Disclosure and Barring services) or the police.

- a) All staff must keep themselves and the School safe, and maintain the School's good reputation at all times. They must be aware how their use of the internet could put them at risk and should follow the same online-safety guidelines that we give the children.
- b) Internally, the use of the internet at school is always monitored. Staff must not use networking websites when using a school computer. School facilities are intended for professional school use only.
- c) Staff must take care that the computers that they use in school have appropriate security settings. Pupils must not be at risk of seeing inappropriate images on the screen, even if they come into the classroom outside of lesson times. School computers must only be used for teaching and School administrative purposes.
- d) Staff must not make inappropriate contact with pupils, either current or ex-pupils by electronic methods.

2.1. Social Networking:

However high you set your own privacy settings you are potentially vulnerable when you correspond with others who have not set their own security to the same level. Matters of concern are:

- Inappropriate pictures of staff
 - Sending inappropriate images over the internet
 - Sending inappropriately worded text or email messages relating to the school
 - Pupils having access to private details of staff, thus rendering staff vulnerable to abuse
- When using personal social networking groups such as 'Facebook', staff must ensure that:
- All settings give maximum privacy
 - Personal details are kept to a minimum and the words '**Kew College**' are not **anywhere** on your profile, with the exception of 'Linkedin' which is a work-based platform.
 - No photographs are on your profile / site that could be embarrassing if seen by colleagues, pupils or parents or could identify the School
 - Any abuse is reported.

In order to maintain the highest possible professional standards in their relationships with parents, staff are not permitted to contact or accept contact from a parent or child on their personal mobiles or personal emails. Nor should they accept an invitation to become friends on social networking sites of parents or their children. Any member of staff who is listed as a 'friend' to a current or previous pupil will be asked to discuss the matter with the Head. It must be understood that this is to protect the reputation of members of staff and of the School. An exception to this is if the member of staff has or has had a child at the School and therefore social contacts with other parents is unavoidable. In this case, they are expected to exercise impeccable judgement regarding any possible conflict between their roles as parent and employee.

Staff must not use Facebook or other social networking sites in school. The only exception is the bursarial staff or Head when screening job applicants.

2.2. E-mail

- It is stated in the ***Staff Procedures Handbook*** that the Head must be routinely copied in on email correspondence with parents where there is any indication of a safeguarding issue, complaint, misunderstanding, concern or dissatisfaction on the part of the parent. Due to the nature of the correspondence, responses to the parent must first be cleared by the Head before being sent out. This must include email or other correspondence.
- When using email to correspond with colleagues, the same level of courtesy and consideration should be shown as at any other times. Emails should be kept short, formal and should not contain inappropriate humour.

(see full ***Internet Acceptable Use Policy***)

3. WHISTLEBLOWING

At the School, the safety of our children is of paramount importance. We promote a culture of safety and of raising concerns. The ***Whistleblowing Policy and Procedures*** have been written in order to provide staff with a mechanism for raising concerns about the safeguarding of pupils and other wrongdoing or malpractice. It is designed to provide guidance to all those who work with or within the School, who may from time to time feel that they need to raise certain issues relating to the School or about their colleagues, with someone in confidence.

Every member of staff has a duty to report any safeguarding concerns or allegations about behaviour of colleagues or practices which are likely to put a pupil at risk of abuse or other serious harm. These concerns **should be brought to the attention of the Head** in the first instance or the Deputy Head in the absence of the Head. Concerns about the Head should be reported to the Governing body.

Employees who wish to raise a concern about another member of staff or colleague under this procedure have a right to do this without any fear of victimisation or detriment as a consequence. They can have the matter treated confidentially and their name will not be disclosed to the alleged perpetrator of malpractice without their prior approval. It may be appropriate to preserve confidentiality that concerns are raised orally rather than in writing, although members of staff are encouraged to express their concern in writing wherever possible. If there is evidence of criminal activity, then the Police will be informed in all cases. All members of staff must be aware of the School's Safeguarding procedures and will receive regular training and updates.

Members of staff may also use the **NSPCC Whistleblowing Advice Line on 0800 800 5000**

The Whistleblowing Policy is distinct from the School's Grievance Procedure. If a concern relates to personal circumstances in the workplace, then the Grievance Procedure should be followed. (See full ***Whistleblowing Policy and Procedures***)

4. USE OF MOBILE PHONES AND DIGITAL CAMERAS

4.1. Policy statement

It is recognised that it is the enhanced functions of many mobile phones that cause the most concern, and which are most susceptible to misuse. Misuse includes the taking and distribution of indecent images, exploitation and bullying. It is also recognised that mobile phones can cause an unnecessary distraction during the working day and can be intrusive when used in the company of others.

When mobiles phones are misused it can impact on an individual's dignity, privacy and right to confidentiality. Such concerns are not exclusive to children and young people, hence there is a duty to protect the needs and vulnerabilities of all. It is appreciated that it can be very difficult to detect when such devices are present or being used, particularly in relation to enhanced functions such as cameras. The use of all mobile phones is therefore limited, regardless of their capabilities. The aim is to avoid distraction and disruption of the working day, and to minimise the opportunities for any individual to make any covert images or misuse functions in any other way.

Designated 'mobile' areas are situated within the setting, this is in the staff room, or in the school offices when no children are present. **'Mobile free' areas** are those which are considered to be the most vulnerable and sensitive, and include:

- Changing areas
- Toilets
- Medical room
- **All EYFS areas**

A zero-tolerance policy is in place with regards to the **use** of personal or work-related mobiles by any individual in these areas or in any areas where there are **EYFS** children. This will include when **EYFS** children are in specialist teaching rooms and at clubs. Where **EYFS** children are being taught, mobile phones **MUST** be locked away.

4.2. Code of Conduct for use of mobile phones by staff

A code of conduct is in place to avoid the use of mobile phones causing unnecessary disruptions and distractions within the workplace, and to ensure effective safeguarding practice is promoted to protect against potential misuse.

It is therefore ensured that all staff:

- Have a clear understanding of what constitutes misuse
- Are vigilant and alert to potential warning signs
- Know how to minimise risk
- Avoid putting themselves into compromising situations which could be misinterpreted and lead to possible allegations

- Understand the need for professional boundaries and clear guidance regarding acceptable use
- Are responsible for self-moderation of their own behaviours
- Are aware of the importance of reporting concerns promptly

Staff are permitted to have their mobile phones about their person with the exception of the EYFS areas where they **MUST** be kept locked away; however, there is a clear expectation that all personal use is limited to allocated lunch and/or tea breaks, during NCT when children are not present and in areas devoid of children. Mobile phones should be tidied away and not be on view in the classroom.

Other than in agreed exceptional circumstances including during emergencies and in a crisis, phones must be switched to silent and calls and texts must not be taken or made whilst in contact with children.

Staff are permitted to use mobile phones at the Games field, Swimming pool, or trips and visits **for work related calls only** or in exceptional circumstances involving emergencies. Another exception is on residential trips and school trips where the Trip Leader may require to be in contact with the School; in this instance they should at all times aim to use their phone away from the children.

It is recognised that mobile phones provide direct contact to others, and at times provide a necessary reassurance due to their ease of access, particularly at stressful times. Therefore in **agreed** exceptional circumstances, staff are permitted to keep their phone on vibrate. This is to enhance their own well-being and peace of mind, to reduce stress and worry and to enable them to concentrate more effectively on their work. Such use will be for an agreed limited period only, until any concerns or issues leading to the exceptional circumstance request have been resolved.

It is ensured at all times that the landline telephone remains connected and operational, except in circumstances beyond control. This means that it is available for emergency/urgent contact at all times. If the landlines are not working, the Head or Deputy Head or a member of the SLT can make the decision about appropriate use of mobile phones until the situation has been rectified.

4.3. Procedures regarding images

Under GDPR regulations, the School is not required to seek parental consent to take photographs and use video recorders for images that are necessary for the ordinary running of the School, or are in the legitimate interests of the School and its community.

For other photographs, parental consent has been requested as per the ***Taking, Storing and Using Images of Pupils Policy***. Any parent can amend or withdraw consent at any time by updating their consent in Schoolbase, contacting the Registrar in writing or completing the form available at the front office. The School will respect the wishes of parents (and indeed pupils themselves) wherever reasonably possible. At **NO** time should a child's full name appear on any promotional material or on the website with their photograph.

All photographs will be stored on the school internal network, which is password protected, The School will not keep photographs longer than is necessary for the purpose or purposes for which they were collected and will take all reasonable steps to destroy, or erase from its systems, all photographs/videos that are no longer required.

Staff should only use School cameras or School iPads to take photographs or videos of pupils unless permission is given for photographs to be taken on personal cameras in exceptional circumstances Where this is the case, photographs on personal cameras should be downloaded and deleted off the memory card so that they are not taken outside of the School. The School's digital cameras/ or memory cards **must not** leave the premises except for school trips or excursions. Photos are printed in the setting by staff and images are then removed from the camera's memory.

Photographs may be taken during indoor and outdoor play and displayed in albums or a child's development records for children and parent/carers to look through. Often photographs may contain other children in the background. Events such as, Sports day, Outings, Christmas and Fundraising Events may be recorded by video and photographs by staff and parents/carers but always in full view of all attending. Photographs taken by parents/carers are to be for personal use only and images which may, expressly or not, identify other pupils should not be made accessible to others via the internet (for example on Facebook), or published in any other way

CCTV is in use on school premises, and will sometimes capture images of pupils. Images captured on the School's CCTV system are used in accordance with the **Privacy Notice** and **CCTV Policy** / any other information or policies concerning CCTV which may be published by the school from time to time.

Staff are not permitted, in any circumstance, to use their personal phones for taking, recording or sharing images and 'mobile free' areas must be observed at all times.

Staff are not permitted to use their personal phones for contacting children, young people and their families within or outside of the setting.

Parents, visitors and contractors are respectfully requested not to use their mobile phones in any of the designated mobile free areas. Should phone calls and/or texts need to be taken or made, use is restricted to those areas not accessed by children in order to avoid any unnecessary disturbance or disruption to others. Should a member of staff see an adult that is not a member of staff using a mobile phone, they should respectfully request them to stop.

Under no circumstances is **any** individual permitted to take images or make recordings on a mobile phone without the School's express permission. Any individual bringing a personal device into the setting must ensure that it contains no inappropriate or illegal content.

Work mobile

The use of a designated work mobile or iPad with mobile phone enabled features is promoted as they are:

- An essential part of the emergency toolkit which is taken on off-site residential trips

- An effective communication aid, enabling text, email messages and calls to be made and received
- A back-up facility should problems be experienced with the landline – or where contact needs to be made outside of work hours

Effective security measures are in place to safeguard against any potential misuse. Only authorised individuals have access to the work mobile, which is password protected and stored securely in the Bursar's office when not in use.

The work mobile is for work related calls and emergencies only.

Safe storage

A designated locker or lockable desk drawer is available to staff to store their personal belongings during the working day. Staff have the **option** to store their mobile phones in this area, should they choose. This is not a mandatory requirement other than in the EYFS or areas where EYFS children are present.

Staff leave their belongings in safe storage at their own risk. It is therefore recommended that phones are security marked, password protected and insured. No liability for loss and damages is accepted.

As well as safeguarding children and avoiding any unnecessary disruptions during the day, this procedure also aims to protect staff against any unfounded allegations.

Reviewed by:	Approved by:	Updated by:
The Full Governing body	Name: Jane Bond	Name: Christine Chui
	Title: Head	Title: Deputy Head
Date: 17 Nov 2021	Date: 12 Sep 2021	Date: 12 Sep 2021

This policy will be reviewed by the governing body annually or earlier if it is considered necessary.