



STAFF CONDUCT POLICY

Please also see:

Anti-corruption and Bribery Policy, Behaviour Policy, Pupil Code of Conduct, Disciplinary Policy, First Aid Policy, ICT (Acceptable Use) Policy, Information Security Policy, Health & Safety Manual, Medical Care Policy, Personal Devices & Photography Policy, Safeguarding and Child Protection Policy, Tutoring Policy, Whistleblowing Policy.

1. INTRODUCTION

- This Staff Code of Conduct applies to all members of staff working at Thomas's Schools. Whenever the word 'staff' is used, it includes all employees; supply staff; staff employed by a third party; self-employed staff; contractors; volunteers and Principals (Proprietors).
- The primary aim of the code is to safeguard pupils and to give staff clear on their expected conduct guidance thereby reducing the risk of anyone being falsely accused of improper or unprofessional conduct.

2. KEY PRINCIPLES

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

3. DUTY OF CARE

- All members of staff have a duty to keep pupils safe and to protect them from physical and emotional harm. This duty is in part exercised through the development of respectful, caring and professional relationships between staff and pupils and behaviour by staff that demonstrates integrity, maturity and good judgement.
- The school has a duty of care towards its employees which requires the provision of a safe working environment for staff and guidance about safe working practices. There is also a duty on employees to take care of themselves and anyone else who may be affected by their actions or failings. In this respect, the duty of care towards both staff and children can be demonstrated through the use of these guidelines.

4. EXERCISING PROFESSIONAL JUDGEMENT AND TRAINING

- This guidance cannot cover every situation which staff may encounter; however, it does highlight behaviour which is illegal, inappropriate or inadvisable. There may be rare occasions and circumstances when staff have to make decisions or take action in the best interests of a pupil where no specific guidance exists. It is expected that in these circumstances staff will always advise senior colleagues of the justification for any such action already taken or proposed.
- Staff must always maintain appropriate professional boundaries, in order to secure the best interests and welfare of the pupils in their charge and must avoid any behaviour which could be misinterpreted by pupils or others.
- Staff must self-refer if they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or if on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards; this includes online behaviour. (see section 24).
- Thomas's recognises the importance of training in developing the professional judgement of staff. Staff induction includes ensuring staff understand KCSIE (Part 1 and Annex B), Thomas's Safeguarding and Child Protection Policy, Thomas's Whistleblowing Policy, Thomas's ICT Acceptable Use Policy and this Staff Conduct Policy as a minimum. Ongoing staff training is provided regularly and further guidance can be found in staff information documents on the TLP.

5. POWER AND POSITIONS OF TRUST

- As a result of their position and the authority invested in their role, all staff working in school are in a position of trust in relation to pupils.
- The relationship between staff and pupils is one in which the adult has a position of power or influence. As such, a relationship between a member of staff and a pupil can never be a relationship between equals.
- There is potential for exploitation and harm of vulnerable young people and staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.
- Staff must never use their power to intimidate, threaten, coerce or undermine pupils.
- Staff must not use their status and standing to form or promote relationships with pupils which are of a sexual nature, or which may become so.

6. DRESS & APPEARANCE (*Also see the dress code on the TLP and any additional school specific guidance*)

Staff should wear clothing which:

- promotes a positive and professional image;
- is appropriate to their role;
- is not likely to be viewed as offensive revealing, or sexually provocative;
- does not distract, cause embarrassment or give rise to misunderstanding;
- is absent of any political or otherwise contentious slogans;
- is not considered to be discriminatory;
- is compliant with professional standards.

7. CONFIDENTIALITY (*Also see Thomas's Confidentiality Policy*)

- Confidentiality is a key aspect of the professional standards required within a school. Staff have access to a great deal of information about pupils, families and the school. They may also be aware of additional highly sensitive or private information in order that they may discharge their duties effectively.
- All information must be treated in a discreet and confidential manner and staff must not discuss or mention such information elsewhere, except to those colleagues who have a professional role in relation to the matter.
- The storing and processing of personal information about pupils is governed by the Data Protection Act (DPA) 2018 and the General Data Protection Regulations.
- To ensure online information is suitably protected, staff are expected to use strong passwords which are always kept private. If there is a possibility a password may have been compromised, it must be changed immediately and the Online Safety Officer must be notified.
- Any mobile devices should be protected with a password or PIN, whether in or out of school, to protect access to content.
- Staff must report any loss or compromise of data (e.g. losing a laptop or phone, losing hard copy documents relating to the school, suspected hacking) immediately to the head and (in the case of electronic data) the Director of IT. Any e-safety issues must also be reported to the DSL.
- Staff should never use confidential or personal information about a pupil or her/his family for their own, or others advantage (including that of partners, friends, relatives or other organisations). Information must never be used to intimidate, humiliate, or embarrass.
- Staff must be aware that should they meet socially after school in local pubs, restaurants or other public places, their conversations may be overheard and so they must be extremely careful that confidential information about the school, the parents or the pupils does not leak in this way or otherwise inadvertently.
- Staff must never make any statement, whether oral or written, to any representative of any newspaper, publisher, television, radio or film company nor write any article or other literary work for the press or otherwise for publication about the school, pupils or parents without the written consent of the Head.
- Staff must not discuss or comment on the school, pupils, colleagues or parents/carers on any social or professional networking websites or other similar media.
- Staff must understand that if they discuss a problem of a personal nature with any

other member of staff, the confidant(e) may in some instances have a professional duty to report what he or she has been told, e.g. where there are child protection, alcohol or drug abuse issues.

- Members of staff are required to share information when there is a safeguarding concern about a pupil and/or if abuse is alleged or suspected. In such cases, staff must inform the DSL in accordance with Thomas's Safeguarding and Child Protection Policy.
- Staff are expected to report any concern about the conduct of an adult by following the procedures outlined in Thomas's Safeguarding and Child Protection Policy and in paragraph 24.
- Staff including the Head, DSL and Deputy DSL will be required to share confidential information with other agencies to safeguard children. The school follows the DfE guidance in *Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers July 2018 and KCSIE (2021)*

8. PROFESSIONAL CONDUCT

All staff are expected to uphold high standards of personal and professional conduct both within and outside school. For teachers, standards are also laid down in the [DfE Teachers' Standards](#).

This means staff must:

- safeguard pupils' well-being at all times ;
- treat pupils with dignity, building relationships rooted in mutual respect;
- observe appropriate professional boundaries with pupils;
- use clear and professional language when talking to pupils, parents and colleagues;
- not swear, blaspheme or use any sort of offensive language;
- not shout when reprimanding pupils;
- show tolerance of and respect for the rights of others;
- not discriminate, bully, harass or intimidate;
- actively promote and not undermine fundamental British values, which are defined as comprising: democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs;
- not discriminate against pupils or other staff on the basis of protected characteristics, which include: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex, sexual orientation;
- uphold the school's values and ethos and challenge any attitudes or behaviours which undermine them e.g. the use of misogynistic or racist language.

9. WORKING WITH PUPILS ONE TO ONE

- Working or dealing with pupils one to one requires additional safeguards to be in place as staff are more vulnerable to unfounded or malicious allegations being made against them. One to one situations also have the potential to make the child more vulnerable to harm by those who seek to exploit their position of trust. Every attempt should be made to always ensure the safety and security needs of both staff and pupils.

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

10. PHYSICAL CONTACT

- The school accepts that there are occasions when physical contact with a pupil may be proper and necessary such as:
 - when comforting a distressed pupil;
 - when a pupil is being congratulated or praised;
 - to demonstrate how to use a musical instrument;
 - to demonstrate exercises or techniques during PE lessons or sports coaching;
 - to support learning in Dance or Ballet lessons;
 - to give first aid;
 - if pupils soil themselves.
- Whenever physical contact is made with pupils this should be in response to their needs at the time, of limited duration and appropriate to their age, stage of development, gender, ethnicity and background.
- Staff should remain self-aware at all times in order that their contact is not threatening, intrusive or subject to misinterpretation.
- Members of staff should observe the following guidelines (where applicable).
- Explain the intended action to the pupil.
- Ask the pupil's permission if appropriate e.g. to examine an injury if sustained in school and for which medical treatment may be needed.
- Do not proceed with the action if the pupil appears to be apprehensive or reluctant, or if you have other concerns about the pupil's likely reaction.
- Ensure that the door is open and, if you are in any doubt, ask a colleague or another pupil to be present.
- If intimate care is needed two members of staff should be present although the dignity and privacy of the pupil must always be considered.
- Particular care must be taken in instances which involve the same pupil over a period of time.

- Some children may seek out inappropriate physical contact. In such circumstances staff should deter the child sensitively by helping them to understand the importance of personal boundaries, and also make a report of the incident via Neutral Notification (see section 24). If the type of behaviour causes concern, or continues, the member of staff should inform the DSL, as this could be a sign the pupil is a victim of abuse.

11. INTIMATE / PERSONAL CARE *(also see Medical Care Policy)*

- Intimate care is one of the following:
 - Supporting a pupil with dressing/undressing (this may be necessary in Early Years but staff should always encourage children to dress and undress unaided).
 - Providing comfort or support for a distressed pupil.
 - Assisting a pupil requiring medical care, who is not able to carry this out unaided.
 - Cleaning a pupil who has soiled him/herself, has vomited or feels unwell.
- When touching a child, staff must always be aware of the possibility of invading a child's privacy and must respect the child's wishes and feelings.
- If a child needs to be cleaned, staff must make sure that:
 - protective gloves are worn;
 - the procedure is discussed in a friendly and reassuring way with the child throughout the process;
 - the child is encouraged to act as independently as possible and to undertake as much of their own personal care as is possible and practicable;
 - the child is encouraged to care for him/herself as far as possible;
 - physical contact is kept to the minimum possible to carry out the necessary cleaning;
 - privacy is given appropriate to the child's age and the situation.
- Staff need to have regard to the danger of allegations being made against them and take precautions to avoid this risk. These should include:
 - gaining a verbal agreement from another member of staff that the action being taken is necessary;
 - allowing the child, wherever possible, to express a preference to choose his / her carer and encourage them to say if they find a carer to be unacceptable;
 - allowing the child a choice in the sequence of care;
 - being aware of and responsive to the child's reactions;
 - trying to ensure that while assistance should normally be undertaken by one member of staff, another appropriate adult is in the vicinity who is aware of the task to be undertaken and that, wherever possible, they are visible and/or audible.
- A record should be kept of all intimate and personal care tasks undertaken and parents informed the same day.
- Volunteers must not carry out intimate care procedures. Students should only do so under the supervision of a trained member of staff. Should a child require intimate care on a school visit, the volunteer should contact a staff member without delay.

12. CHANGING AREAS

- Pupils are entitled to respect and privacy at all times, and especially when in a state

- of undress, including when changing, toileting and showering.
- However, there also needs to be supervision which is appropriate to the needs and age of the pupils concerned to ensure health and safety and to ensure that poor behaviour does not occur.
- The following general guidelines should be observed by staff:
 - To avoid any visually intrusive behaviour;
 - To knock and announce the intention to enter the changing area if supervision is required;
 - To consider the necessary level of supervision and only remain in the room when pupils' needs require this;
 - To only assist with intimate or personal care tasks which the pupil is unable to undertake independently;
 - To never change in the presence or sight of pupils;
 - To never use pupils' toilets or shower with pupils;
 - To ensure that when using external facilities for sport or other trips, time spent in shared public changing rooms or toilets is kept to a minimum. Staff/pupil use of such facilities should be deliberately staggered so as not to coincide.
- For pupils in Reception to Year 2 staff may remain in changing areas as younger pupils need a greater level of supervision and it is more likely they will need some help to dress and/or undress. However, staff must still respect the privacy of pupils and only assist if a pupil is unable to complete a personal task independently.
- For pupils in Years 3 to 6 staff should place themselves at the entrance to the changing area. If a member of staff needs to enter a changing room when pupils are changing for swimming or PE, this should only be to ensure safety or address a genuine concern about a pupil's welfare. Wherever possible there should be a minimum of two members of staff supervising.
- In Years 7 and above, staff should place themselves outside the changing area and should only enter the changing rooms, toilets or shower areas in an emergency or when addressing genuine concerns about a child's safety or welfare, or where there is reasonable suspicion of a breach of school discipline. Wherever possible, there should be a minimum of two members of staff supervising.

13. BEHAVIOUR MANAGEMENT

- Staff members are responsible for managing children's behaviour in an appropriate way in accordance with Thomas's Behaviour Policy.
- Rewards and sanctions must be appropriate to the age and understanding of the pupils and in line with the school's policy and procedures.
- All forms of corporal punishment are unlawful and corporal punishment must never be threatened.
- Staff must not use any form of degrading or humiliating treatment to punish a pupil.
- The use of sarcasm, demeaning or insensitive comments towards pupils is completely unacceptable.
- If the behaviour of a pupil(s) causes concern, staff must seek advice from a senior colleague and ensure the behaviour is brought to the attention of the pastoral lead within the school.

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

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

15. EDUCATIONAL VISITS AND OFF-SITE ACTIVITIES *(Also see Thomas's Educational Visits and Off-site Activities Policy)*

- All educational visits and off-site activities must be risk assessed in line with Thomas's Educational Visits and Offsite Activities Policy.
- Staff should take particular care when supervising pupils in the less formal atmosphere of an educational visit where a more relaxed discipline or informal dress and language code may be acceptable.
- Staff remain in a position of trust and must uphold the same professional standards of conduct which pertain within school, following school policies and ensuring that their behaviour cannot be interpreted as seeking to establish an inappropriate relationship or friendship.
- Staff organising trips and activities should pay careful attention to ensuring there is a safe staff/child ratio and suitable gender mix of staff.
- Where out of school activities include overnight stays, careful consideration must be given to sleeping arrangements. Pupils, adults and parents must be informed of these prior to the start of the trip.
- Staff must always be accommodated in separate rooms to pupils, with access to separate washing and toilet facilities.
- Staff must not allow a pupil or pupils to enter their own accommodation nor should pupils be able to witness a member of staff getting showered, dressed or changed.
- Members of staff should refrain from being in bathrooms, changing rooms, showers or toilets when pupils are, or might be, in them in a state of undress and should follow the guidance above relating pupils changing or showering.
- Staff should generally not enter beyond the doorway of a pupil's bedroom. Where there is a safety or welfare reason why the staff member must enter the room, the door must be kept open and the pupil/s within must have signalled that they are happy for the member of staff to enter. The member of staff must respect and bear in mind the privacy and personal space of the pupil/s concerned and should leave the room as soon as possible. Another member of staff should also be present if at all possible. Time spent with a pupil in a room in this way should be noted with the Trip Leader.
- Members of staff involved in any school trip must abstain from alcohol. During residential trips, if a member of staff has an evening which is specifically designated as off duty, permission may be given by the trip leader for a very moderate amount of alcohol to be consumed.

16. CONDUCT OUTSIDE WORK

- Staff must not engage in conduct outside work which could damage the reputation and standing of Thomas's Schools or the member of staff's own reputation or the reputation of other members of the school community.
- Staff may not babysit pupils from the school unless express permission is given from the Head. It is unlikely to be granted except in exceptional circumstances.
- With the Head's permission, staff may tutor pupils of the school on school premises, according to Thomas's Tutoring Policy.
- Staff may not tutor pupils from other schools during term time and, on no occasion, must they tutor or provide teaching for any children who are applicants to a Thomas's school.
- Staff are required to complete a Declaration of Additional Work annually, in which they either list all tutoring and other paid activities, or declare that they are not undertaking any additional paid work during term time. If, having made such a

declaration, a member of staff begins to undertake additional work during the same academic year, he or she must complete and return a revised Declaration before such work begins.

- Full time staff may only undertake work outside school during term time with the written permission of the Head.
- Any other work must not conflict with the interests of the school nor be to a level which may affect an individual's work performance in the school.
- Staff have a professional duty to set a responsible example. Staff should not put themselves in a position which may compromise their professional status.
- Staff must exercise extreme caution when using information technology, including social networking sites, and be aware of the risks to themselves and others. Maximum privacy settings should always be utilised. (See section 17)
- Staff must inform the Head immediately if they are arrested or subject to a criminal conviction or caution.

17. SEXUAL CONTACT WITH YOUNG PEOPLE

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

18. GROOMING AND SEXUAL COMMUNICATION WITH CHILDREN

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

19. INFATUATIONS AND 'CRUSHES'

- All staff need to recognise that it is not uncommon for pupils to be strongly attracted to a member of staff and/or develop a 'crush' or infatuation. They should make every effort to ensure that their own behaviour cannot be brought into question, does not appear to encourage this and be aware that such infatuations may carry a risk of their words or actions being misinterpreted.
- Any member of staff who receives a report, overhears something, or otherwise notices any sign, however small or seemingly insignificant, that a pupil has become or may be becoming infatuated with either them or a colleague, should immediately report this to the Head. In this way, appropriate early intervention can be taken which can prevent escalation and avoid embarrassment or distress for those concerned.
- The Head should ensure a plan to manage the situation is put in place. This plan should respond sensitively to the child and staff member and maintain the dignity of all. The plan should involve all parties and be regularly monitored and reviewed.

20. COMMUNICATION & THE USE OF TECHNOLOGY *(See Personal Devices and Photography Policy, Acceptable Use Policy, Online Safety Policy and Communications Policy.)*

- Thomas's ICT Acceptable Use Policy must be signed by staff before starting work and must be followed at all times. This gives expectations and guidance on the use of social media for both professional and personal purposes for staff within Thomas's London Day Schools.
- Staff must not take video footage or photographs of pupils except for school purposes.
- Cameras, mobile phones or other devices are not allowed in any areas where pupils may be washing or changing, nor should photography be used in a manner that may offend or cause upset.
- Staff should ensure that pupils are appropriately dressed and are comfortable that their image is being recorded.
- Any images captured which might be considered sexually suggestive, demeaning, or otherwise inappropriate in any way must be permanently deleted.
- Wherever possible, school devices should be used to photograph or video images of pupils. Any digital/video images of pupils taken on a personal device must be uploaded to the shared school network and deleted from the personal device as soon as possible.
- The use of personal mobile devices should be limited to their use for two step verification and for emergency use, unless specific authorisation from the Head has been granted.
- Staff must not take images of a child's injury, bruising or similar (e.g. following a disclosure of abuse or suspicion of abuse) or make audio recordings of a child's disclosure.
- No photograph or film taken in school may be published (this includes on any social media platform such as Instagram, Facebook, Twitter, YouTube or Vimeo - regardless of privacy settings - or in any other way) without the explicit consent of the Head.
- Staff should keep their passwords confidential and not allow unauthorised access to equipment.

- There should be no communications between staff and pupils on personal social media. Electronic communications between staff and pupils must be conducted on school systems, such as school email or designated school apps.
- Any communication should be written carefully so it cannot be misinterpreted and must avoid any displays of affection or over familiarity.
- Staff must be aware of the potential for a relationship with a pupil to be misunderstood or misrepresented by the pupil or misrepresented by the terminology or interface of an online platform.
- Staff should ensure that they understand the IT tools they are using and utilise the highest privacy settings. They must be aware that pupils will be naturally curious about staff and their life outside the school. Staff should ensure their settings prohibit others from tagging them in any photos or updates without their permission and be proactive in asking others to remove any undesirable content related to them.
- A school email address should never be used for any personal use including on social media.
- All staff are prohibited from accepting or requesting pupils to connect via social media (such as Facebook and Instagram). Email, messaging or use of social media between staff and pupils outside agreed protocols may lead to disciplinary action and/or criminal investigations.
- Similarly, all staff are prohibited from accepting or requesting requests from the parents of current pupils and should limit contact to more formal channels.
- Staff who have children who are pupils in a Thomas's school will inevitably have social contact with parents through their child(ren). Such members of staff must be very aware of confidentiality and must ensure that neither the school nor themselves is brought into disrepute.
- Staff must ensure they do not claim or appear to claim to represent or speak in the name of the school except where specific permission to do so has been given by the Head.
- If staff have concerns about a pupil's behaviour online, including if they feel they are the victim of cyberbullying or have received inappropriate comments, photos or posts, they must contact the DSL immediately. Any such posts should not be deleted and a record of them kept to facilitate any subsequent investigation.
- Under no circumstances should staff make, download, possess or distribute indecent images or pseudo-images of children. This is illegal and, if proven, will lead to the individual being barred from working with children and young people.
- In the event of any indecent images of children or unsuitable material being discovered on a device the equipment should not be tampered with in any way. It should be confiscated, secured and isolated from the network, and the DSL contacted without delay, who will contact the police. If the images are of children known to the school, a referral will also be made to Children's Services.
- Staff must not attempt to investigate the matter, forward the images or search for further images as this may lead to a contamination of evidence and a possibility that they will be at risk of prosecution themselves.
- If staff believe their own actions may be misinterpreted, they should immediately make a Neutral Notification (see section 24).

21. SOCIAL CONTACT

- Staff must not give pupils their home address, home telephone number, mobile number or email address (other than the school internal email address).
- School mobile phones, or a central school contact number, should be used in situations where staff/pupils may require an emergency contact number, such as during a school fixture, day trip or residential trip.
- Members of staff should avoid all contact with pupils outside school.
- Staff must not divulge personal information in their interactions with pupils and parents or during lessons.
- Staff must decline any invitation to attend a pupil's home unless this has been specifically sanctioned in advance by the Head.
- Staff should not make arrangements to meet pupils, individually or in groups, outside school other than on school trips or fixtures authorised by the Head.
- Staff must not invite pupils (groups or individuals) to their home.
- Staff should avoid forming 'out of school' friendships with parents, as it can cause issues with other parents and such relationships blur professional boundaries.
- Members of staff who are already friends with parents of pupils; whose own children are pupils of the school; or staff who may work/volunteer in other organisations attended by pupils, will inevitably have contact outside school and pupils may visit their homes. However, such staff must still respect the advice within this code and should ensure that pupils do not see anything in their home that may cause embarrassment or that might become the subject of inappropriate gossip or rumour.
- Staff who have such social contact with pupils out of school must inform the Head of the relationship.
- Members of staff should not establish, or seek to establish, social contact with former pupils while they remain of school age. If a pupil seeks to establish social contact, or if this occurs coincidentally, the member of staff should exercise professional judgement in making a response and be aware that such social contact could be misconstrued.

22. GIFTS, REWARDS AND FAVOURITISM *(See Anti-corruption and Bribery Policy)*

- Members of staff need to take care that they do not accept any gift that might be construed as a bribe by others, or lead the giver to expect preferential treatment.
- There are often occasions when pupils or parents wish to pass small tokens of appreciation to staff e.g. at Christmas or as a thank-you and this is acceptable. However, it is unacceptable to receive gifts on a regular basis or of any significant value. Any gifts with a value in excess of £100 must be notified to the Head.
- Any reward, commendation, recognition given to a pupil should be in accordance with agreed practice and consistent with the school's Behaviour Policy, and not based on favouritism.
- Any gifts to pupils must be of insignificant value and given to all pupils equally. e.g. a small token to all the class at Christmas time and/or at the end of the academic year.
- All members of staff must ensure that they do not behave in a manner which is either favourable or unfavourable to individual pupils.
- Staff must also exercise care when selecting children for specific activities, jobs or privileges in order to avoid perceptions of favouritism. Similar care should be

exercised when pupils are excluded from an activity. Methods of selection and exclusion should always be subject to clear and fair criteria.

23. TRANSPORT

- Members of staff should not transport pupils in a private vehicle, or in their own vehicle. In exceptional circumstances, such as a medical emergency, a taxi should be called after first seeking approval from the Head or DSL before doing so.
- In such instances staff must:
 - be aware that the safety and welfare of the child is their responsibility until safely discharged to a parent / carer;
 - ensure that when travelling in a car, pupils are situated in the back seats whenever possible and that seatbelts are always used.

24. NEUTRAL NOTIFICATION Allegations against staff, low-level concerns and self-referral (also see Thomas's Safeguarding & Child Protection Policy)

- The school aims at all times to promote an open and transparent culture in which all concerns about staff are reported and dealt with promptly and appropriately.
- A member of staff receiving an allegation of abuse about another member of staff, or with concerns about a member of staff, should report this immediately to the Head. If the Head is absent, the report should be made to the Principals' Nominated Safeguarding Governor.
- An allegation or concern about the Head should be reported to the Principal, Mr Tobyn Thomas, without the Head first being informed.
- If the concern is about a Principal the report should be made directly to the LADO for the borough in which the school is situated, without first informing the Principal.
- An allegation or concern about a Head who is also a Principal should be made directly to the LADO.
- In any instance where there may be a conflict of interest about reporting an allegation or concern to the Head or to a Principal, the LADO should be contacted directly and without hesitation.
- There may also be occasions when something occurs which causes a member of staff to have doubts about the behaviour of another adult towards a pupil, or another child, or concerns about how their own behaviour might be interpreted. This may be considered a low-level concern.
- A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school may have acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and does not appear to meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.
- Examples of such behaviour could include, but are not limited to:
 - being over friendly with children;
 - having favourites;
 - taking photographs of children on their mobile phone/other device;
 - engaging with a child on a 1:1 basis in a secluded area or behind a closed door;

- using inappropriate sexualised, intimidating or offensive language, email, messaging, use of social media sites or other communication between adults and pupils outside agreed protocols;
- Any incident where a member of staff feels that his/her actions or behaviour towards a pupil or that of another adult, may have been misinterpreted or may have given rise to a risk or misinterpretation.
- Staff must report any such low-level concerns to the relevant senior person, as outline earlier in this section. Notifications may be reported verbally or submitted via the Google Form which can be found on the Staff Forms area of the TLP. If the notification is made in person in the first instance, staff will be required to complete a form later.
- Staff are also encouraged, and to feel confident if the need arises, for them to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.
- Reporting of these types of concerns is a neutral act, and the Head will, on receipt of a report, determine how to best approach the issue. In the vast majority of cases, there will be a perfectly innocent explanation for what has occurred, and staff should not feel that making a report, or being the subject of a report, will cause them to suffer any detriment or stigma where this is the case.
- All such concerns will be dealt with as outlined in the Thomas's Safeguarding & Child Protection Policy.
- The purpose of low-level reporting is to protect both pupils and the staff working with them, and allows a system for a simple record to be kept in case events are later referred to or any patterns emerge.
- Low level concerns relating to supply staff and staff employed by a third party will be reported to the agency/employer in order that any patterns of behaviour may be identified.
- A staff member who reports a low-level concern, or a more serious allegation, in good faith will suffer no detriment as a result, and will benefit from the protection set out in the school's Whistleblowing Policy.

25. WHISTLEBLOWING (*also see Thomas's Whistleblowing Policy*)

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

All staff should be aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues.

All members of the school community have a duty to protect children and should they have concerns must make these concerns known to the Head or Principal.

26. SUPPORT FOR STAFF

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

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

27. REFERENCES

This code of conduct has been informed by:

DfE statutory guidance: 'Keeping children safe in education' (September 2021)

Guidance for safer working practice for those working with children and young people in education settings: Safer Recruitment Consortium (May 2019)

HM Gov guidance: 'Working together to safeguard children' (July 2018, updated 2020),

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

DfE: Teachers' Standards (June 2013)

The Sexual Offences Act (2003)

This guidance will be reviewed annually			
Latest Review: November 2021	By:	Joanna Copland, Vice Principal	Revision of code
Next Review: January 2022	By:	Joanna Copland, Vice Principal	