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Staff Behaviour (Code of Conduct) Policy 2023-2024



Date of Approval

16.06.2023

Date of Review

Summer 2024

Signed HR Committee

Signed HR Committee

Staff Behaviour (Code of Conduct) Policy

Safeguarding Statement

“It could happen here”

At South Camberley Primary & Nursery School we recognise our moral and statutory responsibility to safeguard and promote the welfare of all pupils.

We make every effort to provide an environment in which children and adults feel safe, secure, valued and respected, and feel confident to talk if they are worried, believing they will be effectively listened to. We are alert to the signs of abuse and neglect and follow our procedures to ensure children receive effective support, protection and justice. Child protection forms part of the school's safeguarding responsibilities. We expect all staff, governors and volunteers to share this commitment to safeguarding our pupils.

We have a number of policies and procedures in place with contribute to our safeguarding commitment, including our Child Protection and Safeguarding Policy. A copy of this policy is available on our website.

Our Designated Safeguarding Lead (DSL) is

Maxine Kurzberg

Our Deputy Safeguarding Leads are:

Nicky Wright, Sarah Ayres-Townshend, Jess Stodart, Rachel Summerland

The Governor with responsibility for safeguarding in our school is Mrs Thora Ray.

If you are concerned about a child's welfare, please record your concern, and any observations or conversation heard, and report to one of the DSLs as soon as possible on the same day. Do NOT conduct your own investigation. The Surrey Children's' Single Point of Access (C-SPA) can be contacted on 0300 470 9100 or out of hours on 01483 517898, email cspa@surreycc.gov.uk

Terminology

Safeguarding and promoting the welfare of children is defined as:

- protecting children from maltreatment;
- preventing impairment of children's mental and physical health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care;
- taking action to enable all children to have the best outcomes.

Staff refers to all those working for or on behalf of the school, full or part time, temporary and or permanent, in either a paid or voluntary capacity, including casual workers, temporary and supply staff, either from agencies or engaged directly and student placements, including those undertaking initial teacher training and apprentices.

Child(ren) includes everyone under the age of 18. On the whole, this will apply to pupils of our school; however, the policy will extend to visiting children and students from other establishments

Parents refers to birth parents and other adults who are in a parenting role, for example step-parents, foster carers and adoptive parents.

Social media refers to all forms of communication through internet, web-based applications, text and instant messaging.

Introduction

This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004; and the Education Act 2002.

The policy also reflects, both statutory guidance 'Keeping Children Safe in Education' 2022 (KCSIE), Teacher Standards 2012 'Guidance for safer working practice for those working with children and young people in education settings' 2019 and Surrey Safeguarding Children Partnership (SSCP) Procedures.

The Governing body takes seriously its responsibility under section 175 of the Education Act 2002 to safeguard and promote the welfare of children.

This policy applies to all members of staff in the school as defined in the Terminology

Policy Aims

To demonstrate South Camberley Primary & Nursery School's commitment with regard to upholding staff professional standards.

To support staff with their responsibilities to safeguard children and to act appropriately by following the expected code of conduct.

To encourage staff to minimise the risk of inappropriate conduct occurring and thereby enable staff to set a good example to children within the school

1.0 Policy Principles & Staff Conduct and Values

- 1.1 This policy sets out clear guidance on the standards of behaviour expected from all staff at South Camberley Primary & Nursery School. The principles underlying the guidance aim to encourage staff to achieve the highest possible standards of conduct and minimise the risk of inappropriate conduct occurring.
- 1.2 School staff are in a unique position of trust and influence as role models for pupils. Therefore, staff must adhere to behaviour that sets a good example to all pupils within the school.
- 1.3 Staff also have an individual responsibility to maintain their reputation and the reputation of the school, both inside and outside working hours and work setting.
- 1.4 The school expects all staff to promote and maintain high standards of personal conduct and to safeguard and promote the welfare of children and young people. In particular staff are expected to:
 - Perform their duties with honesty, integrity and impartiality and be accountable for their own actions.
 - Maintain the confidence and respect of the general public and those with whom they work.
 - Treat others with respect, fairness and dignity at all times.
 - Communicate immediately any relevant concerns they may have about the quality of provision or the safety and welfare of children and young people.
 - Familiarise themselves with systems and procedures, including reporting requirements, within the school that support the protection of children and to attend training and read all safeguarding briefings provided to ensure that they remain up to date.
 - Be aware that their behaviour inside and outside the workplace, as well as the behaviour of others in their personal lives, could compromise their position within the school in relation to the protection of children, loss of trust and confidence or bringing the employer into disrepute. It could also result in action by regulatory bodies.
- 1.5 In addition to this code of conduct, teachers are also expected to meet the professional conduct standards outlined in the DfE Teachers' Standards.
- 1.6 South Camberley Primary & Nursery School requires that all staff have read and agree to comply with this policy.
- 1.7 Breach or failure to observe this policy will result in action being taken under the school disciplinary procedures including, but not limited to, dismissal.

- 1.8 This policy is not an exhaustive list of acceptable and unacceptable standards of behaviour. In situations where guidance does not exist in this policy staff are expected to exercise their professional judgement and act in the best interests of the pupils and the school.

2.0 Professional Behaviour and Conduct

- 2.1 All staff are expected to demonstrate consistently high standards of personal and professional conduct in line with 'Guidance for safer working practice for those working with children and young people in education settings' 2019.
- 2.2 All staff must uphold public trust in their professional position and maintain high standards of ethics and behaviour, within and outside school, by:
- treating children with dignity, building relationships rooted in mutual respect, and at all times observing proper boundaries appropriate to professional position
 - having regard for the need to safeguard children's well-being, in accordance with statutory provisions
 - showing tolerance of and respect for the rights of others not undermining fundamental British values, including democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs
 - ensuring that personal beliefs are not expressed in ways which exploit children's vulnerability or might lead them to break the law
 - All staff must have proper and professional regard for the ethos, values, policies and practices of the school in which they work and teach, and maintain high standards in their own attendance and punctuality.
 - All staff must have an understanding of, and always act within, the statutory frameworks which set out their professional duties and responsibilities
 - All staff should avoid any conflict of interest between activities undertaken outside school and responsibilities within school.
 - Staff are expected to act in accordance with the school's policies and procedures at all times.

3.0 Dress and Appearance

- 3.1 All staff must dress in a manner that is appropriate to their role and that promotes a professional image.
- 3.2 Staff should dress in a manner that is not offensive, revealing or sexually provocative and in a manner that is absent from political or contentious slogans.
- 3.3 Staff should dress decently, safely and appropriately for the tasks they undertake.
- 3.4 All jewellery and piercings are worn at the individual's own risk. Care must be taken to ensure they do not cause a health and safety hazard which might injure a pupil unintentionally. Staff must also be aware of their own safety and ensure any jewellery cannot be used by a pupil to cause harm to themselves. All jewellery must be removed during P.E. lessons in line with the school's expectations of pupils.
- 3.5 Footwear must be safe, sensible, in good order, smart, clean and have regard to health and safety considerations. Trainers (unless required for PE), stiletto heels, flip flops or other footwear without backs are not acceptable.

4.0 Smoking, alcohol, e-cigarettes and other substances

- 4.1 South Camberley Primary & Nursery School is a non-smoking site. Staff must not smoke or use e-cigarettes on school premises or outside school gates. Any member of staff wishing to smoke or use an e-cigarette must leave the school grounds.

- 4.2 Staff must not smoke or use an e-cigarette whilst working with or supervising pupils in a residential setting or offsite.
- 4.3 Staff must not consume or be under the influence of alcohol, drugs or other illegal substances on or near school premises.
- 4.4 Staff must refrain from the consumption of alcohol and other substances at school community activities (i.e. Christmas fairs, sports days, residential visits) both within the school premises and outside the school setting. Staff who attend school activities in their capacity as 'parents' and who are not supervising pupils may consume a small amount of alcohol (a maximum of 3 units) but must be mindful of their responsibilities as role models for the school's pupils at all times and ensure that their behaviour does not bring the school into disrepute.

5.0 Relationships with Pupils, Working Relationships and Social Contact Outside of school

- 5.1 Staff must maintain professional boundaries in their interactions with pupils, parents and others who work for or on behalf of the school, appropriate to their position and must always consider whether their actions are warranted, proportionate, safe and applied equitably. Staff should act in an open and transparent way that would not lead any reasonable person to question their actions or intent. Staff should think carefully about their conduct so that misinterpretations are minimised. Staff are not permitted to share confidential school information with parents or pupils. For example, discussing the performance of a member of staff or stating why a member of staff is leaving the school.
- 5.2 Staff must not establish or seek to establish social contact with pupils or parents for the purpose of securing a friendship or to pursue or strengthen a relationship. If a pupil or parent seeks to establish social contact staff should exercise professional judgement in making a response and be aware that such social contact could be misconstrued. This also applies to social contacts made through outside interests or the staff member's own family.
- 5.3 Staff must not develop personal or sexual relationships with pupils and should not engage in any sexual activity with a pupil.
- 5.4 Staff should be familiar with the contents of Working Together to Safeguard Children 2018, Keeping Children Safe in Education 2023 and the definition of sexual abuse.
- 5.5 Staff should be familiar with sections 15A and 16 of The Sexual Offences Act 2003, regarding communication with children and the abuse of a position of trust. All staff should be aware that under the Sexual Offences Act 2003, it is a crime for an adult in a position of trust to engage in sexual activity with a person under the age of 18.
- 5.6 Staff must not make sexual remarks to a pupil, discuss their own sexual relationships with, or in the presence of, pupils or discuss a pupil's sexual relationships in an inappropriate setting or context.
- 5.7 Contact with pupils and parents should be through South Camberley Primary & Nursery School's authorised mechanisms. Personal phone numbers, email addresses, web-based identities or communication routes via all social media platforms should not be used and staff should not share their home address with pupils or parents. If contacted via an inappropriate route the member of staff must inform the Headteacher immediately.
- 5.8 Only equipment and services provided by the school should be used for communication with pupils.
- 5.9 If approached by ex-pupils, staff must act with integrity and must consider if the relationship might be considered to be an abuse of the position of trust.

- 5.10 Staff need to be mindful that professionals who sexually harm children often seek to establish relationships and contact outside of the workplace with both the child and their parents, in order to 'groom' the adult and the child and/or create opportunities for sexual abuse, exploitation or radicalisation.
- 5.11 Staff should ensure that any type of social contact does not undermine fundamental British values, including democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs. Staff must ensure that personal beliefs are not expressed in ways which exploit pupils' vulnerability or might lead them to break the law.
- 5.12 Some staff may, as part of their professional role, be required to support a parent or carer. If that person comes to depend upon the staff member or seeks support outside of their professional role this should be discussed with senior management and where necessary referrals made to the appropriate support agency.

6.0 Infatuations

- 6.1 It is not unusual for pupils or, sometimes, their parents to develop infatuations towards members of staff. All such situations must be responded to sensitively to maintain the dignity of those concerned.
- 6.2 Staff should also be aware that such circumstances carry a high risk of words or actions being misinterpreted and for allegations to be made against staff. Any indications of an infatuation towards staff must be reported to their line manager.

7.0 Gifts/Hospitality

- 7.1 Staff need to take care that they do not accept any gift/offer of hospitality that might be assessed as an inappropriate inducement by others, or lead the giver to expect preferential treatment. However, there may be occasions where pupils or parents wish to give a small token of appreciation to staff, for example at religious festivities or at the end of the year.
- 7.2 It is unacceptable to receive gifts on a regular basis or to suggest to pupils that gifts are appropriate or desired. Money must not be accepted as a gift. If staff are unsure whether to accept a gift they should consult their line manager.
- 7.3 ALL offers of gifts and hospitality which have a value of more than £50 must be recorded in the school's Register of Gifts and Hospitality maintained by the School Business Manager, even if they are not accepted.
- 7.4 For reasons of probity and transparency, the principle of receipt of gifts or hospitality extends to the spouse, partner or immediate family of staff members.
- 7.5 Personal gifts must not be given by staff to pupils or their families and any reward to pupils should be in accordance with South Camberley Primary & Nursery School's behaviour policy, recorded and not based on favouritism.

8.0 Physical Contact with Pupils

- 8.1 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 and in relation to the pupil's individual needs and any agreed care plan. A 'no touch' approach is impractical for most staff and may in some circumstances be inappropriate. When physical contact is made with pupils it should be in response to their needs at that time, of limited duration and appropriate to their age, stage of development, gender, ethnicity and background.
- 8.2 Where feasible, staff must seek the pupil's permission before initiating contact and explain to the pupil why contact is necessary and what form the contact will take. Staff must listen, observe and

take note of the pupil's reaction or feelings and, so far as is possible, use a level of contact which is acceptable to the child for the minimum time necessary. Staff should consider alternatives, where it is anticipated that a pupil might misinterpret or be uncomfortable with physical contact.

- 8.3 It is not possible to be specific about the appropriateness of each physical contact, since an action that is appropriate with one child in one set of circumstances may be inappropriate in another, or with a different child. Staff should therefore, use their professional judgement at all times.
- 8.4 Staff should never touch a child in a way which may be considered inappropriate. Always be prepared to explain actions and accept that all physical contact be open to scrutiny. Staff must not engage in rough play, tickling or fun fights with pupils.
- 8.5 Extra caution should be exercised where a child is known to have suffered previous abuse or neglect. Such experiences may sometimes make a child exceptionally needy and demanding of physical contact and staff should respond sensitively by deterring the child through helping them to understand the importance of personal boundaries.
- 8.6 Staff supervising PE and games or providing musical tuition should demonstrate the use of a particular piece of equipment/instrument on another member of staff if possible. However, they may be required to initiate physical contact with pupils to support a child to perform a task safely, to demonstrate the use of a particular piece of equipment/instrument or to assist them with an exercise. Contact under these circumstances must be done with the pupil's agreement, for the minimum time necessary and in an open environment. Staff should remain sensitive to any discomfort expressed verbally or non-verbally by the pupil.
- 8.7 Physical contact must never be secretive, for the gratification of the adult or abuse a position of trust.
- 8.8 If a member of staff believes that an action could be misinterpreted, the incident and circumstances should be reported to their line manager, recorded and, if appropriate, a copy placed on the child's file.
- 8.9 Staff must refer to South Camberley Primary & Nursery School's Touch & Physical Intervention and Intimate Care & Toileting Policies.
- 8.10 Physical contact should be avoided, de-escalation strategies should be employed and support sought from a colleague. Restraint should only be used by those who have had MAPA or other appropriate training.

9.0 Behaviour Management and Physical Intervention

- 9.1 All members of staff must avoid any form of degrading or humiliating treatment to punish a child or use force as a means of punishment. Staff are expected to act as role models and should avoid shouting at children other than as a warning in an emergency situation.
- 9.2 Staff may reasonably intervene to prevent a child from committing a criminal offence, injuring themselves or others, causing damage to property or engaging in behaviour prejudicial to good order and to maintain good order and discipline. The use of physical intervention should, however, be avoided wherever possible and, where necessary, should only use minimum force and for the shortest time needed.
- 9.3 All members of staff are expected to understand and to follow the School's Behaviour Policy and Physical Intervention Policy as appropriate to their role.

10. Child in distress

- 10.1 There may be occasions when a pupil is in distress and in need of reassurance. This may include age appropriate physical contact. Staff should remain self-aware at all times in order to avoid misinterpretation of their actions.
- 10.2 Such incidents should always be recorded and shared with their line manager. If staff have a particular concern about the need to provide this type of care and reassurance they should seek further advice from their line manager.

11.0 Showers and changing

- 11.1 Pupils are entitled to respect and privacy whilst they are changing or showering after PE/games or swimming. However, the supervision by staff should be appropriate to the needs and age of the pupils and sensitive to the potential for embarrassment.
- 11.2 Staff should be vigilant about their own behaviour and announce their intention of entering a changing room. Personal and school devices with a camera or video function should not be taken into areas where children are showering or changing. Staff must not change or shower in the same place as children.

12.0 One to one situations

- 12.1 Staff working individually with pupils should be aware of the potential vulnerability of pupils and staff in such situations. Staff should manage these situations with regard to the safety of the pupil and to themselves.
- 12.2 Individual work with pupils should not be undertaken in isolated areas or rooms where there is no external viewing panel. Where it is necessary to close doors for reasons of confidentiality a colleague should be made aware of this and asked to remain vigilant. (If applicable) When working on a 1:1 basis with a child in any room, the door should remain open and the slatted door curtain should be placed over the door opening.
- 12.3 Members of staff should not arrange to meet with pupils from the school away from the school premises unless the necessity for this is clear and approval is obtained from a senior member of staff, the pupil and their parents/carers.

13.0 Intimate/Personal care

- 13.1 Staff should comply with the school's Intimate Care & Toileting policy to ensure that the health, safety, independence and welfare of pupils is promoted and their dignity and privacy are respected. Arrangements for intimate and personal care must be open and transparent and accompanied by recording systems.
- 13.2 Pupils should be encouraged to act as independently as possible and to undertake as much of their own personal care as is possible and practicable. When assistance is required, this should normally be undertaken by one member of staff, however, they should try to ensure that another appropriate adult is in the vicinity who is aware of the task to be undertaken and that, wherever possible, they are visible and/or audible.
- 13.3 As far as possible, intimate or personal care procedures should not involve more than one member of staff unless the pupil's individual healthcare plan specifies the reason for this. The school's Intimate Care & Toileting policy provides guidance on when a second member of staff may be required to assist. A signed record should be kept of all intimate and personal care tasks undertaken and, where these have been carried out in another room, should include times left and returned.
- 13.4 Any vulnerability, including those that may arise from a physical or learning difficulty should be considered when formulating the pupil's individual healthcare plan. The views of parents, carers and the pupil, regardless of their age and understanding, should be actively sought in formulating the plan and in the necessary regular reviews of these arrangements.

- 13.5 Pupils are entitled to respect and privacy at all times and especially when in a state of undress, including, for example, when changing, toileting and showering.
- 13.6 However, there needs to be an appropriate level of supervision in order to safeguard pupils, satisfy health and safety considerations and ensure that bullying or teasing does not occur. This supervision should be appropriate to the needs and age of the pupils concerned and sensitive to the potential for embarrassment

14.0 First Aid/Medication

- 14.1 Staff should comply with the school's Supporting Pupils with Medical Needs Policy When administering first aid, wherever possible, staff should ensure that another adult is present, or aware of the action being taken.
- 14.2 After discussion with parents, pupils who are competent should be encouraged to take responsibility for managing their own medicines and procedures.
- 14.3 If a member of staff is concerned or uncertain about the amount or type of medication being given to a pupil, provided by a parent/carer or prescribed, this should be discussed with the Inclusion Leader.
- 14.4 Staff taking medication which may affect their ability to care for pupils should seek medical advice regarding their suitability to do so and providers should ensure that they only work directly with pupils if that advice confirms that the medication is unlikely to impair their ability to look after pupils.
- 14.5 Staff medication on the premises must be securely stored and out of reach of pupils at all times.

15.0 Transporting pupils

- 15.1 In certain circumstances it may be appropriate for staff to transport pupils offsite, for example sports fixtures, swimming lessons or other out of school activities. A designated member of staff should be appointed to plan and provide oversight of all transport arrangements and to respond to any difficulties that may arise.
- 15.2 Staff should ensure that the transport arrangements and the vehicle meet all legal requirements. Staff should ensure that the driver has the appropriate license for the vehicle, that the vehicle is roadworthy, has a valid MOT certificate and is appropriately insured and that the maximum capacity is not exceeded.
- 15.3 Senior staff should make consideration in terms of the supervision of passengers. A judgement should be made about the likely behaviour and individual needs of the child/ren. If any of them may require close supervision, then another adult should travel in the vehicle so that the driver is not distracted or compromised. Wherever possible and practicable it is advisable that transport is undertaken other than in private vehicles and with at least one adult additional to the driver acting as an escort.
- 15.4 Staff should ensure that the driver is not distracted while the vehicle is in motion for any reason other than an emergency and should also ensure all passengers are wearing correctly fitted, maintained and fastened seatbelts and using car seats for younger children where required by current legislation. Staff should never transport pupils while under the influence of alcohol or drugs.
- 15.5 Prior to transporting pupils' offsite consent must be obtained from pupils' parent/guardian and staff should be aware that the safety and welfare of the pupils is their responsibility until this is safely passed back to their parent/carer.

- 15.6 Staff should not offer lifts to pupils unless the need for this has been agreed by the Headteacher.
- 15.7 Staff should never offer to transport pupils outside of their normal working duties, other than in an emergency or where not doing so would mean the child may be at risk. In these circumstances the matter should be recorded and reported to both their line manager and the child's parent(s).
- 15.8 The school's Health and Safety Policy and Educational Visits Policy set out the arrangements under which staff may use private vehicles to transport pupils.

16.0 Online Safety

- 16.1 Staff should follow South Camberley Primary & Nursery School's Acceptable Use (ICT) policy and Acceptable Use (Computing) policy at all times and have regard for South Camberley Primary & Nursery School's Online Safety policy for pupils.
- 16.2 Staff must not engage in inappropriate use of social media which may bring themselves, the school or the school community into disrepute. Staff should adopt the highest security settings on any personal profiles they have.
- 16.3 Staff should remain mindful of their digital tattoo and exercise caution in all their use of social media or any other web-based presence they have. This includes written content, videos or photographs and views expressed either directly or by 'liking' certain pages or posts or following certain individuals or groups. Staff should exercise care when using dating websites where staff could encounter pupils or ex pupils.
- 16.4 Staff must not make contact with pupils or ex pupils, must not accept or initiate friend requests nor follow pupils or ex pupil accounts on any social media platform. Staff must not communicate with pupils or ex pupils via social media, websites, instant messenger accounts or text message. The only acceptable method of contact is via the use of school email accounts or telephone equipment.
- 16.5 Staff should not make contact with pupils or pupils' family members, accept or initiate friend requests or follow pupils or pupils' family members' accounts on any social media platform.
- 16.6 Mobile phones and personally-owned devices such as tablets may not be used during lessons or formal school time. They should be switched off (or silent) at all times. The Bluetooth functionality of a mobile phone or tablet should be switched off at all times and may not be used to send images or files to other mobile phones. Mobile phones and personal devices, cameras and videoing equipment are not permitted in certain areas within the school site such as corridors, changing rooms and toilets. Staff are not permitted to wear headphones when walking around the school.
- 16.7 The camera and filming functions of mobile devices must not be used in school, on school trips or on official school business.
- 16.8 As a precaution any other devices that can take images or can make contact with other devices (e.g. Smart Watches) must be kept in a school staff locker throughout the school day.
- 16.9 Mobile phones and personally-owned mobile devices brought in to school are the responsibility of the device owner. South Camberley Primary & Nursery School accepts no responsibility for the loss, theft or damage of personally-owned mobile phones or mobile devices.

17.0 Photography, video and images of children

- 17.1 Many school activities involve recording images as part of the curriculum, extra school activities, publicity or to celebrate an achievement. In accordance with The Data Protection Act 2018 the image of a pupil is personal data. Therefore, it is a requirement under the Act for consent to be obtained from the parent/guardian of a pupil for any images made. It is also important to take into account the

wishes of the pupil, remembering that some pupils do not wish to have their photograph taken or be filmed.

- 17.2 Using images for publicity purposes will require the age-appropriate consent of the individual concerned and their parent/guardian. Images should not be displayed on websites, in publications or in a public place without their consent. Staff should also be clear about the purpose of the activity and what will happen to the photographs/images/video footage when the lesson or activity is concluded.
- 17.3 Photographs/stills, digital images or video footage of pupils should only be taken using school equipment for purposes authorised by the school and should be stored securely and only on school equipment.
- 17.4 Staff should ensure that a member of the Senior Leadership Team is aware of the proposed use of photographic/video equipment and that this is recorded in lesson plans. All photographs/stills and video footage should be available for scrutiny and staff should be able to justify all images/video footage made.
- 17.5 Staff should remain aware of the potential for images of pupils to be misused to create indecent images of children and/or for grooming purposes. Therefore, careful consideration should be given to how activities which are being filmed or photographed are organised and undertaken. Particular care should be given when filming or photographing young or vulnerable pupils who may be unable to question how or why the activities are taking place. Staff should also be mindful that pupils who have been abused through the use of video or photography may feel threatened by its use in a teaching environment.
- 17.6 Staff should not take images of a child's injury, bruising or similar (e.g. following a disclosure of abuse) even if requested by children's social care; or make audio recordings of a child's disclosure.

18.0 Confidentiality, Data Protection and sharing information

- 18.1 All staff should develop a clear understanding about what information can be disclosed to government departments, internal or external auditors, parents, pupils and the wider public, and what information should remain confidential.
- 18.2 Members of staff may have access to confidential information about pupils, their parents/carers or their siblings. Staff must not reveal such information except to those colleagues who have a professional role in relation to the pupil on a need to know basis. Any information made available should be provided in a clear and concise way. Staff should seek the advice of their line manager if they are at all unsure of the level of confidentiality which is required.
- 18.3 Staff should never use confidential or personal information about a pupil or her/his family for their own, or others' advantage.
- 18.4 All staff are likely at some point to witness actions which need to be confidential. For example, where a pupil is bullied by another pupil, this needs to be reported and dealt with in accordance with the appropriate school procedure. It must not be discussed outside the school, including with the pupil's parent or carer, nor with colleagues in the school except by a senior member of staff with the appropriate authority to deal with the matter.
- 18.5 Staff have a statutory obligation to immediately share with South Camberley Primary & Nursery School's Designated Safeguarding Lead or Deputy Designated Safeguarding Leads any information which gives rise to concern about the welfare or safety of a pupil or that might suggest a pupil is in need or at risk of significant harm. Staff should pass on information without delay in accordance with South Camberley Primary & Nursery School's Child Protection and Safeguarding policy and procedures and this should be recorded. Staff must never promise a pupil that they will not act on

or pass on any information that they are told by the pupil but should give reassurance that the information will be treated sensitively.

- 18.6 Staff should refer to the Department of Education's document Information sharing: advice for practitioners providing safeguarding services¹ for further guidance on information sharing. If staff are in any doubt about whether to share they should seek guidance from a member of the senior leadership team.
- 18.7 Any media or legal enquiries should be passed to the senior leadership team and only approved staff and Governors should communicate to the media about the school.
- 18.8 In line with the Data Protection Act (DPA) 2018 school leaders who need to share 'special category personal data' should be aware that the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition. This allows practitioners to share information without consent if it is not possible to gain consent, it cannot reasonably be expected that a practitioner gains consent or if to gain consent would place a child at risk.
- 18.9 All staff should be aware of South Camberley Primary & Nursery School's safeguarding procedures, including the procedures for dealing with allegations against staff and volunteers. In the event of an allegation being made, by any person, or incident being witnessed, the relevant information should be immediately recorded and reported to the Headteacher or if the allegation is against the Headteacher it should be reported to the Chair of Governors.
- 18.10 All staff are expected to familiarise themselves with the school's Data Protection Policy and any associated procedures which govern day-to-day working practices as well as how to report a suspected data breach and to recognise when someone may have made a subject access request. If in any doubt staff members should consult their line manager promptly or contact the School Data Protection Officer (whose details can be found on the Data Protection Policy).
- 18.11 Staff must be aware of their duty to report any breach of GDPR to the Data Protection Officer.

19.0 Parents as employees

- 19.1 It is acknowledged that some staff also have children who attend the school. It is recognised that in these cases the staff fulfil a dual role of parent and employee.
- 19.2 Parents as employees should ensure that they uphold boundaries between the two roles and that their behaviour does not constitute a conflict of interest. For example, they must maintain the same level of confidentiality despite social expectations. Parent-staff should discuss any inter-role conflict with the DSL and/ or Headteacher.

20.0 Whistleblowing

- 20.1 Whistleblowing is the mechanism by which staff can voice their concerns, without fear of repercussion.
- 20.2 All school staff have a duty to report any behaviour by a colleague which they believe to be illegal, improper, unethical or otherwise inconsistent with this code of conduct. Staff should refer to EEEA whistleblowing policy for further guidance. This is particularly important where the welfare of pupils may be at risk.
- 20.3 All staff are required to comply with any investigation undertaken as a result of such allegations being raised.

22.0 Low-level Concerns

- 22.1 All staff have a duty to report Low-level Concerns to create and embed a culture of openness, trust and transparency in which the school's values and expected behaviour set out in this staff code of conduct are lived, monitored and reinforced constantly by all staff. 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 meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

22.0 Educational visits and after-school activities

- 22.1 The duties in the Health and Safety at Work etc. Act 1974 and the supporting regulations apply to activities taking place on or off the school premises (including school visits) in the UK. The school has a Health and Safety policy, which includes policy and procedures for off-site visits, including residential visits and any school-led adventure activities. Staff responsible for organising educational visits should be familiar with the Department for Education's advice on Health and Safety (updated April 2022) available at <https://www.gov.uk/government/publications/health-and-safety-advice-for-schools/responsibilities-and-duties-for-schools>.
- 22.2 The Management of Health and Safety at Work Regulations (1999) impose a duty on employers to produce suitable and sufficient risk assessments. This would include assessment of any risks to staff members, children or others during an educational visit, and the measures that should be taken to minimise these risks.
- 22.3 Staff should take particular care when supervising pupils in the less formal atmosphere of an educational visit or after-school activity where a more relaxed discipline or informal dress and language code may be acceptable. Staff remain in a position of trust and need to ensure that their behaviour cannot be interpreted as seeking to establish an inappropriate relationship or friendship.
- 22.4 Where out of school activities include overnight stays, careful consideration needs to be given to sleeping arrangements. Children, adults and parents should be informed of these prior to the start of the trip. In all circumstances, those organising trips and outings must pay careful attention to ensuring safe staff/child ratios and suitable gender mix of staff.
- 22.5 Health and Safety arrangements require members of staff to keep colleagues/employers aware of their whereabouts, especially when involved in activities outside the usual workplace. On residential trips we ensure that staff behaviour remains professional at all times, that staff and children have separate sleeping areas and that children share dormitories. We undertake risk assessments in line with school policy. On residential trips we ensure a DSL is present.
- 22.6 Educational visits will be undertaken in accordance with the school's Educational Visits Policy and any member of staff accompanying children on an educational visit are required to familiarise themselves with and adhere to this policy.

23.0 Home visits

All work with pupils and parents should, wherever possible, be undertaken in the school or other recognised workplace. There are however occasions, in response to urgent or specific situations where it is necessary to make one-off or regular home visits. During home visits in EYFS we ensure there are always two members of staff in attendance to minimise the following risk factors:

- Hostility
- Child protection concerns
- Complaints or grievances as these can make adults more vulnerable to an allegation.

24.0 Curriculum

- 24.1 The curriculum can sometimes include or lead to unplanned discussion about subject matter of a sexually explicit, political or otherwise sensitive nature. Staff must ensure they respond to children's questions with careful judgement and if necessary staff should take guidance in these circumstances from the Designated Safeguarding Lead.
- 24.2 Staff must comply with the school's policy on spiritual, moral, social, cultural (SMSC) education which promotes fundamental British values. Staff should also comply at all times with the school's Relationships and Sex Education (RSE) Policy.

25.0 Political Neutrality

Staff should ensure that their own personal or political opinions do not interfere with any policy of the school. This means that adults should not enter into or encourage inappropriate discussions which may offend or harm others, undermine fundamental British values, express any prejudicial views or attempt to influence or impose their personal values, attitudes or beliefs on pupils.

26.0 Equality, bullying and Harassment

- 26.1 All staff members and members of the school and local community have a right to be treated with fairness and equality. Staff must ensure that they comply at all times with the school's Equality Policy.
- 26.2 The bullying or harassment of other work colleagues, pupils or other members of the community is considered to be gross misconduct. Staff members are expected to report any concerns or suspicions they may have about the treatment of others to their line manager or the Headteacher, concerns related to the behaviour of the Headteacher should be reported to the Chair of Governors.

27.0 Appointment of Staff

Staff members should not be involved in a staffing appointment, or in any decision relating to the discipline, promotion or pay and conditions of another staff member (or prospective employee) to whom they are related or have a close personal relationship.

28.0 Safeguarding Children and Young People Safe Working Practices Agreement

All staff, governors, volunteers and those undergoing training at the school must sign the Safeguarding Children and Young People Safe Working Practice Agreement (**see Child Protection and Safeguarding policy**) and the ICT Acceptable Use Policy.

29.0 Declaration of Personal Interests and Outside Commitments

- 29.1 Staff are responsible for ensuring that their private interests, beliefs and personal associations do not conflict with their professional duties.
- 29.2 All staff should declare any non-financial or financial interest which might conflict with the ethos or work of the school or any relationship which, by the staff member's association with that person, might adversely affect the school's reputation, attract negative publicity or potentially bring into question the staff member's suitability to work with children and young people. Declarations must extend to acknowledging the involvement of a relative or partner of a member of staff in an organisation with which the school does business (or seeks to do business), particularly if they are directors, partners or hold senior managerial positions in those organisations.
- 29.3 Declarations should be made via the School Business Manager (or for the Headteacher via the Chair of Governors) who should ensure that a written record is made in accordance with the school's procedure.
- 29.4 Where staff are in any doubt about whether any personal relationships, interests, or outside commitments should be declared in particular circumstances, they should either declare the information in any case, or else seek further advice from the School Business Manager or the Headteacher.

30.0 Secondary Employment

Staff members are able to take up additional employment other than at the school provided the employment concerned does not constitute a conflict of interest or adversely affect their employment at the school. Staff should keep the school informed of other employment they undertake so that the school may ensure that the 48-hour weekly working time limit under the Working Time Regulations 1998 is adhered to. In the event that a staff member's combined working hours are likely to exceed this figure they will be asked to sign a working time 'opt out' agreement.

31.0 Criminal Charges or Convictions

Staff members must inform the Headteacher immediately of any criminal conviction, caution, reprimand or final warning or if they are the subject of a police investigation during the course of their employment. Staff should be aware that behaviour by themselves, those with whom they have a relationship or association, or others in their personal lives, may impact on their work with children.

32.0 School Policies

The school has in place a range of policies, some of which have been referred to in this code of conduct. Staff are expected to familiarise themselves with any policy the school has provided or drawn to their attention and to ensure that they take account of any future policy changes communicated to them. If in doubt about the application or interpretation of any policy, the member of staff should seek advice from his/her line manager in the first instance.

33.0 Disciplinary Action

All staff need to recognise that failure to meet these standards of behaviour and conduct may result in disciplinary action, including dismissal.

34.0 Compliance

All staff must complete the form in the Appendix to confirm they have read, understood and agree to comply with this policy. This form should be signed and dated and a copy retained on the member of staff's file.

APPENDIX

South Camberley Primary & Nursery School

Staff Behaviour (Code of Conduct) Policy

Confirmation of Compliance

South Camberley Primary & Nursery School is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. To enable us to do so we ensure all staff, governors and volunteers are up to date with all safeguarding policies and documentation. It is essential that all staff, governors and volunteers read and understand and therefore agree to adhere to the Staff Behaviour (Code of Conduct) Policy.'

I confirm that I have read, understood and agree to comply with the Staff Behaviour (Code of Conduct) Policy.

Name: _____

Position/ Post Held: **Staff/Governor/Volunteer**

Date: _____

Signature: _____

Once completed please return this form to the SBM/Headteacher