



## **Code of Conduct for Staff Including EYFS**

### **Purpose**

Relationships between staff and between staff and pupils at Stonar School are friendly and mutually respectful. This policy has been formulated in order to maintain this balance and bring together expectations and guidance for staff in their standards of behaviour as Staff of Stonar School. The policy will also:

1. Confirm and reinforce the professional responsibilities of staff (both teaching and non-teaching).
2. Clarify the legal position in relation to sensitive aspects of staff/pupil relationships.
3. Set out the expectations of standards to be maintained within the school.

This policy should be read in conjunction with the School's current Child Protection and Safeguarding Policy. Academic staff must also have regard to the policy document: Routines, Procedures and Expectations for Academic Staff (A8) Staff Handbook.

### **Acronyms used in this policy**

DSL	Designated Safeguarding Lead
DBS	Disclosure and Barring Service: <i>Helps employers make safer recruitment decisions and prevent unsuitable people from working with vulnerable groups, including children. It replaces the Criminal Records Bureau (CRB) and Independent Safeguarding Authority</i>
DfE	Department for Education
DSL	Designated Safeguarding Lead
EYFS	Early Years Foundation Stage: The set of Welfare, Learning and Development Requirements, which has to be followed by providers of care for children aged from birth to 5 years old
HWBC	Health and WellBeing Centre
PSLT /SSLT	Prep School Leadership Team/ Senior School Leadership Team
NMS	National Minimum Standards for boarding schools
SEND	Special Educational Needs and Disabilities

## I. Safeguarding

All individuals who work in an educational setting have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of pupils. Stonar School is committed to safeguarding and promoting the welfare of children and young people and expects all staff to share this commitment. All staff undergo an Enhanced disclosure check with the Disclosure & Barring Service prior to commencing employment. Until this disclosure is received, no unsupervised access to children will take place.

**All staff must abide by the School's Child Protection Policy and this Code of Conduct at all times.**

All staff must adopt high standards of personal conduct in order to maintain the confidence and respect of their colleagues, pupils, and the public in general. Allegations of unprofessional or improper conduct, contact or words can arise at any time. All members of staff are reminded that professionalism and vigilance are required to ensure the safety of children in our care and to reduce the risk of an allegation of impropriety against a member of staff. This guidance applies to all adults working at Stonar, and not just teachers.

Staff should be aware that some actions may be misconstrued by pupils as unprofessional conduct. We should also all be alert to situations where we (ourselves) and other staff (including visiting staff) are potentially vulnerable to false allegations of abuse.

In particular staff need to:

1. Be mindful that they cannot step fully into the shoes of parents and patterns of caring in families vary. What one child has experienced as normal conduct may be intrusive and disquieting to a child from a different family background or culture.
2. Remember that as children get older, and particularly during adolescence a young person's responses and attitudes to personal contact change and we must be sensitive to these changes.

Members of staff need to take particular care when dealing with a pupil who:

1. Appears to be emotionally distressed, or generally vulnerable and/or who is seeking expressions of affection from a member of staff.
2. Appears to hold a grudge against a member of staff.
3. Acts in a sexually provocative way, or who is inclined to make exaggerated claims about themselves and/or others, or to fantasise, or one whose manner with adults is over-familiar.
4. May have reason to make up an allegation to cover the fact that he or she has not worked hard enough for public examinations.
5. Are in receipt of a personalised risk assessment, (as identified on SchoolBase).

**It should be noted that forming inappropriate relationships with children or young people who are pupils or students at another school may also be regarded as gross misconduct. Such behaviour tends to bring the School into disrepute and gives rise to concern that the staff involved cannot be trusted to maintain professional boundaries with pupils and students at School.**

Any concerns, serious or low level, staff may have about the appropriateness of another member of staff's conduct towards a pupil must be made to the Head or DSL. Any allegation of abuse or sexual impropriety by a member of staff or volunteer must be reported immediately to the Head, or in their absence the DSL. If the concern is about the Head, staff must contact the Director with responsibility for safeguarding.

## 2. Standards of Personal Behaviour

### Equality, Diversity and Inclusion

An important core value of Stonar is the promotion of inclusivity and diversity. It seeks to ensure that the workplace is supportive of its staff and one where individual respect is shown to all members of staff, regardless of sex, age, (dis)ability, gender identity, marriage or civil partnership, pregnancy or maternity, race, ethnic background, culture, sexual orientation, religion or belief or any other factor. All staff will be supported and encouraged to perform to their potential. For further information, staff should refer to the *Equal Opportunities Policy*.

### General Conduct

1. Staff are expected to set the highest standards of conduct and must behave politely and reasonably to colleagues, parents, members of the public and clients/customers of the School.
2. Staff must demonstrate self-awareness and take responsibility for their own actions and for providing help and support to pupils and colleagues.
3. Staff must not abuse their authority either in relation to a colleague or a member of the public.
4. Staff must not conduct themselves in a manner in relation to their employment or otherwise which could reasonably be regarded as bringing themselves or the School into disrepute.
5. Staff must not be under the influence of alcohol or unprescribed drugs during working hours, in so far as it impairs employee performance, conduct or safety.
6. Staff may not smoke or vape on the School site: Smoking or vaping is not permitted in any part of the premises or at School entrances at any time, by any person regardless of their status or business with the School. Further details can be found in the School's 'Smoke-Free Workplace Policy' on smoking contained in the Staff Handbook in the policies folder in Section G.
7. Staff must take reasonable care with School property, equipment, resources and facilities and ensure that they are only used for School purposes.
8. Staff must act honestly and in good faith in the course of their duties.
9. Staff must behave towards any other person in a way that creates mutual respect.
10. Acts of violence, threatening behaviour and verbal abuse are unacceptable.
11. Staff must not subject any other person to any form of harassment, victimisation or bullying.
12. Staff must comply with all lawful and reasonable instructions of the School and their managers.
13. Staff must familiarise themselves with the legislation, standards, rules and procedures that relate to their work and general conduct.
14. Staff requiring further information or guidance as to the appropriate course of action to adopt in any situation must refer to their Line Manager.

### Use of language

Staff should ensure that they use appropriate language at all times:

1. Avoid words or expressions that have any unnecessary sexual content or innuendo; avoid displays of affection either personally or in writing (e.g. messages in birthday cards, text messages, emails etc).
2. Avoid any form of aggressive contact such as holding, pushing, pulling or hitting, which could amount to a criminal assault, or threatening words.
3. Avoid any words or actions that are over-familiar.
4. Do not swear, blaspheme or use any sort of offensive language in front of pupils.
5. The use of sarcasm or derogatory words should be avoided when punishing or disciplining pupils and unprofessional personal comments about anyone should also be avoided.

### **Dress and Personal Appearance:**

The way staff dress sends a message to pupils, parents and visitors about their professionalism and standards of care. It is an important safeguard for staff and pupils that staff wear clothing that is appropriate to their role and garments are suitable for the activities carried out whilst at work. To this effect:

1. Staff must be clean and tidy and ensure good personal hygiene.
2. Formal office wear is to be worn by all teaching and admin staff. (i.e. smart suit / jacket and tie)  
Formal dress is required for school events such as parents' evening and open days.
3. EYFS support staff must wear clothing that is comfortable and practical for sitting, bending and lifting, to include flat shoes that cover the toes. Long hair should be tied back.
4. Staff working in Housekeeping, Equestrian, Catering, Maintenance department or PE (practical lessons) should wear branded Stonar attire.
5. Clothing must not be offensive, distracting or revealing, nor should it be of an extreme style. Political or other contentious slogans or badges are not allowed.
6. Make up should be discreet, visible (yet discreet) piercings are only permitted in the ears or nose, (no spacers please,) tattoos should be hidden where possible. Hair should be clean, tidy and of natural appearance, extremes of fashion are not permitted.
7. Appropriate footwear must be worn at all times, particularly for health and safety reasons.
8. ID badges and lanyards must be worn at all times on the School campus, unless staff are wearing Stonar branded uniform
9. Staff will be informed in advance if the dress code is to be altered for a particular event - Academic gowns and hood are to be worn by academic staff at significant school events e.g. The Carol Service.

Further details regarding the professional expectations for academic staff are found in the Staff Handbook in section A 'Professional Expectations for Academic Staff'.

### **Bullying and Harassment**

Stonar has a zero tolerance to bullying and harassment. You must treat colleagues with courtesy and respect and must not abuse them verbally or physically. You must not harass, bully or be insubordinate to colleagues and must comply with the standards set out in this Code in relation to Equalities. Disciplinary action will be taken against inappropriate behaviour that shows lack of respect for others or causes people to feel threatened. Concerns should be raised with the HR Manager.

### **Conduct Outside Work**

Safe practice by staff involves using judgement and integrity about their behaviour both at work and outside. Stonar does not concern itself with the private lives of its staff unless they affect its effective operation or its reputation. Teaching staff must also be mindful of adhering to the conduct and requirements of the Teacher's Standards.

However, Stonar School will become involved in the following circumstances:

1. When a member of staff's behaviour or actions in their personal life comes under scrutiny from local communities, the media or public authorities. Misuse of drugs, alcohol or acts of violence would be examples of such behaviour. All staff must therefore report any such behaviour or actions to the Head. *(In addition, such behaviour by a member of staff's partner or other family members may raise similar concerns and require careful consideration by an employer as to whether there may be a potential risk to pupils in the workplace, or to the School's reputation. Therefore any such behaviour or actions must again be reported to the Head.)*
2. If a member of staff is arrested or questioned by the police the staff member is expected to inform the School at the earliest opportunity. Failure to do so may be a disciplinary offence. Consideration will be given to disciplinary procedures in relation to the accusation, taking all the circumstances into account.

In addition Stonar's policies will continue to apply at the following events:

1. At work parties, events and other work-related social occasions.
2. At third-party (that is suppliers, parents) occasions where the employee has been invited in their capacity as an employee and representative of the School.
3. At work-related conferences and training courses.
4. Where the employee is away on business on behalf of the School.

In all cases an employee should not bring the School's name into disrepute. Improper behaviour will lead to investigation and possible disciplinary action, including dismissal and in cases of gross misconduct, a summary dismissal.

For all staff Statutory Guidance outlined in Keeping Children Safe in Education 2021 makes clear that there are types of behaviour which may indicate a person poses, or might pose, a risk of harm if they continue to work in regular or close contact with children. This is more commonly known as the 'harm test': a person has 'behaved or may have behaved in a way that indicates they may not be suitable to work with children'.

This may be indicated by risk of an incident that occurs outside of school and did not involve children but could have an impact on their suitability to work with them. For example, being involved in a domestic violence incident at home, where violent behaviour is triggered and could pose a risk to children at school. This is known as transferrable risk.

Where concerns of this nature are known or raised, the Child Protection and Safeguarding Policy and Procedures will be following in relation to Allegations about Staff or Volunteers.

For further information, Staff should also refer to the *Disciplinary and Grievance Procedures*, in the Staff Handbook.

### **Relationships with Other Members of Staff and Suppliers, Customers, Clients and Parents**

Members of staff who are relatives or who have close personal relationships should not normally have a supervisory, assessing or authorising relationship with each other.

Staff must inform their line manager if they have a close personal relationship with another employee or supplier, customer, client and parent which could be considered by colleagues or others, as impacting on the way that they conduct themselves at work.

### **Health and Wellbeing**

Stonar requires its staff to share pertinent medical information as part of the Safer Recruitment process, to enable the School to respond appropriately and ensure where appropriate reasonable adjustments are made to support effective and safe working practices in line with the employee's duties.

1. It is the employee's responsibility to ensure that the school are aware of any changes of significance in their health that impact on their ability to fulfil their duties as outlined in their job description
2. It is the employer's responsibility to work with Staff to address concerns, make reasonable adjustments where possible and support Staff to fulfil their duties.

Use of the HWBC by staff is outlined in the Staff Handbook: 'Staff use of the HWBC'.

## Confidentiality and Data Protection

1. Staff should respect the privacy of pupils, parents and colleagues and should not pass information about; for example, addresses or telephone numbers to others, without checking first with the person concerned.
2. Lists of pupils'/parents' names and addresses must not be used for any purpose without the consent of the Head. Information about pupils, parents or colleagues should never be disclosed to telephone enquirers. Staff should ask the enquirer to put the request in writing so that it can be dealt with appropriately.
3. Confidential information should only be disclosed on a need-to-know basis. Where it is not necessary to disclose a child's identity the information should be disclosed anonymously. If staff are not sure whether they should disclose information, they should seek advice from a senior member of staff.
4. Members of staff may have to disclose information; for example where abuse is alleged or suspected. In such cases, there is a duty to pass on the information immediately, but only to the Designated Safeguarding Lead. **Note: staff should never give an undertaking of confidentiality to a pupil where child protection issues are involved (see separate Child Protection and Safeguarding Policy available in the Staff Handbook).**
5. The storing of personal information must not breach the School's Data Protection Policy. Further information can be found in the Stonar Data Protection Policy in the Staff Handbook.

## Gifts and Rewards

Where staff receive a gift they should:

1. Declare the gift to the Head where there is any possibility that it could be misconstrued or it is of significant value (i.e. it is worth more than £75).
2. Decline gifts that could be seen as a bribe or those that could create an expectation of preferential treatment or raise a conflict of interests. Although it is accepted for parents or children to make small gifts to show appreciation, a teacher must not receive gifts on a regular basis.

Where staff are thinking of giving a gift or reward it should:

1. Only be provided as part of an agreed reward system;
2. In all cases except the above, be of little value and should be distributed equally;
3. Selection processes should be fair and where possible should be agreed by more than one member of staff.

## Whistle Blowing

Staff should report any activities or behaviour of colleagues that gives them cause for concern. Staff should be familiar with the School's whistle blowing procedures, as given in the staff handbook section G.

## Staff conduct with Pupils

### One-to-one Contact with Pupils

Members of staff teaching one pupil, or conducting a one-to-one meeting or teaching session with a pupil should take particular care in the following ways:

1. Use a room that has sufficient windows onto a corridor so the occupants can be seen, or keep the door open, or inform a colleague that the lesson/meeting is taking place.
2. Arrange the meeting during normal school hours when there are plenty of other people about.
3. Do not continue the meeting for any longer than is necessary to achieve its purposes.
4. Avoid sitting or standing in close proximity to the pupil, except as necessary to check work. Exceptions to this are made for appropriately trained staff (*as approved by the Executive Management Group*) who engage in specialised therapeutic practice (eg: Thrive work / medical interventions).
5. Avoid idle discussion.

6. Avoid all unnecessary physical contact and apologise straight away if there is accidental physical contact.
7. Avoid any conduct that could be taken as a sexual advance.
8. Report any incident that causes you concern to the Designated Safeguarding Lead and make a written record (dated and signed).

Pre-arranged meetings with pupils outside School should not be permitted unless approval is obtained from their parents and a senior member of staff, and staff should inform colleagues before the meeting.

To this effect **private tutoring** outside of School for current Stonar pupils is not permitted unless written approval has been given by the Head.

Staff who use pupils to babysit for their own children should declare this arrangement to the Head.

In some rare circumstances home visits may be necessary, in this case staff should:

1. Discuss the purpose of any visit with senior colleagues.
2. Follow the risk management strategy.
3. Not visit unannounced if it can be avoided.
4. Leave the door open where they will be alone with pupils.
5. Keep records detailing time of arrival and departure and work undertaken.
6. Discuss with their manager anything that gives cause for concern and refer to other agencies if felt appropriate.
7. Have a mobile phone and an emergency contact.

In EYFS, staffing arrangements must meet the needs of all children, ensure their safety, and abide by statutory staff: pupil ratios. Children should usually be within sight of staff and always within hearing.

### "Crushes"

1. "Crushes", fixations or infatuations are part of normal adolescent development; however, they need sensitive handling to avoid allegations of exploitation.
2. Where a member of staff suspects that a pupil has a "crush" on him / herself or on another colleague they should bring it to the attention of a member of EMG, or The Deputy Head (Pastoral).

### Visits to Staff Members' Homes, after School Clubs and School Trips

Staff should avoid unnecessary contact with pupils outside School.

1. **They should not give pupils their home address, home phone number, mobile phone number or e-mail address.**
2. They should not send personal communications to pupils (ie communications not pertaining to school 'work' and professional matters) unless agreed by a senior colleague.
3. They should not make arrangements to meet pupils, individually or in groups, outside school other than on school trips authorised by the Head.
4. They should avoid contacting pupils at home unless this is strictly necessary; they should keep a record of any such occasion.
5. They should not give a pupil a lift in their own vehicle other than on school business and with permission from the Head.
6. They should avoid inviting pupils (groups or individuals) to their home or hotel room – on trips (etc.) unless there is a good reason **and** it has been approved by senior management. This prohibition also applies where staff have on-site accommodation.
7. They 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.

8. Staff should be aware that when they meet children or parents socially, their contact could be misinterpreted as grooming. Any social contact that could give rise to concern should be reported to a senior colleague.
9. Members of staff who are friends with parents of pupils or who, for example, are voluntary workers in youth organisations attended by pupils, will of course have contact with those pupils outside School. However, they should still respect the above advice wherever possible and should keep the Head informed of such relationships.
10. Where staff are arranging planned social contact with parents or pupils, such as part of a reward scheme or pastoral care programme, they should still seek the approval of senior colleagues.
11. The same guidelines should be applied to After School Clubs, School trips, and especially trips that involve an overnight stay away from the School. **They also apply to contact with children or young people who are pupils at another school.**

### **Cases in which Restraint is Necessary**

**All forms of corporal punishment are unlawful.** However, by law, 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:

1. Committing a criminal offence.
2. Injuring themselves or others.
3. Causing damage to property, including their own.
4. 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 pupils 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.

Before intervening physically a member of staff should, wherever practicable:

1. Tell the pupil to stop and what will happen if he or she does not.
2. Continue attempting to communicate with the pupil throughout the incident.
3. Make it clear that physical contact or restraint will stop as soon as it ceases to be necessary.

Staff should always:

1. Avoid touching or holding a pupil in a way that might be considered indecent.

The member of staff involved should inform the Head/Senior Deputy Head/Head of Prep immediately following an incident, where force has been used. This is to help prevent any misunderstanding or misrepresentation of the incident, and it will be helpful in the event of a complaint.

The member of staff should provide a written report as soon as possible afterwards and pass this to the Senior Deputy Head. In the EYFS setting, parents and/or carers must be informed on the same day, or as soon as reasonably practicable.

### **Action taken in Self-Defence or in an Emergency**

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

There is no legal definition of “reasonable force”. It will always depend on the circumstances. Staff should note that:

1. Physical force could not be justified to prevent a pupil from committing a trivial misdemeanour.
2. Any force should always be the minimum needed to achieve the desired result.
3. Whether it is reasonable to use force and the degree of force that could be reasonably employed might also depend on the age, understanding and sex of the pupil.

### **Physical Contact in other Circumstances**

Physical contact between a member of staff and a pupil may be necessary and beneficial in order to demonstrate a required action, or a correct technique in, for example, singing and other music lessons or during PE, sports and games.

Members of staff should observe the following guidelines (where applicable):

1. Explain the intended action to the pupil.
2. Not proceed with the action if the pupil appears to be apprehensive or reluctant, or if the member of staff has other concerns about the pupil's likely reaction.
3. Ensure that the door is open and, if in any doubt, ask a colleague or another pupil to be present during the demonstration.

If members of staff are at all concerned about any instance of physical contact, they should speak to a senior member of staff as soon as possible afterwards and then make a written report which is passed to the Head, the Senior Deputy Head (Senior School) or Head of Prep (Prep School & EYFS).

Touching may also be appropriate where a pupil is in distress and needs comforting. Staff should use their own professional judgement when they feel a pupil needs this kind of support and should be aware of any special circumstances relating to the pupil. Staff should always notify a senior colleague when comfort has been offered and should seek guidance if unsure whether it would be appropriate in a particular case.

Where staff are administering first aid they should explain to the child what is happening and ensure that another adult is present or is aware of the action being taken. The treatment must meet the School's safety and intimate care policies and the HWBC should be informed. The HWBC will contact parents as appropriate. When the HWBC is closed, houseparents, tutors, or the lead member of staff on the School trip will contact parents as appropriate.

Generally, regular physical contact can only be justified where it is part of an agreed plan such as School policy or SEND.

### **Supervision of Pupils when changing / showering**

Children are entitled to privacy when changing or showering. However, there still must be an appropriate level of supervision to ensure safety. (See supervision of pupils' policy in the Staff Handbook).

Adults should:

1. Avoid physical contact or intrusive behaviour when children are undressed.
2. Announce themselves when entering changing rooms and avoid remaining unless required.
3. Not shower or change in the same place as children.

### **Intimate care of pupils**

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

Staff should:

1. Comply with the School's intimate care guidelines and policies, for example the EYFS nappy changing policy. Sharing information with parents as appropriate.
2. Advise other staff of the task being undertaken and consult where there is any change from the agreed procedure.
3. Explain to the child what is happening.

### **Consumption of Food and Drinks**

Stonar has a significant number of pupils with food allergies and intolerances and Stonar is (as far as is possible) a nut free school. Staff must refrain from bringing food containing nuts into School. The School Food Policy (which you must read) is available in the Staff Handbook Section F. These pupils can be identified from SchoolBase and alert poster in the School Dining Hall and Staff workrooms.

School policy is that, during term time, no food is to be consumed, by pupils, outside the Dining Room or Boarding Houses unless catered for by the Stonar Catering team or at a Stonar event.

Staff bringing in food for their own consumption may only consume this in the Staff Room or areas not used by pupils (unless separately approved by Senior Management).

Staff (and pupils, with the permission of the teacher), may drink water in classrooms (not labs). Staff may consume drinks outside of staff areas during non-contact times; however, beverages must be contained within a robust lidded cup or bottle to prevent spillage. Drinks must be stored out of sight of pupils. Drinks may not be consumed in labs.

In order to help support pupils with food allergies & intolerances, food is not to be used as a reward or treat. Food used as a teaching aid must always be the subject of a separate risk assessment approved by the Senior Deputy Head.

### **Use of Technology, Imagery and Communication with Pupils**

All communication with children or parents should conform to School policy and be limited to professional matters. This includes the wider use of technology such as mobile phones, text messaging, emails, digital cameras, videos, web-cams, websites, social networking sites, online gaming and blogs. *Further details regarding the responsible use of social media are to be found in the Social Networking Policy for Staff found in the Staff Handbook, section G and ICT acceptable use policy.*

### **Except in an Emergency, Communication should only be made using School Property.**

School mobile phones are always available for staff taking trips who wish to give out a contact number to pupils. Staff should be circumspect in all communications with students so as to avoid any possible misinterpretation of their motives or any behaviour which could be construed as grooming. They should not give their personal contact details to students including personal e-mail addresses, home or personal mobile telephone numbers, unless the need to do so is agreed with the Senior Deputy Head.

**Staff must not use Social Networking Sites** (e.g. Facebook, Instagram, Snapchat etc.) to connect or communicate with current pupils. In the event of wanting to continue communications with a pupil once they have left Stonar, professional discretion is advised and should be exercised with caution. If the pupil is still under 18 or has continued multiple friendships with current pupils, there is a greater risk of blurring professional boundaries which should be avoided.

Any form of communications between an adult and a pupil outside agreed protocols may lead to disciplinary and/or criminal investigations. This also includes communications through internet-based web sites, such as social networking, instant messaging or gaming.

### **Mobile Phones / Devices**

Stonar will not accept liability for loss or damage to personal mobile devices. Inappropriate use of a mobile phone or device will result in disciplinary action. Personal use of mobile phones is restricted to lunch/break times and non-contact periods. Staff should make personal calls in an office or an area out of the sight and sound of pupils. Mobile phones should be kept on silent/ buzz and kept out of sight.

**Staff in the EYFS setting must keep their mobile phones/ devices in their bags in the Nursery Office. They may not use their personal phones (cameras or any other personal mobile device) when in the EYFS setting.** Setting issued devices only should be used for the purpose of photographing pupils and these devices should not leave the premises, unless they are to be taken on EYFS trips

Staff are responsible for ensuring that their mobile device / phone does not hold inappropriate or illegal content. Inappropriate material, such as pornography, should not be brought to work and staff must not use School property to access such material. Staff should not allow unauthorised access to School equipment and should keep their computer passwords safe. If staff discover material that is potentially illegal, they must isolate the equipment and contact the School's Designated Safeguarding Lead immediately.

### **Photographs and Imagery**

Most of the people who take or view photographs or videos of children do so for entirely understandable and acceptable reasons. However, some people abuse children through taking or using images, so we must ensure that we have safeguards in place.

Staff (other than peripatetic staff) should not use their personal mobile phone to contact a parent except in an emergency or with prior authorisation of a member of the EMG. Staff should not give out their mobile phone number to a pupil, or contact a pupil from their personal mobile unless there is a legitimate reason to do so and permission has been given by the Head.

### **To protect pupils, we:**

1. Seek their parental and where appropriate pupil consent for photographs to be taken or published (for e.g. on our website or in publications).
2. Use only the pupil's first name with an image used for publication.
3. Ensure pupils are appropriately dressed in any images taken.
4. Do not allow staff to take images of children using personal mobile phones, unless permission has been granted by a member of the Executive Management Group and there has been an agreed timescale for transfer and deletion of the image from the staff member's device.
5. Encourage pupils to tell us if they are worried about any photographs that are taken of them.
6. Request that photographs of pupils and children taken at School events are not be posted on to publicly accessible websites without the prior permission of the Head.

### **Access to Boarding Houses and Pupil Accommodation**

Staff should be sensitive to the pupils' needs for privacy and personal space. This is particularly so in changing and boarding areas.

1. Staff who are not involved in boarding should not enter boarding houses unless they have express permission of the houseparent / relief on duty or are undertaking housekeeping / maintenance work in the boarding houses.
2. Support staff have access to laminated signs which they can display when working in a house should they wish to do so.
3. Staff should only enter dormitories after knocking loudly, announcing one's intention to enter and allowing an interval (10-20 seconds) between knocking and entry.
4. The staff member should then enter but remain in the doorway with the door open, if the room is occupied and inform the occupant of the nature of their work as appropriate.
5. All staff should avoid entering, except in the case of an emergency, the washing, changing and toilet facilities in House.
6. Pupils are required to leave their rooms whilst any maintenance work is being carried out. If a pupil chooses to remain in their room the work will not go ahead and the Houseparent will be informed of this.
7. When working in bathrooms the toilet / showering facilities in immediate vicinity will be closed to pupils whilst repairs / cleaning are undertaken.
8. Staff are asked to consult with the Head of Boarding or the Domestic Manager if they require further advice or clarification regarding working in occupied boarding houses.

### **Pupil Access to Resident Staff Accommodation**

NMS 15.10 states: *'Any boarder access to staff accommodation is properly supervised and does not involve inappropriate favouritism or inappropriate one-to-one contacts between staff and boarders'*.

In order to comply with standard, pupils are NEVER permitted to enter the accommodation of a Graduate or Undergraduate Resident / Equestrian Assistants. Pupils are permitted in groups to visit the accommodation of Resident House Staff or Members of the Executive Management Group. This must never be on a one to one basis and only following authorisation by a member of the Executive Management Group, in order to undertake a supervised activity, (such as 'year group come dine with me') events or pizza nights. Pupils should not use staff bathrooms or toilet facilities and must only access communal areas such as living rooms and kitchens.

Further information about visitors to staff accommodation can be found in the Policy for Visitors to Resident Staff Members in the Staff Handbook.

### **Breach**

Failure to comply with this Code (or any rule, procedure or responsibility such as those indicated above) will be regarded as serious and any breach is likely to lead to investigation and disciplinary action under the School's agreed disciplinary procedures.

## General Information about the Law

In addition to being gross misconduct, it is a criminal offence under the Sexual Offences Act 2003 for a person aged 18 or over who is in a position of trust in relation to another person under 18 to engage in sexual activity with that person. Sexual activity is defined broadly and does not have to include physical contact. The offence is punishable by up to six months' imprisonment and/or an unlimited fine. For the purposes of the Act, a teacher is in a position of trust in relation to pupils at the school at which he or she is teaching.

**It should be noted, however, as explained above, that forming inappropriate relationships with children or young people who are pupils or students at another school may also be regarded as gross misconduct. Such behaviour tends to bring the School into disrepute and gives rise to concern that the staff involved cannot be trusted to maintain professional boundaries with pupils and students at this School.**

The Sexual Offences Act 2003 also introduced the offence of "meeting a child following sexual grooming". This applies where an adult arranges to meet a child aged under 16 in any part of the world, if he/she has met or communicated with that child on at least two earlier occasions and intends to commit a sexual offence against that child. The law is clearly intended to apply where adults contact children through the internet. However, the prior meetings or communications need not have an explicitly sexual content.

Most sexual activity involving a person under the age of 16 is an indecent assault, which is both a criminal offence and a matter for which damages can be awarded. This is so, even when the younger person is alleged to have provoked or encouraged the activity.

Schools and colleges have a legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left.

In line with The Counter-Terrorism and Security Act (2015) Stonar expects all staff 'to have due regard to the need to prevent people from being drawn into terrorism' and expects all staff to challenge any extremist ideas from pupils, staff or visitors to the school and then reports such concerns to a member of the Safeguarding and Child Protection Team.

Previous versions: November 2018, November 2019, November 2020, October 2021

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