



Staff Code of Conduct

Table of Contents

1. Introduction.....	2
2. Definitions.....	2
3. Overview and purpose.....	3
4. Principles.....	4
5. Responsibilities	4
6. Making professional judgements	5
7. Power and positions of trust and authority	5
8. Confidentiality	6
9. Standards of behaviour	6
10. Dress and appearance	9
11. Gifts, rewards, favouritism and exclusion	10
12. Infatuations and “crushes”	10
13. Social contact outside of the workplace.....	11
14. Communication with children (including the use of technology)	11
15. Physical contact	11
16. Intimate and personal care.....	13
17. Behaviour management	13
18. Sexual conduct.....	14
19. One to one situations	15
20. Transporting children and young people	15
21. Educational visits, trips, holiday programmes.....	16
22. First aid and medication	16
23. Photography, videos and other images.....	17
24. Exposure to inappropriate images	18
25. Overnight supervision and examinations	18

26. Curriculum 19

27. Sharing concerns and recording incidents..... 19

28. Appendix 1 – Staff Interaction with Children and Young People 20

Prepared By	Approved By	Reviewed in	Reviewed By	Next Review
DOP, Safeguarding Officer, Heads of Schools	Talent Committee – Approved on 12 June 2023	August 2023	MT/LT	June 2026

1. Introduction

This *Staff Code of Conduct* has been based upon the Safer Recruitment Consortium’s document, *Guidance for safer working practice for those working with children and young people in education settings* (United Kingdom, October 2015), and adapted by Tanglin Trust School for the Singapore jurisdiction. The guidance provides simple and practical advice to support school staff in their safeguarding responsibilities.

The *Staff Code of Conduct* is designed to provide guidance that is specific enough to assist staff in managing their interaction with children and young people, without replacing their professional judgement. It operates alongside the School’s *Safeguarding and Child Protection Policy* and the *Management of Concerns about Staff Interaction with Children and Young People Policy*.

The *Staff Code of Conduct* is guided by the School’s core values:

Respect

The School is committed to respecting the rights of all children in accordance with the *United Nations Convention on the Rights of the Child*. All children have the right to education that nurtures individual talents and abilities. All children have the right to be protected from any kind of exploitation.

Responsibility

The School is committed to educating and supporting everyone in the School community to develop competence and confidence in taking responsibility for identifying and sharing concerns appropriately to ensure the care and protection of all children and young people.

Purpose

The School acknowledges its privileged position and the role it plays in children and young people’s lives. The School is committed to providing a caring, safe and stimulating environment where all children and young people can flourish.

This code of conduct may be amended by the Board of Governors with due written notice. Staff will receive advice of any such changes.

2. Definitions

Children and Young People

The *Singapore Children and Young Persons Act (2001)* defines a child as below 14 years old and a young person as above 14 and below 16 years old. The School is committed to safeguarding and child protection in relation to any student in its care. Where the terms “child or young person” are used in this code of conduct, they refer to all students under the School’s care. Where the reference to “child

Prepared By	Approved By	Reviewed in	Reviewed By	Next Review
DOP, Safeguarding Officer, Heads of Schools	Talent Committee – Approved on 12 June 2023	August 2023	MT/LT	June 2026

or young person” is made in the context of reports to, or consultations with the Singapore Child Protection Service (Ministry for Social and Family Development), the *Singapore Children and Young Persons Act (2001)* definitions apply.

Staff

References made to “staff” includes all those who work with children and young people attending the School, in either a paid or unpaid capacity. This includes staff who are not directly employed by the School, but are contracted through other organisations (for example, sports coaches, catering staff, transport staff). Parents and visitors should be guided by the *Parents’ Code of Conduct*.

3. Overview and purpose

These guidelines were formulated in response to requests from people who work with children for clear advice and practical guidance about what constitutes illegal behaviour and what might be considered as misconduct. This guidance aims to assist in establishing the safest possible learning and working environments that protect children and young people and reduce the risk of staff being falsely accused of improper or unprofessional conduct.

The School acknowledges that:

- The majority of adults who work with children act professionally, focused on providing supportive environments that secure the well-being and very best outcomes for children in their care.
- There are people who create or exploit opportunities to harm children.
- Concerns and allegations can be false, well-intentioned but misplaced, or may arise from differing perceptions of the same event.
- When concerns arise, they are inevitably distressing and difficult for all concerned.
- It is essential that all possible steps are taken to safeguard children and young people and ensure that the adults working with them do so safely.

This *Staff Code of Conduct* aims to:

- Raise awareness of illegal, unsafe, unprofessional and unwise behaviour.
- Assist staff to monitor their own standards and practice.
- Reduce the risk of allegations being made.
- Reduce the risk of tensions and misunderstandings.
- Acknowledge the importance of the use of professional judgement in situations that may not be covered in this code of conduct and the importance of consultation with senior colleagues in such situations.
- Give a clear message that unacceptable behaviour will not be tolerated and that, where appropriate, legal or disciplinary action is likely to follow.
- Give clear messages about staff responsibility to be aware of and understand School policies, including this code of conduct and the *Safeguarding and Child Protection Policy*.

Prepared By	Approved By	Reviewed in	Reviewed By	Next Review
DOP, Safeguarding Officer, Heads of Schools	Talent Committee – Approved on 12 June 2023	August 2023	MT/LT	June 2026

4. Principles

- The safety and wellbeing of the child or young person is paramount.
- Staff should understand their responsibilities to safeguard and promote the welfare of children and young people.
- Staff are responsible for their own actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motivation and intentions.
- Staff should work, and be seen to work, in an open and transparent way.
- Staff should acknowledge that deliberately invented/malicious allegations are rare and that all concerns should be reported and recorded.
- Staff should discuss and/or take advice promptly from their line manager if they have acted in a way which may give rise to concern.
- Staff should apply the same professional standards regardless of culture, disability, gender, language, racial origin, religious belief and sexual orientation.
- Staff should not consume or be under the influence of alcohol or any substance, including prescribed medication, which may affect their ability to care for children.
- Staff shall not consume alcohol on campus during core teaching hours. Whilst supervising students outside the campus, staff are not permitted to consume alcohol at any time for the duration of the activity they are supervising. The guidelines on alcohol consumption are covered in the Staff Handbook.
- Staff should be aware that students are prohibited from consuming alcohol on campus regardless of age (with the exception of students 18 years and above at the Year 13 graduation).
- Staff should be aware that breaches of the law and other professional guidelines could result in disciplinary or criminal action being taken against them.
- Staff and managers should continually monitor and review practice to ensure this code of conduct is followed.
- Staff should be aware of and understand this code of conduct, the *Safeguarding and Child Protection Policy*, *Management of Concerns about Staff Interaction with Children and Young People Policy*, and the *Whistle Blowing Policy*.

5. Responsibilities

Staff are expected to:

- Always act, and be seen to act, in the child’s best interests.
- Be accountable for the way in which they exercise authority, manage risk, use resources and safeguard children.
- Protect children and young people from abuse (sexual, physical, emotional abuse and neglect) and to take reasonable steps to ensure their well-being.
- Develop respectful, caring and professional relationships with children, young people and colleagues that demonstrates integrity, maturity and good judgement.

Prepared By	Approved By	Reviewed in	Reviewed By	Next Review
DOP, Safeguarding Officer, Heads of Schools	Talent Committee – Approved on 12 June 2023	August 2023	MT/LT	June 2026

- Understand the responsibilities that are part of their employment or role and be aware that sanctions may be applied for breaches.
- Avoid any conduct which would lead any reasonable person to question their motivation and intentions.

6. Making professional judgements

This code of conduct cannot provide a finite list of what constitutes appropriate and inappropriate behaviour.

Staff are expected to make professional judgements about their behaviour that prioritise the safety and wellbeing of children and young people in their care and in doing so, will be regarded as acting reasonably.

Staff should:

- Always consider whether their actions are warranted, proportionate, safe and applied equitably.

In situations where they may be perceived ambiguity surrounding their actions, staff should:

- Where no specific guidance exists, discuss the circumstances that informed their action, or their proposed action, with their line manager or, where appropriate, a Designated Safeguarding Lead.
- Always discuss any misunderstanding, accidents or threats with the Designated Safeguarding Lead.
- Always record discussions (including disagreements), actions taken and rationale for decisions.

7. Power and positions of trust and authority

Staff are responsible for recognising the power imbalance between adults and children and young people and ensuring that they do not manipulate this power imbalance for personal advantage or gratification.

Staff should:

- Always maintain appropriate professional boundaries.
- Avoid behaviour which could be misinterpreted by others and report and record any incident that may raise concerns.
- Be mindful about how they discipline or reprimand children and young people, avoiding intimidating, threatening, undermining or coercive behaviour toward the child or young person.

Prepared By	Approved By	Reviewed in	Reviewed By	Next Review
DOP, Safeguarding Officer, Heads of Schools	Talent Committee – Approved on 12 June 2023	August 2023	MT/LT	June 2026

8. Confidentiality

Personal information and records are managed in accordance with the Singapore *Personal Data Protection Act*, the School's *Personal Data Protection Policy* and the School's *Confidentiality Policy*.

Staff may have access to confidential information about children, young people and their families.

Staff should:

- Be aware of the School's *Personal Data Protection Policy* and *Confidentiality Policy*.
- Only share information when legally permissible to do so and in the best interests of the child or young person.
- Only share information with colleagues who have a legitimate professional reason to have access to the information.
- Be mindful not to use confidential information about a family for their own or others' advantage.
- Be mindful not to use confidential information to intimidate, humiliate, or embarrass a child or young person.
- Consider whether confidential information requested or required by a colleague or professional outside the school can be provided anonymously.
- Know who the School's Designated Safeguarding Leads are.
- Share information promptly about harm or risk of harm to a child or young person with a Designated Safeguarding Lead or a line manager. Line managers are then expected to inform a Designated Safeguarding Lead at the earliest opportunity.
- Know the School's procedures for managing a child or young person's disclosure.
- Provide reassurance to families that information will be treated sensitively and that confidentiality does not extend to situations that require the School to report to police or the child protection authorities.
- Seek advice from a Designated Safeguarding Lead if they are in any doubt about sharing information they hold or which has been requested of them.
- Refer media or legal inquiries to senior management.

9. Standards of behaviour

There may be times where an individual's actions in their personal life come under scrutiny from the community, the media or public authorities, including with regards to their own children, or children or adults in the community. Staff should be aware that their behaviour, either in or out of the workplace, could compromise their position within the work setting.

For specific guidance about misconduct involving staff interaction with children, please refer to *Appendix 1*.

Prepared By	Approved By	Reviewed in	Reviewed By	Next Review
DOP, Safeguarding Officer, Heads of Schools	Talent Committee – Approved on 12 June 2023	August 2023	MT/LT	June 2026

All members of staff are employed on the understanding that they have no previous criminal convictions, police cautions, or bind overs of which the Human Resources Department has not been informed prior to the commencement of employment with the School.

Members of staff who are parents should not stand as class representatives or be members of a school Parent Voice group due to conflicts of interest.

Staff should not lobby parents, or dissent publicly, about school matters that have been decided on or are under discussion.

Staff should not, during or following their employment at the School, use or disclose to any party the affairs and confidential information about the School of which they have knowledge.

Serious Misconduct

The following list (which is not exhaustive) indicates the type of behaviour which may result in disciplinary proceedings or summary dismissal referred to in the *Staff Contract* or other appropriate employment contract:

- Harming a child or young person (including physical, sexual and emotional abuse) or negligence resulting in harm.
- Behaving in a way toward a child or young person that may constitute an offence under Singapore or international law.
- Behaving in a way that indicates unsuitability to work with children or young people, including patterns of grooming behaviour and physical punishment or reprimand.
- Extremely intoxicated, violent, or unruly behaviour within the school or in any public place.
- Behaviour of a type which could render the member of staff liable to prosecution for any criminal offence, whether in Singapore or any other place (excluding minor motoring or other similar offences).
- Sexual harassment within the school.
- The expression of racist, sexist, or intolerant political or religious views (and/or behaviour of a racist, sexist or politically or religiously intolerant nature).
- Inappropriate conduct (including sexual conduct) which could disturb or cause disruption or embarrassment to other members of staff or students.
- Gross negligence or wilful acts leading to the injury of other people.
- Use of technology, programmes or communication channels to harm or threaten others, or to the detriment of the School or work performance.
- Theft of Tanglin property or any property within the School.
- Verbally or physically intimidating or threatening any person in the school community on the school grounds.
- Conduct of a nature liable to lower the reputation of the School.
- Repeated infractions of the items listed under Other Misconduct below.

Prepared By	Approved By	Reviewed in	Reviewed By	Next Review
DOP, Safeguarding Officer, Heads of Schools	Talent Committee – Approved on 12 June 2023	August 2023	MT/LT	June 2026

Disciplinary procedure for Serious Misconduct

All matters involving Serious Misconduct will be referred to the Chief Executive Officer with recommendations for any disciplinary action from the Head of School or the Management Team staff member who is responsible for the investigation. If the staff member belongs to a part of the school or department that is different to the person responsible for the investigation, the Head of School or Head of Department relevant to the staff member may also be involved in disciplinary decisions.

Investigation report findings and disciplinary actions will be communicated to the staff member in person where possible by the Chief Executive Officer.

If the staff member remains employed by the School, the relevant Head of School or Head of Department will implement any disciplinary procedure and risk management strategies required, in consultation with the Director of People.

All matters of substantiated Serious Misconduct where the decision involves the staff member's continued employment at the School will involve a formal written warning.

Other Misconduct

The following list (which is not exhaustive) indicates the type of behaviour which will render a member of staff liable to verbal and written warnings and other disciplinary action:

- Behaviour involving interaction with children or young people that is inappropriate but on its own, does not meet the threshold for serious misconduct.
- Rudeness or lack of courtesy to parents or other members of staff within the school.
- Failure to carry out responsibilities of the role in a constructive and collaborative manner.
- Failure to satisfactorily meet performance targets or implement action plans resulting from questionable quality practice and/or classroom management identified by a senior member of staff/line managers.
- Revealing confidential/privileged information concerning the school, its students, or any member of staff at the school.
- Persistently arriving late for work/in class after the member of staff has been informed of his or her required starting time.
- Inappropriate dress which could cause embarrassment to other members of staff or students or the School.
- Deliberately instigating or inciting others to unruly behaviour.
- Removal/disposal of equipment from the School without proper authorisation.

Disciplinary procedure for Other Misconduct

Matters involving other misconduct will be managed by the relevant Head of School or Head of Department, in consultation with the Director of People.

Prepared By	Approved By	Reviewed in	Reviewed By	Next Review
DOP, Safeguarding Officer, Heads of Schools	Talent Committee – Approved on 12 June 2023	August 2023	MT/LT	June 2026

A formal written warning may be issued. Written warnings may result in further investigation and disciplinary proceedings.

Procedural fairness

During the period of any investigation into an allegation of misconduct (of whatever nature or severity) a member of staff will be entitled to:

- External emotional support during and following any investigation (for a reasonable duration) that is funded by the School.
- Request support for family members during and following any investigation (for a reasonable duration) that is funded by the School.
- Confidentiality, notwithstanding the School’s legal obligations to report certain matters to, or share certain information with, external authorities.
- Be supported by a person of their choice during the interview process.
- A copy of the investigation report at the conclusion of the investigation and after the School has reached a decision on a matter.
- A copy of investigation interview notes pertaining to the staff member’s interviews.
- Seek external legal advice.
- Seek advice from any union the staff member may be associated with.
- Appeal the School’s decision.
- Attend any Review Panel meeting (with a support person if desired) that is the result of an Appeal.

10. Dress and appearance

A person's dress and appearance are matters of personal choice and self-expression and some individuals will wish to exercise their own cultural customs. However, staff should select a manner of dress and appearance appropriate to their professional role and which may be necessarily different to that adopted in their personal life.

Staff should wear clothing that:

- Promotes a positive and professional image.
- Is decent, safe and appropriate for the tasks they undertake.
- 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.

For specific guidance on dress code, please refer to the Staff Handbook.

Prepared By	Approved By	Reviewed in	Reviewed By	Next Review
DOP, Safeguarding Officer, Heads of Schools	Talent Committee – Approved on 12 June 2023	August 2023	MT/LT	June 2026

11. Gifts, rewards, favouritism and exclusion

The School acknowledges that there are occasions when children, young people or parents wish to pass gifts of appreciation to staff. However, it is unacceptable to receive gifts on a regular basis or of any significant value.

Staff should:

- Be familiar with the School's *Acceptance of Gifts Policy*.
- 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.
- Ensure that gifts received or given in situations which may be misconstrued are declared and recorded.
- Similarly, it is inadvisable to give such personal gifts to pupils or their families. This could be interpreted as a gesture either to bribe or groom. It might also be perceived that a 'favour' of some kind is expected in return.

Staff should:

- Take care to ensure that any reward given to a child or young person is in accordance with agreed practice, recorded and not based on favouritism.
- Take care when selecting or excluding children or young people for or from specific activities, jobs or privileges in order to avoid perceptions of favouritism or injustice.
- Ensure that methods of selection and exclusion are always subject to clear, fair, agreed criteria.

12. Infatuations and “crushes”

All staff need to recognise that it is not uncommon for children and young people to be strongly attracted to a member of staff and develop a “crush” or infatuation.

Staff should:

- Make every effort to ensure that their own behaviour is professional and does not encourage the child or young person.
- Be aware of signs of infatuation that a child or young person may display (for example, seeking contact on social media, requesting or offering personal contact details, requests to meet outside of school hours, “rumours” circulating in the child or young person’s peer group about them and the staff member).
- Report any concern about themselves or any other staff member to the Designated Safeguarding Lead for appropriate management.
- Understand that early intervention can prevent escalation and avoid hurt, embarrassment or distress for those concerned.

Prepared By	Approved By	Reviewed in	Reviewed By	Next Review
DOP, Safeguarding Officer, Heads of Schools	Talent Committee – Approved on 12 June 2023	August 2023	MT/LT	June 2026

13. Social contact outside of the workplace

It is acknowledged that staff may have genuine friendships and social contact with parents of students, independent of the professional relationship.

Staff should:

- Be aware that professionals who sexually harm children often seek to establish relationships and contact outside of the workplace with both the child/young person and their parents, in order to ‘groom’ the adult and the child/young person and/or create opportunities for sexual abuse.
- Be aware of professional boundaries with parents. If a parent seeks support from the staff member that is outside the staff member’s professional role, this should be discussed with the Designated Safeguarding Lead or Head of School.

14. Communication with children (including the use of technology)

In order to make best use of the many educational and social benefits of new and emerging technologies, children and young people need opportunities to use and explore the digital world. E-safety risks are posed more by behaviours and values than the technology itself.

Staff should:

- Ensure that they comply with the School’s acceptable use of technology policies.
- Communicate with children within explicit professional boundaries, using professional contact details only, such as work email.
- Ensure that all photography and videoing of children and young people is in accordance with the School’s *Photography and Video Policy*.
- Not request or respond to any personal information from children other than which may be necessary in their professional role. Staff should not give their personal contact details to children for example, e-mail address, home or mobile telephone numbers, details of web-based identities. If children locate these by any other means and attempt to contact or correspond with the staff member, the adult should not respond and should report the matter to the Designated Safeguarding Lead.
- Ensure that their communication is open and transparent and avoid any communication which could be interpreted as ‘grooming behaviour.’

15. Physical contact

There are occasions when it is entirely appropriate and proper for staff to have physical contact with children and young people, however, it is crucial that they only do so in ways appropriate to their professional role and in relation to a child or young person’s individual needs and any agreed care plan.

Prepared By	Approved By	Reviewed in	Reviewed By	Next Review
DOP, Safeguarding Officer, Heads of Schools	Talent Committee – Approved on 12 June 2023	August 2023	MT/LT	June 2026

Any physical contact should be in response to the child or young person’s needs at the time, of limited duration and appropriate to their age, stage of development, gender, ethnicity and background.

Staff should:

- Wherever possible seek the child or young person’s permission before making physical contact.
- Be sensitive to any signs that the child or young person may be uncomfortable or embarrassed.
- Be sensitive to factors that may indicate increased vulnerability such as special education needs and disability, gender issues, cultural issues and history of trauma or abuse issues.
- Be aware that even well-intentioned physical contact may be misconstrued by the child or young person, an observer or any person to whom the action is described, and always be prepared to explain actions.
- Never touch a child or young person in a way which may be considered indecent.
- Always allow and encourage pupils, where possible, to undertake self-care tasks independently, and always explain the reason contact is necessary and what form that contact will take.
- Report and record situations which may give rise to concern to a Designated Safeguarding Lead.
- Ensure that any physical contact is not secretive, for the gratification of the adult, or represent a misuse of authority.
- Report any concerns about another staff member’s interaction with a child or young person to a Head of School or Designated Safeguarding Lead.
- Understand that a child or young person who has been subjected to abuse or neglect may associate physical contact by an adult with their experience.
- Ensure that they understand care plans for any child or young person with a disability or learning needs that require physical contact. Such arrangements should be understood and agreed by all concerned, justified in terms of the child or young person’s needs, consistently applied, open to scrutiny and regularly reviewed.

Regarding other activities that may require physical contact in certain curriculum areas, such as physical education, drama or music, staff should:

- Treat children and young people with dignity and respect and avoid contact with intimate parts of the body.
- Ensure that parents and children and young people are informed of the extent and nature of any physical contact that may be required for particular activities.
- Consider whether a verbal instruction would be sufficient to deliver the required message.
- Provide physical guidance only when it is necessary in relation to a particular activity (for example, to demonstrate technique in the use of a piece of equipment, adjust posture or support a child or young person so they can perform an activity safely).
- Provide the physical guidance in a safe and open environment and for the minimum time necessary.
- Ensure that they report any incidents of physical contact that cause concern or fall outside of specified parameters to a Designated Safeguarding Lead.

Prepared By	Approved By	Reviewed in	Reviewed By	Next Review
DOP, Safeguarding Officer, Heads of Schools	Talent Committee – Approved on 12 June 2023	August 2023	MT/LT	June 2026

16. Intimate and personal care

Children and young people should be encouraged to attend to their own personal care. The School acknowledges that situations arise in which a children and young people may require assistance with their personal care, such as:

- When a child or young person’s Individual Care Plan specifies assistance to be provided.
- Providing First Aid assistance where a child or young person has sustained an injury to an intimate part of the body, is ill and requires assistance to clean themselves, or requires treatment for a medical condition.
- The child or young person’s mobility is limited due to injury, illness or disability.
- Assisting a child or young person to change his or her clothes.
- Assisting a child with toileting issues.
- A situation where a child or young person’s distress obstructs their ability to attend to their personal care.
- Providing comfort or support for a child or young person that involves physical contact.
- Other personal care situations where School staff are required to monitor children and young people.

In situations where a child or young person requires assistance with personal care, staff should:

- Act in accordance with the School’s *Personal and Intimate Care Guidance*.
- Always encourage the child or young person to attend to their own care.
- Always explain what care they are going to provide to the child or young person.
- Provide the minimal amount of assistance required for the minimal amount of time required.
- Always respect a child or young person’s privacy, especially when in a state of undress, including, for example, when changing, toileting and showering.
- Ensure that another staff member is aware that personal care is being provided.
- Keep a record of any intimate and personal care task undertaken.
- Always consider the supervision needs of children and young people, only enter/remain in rooms such as change rooms for the minimal amount of time necessary to ensure safety, and avoid visually intrusive behaviour. Supervision should be appropriate to the needs and age of the young people concerned and sensitive to the potential for embarrassment.

17. Behaviour management

The School acknowledges that behaviour management challenges arise with children and young people.

Staff should:

- Behave as a role model.
- Try to defuse situations before they escalate.

Prepared By	Approved By	Reviewed in	Reviewed By	Next Review
DOP, Safeguarding Officer, Heads of Schools	Talent Committee – Approved on 12 June 2023	August 2023	MT/LT	June 2026

- Not use any form of degrading or humiliating treatment to punish a child or young person.
- Not use physical force as a form of punishment.
- Keep parents informed of any sanctions or behaviour management techniques used.
- Be mindful of and sensitive to factors both inside and outside of the school or setting which may impact on a child or young person’s behaviour.
- Where a child or young person has specific challenging behaviour, a positive handling plan should be formulated and agreed by all parties.
Staff may reasonably physically intervene to prevent a child from:
 - Committing a criminal offence.
 - Injuring themselves or others.
 - Causing damage to property.

In all cases involving physical intervention, staff should record the incident, actions and rationale for decisions and report these to a Designated Safeguarding Lead or line manager. The child or young person’s parents should also be informed, unless there is a reasonable excuse not to inform them.

18. Sexual conduct

Any sexual behaviour by a member of staff with or towards a child or young person is unacceptable.

Sexual behaviour includes:

- Commission of a sexual act with a child or young person.
- Coercing or encouraging a child or young person to engage in sexual acts with or without others for the adult’s gratification, including for the production of pornographic materials.
- Exposing a child or young person to sexual acts, or material of a sexual nature, including printed and electronic material.
- Grooming.

Sexual abuse may involve a perpetrator exploiting a situational opportunity, or it may involve a complex dynamic referred to as “grooming” where a perpetrator systematically manipulates the child or young person, significant people in the child or young person’s life and the environment, in order to:

- Gain access to the child or young person.
- Gain the child or young person’s compliance.
- Prevent the child or young person disclosing the abuse and limit the possibility that any disclosure will be believed and acted on.

A perpetrator of sexual abuse may exhibit the following behaviours:

- Singling out a child or young person and/or their parents/caregivers/family for “special” attention, including giving gifts, providing favours, ingratiating themselves.
- Persuading a child or young person that a special relationship exists.

Prepared By	Approved By	Reviewed in	Reviewed By	Next Review
DOP, Safeguarding Officer, Heads of Schools	Talent Committee – Approved on 12 June 2023	August 2023	MT/LT	June 2026

- Isolating a child or young person for the purposes of favouritism.
- Allowing a child or young person to overstep rules.
- Testing of physical boundaries – “accidental” touching.
- Using social media, gaming or other electronic platforms to form a relationship with a child or young person.

Staff should:

- Be familiar with the School’s *Safeguarding and Child Protection Policy*.
- Not have any form of sexual contact with a child or young person.
- Avoid any form of touch which is, or may be considered to be, indecent.
- Avoid any form of communication with a child or young person which could be interpreted as sexually suggestive, provocative or give rise to speculation, including verbal comments, letters, notes, by email or on social media, phone calls, texts, physical contact.
- Not discuss sexual matters with, or in the presence of, children and young people other than within agreed curriculum content or as part of their professional role.

19. One to one situations

The School acknowledges that staff working in one to one situations with children and young people may be more vulnerable to allegations or complaints.

Staff should implement strategies to minimise the risk of allegations being made against them, including:

- Ensure, as far as possible, that any one to one contact occurs during normal school hours.
- Ensure that if the one to one situation (for example, a music lesson or extra tutoring lesson) occurs outside normal school hours, a line manager and/or a Designated Safeguarding Lead is aware and has approved the arrangement.
- Ensure, as far as possible, that there is visual access and/or an open door in one to one situations.
- Ensure, as far as possible, that any one to one situation is held in a location where security cameras are operating.
- Avoid using “engaged” or equivalent signs wherever possible. Such signs may create an opportunity for secrecy or perceived secrecy.
- Always report any situation where a child or young person becomes distressed or angry.

20. Transporting children and young people

Staff should not transport children or young people in private vehicles unless in an emergency situation.

Prepared By	Approved By	Reviewed in	Reviewed By	Next Review
DOP, Safeguarding Officer, Heads of Schools	Talent Committee – Approved on 12 June 2023	August 2023	MT/LT	June 2026

There may be occasions when a staff member is required to accompany a child or young person in a taxi. Such occasions must be discussed with a line manager, consented to by the child or young person's parents/guardian and rationale for decisions recorded.

Staff should:

- Where possible, make appropriate arrangements with all parties in advance, including details about the nature of the journey and expected time of arrival.
- Use professional judgement to decide on appropriate actions in an emergency or a situation where a child or young person may be at risk of harm. In these circumstances the matter should be reported a line manager and/or Designated Safeguarding Lead, details documented and rationale for decisions recorded.
- Ensure that any time alone with a child or young person is minimised.

21. Educational visits, trips, holiday programmes

The School acknowledges the unique environment of Outdoor Education and Trips that is often less formal than the School environment.

Staff should:

- Take care to maintain professional boundaries to ensure that their behaviour cannot be interpreted as seeking to establish an inappropriate relationship or friendship with a child or young person.
- Adhere to the School's *Outdoor Education Policy* and *Personal and Intimate Care Guidance*.
- Undertake risk assessments.
- Give careful consideration to sleeping arrangements, particularly in relation to gender issues.
- Never share beds with children or young people.
- Never share bedrooms with children or young people unless,
 - it involves a dormitory situation,
 - it is required in order to provide appropriate supervision, care and monitoring of an unwell child or young person, and
 - the arrangements have been previously discussed with the Head of Outdoor Education, a Designated Safeguarding Lead and parents.
- Ensure they are appropriately briefed by the School's Lead Nurse (or delegate) about the health needs of the children or young people participating in the visit, trip or holiday programme.
- Ensure there are trained and named individuals to undertake first aid responsibilities.
- Staff on school trips, when on duty, must not consume alcohol.

22. First aid and medication

First aid should be delivered to children and young people in accordance with the School's:

Prepared By	Approved By	Reviewed in	Reviewed By	Next Review
DOP, Safeguarding Officer, Heads of Schools	Talent Committee – Approved on 12 June 2023	August 2023	MT/LT	June 2026

- *First Aid and Medications Policy*
- *Personal and Intimate Care Guidance*

Any staff member who witnesses illness, an accident, or injury to a child or young person at school should:

- Contact the School nurses or take the child or young person to the appropriate School health centre.
- Complete an accident form if required.
- Report to a Designated Safeguarding Lead if the injury is, or appears to be, related to self-harm or caused by another person and not an accident.

In cases where the School nurses are not available or accessible, School first aid staff are expected to:

- Always act in a student’s best interests.
- Refer to students’ individual healthcare plans where possible.
- Always ensure that an appropriate health/risk assessment is undertaken prior to undertaking certain activities.
- Explain to the student what care is being administered and the purpose where possible.
- Take care to encourage students to undertake self care tasks where possible.
- Take care to observe the School’s *Personal and Intimate Care Guidance*.
- Make a record of all medications and care administered.

23. Photography, videos and other images

The School acknowledges that some educational activities involve creating digital images of children and young people for display purposes, publicity, to celebrate achievement and to provide records of evidence of the activity.

Staff should not be expected to use their personal equipment to create images of children or young people at, or on behalf of, the School.

Staff should:

- Be aware of the School’s *Photography and Video Policy*.
- Create, share, display and distribute images of children and young people respectfully and within a defined context.
- Never create images that could be considered as indecent or sexual.
- Be aware of the potential for images to be misused and manipulated for pornographic or “grooming” purposes, e.g. students dressed for swimming or gymnastics.
- Be sensitive to any child or young person who appears uncomfortable and recognise the potential for misinterpretation. Be particularly aware that children and young people who have been subjected to abuse may be sensitive to being photographed or recorded.

Prepared By	Approved By	Reviewed in	Reviewed By	Next Review
DOP, Safeguarding Officer, Heads of Schools	Talent Committee – Approved on 12 June 2023	August 2023	MT/LT	June 2026

- Only retain images where there is a clear and agreed purpose to do so.
- Be able to justify images of children and young people in their possession.
- Avoid creating images in one to one situations.

24. Exposure to inappropriate images

Staff should take care to ensure that children and young people are not exposed to inappropriate images.

Staff should:

- Adhere to the School’s acceptable use of technology policies.
- Ensure, as far as possible, that children and young people cannot be exposed to indecent or inappropriate images.
- Ensure that any films or material shown to children and young people are age appropriate.
- Never bring equipment containing pornography or links to pornography into the workplace. This will raise serious concerns about suitability to continue working with children and young people.
- Keep passwords confidential and not allow unauthorised access to equipment.
- Report the discovery of any indecent images of children or young people or any other unsuitable material immediately to a Designated Safeguarding Lead who will secure the equipment, arrange for it to be isolated from the network and report to external authorities as required. Staff should not attempt to delete images, investigate the matter or evaluate the material themselves as this may contaminate evidence and/or incriminate them.

25. Overnight supervision and examinations

There are occasions when examinations take place over more than one day and arrangements need to be made to preserve the integrity of the examination process.

Where arrangements are made for a staff member to supervise a pupil overnight, staff should:

- Ensure all arrangements are made in partnership and agreement with the child or young person and their parents/guardian.
- Ensure all arrangements are made in consultation with, and with the approval of, a Head of School and a Designated Safeguarding Lead.
- Avoid arrangements involving one to one supervision wherever possible.
- Ensure that any situation involving complaint, disagreement or misunderstanding is reported to a Designated Safeguarding Lead.

Prepared By	Approved By	Reviewed in	Reviewed By	Next Review
DOP, Safeguarding Officer, Heads of Schools	Talent Committee – Approved on 12 June 2023	August 2023	MT/LT	June 2026

26. Curriculum

Some areas of the curriculum may include, or prompt discussion about, subject matter that is sexually explicit or of a political or sensitive nature.

Staff should:

- Take care to ensure that resource materials clearly relate to the learning outcomes identified by the curriculum plan.
- Ensure that ground rules are developed with children and young people about discussion of sensitive topics. This is particularly important in curriculum areas (drama or outdoor education, for example) where usual formal structure becomes more flexible.
- Take particular care to maintain professional boundaries when encouraging a child or young person's self-expression.
- Take care not to attempt to influence or impose personal values, attitudes or beliefs on children and young people.

27. Sharing concerns and recording incidents

All concerns about another staff member's interaction with children or young people require reporting:

- Faculty staff are required to report to any Head of School or a Designated Safeguarding Lead.
- Business support staff are required to report to any Director, Head of Department or a Designated Safeguarding Lead.
- All other members of the School community are encouraged to report any concern to a Head of School or one of the School's Designated Safeguarding Leads.
- Staff should discuss any issues that may impact on their relationships with, or behaviour towards, children and young people with their line manager, so that appropriate support can be provided.

The School's response to staff misconduct is guided by the following School documents:

- *Staff Code of Conduct*
- *Safeguarding and Child Protection Policy*
- *Management of Concerns about Staff Interaction with Children and Young People Policy*

If a person wishing to report a serious concern is not comfortable with the above reporting arrangements, or a person has a complaint about the School's management of a matter, the concern may be reported to the Director of People or the Chief Executive Officer in accordance with the School's *Whistleblowing Policy*.

Prepared By	Approved By	Reviewed in	Reviewed By	Next Review
DOP, Safeguarding Officer, Heads of Schools	Talent Committee – Approved on 12 June 2023	August 2023	MT/LT	June 2026

28. Appendix 1 – Staff Interaction with Children and Young People

Serious Misconduct

Serious misconduct that relates to children and young people as specified in the Staff Code of Conduct:

- Harming a child or young person (including physical, sexual and emotional abuse) or negligence resulting in harm.
- Behaving in a way toward a child or young person that may constitute an offence under Singapore or international law.
- Behaving in a way that indicates unsuitability to work with children or young people, including patterns of grooming behaviour and physical punishment or reprimand.
Specific behaviour that meets the threshold for serious misconduct includes, but is not limited to:
- Commission of a sexual act with a child or young person.
- Touching a child or young person in a sexual manner.
- Sexual exhibitionism.
- Personal correspondence (including email and phone messages) with a child or young person with regard to the staff member’s own sexual feelings for any child or young person.
- Exposing a child or young person to material of a sexual nature (not including school curriculum based material that is provided within a school educational context), including printed or digital material such as pornography.
- Possession or creation or distribution of pornography involving children or young people or any student involved with the School, regardless of age.
- Exposing a child or young person to the sexual behaviour of others.
- Encouraging a child or young person to behave in a sexual manner.
- Watching a child or young person undress, for example in change rooms or toilets when supervision is not required or justified.
- Exhibiting a pattern of behaviour that is consistent with grooming a child or young person for sexual exploitation.
- Hitting, smacking, pushing or throwing objects at a child or young person (that is not related to sports or other situations where physical contact is accidental, required or foreseeable).
- Any other type of physical discipline or reprimand.
- Verbally or physically threatening behaviour that causes a child or young person to fear that an assault may occur.
- Humiliating or belittling a child or young person.

Other Misconduct

Other misconduct that relates to children and young people as specified in the Staff Code of Conduct:

- Behaviour involving interaction with children or young people that is inappropriate but on its own, does not meet the threshold for serious misconduct.

Prepared By	Approved By	Reviewed in	Reviewed By	Next Review
DOP, Safeguarding Officer, Heads of Schools	Talent Committee – Approved on 12 June 2023	August 2023	MT/LT	June 2026

Specific behaviour that is classified as other misconduct includes, but is not limited to:

- Conversations or comments of a sexual nature in the presence of children or young people.
- Physical restraint that is excessive in the circumstances.
- Verbally or physically reprimanding in a way that is disproportionate to a child or young person's behaviour or inappropriate given the child or young person's stage of development and does not result in physical harm.
- Singling a child or young person out for "special" attention that is outside the boundaries of encouraging and supporting a child or young person.
- Persuading a child or young person that a special relationship exists with them.
- Isolating a child or young person for the purposes of favouritism.
- Allowing a child or young person to overstep rules that is outside of making reasonable concessions where particular issues exist for the child or young person.
- Testing a child or young person's physical boundaries or "accidental" touching.
- Touching a child or young person in an inappropriate, unnecessary or unwelcome manner.
- Inappropriate personal comments such as complimentary or derogatory comments about a child or young person's appearance.
- Using social media, gaming or other digital platforms to form a relationship with a child or young person.
- Providing physical comfort to a child or young person that is not in accordance with the School's Personal and Intimate Care Guidance.
- A repeated pattern involving one of the above behaviours, or a pattern involving more than one of the above behaviours may be considered to constitute Serious Misconduct that will be investigated accordingly.

Prepared By	Approved By	Reviewed in	Reviewed By	Next Review
DOP, Safeguarding Officer, Heads of Schools	Talent Committee – Approved on 12 June 2023	August 2023	MT/LT	June 2026