Faculty and Staff Behaviour Policy (Code of Conduct)

The current version of any policy, procedure, protocol or guideline is the version held on the TASIS England website. It is the responsibility of all staff to ensure that they are following the current version.

Information Sharing Category	PUBLIC
TASIS England Document reference (Org, Doc, version, date)	TASIS_CofC_V9.4_01092026
Version	9.4
Date published	01 September 2026
Date ratified by Head of School	01 September 2026
Review/Update date before	01 September 2027
Responsible area	Head of School's Office

Agreed by:

Head of School	Director of Human Resources	Chair of the Board
Bryan Nixon	Sally Holmes	David King
01 September 2026	01 September 2026	01 September 2026

TASIS England is committed to safeguarding and promoting the welfare of students and expects all faculty, staff and volunteers to share this commitment. It is our aim that all students fulfil their potential.

Key Personnel			
Role	**Name**	**Tel.**	**Email**
Head of School	Mr. Bryan Nixon	T: +44 (0) 1932 582314 M: +44 (0) 7392 319933	bnixon@tasisengland.org
Designated Safeguarding Lead (DSL), Director of Pastoral Care, Designated Teacher for Looked After Children and Prevent Lead	Mr. Jason Tait	T: +44 (0) 1932 582312 M: +44 (0) 7392 319922	jtait@tasisengland.org
Upper School Pastoral Coordinator Deputy Whole School DSL (DDSL)	Mrs. Jen Vinton	T: +44 (0)1932 582225 M: +44 (0) 7900 721134	jvinton@tasisengland.org
Director of Inclusion, Wellbeing and Compliance and Senior Mental Health Lead	Mr. Darren Singh-MacPherson	T: +44 (0)1932 582435 M: +44 (0) 7774 658911	dsinghmacpherson@tasisengland.org
Chair of the Board of Directors and Nominated Board Director for Safeguarding	Mr. David King	M: +44 (0) 7564 341887	dking@tasisengland.org
The key safeguarding responsibilities within each of the roles above are set out in Keeping Children Safe in Education 2026.			
If you believe a child has suffered or is likely to suffer significant harm, Children's Social Care must be contacted immediately:			
Children's Social Care referrals: Children's Single Point of Access (C-SPA): 0300 470 9100 cspa@surreycc.gov.uk	**Children's Social Care Out-of-hours:** 01483 517898 - edt.ssd@surreycc.gov.uk	**Surrey Local Authority Designated Officer (LADO):** 0300 123 1650 lado@surreycc.gov.uk	
If you believe a child is at immediate risk of significant harm or injury, you must call the emergency services on 999.			

1 Purpose and application of this policy

Relationships with fellow faculty, staff, employees, directors, trustees, contractors, visitors, volunteers, students and their parents, guardians or carers must be reasonable and mutually respectful at all times, in accordance with the TASIS England Mission, Commitments and Outcomes.

This Code has been produced to place the welfare of TASIS England children and students at the centre of the school and its culture and to ensure that all those who work in the school and may have contact with students are clear on the rules of conduct and the expectations of the school. It is expected that our Code of Conduct is constantly lived, monitored and reinforced by all faculty and staff. Children place trust in those connected to the school creating obligations which we must all meet to ensure the successful outcomes achieved by the students in our care.

1.1 General safeguarding and regulatory guidance

This Code has regard to all school policy and procedures, which are available on the TASIS England website, and the following guidance and regulations (collectively referred to in this Code as the Guidance):

- Keeping children safe in education (KCSIE) (September 2026) (which refers to the statutory guidance for practitioners: What to do if you're worried a child is being abused (March 2015))
- Disqualification under the Childcare Act 2006 (August 2018)
- Working together to safeguard children (WT) (2026)
- Information sharing advice for safeguarding practitioners (March 2015, updated May 2024)
- Independent School Standards guidance (April 2026), including the safeguarding, staff conduct and supervision expectations
- Crime and Policing Act 2026
- Mobile phones in schools (DfE statutory guidance, 2026)
- Restrictive interventions, including use of reasonable force, in schools (DfE: April 2026)

1.2 Guidance on the Prevent Duty

- Prevent duty guidance: England and Wales (2023) (March 2015, updated May 2024). Prevent is supplemented by:
- The Prevent duty: safeguarding learners vulnerable to radicalisation (October 2022, updated September 2023)
- Channel and Prevent Multi-Agency Panel (PMAP) guidance (February 2021, updated December 2023)
- The use of social media for online radicalisation (July 2015)

1.3 **Guidance on female genital mutilation (FGM)**, to include:

- Multi-agency statutory guidance on female genital mutilation (October 2018 updated July 2020)
- Mandatory reporting of female genital mutilation: procedural information (October 2015 updated January 2020)
- Female genital mutilation (FGM): resources for healthcare staff (November 2015)

1.4 **Guidance on mental health**, to include:

- Preventing bullying: Guidance for schools on preventing and responding to bullying (August

2013, updated July 2017)

- Mental health and behaviour in schools (June 2014, updated November 2018)
- Promoting children & young people's emotional health and wellbeing (March 2015, updated November 2023)

1.5 **Guidance on political impartiality**

- Political impartiality in schools (February 2022)

2 The purpose of the Code is to:

2.1 confirm and reinforce the professional responsibilities of all faculty and staff

2.2 clarify the legal position in relation to sensitive aspects of faculty and staff/student relationships and communication including the use of social media

2.3 set out the expectations of standards and behaviour to be maintained within the school, and

2.4 help faculty and staff establish safe practices and reduce the risk of false accusations or improper conduct.

3 Application: This Code of Conduct (the Faculty and Staff Behaviour (Code of Conduct) Policy) applies to all faculty and staff working in the school (**TASIS England)**, whether paid or unpaid, whatever their position, role or responsibilities. For the purposes of this policy, the terms "**faculty"** and **"staff"** may be used interchangeably and refers to, and includes, all TASIS England employees, directors, contractors, work experience / placement students, bank, agency and volunteers. All staff will receive training in relation to the Code of Conduct. Additionally, the terms "students" and "children" may be used interchangeably in this policy, with both terms referring to all those under or over the age of 18 years enrolled at TASIS England.

This Code of Conduct is reviewed annually or more frequently as required to ensure it remains compliant with current legislation, regulatory requirements, and best practice.

4 Your duty: It is the contractual duty of every member of faculty and staff to observe the rules and obligations of this Code and follow all guidance contained herein. TASIS England also has a duty of care to its faculty and staff, parents, guardians or carers and students and the implementation of the practices in this Code will help to discharge that duty.

5 Application with other policies: The Code must also be read in conjunction with all other school policies, particularly the Safeguarding Children and Child Protection Policy and the Whistleblowing Policy. All referenced policies are available on the TASIS England website.

6 Wrongdoing and disclosure of concerns: All staff are required to report their own wrongdoing, or any wrongdoing or proposed wrongdoing of any other member of faculty or staff, or any conduct that they suspect may be inappropriate, to the Head of School without delay. This duty applies even where the concern is no more than a sense of unease or a "nagging doubt" and includes low-level concerns as described in KCSIE 2026 and Appendix 1 (Low Level Concerns Policy). The school operates a Whistleblowing Policy, which sets out the processes to follow where suspected, known, or proposed wrongdoing is brought to a member of staff's attention by a colleague, student, parent, or other adult.

If the concern relates to the Head of School, report it to the Chair of the Board; where there is a conflict of interest, report directly to the LADO. The school will handle all reports confidentially, record them appropriately, and staff will be protected from detriment or retaliation when raising concerns in good faith.

7 **Close personal relationships and conflicts of interest:** You must promptly disclose to the Head of School (or the Director of HR) any close personal relationship with a student, parent, contractor, job applicant, supplier, or colleague where a conflict of interest, perceived bias, or safeguarding risk could arise (e.g., admission, grading/assessment, discipline, line-management, recruitment, procurement, contract management). For these purposes, a "close personal relationship" includes family/household relationships, romantic or intimate relationships (current or recent), and significant financial or business relationships. The school may implement proportionate controls (for example, reallocating decision-making, changing line-management/supervision, recusal from panels, or removing you from a procurement process). Disclosures will be recorded by the Director of HR and handled in line with UK GDPR. Failure to disclose a relevant relationship or to comply with mitigation measures may be treated as a disciplinary matter.

8 **Guiding principles - principles for all staff:** The school prioritizes the welfare of students, its diverse and inclusive culture, and the maintenance of positive and professional relationships between faculty and staff, students and their parents, guardians and/or carers. All faculty and staff should follow the guiding principles set out herein

8.1 <u>All faculty and staff must put the wellbeing, development and progress of all students first, by:</u>

- taking all reasonable steps to ensure the safety and wellbeing of students under their supervision
- using professional expertise and judgment for the best interests of students in their care
- demonstrating self-awareness and taking responsibility for their own actions and for providing help and support to students
- ensuring all interactions with students about political matters are conducted in a balanced and impartial way without promoting partisan political views, taking into account the 'Political impartiality', 'Communicating about shared principles', and 'Questions about political impartiality' sections of this Code
- raising concerns about the practices or conduct of faculty, staff or any other individuals employed by TASIS England or otherwise, where these may have a negative impact on students' learning or progress, or may put students at risk of harm
- being familiar with the school's Safeguarding Children Child Protection Policy and procedures and the student Behaviour Management, Discipline and Sanctions Policy
- reading and understanding Part One of Keeping Children Safe in Education and, for school leaders and staff who work directly with children, Annex A – Further information (KCSIE

– DfE September 2026)

- knowing the role, identity and contact details of the current Designated Safeguarding Lead (DSL) and their Deputies (DDSL)

- knowing the role, identity and contact details of the nominated Director with leadership responsibility for safeguarding, and

- being aware that they are in a position of trust (i.e., the adult is in a position of power or influence over the student due to their status in the school); that the relationship is not a relationship between equals and that this position must never be used to intimidate, bully, humiliate, coerce or threaten students.

- upholding the whole-school culture of zero tolerance for sexism, racism, misogyny/misandry, homophobia, biphobia, sexual violence or harassment, derogatory behaviour and other forms of physical violence and conflict set out in KCSIE 2026, and never dismissing or downplaying such behaviour as banter, having a laugh or part of growing up.

- volunteer arrangements must comply with the school's safer recruitment procedures and KCSIE 2026 Part Three. Following changes made by the Crime and Policing Act 2026, the 'supervision exemption' has been removed: any person volunteering in a role that involves teaching, training, instructing, caring for or supervising children frequently, on more than 3 days in any 30-day period, or overnight, is in regulated activity and requires an enhanced DBS check with children's barred list information.

8.2 <u>All faculty and staff should demonstrate respect for diversity, equity and inclusion and take steps to promote equality by</u>:

- acting appropriately and in accordance with this Code of Conduct, towards all students, parents, guardians or carers, faculty and staff

- complying with the school's Anti-Bullying, Single Equalities and Dignity at Work policies and this Code of Conduct

- addressing issues of discrimination and bullying whenever they arise

- helping to create a fair and inclusive school environment, and

- promoting intercultural learning by demonstrating cultural competence in their interactions with students, colleagues, and parents, being aware of and sensitive to cultural differences, and ensuring equitable treatment for all students.

8.3 <u>Responsible use of AI & data security</u>

- do not enter personal, confidential or sensitive data about any student, parent, or colleague into any unauthorised AI tool or chatbot. Doing so will be treated as a data breach and handled per the school's Data Protection Policy

- only use school-approved AI tools and follow published prompts/guardrails

- never use generative AI to create, edit or share images, audio or video of any student or colleague in a way that is unauthorised, sexualised, humiliating, deceptive or otherwise inappropriate. This includes the creation or sharing of deepfakes. Creating, possessing or sharing indecent images or pseudo-photographs of children, including qualifying AI-generated material, may constitute a criminal offence.

- AI must not be used to make decisions about students (assessment, sanctions, references) without human oversight and Section Head approval

- if you suspect AI misuse or a data leak, report it immediately to the Head of School, or the DSL.

8.4 All faculty and staff should work as part of a unified staff body by:

- developing productive and supportive relationships with colleagues

- exercising any management responsibilities in a respectful, inclusive and fair manner

- complying with all school policies and procedures

- participating in the school's development and improvement activities

- recognising the role of the school in the life of the local community, and

- upholding the school's reputation and standing within the local community and building trust and confidence in it.

8.5 All staff should understand that the school has a legal duty to have regard to the need to prevent people from being drawn into terrorism, and consequently should be aware of:

- what extremism and radicalisation means and why people - including students and fellow faculty or staff members - may be vulnerable to being drawn into terrorism as a consequence of it

- what measures are available to prevent people from becoming drawn into terrorism and how to challenge the extremist ideology that can be associated with it, and

- how to obtain support for people who may be being exploited by radicalising influences.

8.6 All faculty and staff should maintain public trust and confidence in the school and in their

profession by:

- always demonstrating honesty and integrity
- understanding and upholding their duty to safeguard the welfare of children and young people
- understanding and demonstrating fundamental British Values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs
- maintaining reasonable standards of behaviour whether inside or outside normal school hours and whether on or off the school's site
- maintaining an effective learning environment, and
- when political issues arise (including during elections/referendums), faculty and staff must present balanced coverage, avoid endorsing any party/candidate, and take extra care with displays, classroom resources, and social media to ensure students are not exposed to partisan messaging in the school context.

8.7 All faculty and staff should raise concerns relating to honour or faith-based abuse (HBA), including FGM and forced marriage, with the Designated Safeguarding Lead and follow the school's Safeguarding Children and Child Protection Policy.

Teachers have an additional statutory duty: where, in the course of their professional duties, they discover through disclosure by the child or visual evidence that an act of FGM appears to have been carried out on a girl under 18, they must personally report the matter to the police in accordance with the Female Genital Mutilation Act 2003. Where FGM is suspected, or a child is considered to be at risk, staff must report the concern to the DSL. If someone is in immediate danger, call **999** and ask for the police. Reports can also be made to **101**. For those with a hearing or speech impairment, the textphone service **18000** can be called. It would be rare for faculty and staff to observe visual evidence of FGM, and they must not examine or offer to examine students under any circumstances.

8.8 All faculty and staff should know what to do if a child tells them that they are being abused, exploited or neglected. Faculty and staff should know how to manage the requirement to maintain an appropriate level of confidentiality. This means only involving those who need to be involved, such as the DSL (or deputy) and children's social care. Faculty and staff should never promise a child that they will not tell anyone about a report of any form of abuse, as this may ultimately not be in the best interests of the child.

8.9 All faculty and staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of the school environment. All faculty and staff, but especially the DSL (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-

familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

8.10 All faculty and staff should also be aware that mental health issues can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of mental ill health. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health issue or be at risk of developing one. It is key that faculty and staff are aware of how experiences such as abuse, neglect or other potentially traumatic adverse childhood experiences can impact on a child's mental health, behaviour and education. If faculty and staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following the school's Safeguarding Children Child Protection Policy.

8.11 All faculty and staff should be able to reassure victim-survivors that they are being taken seriously and that they will be supported and kept safe. A victim-survivor should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim-survivor ever be made to feel ashamed for making a report.

8.12 The school encourages an open and transparent culture in which it may identify concerning, problematic or inappropriate behaviour early, minimize the risk of abuse and ensure that all faculty and staff working in or on behalf of the school are clear about professional boundaries and act within these boundaries.

8.13 All faculty and staff should be aware of their responsibility in relation to even low-level concerns which should be reported in accordance with the guidance in Part Four of KCSIE 2026.

8.14 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 faculty and staff working in or on behalf of the school may have acted in a way that is inconsistent with the faculty and 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.

8.15 All faculty and staff are encouraged to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider may fall below the expected professional standards.

8.16 It is critical that all concerns about faculty and staff should be shared responsibly, with the right person, recorded and dealt with appropriately. Even low-level concerns should be reported to the Head of School who can address the concern in a proportionate manner. See Appendix 1 – Low Level Concerns Policy for recording, thresholds, and reference wording. All low-level concerns must be logged in the school's central low-level concerns register.

8.17 Where there are concerns about the Head of School, these should be reported to the Chair of

the Board of Directors. In a situation where there is a conflict of interest in reporting the matter to the Chair of the Board of Directors, this should be reported directly to the LADO.

8.18 Reports about supply faculty and staff and contractors should be reported to the Head of School who will ensure their employers are notified, so any patterns of inappropriate behaviour can be identified.

8.19 All concerns should be recorded in writing. This also applies to low-level concerns. The record should include details of the concern, the context on which it arose, and action taken. The name of the individuals sharing their concerns should also be noted, but a wish to remain anonymous should be respected as far as reasonably possible.

8.20 If a concern is raised via a third party the Head of School should collect as much evidence as possible by speaking directly to the person raising the concern and the individual involved and any witnesses.

9 Additional principles for teachers

9.1 Teachers should take responsibility for maintaining the quality of their teaching practice by:

- meeting the professional standards for teaching applicable to their role and position within the school
- reflecting on their current practice and seeking out opportunities to develop knowledge, understanding and skills
- helping students to become confident and successful learners, and
- establishing productive relationships with parents, guardians or carers by:
  - providing accessible and accurate information about their child's progress
  - involving them in important decisions about their child's education, and
  - complying with this Code of Conduct.

10 Guidance on faculty and staff / student relationships – see the sections immediately below in this part of the Code:

11 Application: Allegations of unprofessional conduct or improper contact or words can arise at any time. Professionalism and vigilance are required to ensure the safety of children and young people in our care, and to reduce the risk of an allegation of impropriety against a member of staff. This guidance applies to all faculty and staff.

12 Sexual contact: Faculty and staff must not:

12.1 have any type of sexual relationship with a student

12.2 have sexually suggestive or provocative communications with a student

12.3 make sexual remarks to or about a student, and

12.4 discuss their own sexual relationships with or in the presence of students.

13 **Abuse of a position of trust and inappropriate relationships with school students:** Sexual relationships or sexual contact with any student or encouraging a relationship to develop in a way which might lead to a sexual relationship, or any relationship considered to be inappropriate with any student at the school is a grave breach of trust that will usually lead to disciplinary action and may also lead to criminal prosecution. It is a criminal offence for an adult to engage in sexual activity with a child under 18 where the adult is in a position of trust in relation to that child, even where the activity is consensual. Whilst not necessarily a criminal offence, it is a breach of this Code and considered to be gross misconduct to have a sexual relationship with any student at this school, even if over the age of 18.

14 **Inappropriate relationships with students at another school:** Sexual activity or sexual contact by an adult with a child under 16 may constitute a criminal offence under the Sexual Offences Act 2003. Sexual activity with a person aged 16 or 17 may also constitute an offence where the adult is in a position of trust in relation to that young person. Irrespective of criminal liability, forming a romantic or sexual relationship with a TASIS England student, or with a student at another school, will be regarded as gross misconduct under this Code. Such behaviour tends to bring the school into disrepute and gives rise to concern that the faculty / staff member involved cannot be trusted to maintain professional boundaries with students at the school. Whilst not necessarily a criminal offence, the school considers it inappropriate for faculty and staff to form inappropriate relationships with students attending any school, irrespective of their age.

15 **General guidance:** You must be aware of the general guidance that will apply in all cases. In particular, you:

15.1 need to exercise professional judgment but always act within the spirit of these guidelines. If you are involved in a situation where no specific guidance exists, discuss the circumstances with the Designated Safeguarding Lead. A written record will need to be kept that includes justification for any action taken.

15.2 must be aware of the risks of child-on-child abuse and be familiar with procedures for handling allegations against other children and bullying as set out in the current school's Safeguarding Children Child Protection Policy and procedures and the important role they have to play in preventing it and responding where they believe a child may be at risk from it. Examples of child-on-child abuse are bullying (including cyberbullying), physical abuse, sexual violence and sexual harassment, upskirting, the consensual and non-consensual making or sharing of nudes or semi-nudes, including AI-generated material and initiation and hazing (which could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may include an online element especially around chat groups, and the sharing of abusive images and pornography).

15.3 must be aware of indicators that children are at risk from, or are involved with, serious violent

crime. These may include increased absence from school or having been frequently absent or permanently excluded from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, having experienced child maltreatment, having been involved in offending such as theft or robbery, signs of self-harm or a significant change in wellbeing or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children or young people have been approached by, or are involved with, individuals associated with criminal networks or gangs.

15.4 must be familiar with procedures for reporting concerns in accordance with the school's Whistleblowing Policy and be aware that if faculty or staff raise concerns about working practices at the school to an appropriately senior member of faculty or staff in accordance with the Whistleblowing Policy, that they will be protected from detriment under the Whistleblowing Policy

15.5 must be familiar with the local reporting guidelines and the Local Safeguarding Children Partnership reporting threshold document in respect of any concerns relating to children

15.6 must be familiar with procedures for handling allegations against faculty or staff as set out in the school's Safeguarding Children Child Protection Policy

15.7 must seek guidance from the Designated Safeguarding Lead if you are in any doubt about appropriate conduct, and

15.8 must report any actions which could be misinterpreted, any misunderstandings, accidents or threats involving you and a student or a group of students to the Designated Safeguarding Lead. This includes any online activity and/or social media interactions.

16 Behaviour giving particular cause for concern: You must take particular care when dealing with a student who:

16.1 appears emotionally distressed, vulnerable, or seeks expressions of affection. Provide supportive, professional care without crossing emotional boundaries, and refer the student to the pastoral or counselling team where appropriate.

16.2 appears hostile or holds a grudge against you. Maintain professional boundaries, avoid unnecessary unsupervised one-to-one interactions, and ensure significant interactions are appropriately documented.

16.3 exhibits over-familiar or sexualised behaviour. Maintain professional boundaries, avoid being isolated with the student where practicable, and report any safeguarding concerns to the Designated Safeguarding Lead (DSL).

16.4 is facing academic distress, disciplinary action, or intense exam pressure. Ensure significant feedback or disciplinary discussions are appropriately documented and, where appropriate, conducted with another member of staff present.

17 Procedure to be followed in these cases: Some of these behaviours may be indications that a student has been, or is currently being, abused, exploited or neglected and, if concerned, must be reported to the Designated Safeguarding Lead under the school's Safeguarding Children Child Protection Policy and procedures.

18 **Record keeping:** Comprehensive records are essential. All concerns, discussions and decisions made and the reasons for those decisions must be recorded in writing. Records should include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved, a note of any action taken, decisions reached and the outcome. Information should be kept confidential and stored securely. Any incident involving children that could give cause for concern, must always be reported promptly to the Designated Safeguarding Lead in accordance with the school's Safeguarding Children Child Protection Policy and procedures. If there is any doubt about recording requirements this must be discussed with the Designated Safeguarding Lead.

This means that faculty and staff should:

- be clear about when information can be shared and under what circumstances it is appropriate to do so
- treat information they receive about students in a discreet and confidential manner
- seek advice from a member of the Senior Leadership Team if they are in any doubt about sharing information they hold, or which has been requested of them, and
- know to whom any concerns or allegations should be reported.

19 **Good order and discipline:** Faculty and staff in charge of, or control of students must always maintain good order and discipline when students are present on school premises and whenever students are engaged in authorised school activities, whether on school premises or elsewhere.

20 **School property:** You must take proper care when using school property and you must not use school property for any unauthorised use or for private gain.

21 **Use of premises:** You must not carry out any work or activity on school premises other than pursuant to the terms and conditions of employment without the prior permission of the Head of School.

22 **Behaviour of others:** You should be aware that the behaviour of your partner or other family members or any member of your household may raise concerns which could affect the welfare of a member of the school community, a member of the public, or bring the school into disrepute and you must bring any such behaviour to the immediate attention of the school. Such concerns will be given careful consideration as to whether they constitute a potential risk to children at the school or its reputation.

23 **Meetings with students (Including guidance on working alone)**

23.1 **One-to-one meetings:** If you are teaching one student, or conducting a one-to-one meeting or teaching session with a student, whether in a class, meeting room or boarding house, you will be required to take particular care in the following ways:

- when working alone with a student it is an integral part of your role, to conduct and agree full risk assessments with the Designated Safeguarding Lead

- use a room that has sufficient windows (that are not obscured and with blinds fully open) onto a corridor so the occupants can be seen, or keep the door open and ensure that colleagues are aware that the lesson / meeting is taking place

- arrange the meeting during normal school hours when there are plenty of other people about
- do not continue the meeting for any longer than is necessary to achieve its purpose
- avoid sitting or standing in close proximity to the student, except as necessary to check work
- avoid using "engaged" or equivalent signs on doors or windows
- avoid idle discussion
- avoid all unnecessary physical contact and apologise straight away if there is accidental physical contact
- avoid any conduct that could be taken as a sexual advance
- report any incident that causes you concern to the Designated Safeguarding Lead under the school's Safeguarding Children Child Protection Policy and procedures, and make a written record (signed and dated), and
- report any situation where a student becomes distressed or angry to the Designated Safeguarding Lead.

24 **Pre-arranged meetings:** Pre-arranged meetings with students outside school are not permitted unless approval is obtained from their parents, guardians or carers and the Designated Safeguarding Lead.

25 **Remote/online teaching & meetings:**

25.1 use only school-approved platforms (e.g., school Teams accounts), never personal accounts

25.2 join from a professional environment, remove or blur background items that could be inappropriate

25.3 ensure another adult is aware of the session, record attendance, avoid 1:1 video unless pre-approved and risk assessed

25.4 do not use personal messaging features; keep chat professional and exportable

26 **Home visits:** In some circumstances home visits are necessary. You should:

26.1 discuss the purpose of any visit with the Designated Safeguarding Lead and adhere to any agreed work plan / contract

26.2 follow the Risk Management Strategy/Risk Assessment Policy and ensure appropriate risk assessments are in place. Where there is insufficient information to complete a risk assessment, ensure that you are accompanied by a colleague

26.3 not visit unannounced if this can be avoided

26.4 leave the door open where you will be alone with students

26.5 keep records detailing times of arrival and departure, and work undertaken

26.6 ensure that any behaviour or situation that gives rise to a concern is reported and actioned

26.7 discuss with the Designated Safeguarding Lead anything that gives cause for concern in accordance with the school's Safeguarding Children Child Protection Policy and procedures, and

26.8 have a school mobile telephone and an emergency contact.

27 **The use of personal living space:** Students must not be in or invited into the personal living space of any member of faculty or staff, unless in exceptional circumstances this is agreed with the parents, guardians or carers and the Designated Safeguarding Lead and in accordance with the school's guidelines for House Parents, Deputy House Parents and House Tutors. Where this occurs, a one-to-one situation should be avoided with students with another adult always present. There is no inappropriate favouritism or inappropriate one-to-one contact between faculty or staff and boarders. It is accepted that children of faculty or staff (whether in school accommodation or not) may at times invite their friends to their homes. In these instances, faculty and staff are reminded to comply with this Code of Conduct and must ensure that the Designated Safeguarding Lead is informed in advance and that any overnight visit is agreed in advance by the Designated Safeguarding Lead subject to a written risk assessment.

28 **Chores:** students should not be asked to assist with chores or tasks in the personal living space. Personal living spaces must not be used as an additional resource for the school. This also applies to all on and off-site faculty and staff residential accommodation.

29 **Boarding houses**: Boarding Houses, where the boarding employees (House Parents and Deputy House Parents) live, may have private living quarters which include areas which current and prospective students and parents can be invited into under supervision. This is for communications between the relevant parties to be effective and at times confidential and to allow for entertaining of parents and students in line with the school's guidelines for House Parents. No boarders have access to faculty or staff residential accommodation, other than in exceptional circumstances. Where this occurs, a one-to-one situation should be avoided with students with another adult always present. There must not be any inappropriate favouritism or inappropriate one-to-one contact between faculty or staff and boarders.

30 **All persons visiting boarding accommodation or staff accommodation** (e.g., visitors, outside delivery and maintenance personnel) are kept under sufficient staff supervision to prevent them gaining unsupervised access to boarders or their accommodation.

31 **Additional comments for boarding staff:** This Code of Conduct applies to all those working or volunteering within the school community; however, within the boarding context the following areas

are highlighted as being of particular significance. These include:

31.1 having a responsibility to TASIS England to fulfil their duties as outlined in their job specifications in addition to any other reasonable requests made to them by the Director of Boarding

31.2 at all times conducting themselves as a role model to the students under their care and approaching their duties and responsibilities in a positive and friendly manner

31.3 being aware that students are particularly vulnerable in a residential setting

31.4 having a professional obligation to highlight and investigate concerns (as appropriate) raised by students at the school

31.5 having a professional obligation to raise legitimate concerns about the conduct of colleagues or managers. In the case of raising legitimate concerns about the conduct of colleagues or senior staff members, the school will seek to respect the confidentiality and anonymity of the whistleblower and will, as far as possible, protect them from reprisals, and

31.6 TASIS England will not tolerate any attempt to victimize the whistleblower or attempts to prevent concerns being raised which is likely to result in disciplinary action.

32 Speech and Language:

32.1 **Language**: You should use appropriate language at all times. You should:

- 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, school authorised text messages, emails etc.)
- avoid any form of aggressive or threatening words
- avoid any words or actions that are over-familiar
- refrain from swearing, blaspheming or the use any sort of offensive language in front of students
- avoid the use of sarcasm, discriminatory or derogatory words when punishing or disciplining students and avoid making unprofessional personal comments about anyone. Any sanctions must be in accordance with the school's behaviour and discipline policies, and
- be aware that some parts of the curriculum may raise sexually explicit subject matters. Care must be taken in subjects where rules / boundaries are relaxed (e.g., drama or art). Careful planning of your own and students' use of language in class must support and reinforce learning (particularly for MFL, EAL & English lessons), which will ensure that meanings are always clear, could not be interpreted as personal and therefore confusion avoided. Faculty and staff should have clear lesson plans and must always take care to avoid overstepping

personal and professional boundaries.

33 Sexual Harassment

33.1 Sexual harassment is any unwanted physical, verbal or non-verbal conduct of a sexual nature that has a purpose or effect of violating a person's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. It also includes treating someone less favourably because they've submitted or refused to submit to unwanted conduct of a sexual nature in the past, or harassment related to sex or gender reassignment. When this behaviour is unwanted, it includes (but isn't limited to):

- unwanted physical conduct or 'horseplay' including touching, pinching, pushing and grabbing
- continued suggestions for sexual activity after it has been made clear that such suggestions are unwelcome
- sending or displaying material that is pornographic, or that some people might find offensive
- unwelcome sexual advances or suggestive behaviour (which the harasser may perceive as harmless)
- offensive emails, text messages or social media content
- comments and jokes of a sexual nature
- sexually suggestive looks and staring
- sexual propositions and advances
- promising things in return for sexual favours
- physical contact such as massaging, hugging or kissing
- sexual contact on social media.

33.2 Staff will help create a positive environment that works to prevent sexual harassment. This includes calling out sexual harassment that they witness. All witnesses will be provided with appropriate support and will be protected from victimisation.

33.3 If a staff member is concerned at any point about incidents of sexual harassment (either directed at them or someone else), they should report their concern to the **Head of School** (or **the Director of HR**). If the concern is about the **Head of School**, or it is believed they may be involved in the wrongdoing in some way, the staff member should report their concern to the **Chair of the Board of Directors**. Where a concern involves or affects a **student**, staff must also inform the **DSL** immediately and follow the Safeguarding Children Child Protection Policy.

33.4 The school will investigate any complaints in a timely, respectful and confidential manner. All staff will receive training on recognising and responding to incidents of sexual harassment. The school will monitor the treatment and outcomes of any complaints of sexual harassment or victimisation received to make sure that they are properly investigated and resolved, those who report or act as witnesses are not victimised, repeat offenders are dealt with appropriately, cultural issues are identified and resolved, and workforce training is targeted where needed.

34 Dress: You are required to dress appropriately and in a professional manner. Dress must not be

offensive, distracting, revealing, or sexually provocative, embarrassing or discriminatory. Political or other contentious slogans or badges are not allowed. Tattoos and body art should be covered while in school. Discreet earrings are acceptable but all other body piercings should be removed while on school premises.

35 **Smoking, alcohol, vaping, e-cigarettes and other substances**: The school is a non-smoking site. Faculty and staff must not smoke or vape on school premises or outside school gates. Any member of faculty or staff wishing to smoke or vape must leave the school grounds. You must not smoke or vape whilst working with or supervising students offsite. Faculty and staff must not consume or be under the influence of alcohol, illicit drugs or other illegal substances on or near school premises or otherwise whilst on duty. You must refrain from the consumption of alcohol and other substances at school/student events (i.e. leaving proms, residential visits) both within the school premises and outside the school setting.

36 **The use of force or physical restraint:** All forms of corporal punishment are unlawful, and the use of unwarranted physical force is likely to constitute a criminal offence. The use of physical intervention should be avoided if possible. There are circumstances when it is appropriate for faculty and staff to use force to safeguard students. This is enshrined in law and applies to any member of faculty and staff at the school. It can also apply to people whom the Head of School has temporarily put in charge of students such as unpaid volunteers or parents accompanying students on a school organised visit.

37 **Application of the Code for physical restraint:** It only applies where no other form of control is available and where it is necessary to intervene. The use of such force or physical contact may be reasonable and proportionate in the circumstances to prevent a student from doing, or continuing to do any of the following:

37.1 committing a criminal offence

37.2 injuring themselves or others

37.3 causing damage to property, including their own, or

37.4 engaging in any behaviour prejudicial to good order and discipline at the school or among any of its students, whether that behaviour occurs in a classroom or elsewhere.

38 **Before intervening:** Before intervening physically you should, wherever practicable, tell the student to stop and what will happen if they do not. You will need to continue attempting to communicate with the student throughout the incident and should make it clear that physical contact or restraint will stop as soon as it ceases to be necessary. Always avoid touching or holding a student in a way that might be considered indecent. You should also avoid any form of aggressive contact such as holding, pushing, pulling or hitting which could amount to a criminal assault, nor act in a way that might reasonably be expected to cause injury.

39 **Inform senior leadership staff:** You should inform the Head of School 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. A written report

will be required as soon as possible afterwards. This will need to include written and signed accounts of those involved, including the student. Parents, guardians or carers must be informed in accordance with the statutory recording and reporting requirements set out below. In the Early Years Foundation Stage, any additional EYFS reporting requirements also apply. Every significant incident involving the use of force, and every incident of seclusion or restraint (with or without physical contact, including the removal of a mobility aid), must be recorded by the staff involved as soon as practicable, ideally on the same day, so that the school can meet its statutory recording and reporting duties under section 93A of the Education and Inspections Act 2006, the schools (Recording and Reporting of Seclusion and Restraint) (No. 2) (England) Regulations 2025 and Standards 16A and 32A of the Independent School Standards. Parents must be provided with the required information as soon as practicable, and the school should endeavour to do so no later than the same day. See the Behaviour Management, Discipline and Sanctions Policy for the full recording and reporting procedure.

40 **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 student 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.

41 **Restrictive interventions, including use of reasonable force, in schools:** There is no legal definition of 'reasonable force'. It always depends on the circumstances. The term 'reasonable force' covers the broad range of actions used by faculty or staff that involve a degree of physical contact to control or restrain students. The use of force can range from passive physical contact, such as standing between students or blocking a student's path, or active physical contact such as leading a student by the arm out of the classroom to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. 'Reasonable in these circumstances' means 'using no more force than is needed' (Restrictive interventions, including use of reasonable force, in schools (DfE: April 2026, which replaces the 2013 guidance)) Note that:

41.1 any use of force would always be proportionate to the behaviour of the student involved and the seriousness of the harm prevented

41.2 you should recognise the additional vulnerability of children with SEN, disabilities and certain medical conditions before using reasonable force

41.3 physical force could not be justified to prevent a student from committing a trivial misdemeanour

41.4 any force used must always be the minimum needed to achieve the desired result, and

41.5 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 student. See also Behaviour, Discipline and Sanctions Policy, available on the school website.

42 **Physical contact in other circumstances**

42.1 **When physical contact may be appropriate:** Physical contact with a student may be necessary and beneficial to demonstrate a required action, or a correct technique in, for example, singing and other music lessons or during PE, sports and games. Any physical contact must be

in response to the student's needs, of limited duration and appropriate to the student's age, stage of development, gender, ethnicity and background. Physical contact can be easily misinterpreted and should be limited. Staff should use professional judgement regarding physical contact, and

42.2 **Guidance on using physical contact:** You should observe the following guidelines (where applicable):

- explain the intended action to the student
- do not proceed with the action if the student appears to be apprehensive or reluctant, or if you have other concerns about the student's likely reaction
- ensure the physical contact continues for as short a time as possible
- ensure that doors are open to improve sight lines and if you are in any doubt, ask a colleague or another student to be present during the demonstration, and
- consider alternatives if it appears likely that the student might misinterpret the contact.

43 **Report concerns:** If you are at all concerned about any instance of physical contact, inform the Head of School without delay, and make a written record of the incident and on the student's file if necessary.

44 **Offering comfort to distressed students:** Appropriate physical contact may sometimes be used to comfort a distressed student. You should use your own professional judgement when you feel a student needs this kind of support and you should be aware of any special circumstances relating to the student. For example, a child who has been abused may find physical contact particularly difficult. You should always notify the Head of School when comfort has been offered, record the action and must seek guidance if you are unsure whether it would be appropriate in a particular case.

45 **Administering first aid:** When administering first aid you should explain to the student what is happening and, where possible, ensure that another adult is present or is aware of the action being taken. The treatment must meet the school's health and safety at work rules and intimate/personal care guidelines, and parents, guardians or carers must be informed. Faculty and staff must:

45.1 adhere to the school's policies on first aid and administering medication

45.2 comply with the necessary reporting requirements

45.3 make other adults aware of the task that is being undertaken

45.4 explain what is happening

45.5 report and record the administration of first aid

45.6 have regard to any health plans, and

45.7 ensure that an appropriate health / risk assessment is undertaken prior to undertaking certain activities.

46 **More on first aid in schools** can be found here: First aid in schools, early years and further education (DfE February 2022)

47 **Student's entitlement to privacy:** Children are entitled to privacy when changing or showering. However there still must be an appropriate level of supervision to ensure safety. You should:

47.1 avoid physical contact or visually intrusive behaviour when children are undressing or are undressed

47.2 announce yourself when entering changing rooms or student's rooms in boarding houses and avoid remaining longer than required

47.3 not shower or change in the same place as students, and

47.4 not assist with any personal care task which a student can undertake themselves.

48 **Intimate/personal care:** Sometimes intimate or personal care is required, for example when assisting with toileting younger children or removing wet clothes after an activity for PreK – Grade 4 students. You must:

48.1 inform another member of faculty or staff, who is within visible or audible distance, of the task being undertaken and consult where there is any change from the agreed procedure. A record must be kept of the justification for any variations and this information should be shared with parents, guardians or carers

48.2 explain to the child what is happening

48.3 comply with applicable professional Codes of Practice, as appropriate, and comply with regularly reviewed, formally agreed section plans, as appropriate, and

48.4 Further information can be found within the Guidance for safer working practice for those working with children and young people in education settings (February 2022).

49 **Where a child has been abused:** Where a child has, or is suspected to have been, previously abused, faculty and staff should be informed on a 'need to know' basis and must be extra cautious when considering the necessity of physical contact. Some children may seek inappropriate physical contact. Staff should sensitively deter the student and help them understand the importance of personal boundaries. Such incidents should be reported and discussed with the Designated Safeguarding Lead and where appropriate parents, guardians or carers.

50 **Children with special educational needs or disabilities (SEND):** Some children may need more physical contact to assist their everyday learning, which should be agreed and understood by all

concerned, justified, openly applied and open to scrutiny. The Designated Safeguarding Lead and Learning Resource staff will establish whether any reasonable adjustments are required for such students in accordance with the current school Accessibility Plan, available on the school website.

51 Code for conduct outside school

51.1 **Contact outside school:** You must avoid unnecessary contact with students outside school. You must:

- not give students your home address, home telephone number, mobile telephone number or email address
- not send personal communications (such as birthday cards or faith cards, text messages etc.) to children unless agreed with the Head of School
- not make arrangements to meet students, individually or in groups, outside school other than on school organised trips authorised by the Head of School
- avoid contacting students at home unless it is strictly necessary. Where you feel this is necessary you should seek approval from the Head of School and keep a record of any such occasion
- not give a student a lift in your own vehicle other than on school business and with prior permission from the Head of School
- avoid inviting students (groups or individuals) to your home unless there is a good reason, and it has been previously approved by the Head of School. This also applies if you have on-site accommodation
- report and record any situation which places a child at risk of harm or compromises the school's or your professional standing
- ensure that students do not see anything in your home that may cause embarrassment or that might become the subject of inappropriate gossip or rumour
- not message students via social media, nor comment on or like student social media posts. In the event of accidental viewing/accessing of a student's social media profile or activity, or a student contacts you via a social media platform please advise the Head of School or Designated Safeguarding Lead as soon as possible
- never engage in secretive social contact with students or their parents, guardians or carers.

52 Social contact: You should be aware that where you meet children or parents, guardians or carers socially, such contact could be misinterpreted as inappropriate, an abuse of a position of trust or as grooming. Any social contact that could give rise to concern must always be reported to the Head of School immediately.

53 **Babysitting:** The school prohibits faculty and staff from babysitting for parents of TASIS England students, regardless of whether the child being babysat is a TASIS England student or not (for example: the child is not of school age or is a student elsewhere) at the school. This is for their own protection and for the continued professional relationship between faculty/staff and parents.

54 **Friendships with parents, guardians or carers and students:** Members of faculty and staff who are friends with parents, guardians or carers of students or who, for example, are voluntary workers in youth organisations attended by students, will of course have contact with those students outside school. However, members of faculty and staff must still respect the advice under the sections 'The use of personal living space', 'Chores', and 'Boarding houses' and keep the Head of School informed of such relationships.

55 **Scope of application of Code on contact outside school:** The same guidelines should be applied to after school clubs, school trips, and especially trips that involve an overnight stay away from the school. There are separate, more detailed guidelines for school trips in the educational visits policy available on the school website. The principles of this guidance also apply to contact with children or young people who are students at another school.

56 **Transporting students:** There may be some situations when faculty and staff are required to transport students. You should:

56.1 ensure that you are fit to drive and free from any substances that may impair your judgement or ability to drive

56.2 be aware that until the student is passed over to a parent / carer, you have responsibility for that student's welfare, health and safety

56.3 record the details of the journey

56.4 record, and be able to justify impromptu or emergency lifts and notify the Head of School

56.5 ensure that there are proper arrangements in place to ensure vehicle, passenger and driver safety, including appropriate insurance, seat belts, adherence to maximum capacity guidelines etc., and

56.6 wherever practicable, you should avoid using private vehicles and should have at least one adult additional to the driver to act as an escort.

56.7 do not use ride-hailing services (e.g., Uber) for unaccompanied students unless pre-approved, risk-assessed, and permitted by parents and the Section Head. Where transport is approved, seat students in the rear seats and ensure seatbelts are used. Follow the school's **Educational Visits/Transport risk assessment** requirements where applicable.

57 **After school activities:** When taking part in after school activities, you should:

57.1 be accompanied by another adult unless otherwise agreed with the Head of School

57.2 have in place the relevant risk assessment, and

57.3 obtain parental consent if appropriate for the activity.

58 **Private tutoring at school:** If providing private tuition to any TASIS England student you must:

58.1 Always:

- use rooms with clear visibility (windows unobscured) or keep doors open
- keep a visible timetable of 1:1 sessions; avoid ad-hoc unscheduled 1:1s
- for counselling/wellbeing work where privacy is required, ensure advance scheduling, door-signage, and that a colleague knows who/where/when.

58.2 ensure that you never tutor or offer tutoring to a student that you teach

58.3 obtain express parental consent to do so and the consent of the Head of PreK – Grade 8 or Upper School as appropriate

58.4 observe all school safeguarding protocols and in particular observe the protocols in respect of meetings with students as detailed in the 'Meetings with students (including guidance on working alone)', 'Pre-arranged meetings', and 'Remote/online teaching & meetings' sections of this Policy

58.5 accompany students back to their boarding house or to their parents as appropriate

58.6 seek the permission of the Designated Safeguarding Lead and Head of PreK – Grade 8 or Upper School as appropriate to carry out tutoring in the parental home, and

58.7 accept full responsibility for the payment of tax or social security contributions payable on any private tutoring whether on school premises or at the parental home.

For more information on tutoring including the Tutoring Policy, Tutoring Risk Assessment and the Tutoring Lessons Request Form please see the Tutoring Page on TASIS England LMS (Learning Management System) – staff log in required.

59 **Educational visits:** When taking part in educational visits, you should:

59.1 follow the school's Educational Visits Policy, available on the school website

59.2 be accompanied by another adult unless otherwise agreed with the Head of School

59.3 undertake a risk assessment, and

59.4 obtain parental consent.

60 **Overnight supervision**: Where overnight supervision is required to preserve the integrity of the examination process:

60.1 the overnight supervision arrangements must ensure that students do not have advance warning of the content of examinations deferred until the following morning. This means that students must not meet or communicate with anyone who may have knowledge of the content. This includes electronic communication/storage devices, e.g., telephone (both landline and mobile), e-mail, Internet and social media. It may even extend to television and radio, which could report key details of the day's examinations.

60.2 you should ensure that a risk assessment has been undertaken and that all members of the household have had the appropriate checks

60.3 arrangements should be made with and agreed by parents, guardians or carers and the student

60.4 one-to-one supervision should be avoided where possible, in accordance with this Code of Conduct

60.5 choice, flexibility and contact with 'the outside world' should be incorporated, so far as it is consistent with appropriate supervision and the school's guidelines

60.6 whenever possible, independent oversight of the arrangements should be made, and

60.7 any misinterpretation, misunderstanding or complaints should be reported to the section head and investigated accordingly.

61 Communicating with students (including the use of technology): All faculty and staff are encouraged to promote digital wellbeing among students. This includes setting a positive example through responsible social media use, educating and guiding students on online safety, and actively engaging in discussions about the ethical use of technology, such as Artificial Intelligence.

61.1 communicating with children and parents, guardians or carers: All communication with children or parents, guardians or carers must conform to school policy and be limited to professional matters. Except in an emergency, communication should only be made using school property.

61.2 students/parents must only be contacted via school email, the LMS, or other school-approved systems for school business.

61.3 do not sync or store school data to personal cloud accounts or devices beyond what is authorised in the IT Acceptable Use Policy.

61.4 keep all communications archivable and accessible to the school.

61.5 application: These rules apply to any form of communication technologies (including 3G, 4G, 5G) such as mobile telephones and associated devices, web-cameras, social networking websites and blogs. You must also ensure you comply with the more detailed IT Acceptable Use Policy (AUP), and Online Safety Policy.

62 **Dealing with "crushes" (infatuations):** Crushes, fixations or infatuations are part of usual adolescent development. However, they need sensitive handling to avoid allegations of exploitation. Such crushes carry a high risk of words, actions and expressions being misinterpreted; therefore, the highest levels of professionalism are required. If you suspect that a student has a crush on you or on another colleague, you must bring it to the attention of the Designated Safeguarding Lead at the earliest opportunity. Suggestions that a student may have developed a crush must be recorded. Faculty and staff must avoid being alone with students who have developed a crush on them and if the student sends personal communications to the member of faculty or staff, this must be reported to the Head of School and recorded. *Concerns about the welfare of colleagues or children should be communicated to the Head of School immediately.*

63 **Making professional judgements:** There will be occasions when faculty and staff are required to make decisions or act in the best interest of a student, which could contravene existing guidance or where no guidance exists. Individuals are expected to make judgements about their behaviour in order to secure the best interests and welfare of the students in their charge and, in so doing, will be seen to be acting reasonably. These judgements should always be recorded in writing and shared with a member of the Senior Leadership Team. Faculty and staff should always consider whether their actions are warranted, proportionate, safe and applied equitably. Faculty and staff should:

- discuss the circumstances that informed their action, or their proposed action with the Head of School, the Designated Safeguarding Lead or a Deputy in their absence. This will help to ensure that the safest practices are employed and reduce the risk of actions being misinterpreted;
- always discuss any misunderstanding, accidents or threats with the Head of School, Designated Safeguarding Lead or a Deputy in their absence
- always record discussions and actions taken with their justifications in writing, and
- record any areas of disagreement in writing and, if necessary, refer to another external agency such as the local authority, relevant inspectorate or regulatory body.

64 **Acceptable use:** Faculty and staff must establish safe and responsible online behaviours and must comply with the IT Acceptable Use Policy, and the Online Safety Policy and the mobile telephone protocol. Adults should report to Section Heads or a member of the Senior Leadership Team, any new and emerging technologies which may have a bearing on school practices and on the review of the IT Acceptable Use Policy. Local and national guidelines on acceptable use policies must be followed. Faculty and staff must also:

64.1 ensure that their own personal social networking sites are set as private and ensure that students are not approved contacts

64.2 ensure that they do not use any website or application, whether on a school or personal device, which publicly identifies your location while on school premises or otherwise in the course of your employment

64.3 never use or access social networking sites of students and do not use internet or web-based communication channels to send personal messages to students

64.4 never use their own equipment (e.g., mobile telephones) to communicate with students - use equipment provided by the school and ensure that parents, guardians or carers have given

permission

64.5 only make contact with students for professional reasons

64.6 do not post content on personal accounts that could reasonably undermine political impartiality, safeguarding, or the reputation of the school. Where in doubt, seek guidance from your Section Head before posting, and

64.7 recognise that text messaging must only be used as part of an agreed protocol and only when other forms of communication are not possible.

65 **Personal details:** Faculty and staff must not give their personal contact details to students, including email addresses, home or mobile telephone numbers, unless the need to do so is agreed with the Head of School and parents, guardians or carers.

66 **Personal mobile telephones and electronic devices**: All school personnel (including volunteers, contractors and anyone else otherwise engaged by the school) are not permitted to use their personal mobile phone or device, while students are present e.g., classroom, gymnasium, dining rooms, changing rooms, toilets, theatre, communal areas or during contact time. Use of personal mobile phones or devices must be restricted to non-contact time, and to areas of the school where students are not present e.g., staff rooms.

During lessons personal mobile phones or devices must be switched off (or set to silent) at all times and kept in a closed drawer or bag. There may be circumstances in which it is appropriate for school personnel to have use of their mobile phone/device during contact time for personal reasons. For instance (this list is non-exhaustive):

- For emergency contact by their child, or their child's school
- In the case of acutely ill dependents or family members

The Head of School will decide on a case-by-basis whether to allow for any other special arrangements.

If special arrangements are not deemed necessary, school personnel can use the school office number +44 (0)1932 565252 as a point of emergency contact.

Faculty and staff are not permitted to use their own mobile phones or devices for contacting students or their families in a professional capacity (either on or off duty) other than in an emergency. In this contingency, wherever practicable, a school phone should be issued for this specific purpose.

All faculty and staff should be aware of the school's filtering and monitoring procedures for its internet on campus and where faculty or staff connect school-issued or their own devices to the school internet provision (e.g., via Wi-Fi) faculty/staff should not attempt to bypass or disrupt these filtering systems. (Please see our Acceptable Use Policy for more details).

67 **Communicating outside the agreed protocols:** Email or text communications between a member of faculty or staff and any student outside agreed protocols may lead to a report to external agencies in

accordance with the school's Safeguarding Children Child Protection Policy, disciplinary action and / or criminal investigations. This also includes communications through internet-based websites.

68 **Political impartiality:** you must not promote partisan political views to students, whether as part of the curriculum, in any extra-curricular activity or in general conversation or other interaction inside or outside school. This means you must not encourage students to support or adopt particular political views and must present any political views in a balanced way that ensures opposing views are aired.

69 **Communicating about shared principles that underpin society:** although you must not promote partisan political views to students, there are some concepts and views that are shared principles that underpin our society, rather than political views. These shared values include fundamental rights, tolerance and challenging discrimination and prejudice. Shared values must be reinforced by all faculty and staff.

70 **Questions about political impartiality:** if you are in any doubt about whether a particular topic is a political issue or a shared value, you should seek guidance from your Section Head in the first instance.

71 **Code of conduct for photographs and videos:**

71.1 **Permission required:** You must seek permission from the Head of School before taking photographs or video camera footage of any students in class, at any school events or on a trip. You must also seek permission before displaying these photographs. You must not take images of students using personal devices such as mobile telephones or tablets. Before using photographs or videos of faculty or staff externally, check any applicable restrictions or consent requirements with the Director of HR or the Marketing and Communications team.

71.2 **Consent:** Subject to the sections immediately below ('Where the use of a photograph or video is less privacy intrusive', 'Some students cannot be featured in photographs or videos', 'Guidance where permission obtained', and 'Consent'), appropriate consents for taking and displaying photographs must be obtained from parents, guardians, carers or from the students themselves if sufficiently mature (most students are seen as being sufficiently mature from the age of 12 years). Consent must be freely given so it must be a genuine choice. Unless told otherwise, the Director of Student Recruitment and Admissions is responsible for obtaining appropriate consent. [Please see the guidance for faculty and staff on the use of photographs and videos of students by the school for further information.] Any consent will need to be sought from either the parent, the student or both depending on the maturity of the student.

72 **Where the use of a photograph or video** is less privacy intrusive (e.g., used in an internal school display) it is sufficient for parents and students to have been informed about this in the school's privacy notices, in which case consent is not required. Please speak to the Director of Student Recruitment and Admissions if you are unsure to which students this applies.

73 **Some students cannot be featured in photographs or videos** under any circumstances (for example, because of safeguarding concerns). Please speak to the Director of Student Recruitment and Admissions if you are unsure to which students this applies.

74 **Guidance where permission obtained:** Where permission and consent (if appropriate) has been obtained, the following must be considered:

74.1 the purpose of the activity should be made clear and what will happen to the photographs or videos. You must be able to justify images in your possession

74.2 all images should be made available to the Head of School in order to determine acceptability

74.3 images should not be made during one-to-one situations

74.4 ensure that the student is appropriately dressed

74.5 ensure that the student understands why the images are being taken and has agreed to the activity

74.6 only use equipment to take images which is provided or authorised by the school

74.7 if a photograph or video is to be displayed in a place to which the public have access (e.g., on the school's website) it should not display the student's name unless consent has been obtained. If the use of a photograph or video is more privacy intrusive, consent may need to be obtained even if the student's name is not used (e.g., using an unnamed photograph of a student in an advertisement). Consent should be obtained from the student and/or their parents as appropriate. Please see the 'Consent' section below for further guidance on consent

74.8 all images of students must be stored securely on school systems or devices and only accessed by those authorised to do so

74.9 images must not be taken secretively

74.10 store images only on school systems in the designated library in line with data retention rules do not keep copies on personal devices or a personal cloud, and

74.11 for marketing or external publication, confirm consent status each time the context of use changes (e.g., internal display → website/social).

75 **Consent**: Children may be considered mature enough to exercise their own data protection rights when they are aged 12 years or older, although their age and understanding must be assessed and considered. Whether consent should be obtained from the parents, the student or both will depend on the age of the student. The school's policy is that when consent is required it must be obtained as follows:

75.1 where the student is in Grade 6 or below, consent must be sought from a parent, guardian or carer

75.2 where the student is in Grades 7, 8, 9 or 10 then consent must be sought from both the student and their parent, guardian or carer

75.3 where the student is in Grade 11 or 12 then only the student's consent will need to be obtained.

76 **Personal social media:** You must not publish anything which could identify students, parents or guardians on any personal social media account, personal webpage or similar platform without the prior consent of the Head of School in writing. This includes photos, videos, or other materials such as student work.

77 **Appropriate material:** TASIS England recognises that many children have unlimited and unrestricted access to the internet via 3G, 4G and 5G. You must ensure children are not exposed to inappropriate or indecent images. Viewing, retrieving or downloading of pornographic, terrorist or extremist material, or any other material which the school believes is unsuitable is strictly prohibited and constitutes gross misconduct. This includes at any time when on school premises or otherwise in the course of your employment, including using the school's ICT network, or via 3G, 4G or 5G, whether or not on a school or personal device. You should not allow unauthorised access to school equipment and must keep your computer passwords safe. If you discover material that is potentially illegal or inappropriate, you must isolate the equipment and contact the Designated Safeguarding Lead in accordance with the school's Safeguarding Children Child Protection Policy and procedures immediately. Students must not be exposed to unsuitable material on the internet and faculty and staff are required to ensure that any film or material shown is age appropriate.

78 **Making or sharing of nudes or semi-nudes, including AI-generated material:** Where safeguarding incidents involve the consensual or non-consensual sharing of nude or semi-nude images, faculty and staff must not intentionally view or forward images reported to them and will follow the school's policy on sharing nudes and semi-nude images and videos as set out in the schools Safeguarding Children Child Protection Policy available on the school website.

79 **Gifts and rewards**

79.1 **Anti-bribery and corruption:** Before accepting or giving any gifts or rewards, faculty and staff must familiarise themselves with the receiving and giving of gifts and rewards section of this Code of Conduct. For more information on the schools' approach to anti-bribery and corruption, please contact the Business Office.

79.2 **If a gift is received:** If you receive a gift from a student or parent, you must:

- declare the gift so it may be recorded in the register maintained by the Head of Schools' Office, where there is a possibility it could be misconstrued, or in any event where the gift is of a value of more than £25. The Head of School may in their absolute discretion require you to decline the gift
- please note, however, that cash, gifts vouchers and any other items deemed to be of direct monetary value are taxable and need to be declared to HMRC for taxable purposes. However, this does not apply where a voucher exchange can be made for a specific item or service i.e.: not to be 'cashed'
- decline outright gifts that could be perceived as a bribe or that have created an expectation

of preferential treatment. Although it is accepted for parents, guardians or carers or children to make small gifts to show appreciation, you must not receive gifts on a regular basis or receive anything of significant value

- do not accept cash or cash-equivalent vouchers. Where refusal may cause cultural offence, seek advice from the Head of School and record the item in the register, and

79.3 gifts should be declared to your line manager and section head or, if unavailable, to the TASIS England Human Resources Department. Further information is also available in the Employee Handbook.

80 Giving gifts and rewards: Where you are thinking of giving a gift or reward:

80.1 it must only be provided as part of an agreed reward system

80.2 in all cases except the above, the gift or reward must be of little monetary value and must be discussed and agreed with the Head of School and where appropriate the parent, guardian or carer

80.3 selection processes must be fair and where possible should be agreed by more than one member of faculty or staff

80.4 gifts must be given openly and not based on favouritism, and

80.5 faculty or staff must not give cash or cash-equivalent vouchers to students. Any reward must be modest, transparent, and recorded where required.

81 Allocation of gifts and rewards: Decisions regarding entitlement to benefits or privileges such as admission to school trips, activities or classroom tasks must avoid perceptions of bias, grooming or favouritism. The selection process must be based on transparent criteria.

82 Childcare disqualification

82.1 **Offence:** The Childcare Act 2006 and the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 state that it is an offence for the school to employ anyone to provide childcare in connection with our early years provision (**EYP**) or later years provision (**LYP**) who is disqualified, or for a disqualified person to be directly involved in the management of EYP or LYP (a **Relevant Role**).

82.2 **EYP** includes usual school activities and any other supervised activity for a “young child” which takes place on the school premises during or outside of the normal school day (a child is a "young child" during the period between birth and up to 01 September following their fifth birthday).

82.3 **LYP** includes provision for children not in EYP and under the age of 8 which takes place on school premises outside of the normal school day, including, for example, breakfast clubs, after school clubs and holiday clubs. It does not include extended school hours for co-

curricular activities such as sports activities.

82.4 **"Childcare"** means any form of care for a child, which includes education and any other supervised activity for a "young child". "Childcare" in LYP does not include education during school hours but does cover before and after school clubs.

82.5 **Grounds for disqualification:** The grounds on which a person will be disqualified from working in connection with EYP or LYP are set out in the school's Safer Recruitment Policy. Faculty and staff are required to familiarise themselves with this document.

82.6 **Duty of disclosure:** Faculty and staff in a Relevant Role are under an on-going duty to immediately notify the school if their circumstances change so that they meet any of the criteria for disqualification at any point during their employment with the school. Any failure to disclose relevant information will be treated as a serious disciplinary matter.

82.7 **Waiver:** A member of faculty or staff who discloses information which appears to disqualify them from working in a Relevant Role may apply to Ofsted for a waiver of the disqualification.

83 **Reporting obligations** - **The school's position:** It is a contractual requirement as well as in your interests to follow this Code of Conduct to maintain appropriate standards of behaviour and your own professional reputation. A breach of this Code of Conduct may be treated as misconduct and will render you liable to disciplinary action including in serious cases, dismissal.

84 **Exit interviews**: All faculty and staff receive training so that they understand they are expected and encouraged to raise concerns they have, whether related to the safeguarding and welfare of students, the conduct of faculty and staff or other matters, during the course of their employment in accordance with the school's policies (including the Whistleblowing Policy, the Safeguarding Children Child Protection Policy and procedures and this Code of Conduct). Safeguarding children is at the centre of the school's culture and is accordingly considered formally during faculty and staff performance development reviews and appraisal and finally at exit interviews which are offered to all leavers.

85 **Termination of employment:** If the school ceases to use the services of a member of faculty or staff because they are unsuitable to work with children, a settlement agreement (formerly known as a compromise agreement) will not be used and a referral to the Disclosure and Barring Service will be made promptly if the criteria for a referral are met. Any such incidents will be followed by a review of the safeguarding procedures within the school, with a report being presented to the Board of Directors without delay. The school may also need to consider a referral to the Disclosure and Barring Service if a member of faculty or staff is suspended or deployed to another area of work that is not regulated activity.

86 **Resignation:** If a member of faculty or staff tenders their resignation or ceases to provide their services to the school at a time when safeguarding or child protection concerns exist in relation to that person, those concerns will still be investigated in full by the school and a referral to the Disclosure and Barring Service will be made promptly if the criteria for a referral are met.

87 **Teaching Regulation Agency (TRA):** Separate consideration will also be given to making a referral to

the TRA where a teacher has been dismissed (or would have been dismissed had they not resigned) because of unacceptable professional conduct, conduct that may bring the profession into disrepute, or a conviction at any time for a relevant offence. An interim referral to the TRA may also be considered and made if appropriate.

88 **Mental Health Awareness:** All faculty and staff should be aware of the signs of mental health issues in students and colleagues. Mental health first aid training is provided regularly to help staff identify, support, and refer individuals in need to appropriate services.

Staff experiencing mental health difficulties can access support confidentially via the Director of HR and the Mental Health First Aid team. Using these routes does not affect safeguarding reporting obligations.

Appendix 1 – Low Level Concerns Policy

As part of our whole school approach to safeguarding, we ensure that we promote an open and transparent culture in which all concerns (including allegations that do not meet the harm threshold) about all adults working in or on behalf of the school (including supply teachers, volunteers, contractors, bank and agency staff) are shared responsibly and confidentially with the right person. Concerns are recorded and dealt with appropriately, to enable the school to identify concerning, problematic or inappropriate behaviour early; minimize the risk of abuse; and ensure that adults working in or on behalf of the school are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the school. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools and colleges from potential false allegations or misunderstandings.

This appendix sets out our response for dealing with concerns (including allegations) which do not meet the harm threshold set out in KCSIE (DfE September 2026). Concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken. We will ensure that we have procedures in place to manage and record any such concerns and take appropriate action to safeguard children.

What is a low-level concern? The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the harm threshold, which is where it is alleged that anyone working in the school that provides education for children under 18 years of age, including supply teachers, volunteers and contractors has:

- *behaved in a way that has harmed a child, or may have harmed a child, and/or*
- *possibly committed a criminal offence against or related to a child, and/or*
- *behaved towards a child or children in a way that indicates they may pose a risk of harm to children, and/or*
- *behaved or may have behaved in a way that indicates they may not be suitable to work with children.*

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 school's Faculty and 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 Local Authority Designated Officer (LADO).

Examples of such behaviour could include, but are not limited to:

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
- using inappropriate sexualised, intimidating or offensive language.
- humiliating children

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

Safeguarding Practices, including Staff Training and Development: As part of our on-going faculty and staff safeguarding training (including at induction) we:

- ensure all faculty and staff are clear about what appropriate behaviour is and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- empower all faculty and staff to share any low-level safeguarding concerns
- address unprofessional behaviour and support the individual to correct it at an early stage
- provide a responsive, sensitive and proportionate handling of such concerns when they are raised

- encourage all faculty and staff to help identify any weakness in the school's safeguarding procedures

Sharing low-level concerns: Concerns may arise in several ways and from a number of sources. For example: suspicion, complaint, or disclosure made by a child, parent or other adult within or outside of the organisation, or as a result of vetting checks undertaken. **Low-level concerns about a member of faculty or staff, supply staff, volunteer or contractor should be reported to the Head of School in person or email.** Reports about supply staff and contractors should be notified to their employers (by the Head of School), so any potential patterns of inappropriate behaviour can be identified. The Head of School may meet with the DSL to discuss the concern and decide if in fact the concern does meet the harm threshold and if a referral to the LADO is required, or if the matter can be dealt with by the school. If the school was in any doubt as to whether the information which has been shared about a member of faculty or staff in fact meets the harm threshold, the school will consult with the LADO.

The school will ensure we create an environment where all faculty and staff are encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that breaches our Faculty and Staff Behaviour Policy (Code of Conduct) or they consider falls below the expected professional standards.

Recording low-level concerns: All low-level concerns should be recorded in writing and reported to the Head of School. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as is reasonably possible. These records will be kept confidential, held securely and will comply with the Data Protection Act 2018 and the UK General Data Protection Regulations (UK GDPR).

Our school will review all records of low-level concerns so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the school will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harm threshold, in which case it will be referred to the LADO. The school will also give consideration to whether there are wider cultural issues within the school that enabled the behaviour to occur and where appropriate policies could be revised, or extra training delivered to minimize the risk of it happening again. All records of low-level concerns will be in line with KCSIE 2026 guidance and retained at least until the individual leaves the school's employment.

References: In line with KCSIE 2026 guidance, the school will only provide substantiated safeguarding allegations in references. Low level concerns will not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should not be referred to in a reference. However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it will be referred to in a reference.

Responding to low-level concerns In responding to reports of low-level concerns, the Head of School will collect as much evidence as possible by speaking directly to the person who raised the concern (unless raised anonymously), the individual involved, and any witnesses. The student to whom the concern relates may also be spoken with. The information collected will help them categorise the type of behaviour and determine what further action may need to be taken. This evidence will be recorded along with the rationale for their decisions and any action taken.

Depending on the nature of the low-level concern and the specific circumstances, action may include:

- management advice;
- additional training or support;
- a verbal or written warning; or
- action under the school's disciplinary procedures.

Where information indicates that the harm threshold may be met, the Head of School will consult with the LADO and the matter will be managed in accordance with Part Four, Section One of KCSIE 2026 and the school's Safeguarding Children and Child Protection Policy.

Malicious or False Concerns: Where a concern is found to be deliberately false or malicious, the school will consider what action is appropriate under the relevant student behaviour or staff disciplinary procedure, as applicable. The Head of School and/or DSL will also consider whether the person who made the report requires support or whether there is any underlying safeguarding concern requiring further action.