DULWICH COLLEGE
FOUNDED 1619

STAFF CODE OF CONDUCT

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PART A GENERAL PROVISIONS

1. Connected Documents

This document should be read in conjunction with the College policies mentioned within (including the College's Safeguarding, Behaviour, Restrictive Interventions (Including Use of Reasonable Force), Whistleblowing and Anti-Bullying Policies).

The policies mentioned in this document and the College Code of Conduct can be viewed on the policies page of the College's website (www.dulwich.org.uk/about/policies/policies).

2. Scope of this Code

This code applies to all staff working at Dulwich College (including operational staff) and sets out the College's expectations of staff regarding behaviour and conduct.

Breach of this Code may result in disciplinary action.

3. College Code of Conduct

All members of our community (pupils and staff) are expected to comply with the College Code of Conduct.

4. General behaviour

All staff are expected to:

- maintain consistently high standards of ethics and behaviour;
- act at all times with honesty and integrity in the performance of their duties;
- be truthful and not misleading in their work-related communications;
- avoid conduct that could bring the College into disrepute (including conduct outside work); and
- comply with this Staff Code of Conduct and the College's other policies and procedures.

These expectations apply irrespective of whether pupils are present at the time. They also apply when a member of staff is wearing College-branded clothing even if they are not working at the time.

All staff should:

- be mindful of the example they set to colleagues and pupils in their own behaviour;
- be mindful of the tone and direction of conversations they have with pupils or colleagues;
- be careful about the language they use in conversation with pupils;

- not make inappropriate or disparaging comments about colleagues or pupils when in conversation with pupils (including personal comments about an individual's appearance, attributes, abilities etc); and

- bear in mind that things said and done by staff in the presence of pupils may be repeated by pupils.

Staff should avoid engaging in banter, teasing or joking with pupils about sexual matters, alcohol or drugs or other topics that could be considered discriminatory or offensive.

Staff should not encourage pupils to refer to a member of staff by nickname.

5. Teachers' Standards

Teaching staff are expected to comply with **Teachers' Standards** (published by the Department for Education).

6. Behaviour towards Colleagues

Staff should adhere to the College Code of Conduct in their dealings with colleagues, including:

- being helpful, tolerant and respectful towards everyone in the Dulwich community;

- behaving with courtesy and in a manner which reflects well on themselves and the College; and

- avoiding behaviour or comments which could lead to any distress.

Breach of the College Code of Conduct or this Staff Code of Conduct may result in disciplinary action.

Members of staff who are in a personal relationship with a colleague (romantic, sexual, marriage etc) are expected to conduct themselves in a professional manner at work at all times in respect of such relationship. This means being considerate of the feelings of their other colleagues in their day-to-day dealings and being discreet in any discussions regarding their private life whilst at work.

7. Sexual Harassment

The College is committed to providing an inclusive, supportive and safe environment for everyone who works here, which includes a zero-tolerance approach to sexual harassment. An employee who sexually harasses a colleague will be liable to disciplinary action (which may include dismissal).

Staff are reminded that:

- Sexual harassment occurs when a person is subjected to unwanted conduct of a sexual nature that has the purpose or effect of: (a) violating that person's dignity, or (b) creating an intimidating, hostile, degrading, humiliating or offensive environment for that person.

- Sexual harassment may include: (i) unwanted physical conduct or "horseplay", including touching, pinching, pushing and grabbing; (ii) continued suggestions for sexual activity after it has been made clear that such suggestions are unwelcome; (iii) sending or displaying material that is pornographic

or that some people may find offensive (including emails, text messages, video clips and images sent by mobile phone or posted on the internet); (iv) unwelcome sexual advances or suggestive behaviour (which the harasser may perceive as harmless); or (v) offensive emails, text messages or social media content.

- Sexual harassment includes treating someone less favourably because they have submitted or refused to submit to unwanted conduct of a sexual nature, or that is related to gender reassignment or sex, in the past.

- A person may be sexually harassed even if they were not the intended target. For example, a person may be sexually harassed by pornographic images displayed on a colleague's computer in the workplace.

- A single one-off event or a series of incidents can amount to sexual harassment.

- A person can be affected by sexual harassment even if the conduct is not targeted at them.

For further information, please refer to the College's Sexual Harassment Prevention and Action Policy.

8. Alcohol & Drugs

Staff have a professional duty to set a responsible example to pupils and must not act in a way that reflects badly upon the College; see expectations set out in Section 4 above.

Staff are encouraged to support their colleagues and remind them (where necessary) about the College's required standards of behaviour. If a member of staff becomes worried about a colleague's use of alcohol or drugs, they should raise their concerns with the Principal Deputy.

Arrival at work

Staff are expected to arrive at work fit to carry out their job and to be able to perform their duties safely and effectively, without being affected by the use or after-effects of alcohol or drugs.

Alcohol

Staff are not permitted to drink alcohol on College property, except:

- at College parties and other events; and/or

- in places and at times expressly authorised in writing by the College (subject to such conditions that may be imposed).

On educational visits, staff are permitted only to drink a *moderate* amount of alcohol for which the College will pay a *reasonable* cost. However, any member of staff who is responsible for a vehicle or College minibus is prohibited from drinking any alcohol. Staff must remain in a state that enables them competently to supervise the pupils in their care and ensure their safety.

On the occasions where the consumption of alcohol is expressly permitted (e.g. at College events), it must only be consumed in modest quantities.

Staff must:

- take particular care when drinking in the company of College parents and/or pupils;
- not drive whilst under the influence of alcohol; and
- not drink to excess or behave in an inappropriate manner when wearing College-branded clothing (whether or not on duty or whether or not on College property).

A member of staff who is intoxicated whilst:

- on duty (including on trips); or
- on College property; or
- attending a College event (including a staff party); or
- wearing College-branded clothing or staff lanyard (whether or not on duty and whether or not on College property),

will be liable to disciplinary action, which (where appropriate) may lead to dismissal for gross misconduct.

Parties and events

Staff may not bring their own alcohol to a College party/event they are attending.

Staff are responsible for the behaviour of any personal guest (e.g. family member or friend) they bring to a College party/event. The staff member: (a) must ensure that their guest is not intoxicated and does not become intoxicated at the party/event and that the guest behaves appropriately at the party/event; and (b) must not leave the party/event before their guest. A failure to comply may result in disciplinary action against the member of staff.

Drugs

Staff who consume illegal drugs/substances whilst at work or are affected at work as a result of the use of illegal drugs/substances; or bring illegal drugs/substances onto College property, will be liable to disciplinary action, which (where appropriate) may lead to dismissal for gross misconduct.

9. Personal Gain

Staff must not misuse their position or authority at the College for personal gain or to benefit family members or others personally connected with them.

To ensure objectivity, another member of staff should be involved where a member of an employee's family or a personal friend is being given work by the College. A member of staff should not sign off the time sheet of a member of their own family.

10. Staff doing Outside Work (private tutoring etc)

Teaching Staff who engage in private tutoring / coaching outside College must comply with the College's Policy on Private Tutoring and Outside Work.

Sports coaches doing outside work must comply with the College's policy on this.

Some DUCKS staff babysit for DUCKS parents and (when doing so) they must comply with the Code of Conduct for Staff taking on such work for families connected with DUCKS.

11. Personal use of College Contractors

If a member of staff needs specialist work carried out at home, they may wish to employ contractors whom they know through their work at the College. Since they are confident in their work it is reasonable that they might wish to use their skills but it is important for all parties to avoid any appearance of a potential conflict of interest. Adverse suspicions may arise if an employee has work done for them at home by a College contractor at a lower than normal cost.

For the sake of absolute transparency and clarity and to protect the reputation of all parties, a member of staff should declare any private use of College contractors with whom they have dealings during the course of their work for the College. The declaration should be made in advance (i.e. before the member of staff enters into a commitment with the Contractor) to the Chief Operating Officer and should include the cost estimate provided by the contractor. After review, the Chief Operating Officer will forward the declaration to the Clerk to Governors, who is the College's Anti-Bribery Officer.

12. Personal Use of College Facilities

As a charity the College must act in pursuit of its charitable objects at all times, including when making decisions about staff using its facilities for personal purposes e.g.:

- Family events;
- Private tutoring; and
- Other activities with which staff are involved on a personal basis for themselves or for organisations with which they may be associated outside their work for the College.

College facilities may only be used by staff for personal purposes (i.e. outside their normal work responsibilities for the College):

- with the prior approval of the Chief Operating Officer or the Master; and
- subject to payment of any hire fee.

13. Anti-Bribery (Gifts and Hospitality)

A member of staff may not accept a gift or hospitality worth more than £100 from any of the following persons (without approval from the Clerk to Governors or the Master):

- a pupil at the College;
- a parent, guardian or grandparent of a pupil at the College;
- a prospective parent;
- an agent of the College, DCE or DCE; and
- a third-party supplying (or seeking to supply) goods or services to the College, DCE or DCEO.

A member of staff who is offered such a gift or hospitality should email the Clerk to Governors (jonesk@dulwich.org.uk) to ask whether they may accept the gift/hospitality.

Exception: This rule does not apply to a personal gift by an employee of Dulwich College to a friend or relation who is also employed by Dulwich College.

For further information please see the Receipt of Gifts & Hospitality Policy.

14. Security (including ID cards)

All staff need to be alert to the risks posed by strangers or others who may wish to harm a pupil in College or pupils travelling to and from College and must take all reasonable steps to lessen such risks.

The presence of intruders and suspicious strangers seen loitering near the College or approaching pupils, will be reported to the police and the local authority with a view to alerting other local schools through appropriate systems.

All staff are required to wear and display an ID card whilst on campus.

Vehicle passes must be displayed at all times whilst on campus.

15. Confidentiality and Data Protection

All staff should familiarise themselves with the Data Protection Policy, and the staff obligations set out therein. Teaching staff and some operational staff have access to personal details about pupils in order to undertake their everyday responsibilities. In some circumstances, staff may be given additional highly sensitive or private information. Such information should be treated in a discreet and confidential manner. Personal information about a pupil or young person should only be shared on a need-to-know basis and must never be shared with spouses/partners, other family members or friends. Staff should also be very careful not to accidentally share information casually in conversation.

There are some circumstances in which a member of staff may be expected to share information about a pupil, for example when abuse is alleged or suspected. In such cases, individuals have a duty to pass information on without delay.

If a member of staff is in any doubt about whether to share information or keep it confidential, they should seek guidance from the Deputy Master Pupils & Safeguarding or a Deputy Designated Safeguarding Lead.

16. Use of the Internet, Mobile Devices and Social Media

We encourage staff to use the internet, mobile devices and social media in an informed, thoughtful, way that is fully consistent with the position of trust we occupy. All of the advice contained in other sections of this Code apply equally in the digital realm. In addition, there are other risks, specific to the use of PCs, mobile devices, software applications and the internet, that need to be understood.

All members of staff are required to have read and to follow the College's ICT Acceptable Use Policy, our Social Media Policy and our Online Safety Policy.

By way of reminder, the College's Social Media Policy states that staff should not interact directly with individual boys on social media. Accordingly, staff should not 'friend' pupils on Facebook or 'follow' them on Twitter.

Staff are aware of the restrictions on the use of mobile phones (and other similar devices) imposed on pupils and in support of that policy they are requested not to use personal mobile phones/iPads etc. for personal reasons in front of pupils at any time during the school day (save for emergencies).

In all things, staff should act with consideration and with an awareness of the trust invested in them for the safeguarding of pupils. A member of staff's judgement will be informed by their experience, prior training, character and the context of any given situation, but it must also be informed by their professional obligations. Where a member of staff has concerns about a pupil's behaviour online, they should immediately inform and take guidance from the Deputy Master Pupils & Safeguarding or a Deputy Designated Safeguarding Lead. If a member of staff believes their actions may be misinterpreted, they should inform the Principal Deputy (or, in their absence, the Deputy Master Pupils & Safeguarding).

17. Criminal Records & Disclosing Convictions

All staff are subject to checks in accordance with the College's Safeguarding Checks Protocols before commencing work at the College. These can be found in the Policies & Guidance section of MyDulwich.

Members of staff must inform the College if they are charged with or convicted of a criminal offence whilst employed by the College (except in the case of staff whose role for the College does not involve driving College vehicles, a road traffic offence for which the only penalty is points and/or a fine). The information should be provided to the Master, the Chief Operating Officer or the Director of Human Resources.

18. Whistleblowing duty

Staff have a responsibility to report certain matters in accordance with the College's Whistleblowing Policy. This includes reporting where a pupil or colleague is being harassed, bullied or otherwise mistreated by a member of staff and where a member of staff has committed "malpractice".

Malpractice includes: (a) any behaviour of a sexual nature towards a pupil (whether physical or verbal); (b) indecent or violent behaviour towards any person; (c) harassment or bullying of a pupil or member of staff; (d) serious neglect of duties (including unauthorised absence from work); (e) serious breach of the College's policies and procedures or acting contrary to this Staff Code of Conduct; (f) criminal activities, theft, fraud, financial irregularities or dishonesty; (g) bribery or any other corrupt behaviour; (h) creating or ignoring a serious risk to health, safety or the environment (negligence); and (h) any act which might give rise to a serious complaint against the College by any pupil, parent, employee, supplier, contractor or visitor.

For further information please read the Whistleblowing Policy. A failure to comply with the Whistleblowing Policy may result in disciplinary action.

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PART B PROVISIONS RELATING TO PUPILS AND OTHER CHILDREN

19. Safeguarding Duty

All staff have a duty to keep our pupils safe and to protect them from physical and emotional harm. This duty is in part exercised through the development of respectful, caring and professional relationships between staff and pupils and behaviour by staff that demonstrates integrity, maturity and good judgement.

All staff should maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff should always act in the best interests of the child.

If staff have any concerns about a child's welfare (including concerns regarding possible child-on-child abuse), or identify a child in need, they must report the matter immediately to the Deputy Master Pupils & Safeguarding (the College's Designated Safeguarding Lead) or one of the College's Deputy Designated Safeguarding Leads: see Key College Safeguarding Contact Details in the Safeguarding (Child Protection) Policy. Where a child is suffering, or is likely to suffer from harm, it is important that a referral to local authority children's social care (and, if appropriate, the police) is made immediately.

20. Dealing with a Safeguarding Disclosure

If a pupil makes a disclosure, staff should:

- listen calmly and patiently;
- take the matter seriously and reassure the child;
- tell the pupil what will happen next;
- not promise to keep the alleged abuse secret or confidential;
- record the information at the time or as soon as possible afterwards;
- explain the information will have to be passed on;
- not ask leading or closed questions;
- not judge or condemn the alleged abuser;
- not assume know how the child feels;
- never think it can't happen here.

The information should then be passed to the Deputy Master Pupils & Safeguarding, or, in their absence, any DDSL, without any delay. Staff should email **safeguarding@dulwich.org.uk.**

21. Power and Positions of Trust

As a result of their knowledge, position and/or the authority invested in their role, all adults working with children in schools are in positions of trust in relation to the pupils in their care.

A relationship between a member of staff and a pupil cannot be a relationship between equals. There is potential for exploitation and harm of pupils and staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.

Staff should exercise caution and avoid placing themselves in a position where their actions might be open to criticism or misinterpretation.

Staff must at all times observe proper professional boundaries with pupils.

22. Boarding

Specific guidance (including induction and safeguarding training) is provided to all boarding staff. This includes appropriate ways of providing emotional support “in loco parentis”.

23. Support before statutory intervention

All staff should be prepared to identify children who may benefit from support before statutory intervention, including from universal services and community-based early help, or the targeted early help level of family help.

Whilst any child may benefit from such support, all staff should be particularly alert to the potential need for additional support for a pupil who:

- is disabled or has certain health conditions and has specific additional needs;
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan);
- has a mental-health need;
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- is frequently missing/goes missing from education, home or care;
- has been repeatedly removed from the classroom, has experienced multiple suspensions, is on a part-time timetable, is at risk of being permanently excluded from College and in alternative provision or a pupil referral unit;
- is at risk of exploitation, modern slavery, trafficking, including criminal or sexual exploitation;

- is at risk of being radicalised into terrorism;
- has a parent or carer in custody, or is affected by parental offending;
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- is misusing alcohol and/or other drugs themselves;
- is at risk of so-called 'honour' or faith-based abuse such as female genital mutilation or forced marriage;
- is a privately fostered child.

In the first instance, staff should discuss early help requirements with the Deputy Master Pupils & Safeguarding or a Deputy Designated Safeguarding Lead. Staff may be required to support other agencies and professionals in an early help assessment.

24. Child-on-Child Abuse

All staff should recognise that children are capable of abusing other children. This can happen both inside and outside of College and online. All staff should recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports.

Staff should understand that even if there are no reports in the College, this does not mean it is not happening. It may be the case that abuse is not being reported. As such it is very important that when staff have **any** concerns regarding child-on-child abuse, they speak to the Deputy Master Pupils & Safeguarding (or a Deputy Designated Safeguarding Lead).

The College has a zero-tolerance approach to child-on-child abuse. All staff must understand the importance of challenging inappropriate behaviours between children (examples of which are set out in in the Safeguarding (Child Protection) Policy). Downplaying behaviours, for example dismissing sexual harassment as 'just banter', 'just having a laugh', 'part of growing up' or 'boys being boys', can lead to a culture of unacceptable behaviour, misogyny, an unsafe environment for children, and in worst-case scenarios, a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it.

25. Sexual or Sensitive content in the Curriculum

Some areas of the curriculum will include or raise subject matter which is of a sexual or of an otherwise sensitive nature. Care should be taken to ensure that resource materials cannot be misinterpreted and clearly relate to the learning outcomes identified when planning lessons. Those with less experience should seek guidance from a senior member of staff, such as their Head of Subject/Department.

The curriculum will sometimes include or lead to unplanned discussion about subject matter of a sexual or otherwise sensitive nature. Responding to pupils' questions will require careful judgement and staff may wish to seek guidance on this from a senior member of staff.

Staff should bear in mind that such discussions might affect particular pupils more than others. Where a discussion takes a course that makes a member of staff feel uncomfortable or appears to make a pupil feel uncomfortable, they should report it to their Head of Subject/Department as soon as possible. The circumstances should be recorded in writing as soon as possible and, if appropriate, a copy placed on the pupil's file.

Parents have the right to withdraw their pupils from all or part of any sex education provided (but not from the biological aspects of human growth and reproduction necessary under the science curriculum).

Further guidance can be found in the relevant Relationships and Sex Education Policies.

26. Preventing radicalisation

All staff need to be aware that children may be susceptible vulnerable to radicalisation into terrorism. Protecting children from this risk is an important part of the College's safeguarding of its pupils.

Extremism is the vocal or active opposition to fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

Radicalisation is the process of a person legitimising support for, or use of, terrorist violence.

Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Although there is no single way of identifying whether a child is likely to be susceptible to radicalisation into terrorism, there are factors that may indicate concern. It is possible to protect people from extremist ideology and intervene to prevent those at risk of radicalisation being drawn to terrorism. As with other safeguarding risks, all staff should be alert to changes in pupils' behaviour, which could indicate that they may be in need of help or protection.

Concerns about a pupil thought to be at risk of radicalisation or of being drawn into terrorism must be referred to the Deputy Master Pupils & Safeguarding or a Deputy Designated Safeguarding Lead in the first instance. Advice will be sought and a referral will be made where this is deemed necessary.

27. Female Genital Mutilation (FGM)

Teachers have a specific legal duty to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under the age of 18. **The teacher must personally report it to the police.** DUCKS staff receive training on FGM as part of their safeguarding training.

Whilst it will be rare for teachers to see visual evidence, and they should not be examining pupils: the same definition of what is meant by 'to discover that an act of FGM appears to have been carried out' is used for all professionals to whom this mandatory reporting duty applies. Unless the teacher has good reason not to,

they should still consider and discuss any such case with the Deputy Master Pupils & Safeguarding (or a Deputy Designated Safeguarding Lead) and involve local authority children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures.

28. Pupil Behaviour Management

All pupils have a right to be treated with respect and dignity. Corporal punishment is unlawful in all schools. Equally, staff should not use any form of degrading treatment to punish a pupil. Whilst the use of humour can help to defuse a situation, the use of demeaning or insensitive comments towards pupils is not acceptable in any situation.

Where a pupil's conduct or behaviour causes concern, the appropriate Behaviour Policy should be adhered to (Years 7-13, Junior School and DUCKS). If a member of staff is in any doubt as to the best course of action, they should seek further advice from the Designated Safeguarding Lead or a Deputy.

Whenever it is deemed necessary to search a pupil's person and / or property it is vital that the member of staff reads and adheres to the Searching and Confiscation of Pupil Property Policy (Years 3 – 13).

No punishment, detention, restraint, sanctions or rewards are allowed outside of those detailed in the Behaviour Policies.

29. Favouritism and emotional attachment (Pupils)

Staff should not put themselves in a position where it might appear that they are showing favouritism to one or more pupils. As far as possible, staff should be consistent and transparent in how they reward pupils or otherwise foster teacher-pupil relationships.

Be aware that giving presents to individual pupils, socialising with pupils and/or sharing inappropriate emails/text messages is likely to raise concerns about 'grooming'. Also be aware that any member of staff who accepts a gift or offer of hospitality from a pupil or parent must log this with the College's Anti-Bribery Officer in line with the Receipt of Gifts and Hospitality By Staff Policy.

In addition, staff should be aware of the potential for a pupil to form an unsolicited, emotionally-dependent, attachment to a teacher. In particular, if pastoral interactions with a pupil become inappropriate or difficult, a member of staff should seek guidance from the Designated Safeguarding Lead or a Deputy.

The circumstances should be recorded in writing and, if necessary, a note placed on the pupil's file.

30. Remote Learning

In a situation where teaching and learning is being carried out off-site all staff must only communicate with pupils via school email accounts or Microsoft Teams. Colleagues are given guidance regarding the use of Microsoft Teams and how to safeguard themselves and the pupils (see below).

Colleagues should avoid 1:1 tutorials via Teams both to safeguard pupils and to safeguard themselves. If a 1:1 tutorial cannot be avoided permission must be sought from the Principal Deputy or Deputy Master Pupils & Safeguarding or the Deputy Master Academic ahead of the lesson.

Staff, pupils and parents will be reminded that the usual arrangements for safeguarding are not affected by school closure and that the College's policy on safeguarding applies despite pupils learning remotely.

Guidance re use of Teams:

- Staff and children must wear suitable clothing, as should anyone else in the household.
- Any computers used should be in appropriate areas, for example, not in bedrooms; and where possible be against a neutral background.
- All Teams classes should be recorded, so that if any issues were to arise, the video can be reviewed.
- Live classes should be kept to a reasonable length of time, or the streaming may prevent the family 'getting on' with their day
- Language must be professional and appropriate, including any family members in the background
- Teams should not be used for the purposes of 1:1 meetings or communicating with pupils beyond the timeframe of 8am-8pm.

31. Care, Control and Physical Intervention

The circumstances in which staff can intervene with a pupil are covered by the 1996 Education Act. Staff may legitimately intervene to prevent a pupil from committing a criminal offence, injuring themselves or others, causing damage to property, engaging in behaviour prejudicial to good order and to maintain good order and discipline. Staff should have regard to the health and safety of themselves and others.

Under no circumstances should physical force be used as a form of punishment. The use of unwarranted physical force is likely to constitute a criminal offence.

In all cases where physical intervention is deemed necessary, the incident and subsequent actions should be documented and reported to the Deputy Master Pupils & Safeguarding or a Deputy Designated Safeguarding Lead.

32. Physical Contact

There are occasions when it is entirely appropriate and proper for staff to have physical contact with pupils, but it is crucial that they only do so in ways appropriate to their professional role.

A 'no touch' approach is impractical for most staff and may in some circumstances be inappropriate. When physical contact is made with pupils this should be in response to their needs at the time, of limited duration and appropriate given their age, stage of development, gender, ethnicity and background.

It is not possible to be specific about the appropriateness of each physical contact, since an action that is appropriate with one pupil in one set of circumstances may be inappropriate in another, or with a different pupil. Staff should therefore use their professional judgement at all times.

Physical contact should never be secretive, or for the gratification of the adult, or represent a misuse of authority.

If a member of staff believes that an action could be misinterpreted, the Designated Safeguarding Lead or a Deputy should be informed of the incident and the circumstances should be recorded in writing as soon as possible and, if appropriate, a copy placed on the pupil's file.

Physical contact which occurs regularly with an individual pupil or young person is likely to raise questions unless the justification for this is part of a formally agreed plan (for example in relation to pupils with SEN or physical disabilities). Any such contact should be the subject of an agreed and open College policy and subject to review.

Where feasible, staff should seek the pupil's permission before initiating contact. Staff should listen, observe and take note of the pupil's reaction or feelings and - so far as is possible - use a level of contact which is acceptable to the pupil for the minimum time necessary.

Extra caution may be required where it is known that a pupil has suffered previous abuse or neglect. In the pupil's view, physical contact might be associated with such experiences and lead to staff being vulnerable to allegations of abuse.

It is recognised that some pupils may seek out inappropriate physical contact. In such circumstances staff should deter the pupil sensitively by helping them to understand the importance of personal boundaries and also inform the Designated Safeguarding Lead of the incident.

The general culture of 'limited touch' should be adapted, where appropriate, to the individual requirements of each pupil. Pupils with special needs may require more physical contact to assist their everyday learning. The arrangements should be understood and agreed by all concerned, justified in terms of the pupil's needs, consistently applied and open to scrutiny.

DUCKS staff will naturally have to touch the children in their care, and this will be determined by their age and needs (e.g. babies and children who are still in nappies, applying sun cream or comforting a child when settling in or feeling ill).

Some staff, for example, those who teach PE and games, or those who offer music tuition, will on occasions have to initiate physical contact with pupils in order to support a pupil so that they can perform a task safely, to demonstrate the use of a particular piece of equipment/instrument or assist them with an exercise. This should be done with the pupil's agreement. Contact under these circumstances should be for the minimum time necessary to complete the activity and take place in an open environment. Staff should remain sensitive to any discomfort expressed verbally or non-verbally by the pupil.

(See also the Restrictive Interventions (Including Use of Reasonable Force) Policy on the College website)

33. Pupils in Distress

There may be occasions when a distressed pupil needs comfort and reassurance. This may include age appropriate physical contact. Staff should remain self-aware at all times in order that their contact is not threatening, intrusive or subject to misinterpretation.

If a member of staff believes such action could be misinterpreted, the Deputy Master Pupils & Safeguarding or a Deputy Designated Safeguarding Lead should be informed of the incident and the circumstances should be recorded in writing as soon as possible and, if appropriate, a copy placed on the pupil's file.

Children at DUCKS may be distressed when they are settling in, are new to the setting or if they have hurt themselves. During these times it is appropriate for staff to provide children with comfort in the form of cuddles, hand holding or sitting on an adult's lap. It is important that staff ensure that they are self-aware and that all comfort is offered appropriately.

34. One to One Situations

Staff working in one to one situations with pupils and young people (eg music staff giving individual music lessons) may be more vulnerable to allegations. Teachers and others should recognise this possibility and plan and conduct such meetings accordingly. Every attempt should be made to ensure the safety and security needs of both staff and pupils are met.

Staff working in one to one situations with pupils should ensure that there is visual access to the room and/or an open door, wherever possible.

Should a pupil become distressed or angry during a one-to-one encounter with a member of staff, this should be reported to the Principal Deputy or the Deputy Master Pupils & Safeguarding.

Wherever possible, staff should avoid meetings with pupils in remote or secluded areas of College.

35. Changing Rooms (including shower and toilet areas and backstage areas)

Young people are entitled to respect and privacy when changing clothes, using the toilet or taking a shower. However, there needs to be an appropriate level of supervision in order to safeguard young people, satisfy health and safety considerations and ensure that bullying or teasing does not occur. This supervision should be appropriate to the needs and age of the young people concerned and sensitive to the potential for embarrassment.

When supervising pupils using the changing rooms, staff should place themselves outside the main changing area, i.e. in the corridor or locker area, and not inside the changing rooms, toilets or shower areas. Staff should enter the changing rooms, toilets or shower areas only in an emergency or when addressing genuine concerns about a pupil's safety or welfare.

During production week for all drama productions, colleagues may at times have to enter dressing rooms to speak to members of the cast. They should knock, wait for permission to enter and remain in the dressing room for as little time as is necessary. If, when they enter, a pupil is in a state of undress, they should leave immediately. The backstage corridor areas are places where pupils (and girls) often need to circulate half-

way through dressing for a show; staff should apply their professional judgement in these areas and ensure that they are never alone with a single pupil in a situation which could be misconstrued or compromising.

Boarding staff when on duty and who have access to boarding accommodation will be issued with guidelines on how to conduct themselves by their respective housemasters.

Members of staff should not use the pupils' toilets during College hours, or when pupils are in the relevant building. When using external facilities for games and sports or other trips, the time spent in shared public changing rooms or toilets should be kept to a minimum.

DUCKS staff should be aware of the intimate care policy and treat children sensitively and respectfully at nappy change times, when changing children if they have had an accident when potty training and when children are changing for PE and swimming lessons or for plays with costumes.

It is acceptable, where necessary, to check briefly that pupils are not loitering in the changing areas or toilets (for example when pupils should be at assembly or in lessons).

If a member of staff believes their actions in any of these areas could be misinterpreted, the Principal Deputy (or, in their absence, the Deputy Master Pupils & Safeguarding) should be informed of the incident and the circumstances should be recorded in writing as soon as possible.

36. First Aid and Administration of Medicine

Information about pupils with acute allergies and/or medical needs is available on MyDulwich. An updated list of these pupils is circulated to all academic staff at the beginning of each academic year.

At DUCKS children with specific dietary, medical or medication needs are identified through the use of posters in the Kindergarten and information boards in the Infants' School staff room and kitchen.

In the event of an untrained member of staff finding themselves in an emergency situation requiring urgent medical attention, they should contact 999 immediately and ask for the appropriate emergency service.

The College has a number of trained first aiders (see list on MyDulwich). Teachers may volunteer to undertake this task, but it is not a contractual requirement. Staff should receive appropriate training before administering first aid or medication. In particular, staff who might have to administer emergency medication (such as an adrenaline auto-injector (e.g. an epipen)) should receive appropriate training before leading an off-site visit or trip involving one or more pupils who have to carry emergency medication.

DUCKS have a number of trained paediatric first aiders (see posters around DUCKS). Training on the administration of epipens is given by the Medical Centre staff at the start of each term and specific training (for example giving insulin to a diabetic child) is provided ahead of the child starting at DUCKS.

Under normal circumstances in College, all medication should be administered by staff in the Medical Centre or by the pupil himself. The exception to this is that pupils can carry and administer their own prescription medication, emergency medication or over-the-counter medication if they do so in a responsible manner, ensure that it is solely for their own personal use and follow the directions on the packet.

At DUCKS staff administer medication or oversee the child taking it (if appropriate), only with written permission of the parents. (See DUCKS Medication Policy.)

For College trips, explicit parental consent should be obtained before giving any medication to a pupil, even over-the-counter medicines such as paracetamol, ibuprofen or antihistamine. Such consent can be received by any means: letter/telephone/email/text message.

Should prescription medication be required during a College trip, the member of staff responsible for the trip should obtain a copy of the Medication Form from the Medical Centre in advance of the trip.

Under the Misuse of Drugs Regulations, controlled drugs must be locked away appropriately and strictly monitored and recorded in a dedicated book as they are used. Should controlled drugs be required during a College trip, the staff member responsible for the trip should remain in possession of the medication and ensure that it is securely kept at all times and only administered as per the prescription.

When administering first aid, wherever possible, staff should ensure that another adult is present or is aware of the action being taken. The Medical Centre and the pupil's parents should always be informed when first aid has been administered.

37. Transporting Pupils

Staff should always avoid driving pupils (other than their own children) in their own cars. Please see the separate guidance re driving pupils_which can be found on MyDulwich (Policies & Guidance/Vehicles and Driving).

Staff who have children at the College will of course have social contact with other parents. Where staff are interacting principally in a parent role, it is appropriate to share contact details and to take other children in personal vehicles. Colleagues should be wary of potential conflicts of interest, however.

38. Trips, sports matches and after-school clubs

Staff should take particular care when supervising pupils in less formal settings e.g. school trips, sports matches and clubs. A more relaxed approach (including dress) may be acceptable in such circumstances but staff remain in a position of trust and need to ensure that their behaviour cannot be interpreted as seeking to establish an inappropriate relationship or friendship, and that they maintain high standards of professional conduct at all times.

Any physical contact should be restricted to occasions when it is absolutely necessary (for example: when breaking up a fight between two pupils; dressing a wound; taking a pupil's temperature; or intervening to prevent a pupil from putting himself in danger; or comforting a pupil in a state of distress) or when playing a contact sport, where the contact should be proportionate and as befits the activity and accounts for any physical mismatches between the staff member and the pupils.

Where out of College activities include overnight stays, careful consideration needs to be given to sleeping arrangements. Pupils, staff and parents should be informed of these prior to the start of the trip. Where

practicable, staff should be accommodated in separate rooms to pupils, with access to separate washing and toilet facilities.

Behaviour of both staff and pupils whilst on trips, or attending sports matches and after-school clubs etc. is subject to the same expectations as when they are in College. All policies, including this Staff Code of Conduct and the relevant Behaviour Policies, must be enforced (by staff) and adhered to (by both staff and pupils). Inaccurate post-event reporting by staff (whether as part of a subsequent investigation or otherwise) may lead to disciplinary action.

See also the Policy on Searching & Confiscating Pupil Property (Year 3 - 13) (on the College website).

39. Projects involving other schools (including mixed groups)

The College often collaborates with other local schools in academic and co-curricular areas (including music and drama). We also sometimes arrange outings and expeditions with other schools.

We have safeguarding responsibility for children from other schools when they are participating in projects run by the College. Staff should take extra care when making the arrangements for such projects, so as to ensure that the children will be suitably supervised by staff and that where there is a mixed group (girls and boys), the additional considerations that arise in relation to mixed groups are properly addressed.

In the case of outings and expeditions involving pupils from another school:

- There must be clear safeguarding arrangements agreed in advance with the other school.
- A member of College staff should avoid being alone with pupils from the other school at any stage.

40. Taking photographs of pupils

Many College activities involve recording images, which are undertaken as part of the curriculum, extra College activities, for publicity, or to celebrate achievement. Parents have the opportunity to opt out of their child's photograph being used in various media, e.g. the website. The Marketing Department keep a record of children where parents have opted out, and staff must check this in advance of using photographs accordingly.

When staff take digital images of pupils involved in College activities on their own cameras, phones or tablets, they must download the images to the College's Shared area as soon as possible and within 24 hours after taking them, except in the case of trip photos which should be downloaded within 24 hours after return from the trip. As soon as the images have been downloaded to the College's Shared area the images should be deleted from the device on which they were taken (and from any cloud storage) and the member of staff should not retain copies on any memory stick or his/her home computer or mobile phone etc. These rules apply for safeguarding reasons and to protect staff (as well as pupils). They do not apply to digital images taken by a member of staff of their own child.

41. Use of Mobile Phones and Cameras at DUCKS (EYFS)

DUCKS has a specific policy regarding the use of mobile phones and cameras which states that staff are required to turn off their mobile phones during their working hours and visitors are asked to turn off their phones when in the buildings or play areas at DUCKS. All staff mobile phones should be stored either in staff lockers or classroom cupboards. Visitors (including Dulwich College boys) must secure their mobile phones in the lockers in each foyer.

Regarding cameras:

- Only designated cameras are to be used when staff are taking photos of DUCKS children (whether in College or on outings).
- Photos must not be taken that might cause embarrassment or distress.
- Images have to be downloaded within a week and stored by DUCKS.
- No photographs may be taken by staff in the bathrooms or nappy changing areas without the consent of the Head or Deputy Head of DUCKS.

42. Social Contact with Pupils

Staff should not establish or seek to establish social contact with pupils for the purpose of securing a relationship that involves an inappropriate level of emotional dependence (on either side) or that would otherwise represent an abuse of the position of trust.

If a pupil seeks to establish social contact, or if this occurs coincidentally, the member of staff should exercise her/his professional judgement in making a response and be aware that such social contact could be misconstrued. Staff should alert the Principal Deputy to any social contact.

Staff should be particularly careful when invited to join pupils at a pub or in a restaurant or when attending an event with pupils where alcohol is being consumed and/or where there is no other adult supervision (even where the pupils involved are all over 18).

Staff should use their College email account or the College phone system to contact pupils and parents.

Staff should not disclose their personal telephone numbers and / or home email addresses to pupils or parents. They may do so only in exceptional circumstances and with the prior approval of the Principal Deputy (or, in their absence, the Deputy Master Pupils & Safeguarding).

A member of staff should not:

- invite a pupil to their homes;
- invite a pupil to attend an event out of school hours that the member of staff is attending which is not a College-organised trip (without prior approval from: (i) the Principal Deputy or the Deputy Master Pupils & Safeguarding; and (ii) the pupil's parents);

- offer a pupil paid or unpaid work out of school hours (without prior approval from: (i) the Principal Deputy or the Deputy Master Pupils & Safeguarding; and (ii) the pupil's parents).

Exception: The 3 bullet points above do not apply if the pupil is in the member of staff's family.

43. Social Contact with young OAs/Alumni

Staff should not do any of the following with a former pupil of the College until one year has passed since the pupil in question ("the OA") completed the final year of their secondary education, whether at the College or another school or college:

- Have social contact with the OA (in person, by email, phone or text), without the prior approval of the Principal Deputy;
- Agree to meet with the OA, without the prior approval of the Principal Deputy;
- Invite the OA to their home;
- Be a contact on social media with the OA (other than on LinkedIN)
- Give the OA the member of staff's personal email address, personal telephone number or home address;
- Have a romantic or sexual relationship with the OA; or
- Behave in a sexual manner with or towards the OA.

Exception: The first 5 bullet points above do not apply if the OA is in the member of staff's family.

44. Low Level Concerns (Safeguarding)

The College seeks to encourage an open and transparent culture to identify inappropriate, problematic or concerning behaviour early and consequently minimise the risk of abuse. Staff should be clear about professional boundaries and must act within these boundaries, particularly those set out in the Staff Code of Conduct. If staff have a safeguarding concern or an allegation about another member of staff (including supply staff, volunteers, or contractors) that:

- is inconsistent with this Staff Code of Conduct, including inappropriate conduct outside of work; and
- does not meet the harm threshold (as defined in the first paragraph of Part 1 of Appendix 6 of the Safeguarding (Child Protection) Policy) or is otherwise not serious enough to consider a referral to the LADO,

then this should be shared with the Deputy Master Pupils & Safeguarding (or, in their absence, the Deputy Master Co-curricular, Operations & Partnerships).

The term 'low-level' concern does not mean that it is insignificant. It 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 may have acted in a way that is inconsistent with this Staff Code of Conduct, including inappropriate conduct outside of work.

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, contrary to College's policies;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or
- humiliating pupils.

It is crucial that all low-level concerns are shared responsibly with the right person and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working at the College from becoming the subject of potential false low-level concerns or misunderstandings.

Staff should share with the Deputy Master Pupils & Safeguarding (or, in their absence, the Deputy Master Co-curricular, Operations & Partnerships) any concerns that they may have about a colleague's behaviour. Whilst the concern may seem very minor and one-off, the behaviour may form part of a pattern that is putting children at risk or (without intervention) may develop into such a pattern. The behaviour may have been innocent, but the member of staff may need to be given guidance to understand why it was inappropriate and should not happen again.

Staff should also self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the professional standards expected by the College.

More detail is set out in the College's low-level concerns procedure set out in Section 2 of Appendix 6 of the Safeguarding (Child Protection) Policy.

A failure to comply with this paragraph of the Code of Conduct may result in disciplinary action.

45. Sexual Relations with Pupils and other Young Persons

Staff should be aware that:

- An employee will be dismissed if they have a sexual relationship with a pupil (even if the relationship is consensual).
- Any sexual behaviour by a member of staff with or towards a pupil or any other school-age person they meet during the course of their work for the College is inappropriate, may be illegal and is likely to result in dismissal. This includes pupils at other schools.

In this context the term "sexual behaviour" is not limited to acts involving physical contact. It may also include non-contact activities, such as causing young persons to engage in or watch sexual activity or the production of pornographic material.

Staff should avoid any form of communication with a pupil which could be interpreted as sexually suggestive or provocative or give rise to concerns of grooming.

Staff are reminded that:

- Grooming is a process that involves an offender building a relationship with a child, and sometimes with their wider family, gaining their trust and a position of power over the child, in preparation for abuse.
- Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other pupils.

46. Reporting incidents that may give rise to allegations or complaints against staff (including supply teacher, volunteer or contractor)

Schools must follow the procedures for handling allegations made against staff etc. as set out in the College's Safeguarding (Child Protection) Policy. The aim is to deal with any allegation quickly and in a fair and consistent way which provides effective protection for the child and at the same time provides appropriate support for the person who is the subject of the allegation.

Where there is an allegation that a member of staff (including a member of supply staff, volunteers, contractors or another individual or organisation using the College premises for the purposes of running activities for children):

- 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 that they may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates that they may not be suitable to work with children (including behaviour that may have happened outside of the College, that might make an individual unsuitable to work with children, known as transferable risk)

this should be referred to the Master (or, in their absence, the Deputy Master Co-curricular, Operations & Partnerships).

Where there are concerns/allegations about the Master, these should be referred to the Chair of Governors (Mrs R Hanna) or, in her absence, the Safeguarding Governor (Dr Malik Ramadhan). Governors can be contacted via Ms Suzanne White, PA Governance & Finance) (telephone 020 8693 3601, email whites1@dulwich.org.uk).

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A failure to comply with this paragraph may result in disciplinary action.

Policy Owner:	The Clerk to the Governors
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