



Staff Code of Conduct and Whistleblowing Policy

Academic Year 2025-2026

This policy applies to staff, governors, and volunteers
and includes the:

- Restrictive Intervention Policy

Aims and Principles

St Paul's Cathedral School is a Christian, co-educational community which holds to the values of love, justice, tolerance, respect, honesty, service and trust in its life and practice, to promote positive relationships throughout the school community and where the safety, welfare and emotional well-being of each child is of the utmost importance.

The school aims to instil a love of learning through a broad curriculum. It aims to give each pupil the opportunity to develop intellectually, socially, personally, physically, culturally and spiritually. All pupils are encouraged to work to the best of their ability and to achieve standards of excellence in all of their endeavours.

Through the corporate life of the school, and through good pastoral care, the school encourages the independence of the individual as well as mutual responsibility. It aims to make its pupils aware of the wider community, espouses the democratic process and encourages a close working relationship with parents and guardians.

Purpose and application

Purpose: Relationships with fellow Staff, pupils and their parents, guardians or carers must be reasonable and mutually respectful at all times. The purpose of this Code is to:

- 1.1 place the welfare of children at the centre of the School and its culture;
 - 1.2 confirm and reinforce the professional responsibilities of all Staff;
 - 1.3 clarify the legal position in relation to sensitive aspects of Staff / pupil relationships and communication including the use of social media;
 - 1.4 set out the expectations of standards and behaviour to be maintained within the School; and to provide employees with guidance on the professional standards expected of behaviour by everyone working at St Paul's Cathedral School.
 - 1.5 help adults establish safe practices and reduce the risk of false accusations or improper conduct.
- 2 **Application:** This Code of Conduct (including its Appendices) (**Code**) applies to all Staff working at the School, whether paid or unpaid, whatever their position, role or responsibilities and Staff includes employees, governors, trustees, contractors, work experience / placement students and volunteers (**Staff**). All Staff will receive training in relation to this Code. This Code applies to staff working with day pupils and boarders and with pupils of all ages including the EYFS (Early Years Foundation Stage).
- 3 **Relationship with other policies and guidance:** This Code must be read in conjunction with the School's policies including the child protection and safeguarding policy and procedures, the whistleblowing policy, and the guidance set out at Appendix I (**Guidance**).

Key duties

- 4 **General duty:** It is the contractual duty of every member of Staff to observe the rules and obligations in this Code. You must also follow the Guidance. The School also has a duty of care to its Staff, parents, guardians or carers and pupils and the implementation of the practices in this Code will help to discharge that duty.
- 5 **Duty to report wrongdoing:** All Staff are under a duty to report their own wrongdoing, or any wrongdoing or proposed wrongdoing of any other member of Staff or any conduct which they may suspect to be inappropriate. This duty applies even if the concern is no more than one which causes a sense of unease or a nagging doubt. Staff are under a duty to report suspected, known or proposed wrongdoing in conjunction with the School's policies including the allegations and concerns policy contained in the School's safeguarding and child protection policy, and the whistleblowing policy attached to this Code. This includes low level concerns as set out in the Appendix I I to this policy. This also includes suspected, known or proposed wrongdoing brought to the attention of a member of Staff by a pupil, parent or other adult.
- 6 **Duty to report potential abuse:** Some of the behaviours contained in this Code (and in particular at Appendix 2) may indicate that a child has been, or is currently being, abused, exploited or neglected. Any incident involving children that could give cause for concern, must always be reported promptly in accordance with the School's child protection and safeguarding policy and procedures.
- 7 **Record keeping:** Comprehensive records are essential. All concerns, discussions and decisions made and the reasons for those decisions must be recorded in writing. Records must 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 must 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 child protection and safeguarding policy and procedures. If there is any doubt about recording requirements this must be discussed with the Designated Safeguarding Lead.

Guiding principles for Staff

8 **Principles:** The School prioritises the welfare of children, its diverse and inclusive culture, and the maintenance of positive and professional relationships between Staff and fellow Staff, pupils and their parents, guardians and / or carers. All Staff must follow the guiding principles set out in this paragraph (**Principles**) and refer to the Appendices for further detail of the application of the Principles.

9 **Public trust and confidence**

9.1 All Staff must maintain public trust and confidence in the School and in their profession by:

9.1.1 Demonstrating the highest standards of work, conduct, honesty and integrity;

9.1.2 understanding and upholding their duty to safeguard the welfare of children and young people;

9.1.3 understanding and demonstrating fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs;

9.1.4 maintaining reasonable standards of behaviour whether inside or outside of normal school hours and whether on or off the School's site; and

9.1.5 maintaining an effective learning environment.

9.1.6 treating colleagues, students and external stakeholders with politeness, courtesy, dignity and respect at all times.

9.1.7 taking proper care when using School property and must not use School property for any unauthorised use or for private gain.

10 **Appropriate pupil relationships**

10.1 All Staff must put the wellbeing, development and progress of all pupils first by:

10.1.1 taking all reasonable steps to ensure the safety and wellbeing of pupils under their supervision, taking particular account of the detailed guidance at Appendix 2;

10.1.2 using professional expertise and judgment to protect the best interests of pupils in their care;

10.1.3 following the guidance at Appendix 3 to ensure they maintain appropriate, professional and effective pupil-staff relationships at all times;

- 10.1.4 following the guidance at Appendix 4 to ensure all communication with pupils and former pupils (including where technology is used) remains appropriate and professional at all times;
- 10.1.5 ensuring all interactions with pupils about political matters are conducted in a balanced and impartial way without promoting partisan political views, taking into account the guidance at Appendix 4;
- 10.1.6 following the guidance at Appendix 5 in any situation where you are taking photo or video camera footage of a pupil or pupils;
- 10.1.7 demonstrating self-awareness and taking responsibility for their own actions and for providing help and support to pupils;
- 10.1.8 following the guidance at Appendix 7 in respect of the use of force or physical restraint on pupils, and in respect of physical contact with pupils in other circumstances;
- 10.1.9 raising concerns about the practices of teachers or other professionals where these may have a negative impact on pupils' learning or progress, or may put pupils at risk;
- 10.1.10 being familiar with the School's child protection and safeguarding policy and procedures and the pupil Good Behaviour policy;
- 10.1.11 reading and understanding Part I; where appropriate Annex A, of KCSIE (September 2025);
- 10.1.12 knowing the role, identity and contact details of the current Designated Safeguarding Lead and their Deputies;
- 10.1.13 knowing the role, identity and contact details of the Nominated Safeguarding Governor; and
- 10.1.14 being aware that they are in a position of trust (i.e. the adult is in a position of power or influence over the pupil due to his or her work); that the relationship is not a relationship between equals and that this position must never be used to intimidate, bully, humiliate, coerce or threaten pupils.

11 **Diversity, equality and inclusion**

- 11.1 All Staff must demonstrate respect for diversity and take steps to promote equality by:
 - 11.1.1 acting appropriately and in accordance with this Code and other relevant policies including the School's anti-bullying policy, equality, diversity and inclusion policy and harassment and bullying policy;
 - 11.1.2 addressing issues of discrimination and bullying whenever they arise; and
 - 11.1.3 helping to create a fair and inclusive school environment.

12 **United Staff body**

- 12.1 All Staff must work as part of a united Staff body by:
 - 12.1.1 developing productive and supportive relationships with colleagues;

- 12.1.2 exercising any management responsibilities in a respectful, inclusive and fair manner;
- 12.1.3 complying with all School policies and procedures;
- 12.1.4 Contribute to colleagues' learning and development; provide honest, accurate, and justifiable comments when giving references for, or assessing the performance of, colleagues.
- 12.1.5 participating in the School's development and improvement activities;
- 12.1.6 recognising the role of the School in the life of the local community; and
- 12.1.7 upholding the School's reputation and standing within the local community and building trust and confidence in it.

13 **Language and appearance**

13.1 **Language:** You must use appropriate language at all times. You must:

- 13.1.1 avoid words or expressions that have any unnecessary sexual content or innuendo;
- 13.1.2 avoid any form of aggressive or threatening words;
- 13.1.3 avoid any words or actions that are over-familiar;
- 13.1.4 not swear, blaspheme or use any sort of offensive language in front of pupils;
- 13.1.5 avoid the use of sarcasm, discriminatory or derogatory words when punishing or disciplining pupils and avoid making unprofessional personal comments about anyone. Any sanctions must be in accordance with the School's behaviour and discipline policies; and
- 13.1.6 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). Staff must have clear lesson plans and must take care to avoid overstepping personal and professional boundaries.
- 13.1.7 all emails are written in a professional manner and are suitable for any audience. Emails and other communications should be made to those that 'need to know' and during reasonable working hours.
- 13.1.8 all communication with children or parents, guardians or carers should conform to School policy and be limited to professional matters

13.2 **Dress:** You must dress appropriately and in a professional manner in keeping with your role at the school. Dress must not be offensive, distracting, revealing, or sexually provocative, embarrassing or discriminatory. Political or other contentious slogans or badges are not allowed.

14 **Gifts and rewards**

14.1 **Anti-bribery and corruption policy:** Before accepting or giving any gifts or rewards, Staff must familiarise themselves with and follow the anti-bribery and corruption policy.

15 **General conduct**

- 15.1 **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.
- 15.2 **Use of premises:** You must not carry out any work or activity on School premises other than pursuant to your terms and conditions of employment without the prior permission of the Head.
- 16 **Behaviour of others:** You must 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.
- 17 **Additional principles for teachers**
- 17.1 Teachers must take responsibility for maintaining the quality of their teaching practice by:
- 17.1.1 meeting the professional standards for teaching applicable to their role and position within the School;
 - 17.1.2 reflecting on their current practice and seeking out opportunities to develop knowledge, understanding and skills;
 - 17.1.3 helping pupils to become confident and successful learners; and
 - 17.1.4 establishing productive relationships with parents, guardians or carers by:
 - (a) providing accessible and accurate information about their child's progress;
 - (b) involving them in important decisions about their child's education; and
 - (c) complying with this Code.

Breach of this Code

- 18 **Consequences of breach:** The School will take appropriate action in accordance with its policies and procedures in the event of a breach of this Code.
- 19 **Reporting obligations:** In the event that a breach of this Code places the School under any reporting obligations, the guidance contained at Appendix 9 will apply.

Appendix 1 Relevant policies and guidance

This Code has regard to the School's child protection and safeguarding policy and procedures and the following guidance (collectively referred to in this Code as the Guidance):

- 1 *Keeping children safe in education* (September 2025) (**KCSIE**) (which refers to the non-statutory advice for practitioners: *What to do if you're worried a child is being abused* (March 2015));
- 2 *Disqualification under the Childcare Act 2006* (August 2018);
- 3 *Working together to safeguard children 2026: statutory guidance* (updated March 2026) (**WT**):
 - 3.1 WT refers to the non-statutory advice: *Information sharing* (July 2018);
- 4 *Revised Prevent duty guidance: for England and Wales* (December 2023) (**Prevent**). Prevent is supplemented by:
 - 4.1 *The Prevent duty: departmental advice for schools and childcare providers* (June 2015);
 - 4.2 *Channel duty guidance: protecting people vulnerable to being drawn into terrorism* (February 2021);
 - 4.3 *The use of social media for online radicalisation* (July 2015).
- 5 Guidance on female genital mutilation, to include:
 - 5.1 *Multi-agency statutory guidance on female genital mutilation* (July 2020);
 - 5.2 Home Office statutory guidance *Mandatory reporting of female genital mutilation: procedural information* (October 2015, updated December 2016);
 - 5.3 guidance published by the Department for Health which provides useful information and support for health professionals which will be taken into account by the School's medical staff.
- 6 Guidance on mental health, to include:
 - 6.1 *Preventing and tackling bullying* (July 2017);
 - 6.2 *Mental health and behaviour in schools* (November 2018); and
 - 6.3 *Promoting children and young people's mental health and wellbeing* (March 2015, updated September 2021)
- 7 *Political impartiality in schools* (February 2022).

Appendix 2 Protecting children from abuse, exploitation or neglect

All Staff should know what to do if they suspect or are told a child is being abused, exploited or neglected. This Appendix provides more information on the kinds of abuse children may suffer both within and outside the home, and how Staff should respond.

The School encourages an open and transparent culture in which it may identify concerning, problematic or inappropriate behaviour early, minimise the risk of abuse and ensure that all Staff working in or on behalf of the School are clear about professional boundaries and act within these boundaries. All Staff should be aware of their responsibility in relation to even low level concerns which should be reported in accordance with the School's raising allegations and concerns procedure contained at Section 12 of the School's safeguarding and child protection policy and procedures and the guidance in Part 1 of KCSIE, September 2025.

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

General guidance

- 1 You should be aware of the general guidance that will apply in all cases. In particular you:**
 - 1.1 must be familiar with procedures for reporting concerns in accordance with the School's whistleblowing policy and be aware that if Staff raise concerns about working practices at the School to the Designated Safeguarding Lead or an appropriate senior member of Staff that they will be protected from detriment under the whistleblowing policy;
 - 1.2 must be familiar with the local reporting guidelines and the Local Safeguarding Partners reporting threshold document in respect of any concerns relating to children;
 - 1.3 must be familiar with procedures for handling allegations against Staff as set out in the School's child protection and safeguarding policy and procedures;
 - 1.4 must seek guidance from the Designated Safeguarding Lead if you are in any doubt about appropriate conduct; and
 - 1.5 must report any actions which could be misinterpreted, any misunderstandings, accidents or threats involving you and a pupil or a group of pupils to the Head or Designated Safeguarding Lead.
- 2 You should take particular care when dealing with a pupil who:**
 - 2.1 appears to be emotionally distressed, or generally vulnerable and / or who is seeking expressions of affection;
 - 2.2 appears to hold a grudge against you;
 - 2.3 acts in a sexually provocative way, or who is inclined to make exaggerated claims about themselves and others, or to fantasise, or one whose manner with adults is over familiar; and
 - 2.4 may have reason to make up an allegation to cover the fact that he or she has not worked hard enough for public examinations.

- 3 **Procedure to be followed in these cases:** Some of these behaviours may be indications that a child has been, or is currently being, abused and should therefore be reported to the Designated Safeguarding Lead under the School's child protection and safeguarding policy and procedures.

Disclosures of abuse, exploitation or neglect

- 4 All Staff should know what to do if a child tells them that they are being abused, exploited or neglected. All Staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.
- 5 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 Designated Safeguarding Lead (or deputy) and children's social care. 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.
- 6 Staff should follow the appropriate School procedure, including the safeguarding and child protection policy, and / or the whistleblowing policy, in order to report a concern or an allegation that has been made.

Suspicious of abuse, exploitation or neglect

- 7 Staff may from time to time suspect a child is suffering abuse exploitation or neglect within or outside the home. Staff should follow the appropriate School procedure, including the safeguarding and child protection policy (and particularly the raising allegations and concerns policy within the safeguarding and child protection policy), and / or the whistleblowing policy, in order to report any such concerns.

Child-on-child abuse

- 8 Staff 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 School's child protection and safeguarding policy and procedures. Examples of child-on-child abuse are bullying (including cyberbullying), physical abuse, sexual violence and sexual harassment, upskirting, the consensual and non-consensual sharing of nudes and semi-nudes images and videos (also known as sexting or youth produced sexual imagery) 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).

Mental health concerns

- 9 Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. 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 problem or be at risk of developing one.
- 10 It is key that 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. All Staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

- 11 If Staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following the School's child protection and safeguarding policy and procedures.

Extra-familial harm

- 12 All 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 Staff, but especially the Designated Safeguarding Lead (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.
- 13 All Staff must be aware of indicators that children are at risk from, or are involved with serious violent crime. These may include being male, 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 have been approached by, or are involved with, individuals associated with criminal networks or gangs.

Terrorism and extremism

- 14 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:
- 14.1 what extremism and radicalisation means and why people - including pupils and fellow Staff members - may be vulnerable to being drawn into terrorism as a consequence of it;
- 14.2 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
- 14.3 how to obtain support for people who may be being exploited by radicalising influences.

So-called "honour" based abuse and female genital mutilation (FGM)

- 15 All Staff should raise any concerns relating to so-called "honour" based abuse (to include FGM and forced marriage) with the Designated Safeguarding Lead and involve children's social care as appropriate in accordance with the School's child protection and safeguarding policy and procedures. Teachers must also report to the police cases where they discover (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a girl under the age of 18. The report should be made orally by calling 101, the single non-emergency number. It will be rare for teachers to see visual evidence, and they should not be examining pupils but those failing to report such cases will face disciplinary sanctions.

Appendix 3 Guidance on Staff / pupil relationships

General guidance on Staff / pupil relationships

- 16 **Application:** Allegations of unprofessional conduct or improper contact or words can arise at any time. Professionalism and vigilance are required so as to ensure the safety of children in our care, and to reduce the risk of an allegation of impropriety against a member of Staff. This guidance applies to all Staff.
- 17 **Staff / pupil rapport:** The School supports and encourages the establishment and maintenance of positive working relationships between Staff and pupils in order to maintain a healthy school environment. Staff should build good rapport with pupils, whilst at the same time always maintaining professional boundaries by following the guidance in this Code.
- 18 **Good order and discipline:** Staff in charge or control of pupils must maintain good order and discipline at all times when pupils are present on School premises and whenever pupils are engaged in authorised school activities, whether on School premises or elsewhere.

Meetings with pupils

- 19 **One-to-one meetings on site:** If you are teaching one pupil, or conducting a one-to-one meeting or teaching session with a pupil, you should take particular care in the following ways:
 - 19.1 when working alone with a pupil is an integral part of your role, inform line manager, consulting the DSL as necessary;
 - 19.2 use a room that has sufficient windows onto a corridor so the occupants can be seen, or keep the door open, or inform a colleague that the lesson / meeting is taking place;
 - 19.3 arrange the meeting during normal school hours when there are plenty of other people about;
 - 19.4 do not continue the meeting for any longer than is necessary to achieve its purpose;
 - 19.5 avoid sitting or standing in close proximity to the pupil, except as necessary to check work;
 - 19.6 avoid using "engaged" or equivalent signs on doors or windows;
 - 19.7 avoid idle discussion;
 - 19.8 avoid all unnecessary physical contact and apologise straight away if there is accidental physical contact;
 - 19.9 avoid any conduct that could be taken as a sexual advance;
 - 19.10 report any incident that causes you concern to the Designated Safeguarding Lead under the School's child protection and safeguarding policy and procedures, and make a written record (signed and dated); and
 - 19.11 report any situation where a pupil becomes distressed or angry to the Designated Safeguarding Lead.

Contact with pupils outside school

20 **Pre-arranged meetings:** Pre-arranged meetings with pupils outside school should not be permitted unless approval is obtained from their parents, guardians or carers and the Deputy Head / Designated Safeguarding Lead. If you are holding such a meeting, you should inform colleagues before the meeting.

21 **Contact outside school:** You should avoid unnecessary contact with pupils outside School. You should:

21.1 not give pupils your home address, home telephone number, mobile telephone number or email address;

21.2 not send personal communications (such as birthday cards or faith cards, text messages etc) to children unless agreed with the Deputy Head or Head;

21.3 not make arrangements to meet pupils, individually or in groups, outside School other than on School trips authorised by the Deputy Head or Head;

21.4 avoid contacting pupils at home unless this is strictly necessary, and you should keep a record of any such occasion;

21.5 not give a pupil a lift in your own vehicle other than on School business and with permission from the Deputy Head / Head / Head of Boarding;

21.6 not invite pupils (groups or individuals) to your home. This prohibition also applies if you have on site accommodation.

An exception to this is if you are both a parent at SPCS and subject to this Code, hosting visits of SPCS pupils who are friends of their child. In such circumstances, you must

- report and record any situation which may place a child at risk or which may compromise the School's or your professional standing;
- ensure that pupils do not see anything in your home that may cause embarrassment or that might become the subject of inappropriate gossip or rumour
- seek the guidance of the Deputy Head if you have any concerns arising from such visits or social contact.

21.7 never engage in secretive social contact with pupils or their parents, guardians or carers.

22 **Home visits:** In limited circumstances, home visits may be necessary. You should:

22.1 discuss the purpose of any visit with the Deputy Head / Designated Safeguarding Lead and adhere to any agreed work plan / contract;

22.2 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;

22.3 not visit unannounced if this can be avoided;

22.4 leave the door open where you will be alone with pupils;

- 22.5 keep records detailing times of arrival and departure, and work undertaken;
 - 22.6 ensure that any behaviour or situation that gives rise to a concern is reported and actioned;
 - 22.7 discuss with the Designated Safeguarding Lead anything that gives cause for concern in accordance with the School's child protection and safeguarding policy and procedures; and
 - 22.8 have a mobile telephone and an emergency contact.
- 23 **The use of personal living space:** Pupils must not have access to staff residential accommodation.
- 24 **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 should be reported to the Deputy Head / Head.
- 25 **Friendships with parents, guardians or carers and pupils:** Members of Staff who are friends with parents, guardians or carers of pupils or who, for example, are voluntary workers in youth organisations attended by pupils, will of course have contact with those pupils outside school. However, members of Staff should still respect the above advice wherever possible and should keep the Deputy Head / Head informed of such relationships.
- 26 **Scope of application:** 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. The principles of this guidance also apply to contact with children or young people who are pupils at another school.

Transport, after School activities and educational visits

- 27 **Transporting pupils:** There may be some situations when Staff are required to transport pupils. You should:
- 27.1 ensure that you are fit to drive and free from any substances that may impair your judgement or ability to drive;
 - 27.2 be aware that until the pupil is passed over to a parent / carer, you have responsibility for that pupil's health and safety;
 - 27.3 record the details of the journey;
 - 27.4 record, be able to justify impromptu or emergency lifts and notify the Deputy Head / Head/Head of Boarding;
 - 27.5 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
 - 27.6 wherever practicable, you should avoid using private vehicles and should try and have one adult additional to the driver to act as an escort.
- 28 **After School activities:** When taking part in after School activities other than organised clubs, you should:

28.1 be accompanied by another adult unless otherwise agreed with the Deputy Head / Head;

28.2 undertake a risk assessment; and

28.3 obtain parental consent.

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

29.1 follow the School's educational visits policy;

29.2 be accompanied by another adult unless otherwise agreed with the Deputy Head / Head;

29.3 undertake a risk assessment; and

29.4 obtain parental consent.

Overnight supervision

30 Overnight supervision outside of the boarding context is not permitted.:

Inappropriate relationships

31 **Sexual contact:** Staff must not:

31.1 have any type of sexual relationship with a pupil or pupils;

31.2 have sexually suggestive or provocative communications with a pupil;

31.3 make sexual remarks to or about a pupil; and

31.4 discuss their own sexual relationships in the presence of pupils.

17 **Abuse of a position of trust and inappropriate relationships with pupils of the School:** Sexual relationships or sexual contact with any pupils, or encouraging a relationship to develop in a way which might lead to a sexual relationship or any relationship just considered inappropriate with any pupil 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 the criminal offence of an abuse of a position of trust to have any sexual relationship with any School pupil under the age of 18.

18 **Inappropriate relationships with pupils at other schools:** Forming inappropriate personal relationships with children or young people who are pupils or students at another school will be a criminal offence if they are under 16 but may also be a criminal offence if under the age of 18 and will be regarded as gross misconduct. Such behaviour tends to bring the School into disrepute and gives rise to concern that the Staff involved cannot be trusted to maintain professional boundaries with pupils and students at the School. Whilst not necessarily a criminal offence, the School considers it unacceptable for Staff to form inappropriate personal relationships with a pupil of any school, irrespective of their age.

Appendix 4 Communication with pupils and former pupils (including the use of technology)

- 1 **Communicating with children and parents, guardians or carers:** All communication with children, former pupils or parents, guardians or carers should conform to School policy and be limited to professional matters. Except in an emergency communication should only be made using School property.
- 2 **Application:** These rules apply to any form of communication including new technologies (including 3G / 4G / 5G technologies) such as mobile telephones, web-cameras, social networking websites and blogs. You should also ensure you comply with the more detailed IT acceptable use policy and social media policy.
- 3 **Dealing with "crushes":** Crushes, fixations or infatuations are part of normal 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 pupil or a former pupil has a crush on you or on another colleague you should bring it to the attention of the Deputy Head, who is also the Designated Safeguarding Lead, at the earliest opportunity. Suggestions that a pupil or a former pupil may have developed a crush should be recorded. Staff should avoid being alone with pupils who have developed a crush on them and if the pupil sends personal communications to the member of Staff, this should be reported to the Deputy Head and recorded.
- 4 **Acceptable use:** Adults must establish safe and responsible online behaviours and must comply with the IT acceptable use policy, social media policy, the online safety policy and the mobile telephone protocol. Adults should report to senior colleagues, 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 user policies should be followed. Staff should also:
 - 4.1 ensure that your own personal social networking sites are set as private and ensure that pupils and former pupils are not approved contacts;
 - 4.2 never use or access social networking sites of pupils or former pupils and do not use internet or web based communication channels to send personal messages to pupils;
 - 4.3 never use your own equipment (e.g. mobile telephones) to communicate with pupils or former pupils - use equipment provided by the School and ensure that parents, guardians or carers have given permission;
 - 4.4 only make contact with pupils or former pupils for professional reasons; and
 - 4.5 recognise that text messaging should only be used as part of an agreed protocol and only when other forms of communication are not possible.
- 5 **Personal details:** Adults must not give their personal contact details to pupils or former pupils, including email addresses, home or mobile telephone numbers, unless the need to do so is agreed with the Deputy Head and parents, guardians or carers.
- 6 **Personal mobile telephones and electronic devices:** It is understood that Staff may need to check text messages and / or personal emails in the case of an emergency or during break times. You may need to use a phone for professional reasons, e.g. to set homework, to access our Management Information System (iSAMS) or to use MFA (multi-factor authentication).

Personal use must not interfere with your work commitments (or those of others). It is a privilege and not a right.

Staff shall set an example and shall never use their own mobile telephones or other electronic devices for personal reasons whilst they are on duty (whether in a classroom or otherwise) and any such mobile devices should be on silent except in the case of an emergency and be kept out of sight of parents or pupils.

- 7 **Communicating outside the agreed protocols:** Email or text communications between an adult and any pupil or former pupil outside agreed protocols may lead to a report to external agencies in accordance with the School's child protection and safeguarding policy and procedures, disciplinary action and / or criminal investigations. This also includes communications through internet-based websites.
- 8 **Political impartiality:** You must not promote partisan political views to pupils, 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 pupils to support or adopt particular political views and must present any political views in a balanced way that ensures opposing views are aired.
- 9 **Communicating about shared principles that underpin society:** Although you must not promote partisan political views to pupils, 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 staff.
- 10 **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 line manager in the first instance.
- 11 **Communication with former pupils:** The School is aware that as a result of its strong sense of community, former pupils may wish to keep in touch with us after they leave. Many Choristers stay in contact with one another via the Guild. The School is seeking to develop a more general alumni association for day pupils, to support the growth of an ever stronger community.

As a precaution and to protect you however, the guidance in this policy also applies to contact with former pupils. To the extent that it is necessary to have contact with former pupils (for example if arranging a careers fair or writing a future reference), you must use your School email address and ensure that communication remains professional at all times. Using personal social media and email accounts creates risk of allegations about the abuse of power in a former Staff / pupil relationship, or even of a former pupil being groomed. This risk is not time limited and may be alleged at any time. To protect yourself, you must not use your personal social media or email to maintain contact with former pupils of the School. These guidelines are designed to protect you from potentially career-ending allegations. Should any former pupil make personal contact with you, you must notify the Designated Safeguarding Lead immediately and follow guidance issued to you in order to ensure the School email system is used for a professional response.

Appendix 5 Photographs and videos

- 1 Permission **required:** Parents give permission for pupils to be photographed for internal purposes on signing up at the school. Routine photography for educational purposes does not generally require further permission.
- 2 **Consent:** Subject to paragraph 6 below, appropriate consents for taking and displaying photographs should be obtained from parents, guardians, carers or from the pupils themselves if sufficiently mature (most pupils 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 you have been told otherwise, the Director of Finance and Operation (DFO) is responsible for obtaining the appropriate consent. Please see the guidance for staff on the use of photographs and videos by the School for further information.
- 3 **Use of photographs / videos:** Where the use of a photograph or video is less privacy intrusive (e.g. used in an internal display) it is sufficient for parents and pupils to have been informed about this in the School's privacy notices, in which case consent is not required. Permission from the Head or Deputy Head is required before the publication (other than in the School Circular) or display of such photographs as additional permissions may be required. .
- 4 **Pupils who must not be photographed:** Some pupils cannot be featured in photographs or videos under any circumstances (for example, because of safeguarding concerns). Please speak to the School Office if you are unsure to which pupils this applies.
- 5 **Guidance where permission has been obtained:** Where permission and consent (if appropriate) has been obtained, the following should be considered:
 - 5.1 the purpose of the activity should be clear as should what will happen to the photographs or videos. You must be able to justify images in your possession;
 - 5.2 all images should be stored on school systems and therefore accessible to the Senior Leadership Team in order to determine acceptability;
 - 5.3 images should not be made during one-to-one situations;
 - 5.4 ensure that the pupil is appropriately dressed;
 - 5.5 ensure that the pupil understands why the images are being taken and has agreed to the activity;
 - 5.6 wherever possible use equipment provided or authorised by the School; if a personal device is authorised to be used, the pictures must be immediately uploaded (within one working day) to school systems and deleted from the personal device; cloud storage systems should be disabled.
 - 5.7 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 pupil's full name unless specific 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 pupil's name is not used (e.g. using an unnamed photograph of a pupil in an advertisement). Consent should be obtained from the pupil and / or their parents as appropriate. Please see paragraph 6 below for further guidance on consent;
 - 5.8 all images of children should be stored securely and only accessed by those authorised to do so; and

- 5.9 images must not be taken secretly.
- 6 **Consent:** Children are usually considered mature enough to exercise their own data protection rights when they are aged 12 years or older. Whether consent should be obtained from the parents, the pupil or both will depend on the age of the pupil. The School's policy is that when consent is required it should be obtained as follows:
- 6.1 where the pupil is in Year 7 or below, consent should be sought from a parent, guardian or carer;
- 6.2 where the pupil is in Year 8 then consent should be sought from both the pupil and their parent, guardian or carer
- 7 **Personal social media:** You must not publish anything which could identify pupils, parents or guardians on any personal social media account, personal webpage or similar platform without the prior consent of the Head in writing. This includes photos, videos, or other materials such as pupil work.
- 8 **Appropriate material:** The School 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 should 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 child protection and safeguarding policy and procedures immediately. Pupils must not be exposed to unsuitable material on the internet and Staff should ensure that any film or material shown is age appropriate.
- 9 **Youth produced imagery:** Where safeguarding incidents involve youth produced sexual imagery, staff must not intentionally view or forward sexual imagery reported to them and will follow the School's policy on sharing nudes and semi-nude images and videos as set out in Section 26 of the School's safeguarding and child protection policy and procedures and *Searching, screening and confiscation: advice for schools* (DfE, July 2022).

APPENDIX 6:

Restrictive Intervention Policy

This policy applies to all pupils, including those in the Early Years Foundation Stage and Boarders (consistent with Standard 15 of the National Minimum Standards for boarding schools 2022). It is written with reference to Section 93 of the Education and Inspections Act 2006 and further guidance issued by the DfE in April 2026 'Restrictive interventions, including use of reasonable force, in schools' which enables school staff to use such force as is reasonable in the circumstances to prevent a pupil from:

- committing any offence (or, for a pupil under the age of criminal responsibility, what would be an offence for an older pupil);
- causing personal injury to, or damage to the property of, any person (including to himself or herself); or
- prejudicing the maintenance of good order and discipline at the school or among any pupils receiving education at the school, whether during a teaching session or otherwise.
- damaging property

This policy sets out the school's approach to restrictive interventions, including the use of reasonable.

Definitions

What is reasonable force? The term '**reasonable force**' covers the broad range of actions used by most teachers at some point in their career that involve a degree of physical contact with pupils.

Force is usually used either to control or restrain. This can range from guiding a pupil to safety by the arm through to more extreme circumstances such as breaking up a fight or where a pupil needs to be restrained to prevent violence or injury.

'Reasonable in the circumstances' means using no more force than is needed.

Restrictive Intervention: An umbrella term for a means to prevent, restrict or subdue movement of the body, or part of the body, of a pupil.

Seclusion: A non-disciplinary intervention where a pupil is kept confined to a place away from others and prevented from leaving by physical obstruction or the belief they will be punished if they try.

Restraint: A non-disciplinary intervention which immobilises a pupil or limits their movement. This may or may not include direct physical contact (e.g. Removing a pupil's walking aid or crutches.)

Significant Incident: Any incident where the use of force goes beyond appropriate physical contact of where physical force is used to implement a non-physical restrictive intervention.

School staff should always try to avoid acting in a way that might cause injury, but in extreme cases it may not always be possible to avoid injuring the pupil.

Principles Governing Use

Restrictive interventions:

- Are used only when there is a significant risk of harm
- Are never used as punishment, discipline or to enforce compliance
- Must be the least restrictive option available
- Must be proportionate to the risk and used for the shortest time possible
- Must prioritise safety, dignity and emotional wellbeing

Use of Restrictive Interventions

- When restrictive intervention is necessary, staff must:
- Use calm, clear communication
- Use the minimum force necessary
- Continuously monitor the pupil's safety
- Cease the intervention as soon as the risk reduces
- Restrictive intervention should never include: restricting breathing or circulation; holding around the neck; ground restraint unless unavoidable and proportionate

Restrictive interventions must never:

- intentionally inflict pain,
- obstruct breathing,
- involve pressure to the neck, chest, abdomen or joints,
- involve prone restraint except in the most exceptional circumstances where there is an immediate risk of serious harm and no safer alternative,
- deprive a pupil of access to food, drink, medication, sleep or toilet facilities,
- or be used in a manner that is degrading, humiliating or abusive.

Responsibilities

The Governing Body is responsible for providing the Head with clear advice and guidance on which the Head can base the behaviour policy, including the use of force. The Head is responsible for standards of behaviour in the school and for ensuring that this policy is implemented, with any necessary training provided to staff. Day to day responsibility for behaviour is delegated to the Deputy Head (Caroline Heylen, who is also the Designated Safeguarding Lead). Staff and volunteers are responsible for understanding and applying the Behaviour Policy.

The school recognises that restrictive intervention should always be a last resort. Staff should, wherever reasonably possible, seek to prevent escalation through proactive and preventative strategies including:

- positive behaviour support,
- clear routines and expectations,
- de-escalation techniques,
- distraction and diversion,
- offering choices,
- reducing environmental triggers,
- allowing processing time,
- and seeking assistance from colleagues.

Where a pupil presents a foreseeable risk of requiring restrictive intervention, the school may implement an individual risk assessment and behaviour support plan.

Who is entitled to use reasonable force?

The staff to which this power applies are defined in Section 95 of the Act as:

- any member of staff who works at the school, and
- people whom the headteacher has temporarily put in charge of pupils such as unpaid volunteers or parents accompanying students on a school organised visit.

The school will ensure that appropriate staff receive regular training in:

- de-escalation strategies,
- safeguarding,
- SEND-informed behaviour support,
- safe restrictive intervention techniques,
- recording and reporting procedures,
- and post-incident review processes.

When can reasonable force be used?

Reasonable force can be used to prevent pupils from hurting themselves or others, from damaging property, or from causing disorder. Schools can use reasonable force to:

- remove disruptive children from the classroom where they have refused to follow an instruction to do so;
- prevent a pupil behaving in a way that disrupts a school event or a school trip or visit;
- prevent a pupil leaving the classroom where allowing the pupil to leave would risk their safety or lead to behaviour that disrupts the behaviour of others;
- prevent a pupil from attacking a member of staff or another pupil, or to stop a fight in the playground; and
- restrain a pupil at risk of harming themselves through physical outbursts.

Where possible a clear oral warning to the pupil that force may have to be used should be given. Schools do not require parental consent to use force on a pupil; parents will be notified of any use of force as soon as possible.

The decision on whether to physically intervene is down to the professional judgement of the teacher concerned. Whether the force used is reasonable will always depend on the particular circumstances of the case. The use of force is reasonable if it is proportionate to the consequences it is intended to prevent. This means the degree of force used should be no more than is needed to achieve the desired result.

Examples of situations that particularly call for judgements of this kind are:

- a pupil attacking another pupil or member of staff;
- pupils fighting and hence causing risk of injury to themselves or others;
- a pupil committing, or on the verge of committing, deliberate damage to property;
- a pupil causing, or at risk of causing, injury or damage by accident, rough play, or by the misuse of dangerous objects or materials;
- a pupil persistently refusing to follow an instruction to leave the classroom;
- a pupil behaving in a way that seriously disrupts a lesson; or

- a pupil behaving in a way that seriously disrupts a school event, trip or activity

Decisions on whether circumstances justify the use of reasonable force will depend on:

- the seriousness of the incident,
- the chances of achieving the desired result by other means,
- the relative risks associated with physical intervention compared to using other strategies.

The power may be used where the member of staff is lawfully in charge of the pupils, and this includes while on school trips.

It is always unlawful to use force as a punishment.

Special educational needs and disability

The judgement on whether to use force in the case of a pupil with special educational needs or a disability should not only depend on the circumstances of the case but also on information and understanding of the needs of the pupil concerned. SPCS recognises its statutory duty to make reasonable adjustments for disabled children and children with special educational needs (SEN).

Restrictive Intervention in the Boarding Environment

The school recognises that the residential boarding environment presents additional safeguarding, welfare and supervision considerations in relation to restrictive intervention. Residential staff must therefore ensure that any intervention remains necessary, proportionate, appropriate and consistent with the principles outlined in this policy and the National Minimum Standards for Boarding Schools (2022).

Particular care must be taken during evening, night-time and weekend periods, where pupils may be more emotionally vulnerable or dysregulated due to tiredness, homesickness, illness or changes to routine.

Where restrictive intervention occurs in the boarding setting:

- the incident must immediately be reported to the senior member of staff on duty;
- the Designated Safeguarding Lead (or Deputy DSL) and Head must be informed as soon as reasonably practicable;
- parents must be informed on the same day wherever possible;
- appropriate medical assessment or welfare support must be considered following the incident;
- a written handover must be provided where necessary between boarding, safeguarding and teaching staff to ensure continuity of support and monitoring.
- If a boarder is subject to repeated incidents of restrictive intervention, the school will consider whether additional risk assessments, behaviour support plans, safeguarding measures, pastoral support or external professional involvement are required.

Any use of seclusion within boarding provision must be continuously supervised and must cease immediately once the risk of harm has reduced. Pupils must never be locked in a room or prevented from accessing basic needs such as drinking water, medication, sleep, toilet facilities or medical assistance.

Other physical contact with pupils

It is not illegal to touch a pupil. There are occasions when physical contact, other than reasonable force, with a pupil is proper and necessary.

Examples of where touching a pupil might be proper or necessary:

- Holding the hand of the child at the front/back of the line when going to assembly or when walking together around the school;
- When comforting a distressed pupil;
- When a pupil is being congratulated or praised;
- To demonstrate how to use a musical instrument;
- To demonstrate exercises or techniques during PE lessons or sports coaching; and
- To give first aid.

Power to search pupils without consent

In addition to the general power to use reasonable force described above, the Head and authorised staff can use such force as is reasonable given the circumstances to conduct a search for the following “prohibited items”: • knives and weapons • alcohol • illegal drugs • stolen items • tobacco and cigarette papers • fireworks • pornographic images • any article that has been or is likely to be used to commit an offence, cause personal injury or damage to property. Force cannot be used to search for other items banned under the school rules. Please see the Search Policy for further details of search arrangements.

Recording and Review

From April 2026 the school has a statutory duty to record and report each significant incident of force, as well as every incident of seclusion or non-force related restraint. An incident of restraint may occur with or without direct physical contact. For restraint incidents that occur without direct physical contact, for example, the removal of a walking aid, these must be recorded under the procedures outlined below.

Recording: All incidents where reasonable force has been used should be brought to the immediate attention of the Deputy Head. A written report of the incident and its context will be completed and submitted to the Deputy Head, who will inform the Head and oversee arrangements for parental contact. Parental contact will be made as soon as possible and **no later than the same day** of the incident. The requirement to record applies even if the use of seclusion or restraint in certain circumstances is agreed with parents as part of a pupil’s behaviour support plan. Details of the incident leading to the use of force or restraint should be recorded in CPOMS by the Designated Safeguarding Lead or an authorised Deputy DSL. The record will also be kept centrally by the Head.

The record should include:

- names of pupil and staff directly involved
- time, date, location and approximate duration of the intervention

- any relevant needs or circumstance of the pupil, including whether the pupil has and identified special educational need or disability and their SEN status code
- brief account of why the intervention was assessed as necessary in that instance
- details of any physical injuries sustained, if applicable
- any post-incident support, such as details of any medical treatment for injuries or other adverse impacts

The Head and Governing Body will review restrictive intervention records periodically to identify:

- patterns or trends
- repeated incidents
- disproportionate impact on particular groups
- training needs
- safeguarding concerns

Following any significant incident:

- the pupil should be given an opportunity to debrief and reflect when calm and managed in a way that is age appropriate
- staff involved should receive appropriate support
- consideration should be given to whether amendments are required to risk assessments or behaviour support plans,

Review: Any incident where reasonable force or restraint have been necessary will be reviewed by the Designated Safeguarding Lead and the Head.

Deputy Head

April 2026

See also Appendix I of the School's Good Behaviour policy.

Appendix 7 Physical contact with pupils

You are referred to Appendix 6 for specific guidance on the use of force or physical restraint against pupils. The guidance in this Appendix concerns physical contact in other circumstances.

- 1 **When physical contact may be appropriate:** Physical contact with a pupil may be necessary and beneficial in order to demonstrate a required action, or a correct technique in, for example, singing and other music lessons or during PE, sports and games. Any physical contact should be in response to the pupil's needs, of limited duration and appropriate to the pupil's age, stage of development, gender, ethnicity and background. Physical contact can be easily misinterpreted and should be limited. Staff should use professional judgement.
- 2 **Guidance on using physical contact:** You should observe the following guidelines (where applicable):
 - 2.1 explain the intended action to the pupil;
 - 2.2 do not proceed with the action if the pupil appears to be apprehensive or reluctant, or if you have other concerns about the pupil's likely reaction;
 - 2.3 ensure the physical contact continues for as short a time as possible;
 - 2.4 ensure that the door is open and if you are in any doubt, ask a colleague or another pupil to be present during the demonstration; and
 - 2.5 consider alternatives if it appears likely that the pupil might misinterpret the contact.
- 3 **Report concerns:** If you are at all concerned about any instance of physical contact, inform the Deputy Head / Head without delay, and make a written record will be kept centrally and on the pupil's file if necessary.
- 4 **Offering comfort to distressed pupils:** Touching may be appropriate where a pupil is in distress and needs comforting. You should use your own professional judgement when you feel a pupil needs this kind of support and should be aware of any special circumstances relating to the pupil. For example, a child who has been abused may find physical contact particularly difficult.
- 5 **Administering first aid:** When administering first aid you should explain to the child what is happening and ensure that the child is aware of the action being taken. The treatment must meet the School's health and safety at work rules and intimate care guidelines, and parents, guardians or carers should be informed. Staff should:
 - 5.1 adhere to the School's policies on first aid and administering medication;
 - 5.2 comply with the necessary reporting requirements;
 - 5.3 make other adults aware of the task that is being undertaken;
 - 5.4 explain what is happening;
 - 5.5 report and record the administration of first aid;
 - 5.6 have regard to any health plans; and
 - 5.7 ensure that an appropriate health / risk assessment is undertaken prior to undertaking certain activities.

- 6 **Pupils' 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:
- 6.1 avoid physical contact or visually intrusive behaviour when children are undressed;
 - 6.2 announce yourself when entering changing rooms and avoid remaining unless required;
 - 6.3 not shower or change in the same place as children; and
 - 6.4 not assist with any personal care task which a pupil can undertake themselves.
- 7 **Intimate care:** Sometimes intimate care is required, for example when assisting with toileting or removing wet clothes. You should:
- 7.1 comply with the School's intimate care guidelines;
 - 7.2 advise other Staff of the task being undertaken and consult where there is any change from the agreed procedure. A record should be kept of the justification for any variations and this information should be shared with parents, guardians or carers;
 - 7.3 explain to the child what is happening;
 - 7.4 comply with applicable professional codes of practice, as appropriate; and
 - 7.5 comply with regularly reviewed, formally agreed plans, as appropriate.
- 8 **Where a child has been abused:** Where a child has previously been abused, Staff should be informed on a "need to know" basis, and should be extra cautious when considering the necessity of physical contact. Some children may seek inappropriate physical contact. Staff should sensitively deter the pupil 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.
- 9 **Children with special educational needs or disabilities:** 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 SENCO will establish whether any reasonable adjustments are required for such pupils.

Appendix 8 Childcare disqualification

- 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**).
- 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 1 September following their fifth birthday).
- 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.
- 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.
- 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 recruitment, selection and disclosure policy and procedure. Staff are required to familiarise themselves with this document.
- 6 **Duty of disclosure:** Staff in a Relevant Role are under an ongoing 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.
- 7 **Ofsted:** Where the School receives disqualification information about a member of Staff working in a Relevant Role and is satisfied that the member of Staff may be disqualified as a consequence, the School is under a duty to report the circumstances of the disqualification to Ofsted.
- 8 **Waiver:** A member of 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.

Appendix 9 Reporting obligations

Reporting obligations

- 1 The School's position:** It is a contractual requirement as well as in your interests to follow the Code of Conduct so as to maintain appropriate standards of behaviour and your own professional reputation. A breach of this Code may be treated as misconduct and will render you liable to disciplinary action including in serious cases, dismissal.
- 2 Exit interviews:** All staff are trained so that they understand they are expected and encouraged to raise concerns they have, whether related to the safeguarding and welfare of pupils, the conduct of staff or other matters, during the course of their employment in accordance with the School's policies (including the whistleblowing policy, the child protection and safeguarding policy and procedures and this Code). Safeguarding children is at the centre of the School's culture and will accordingly be considered formally during staff appraisal from Summer Term 2024 and finally at exit interviews which are offered to all leavers.
- 3 Childcare disqualification:** The School is prohibited from employing 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. You are referred to Appendix 8 for more information on childcare disqualification.
- 4 Termination of employment:** If the School ceases to use the services of a member of 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 Governors without delay. The School may also need to consider a referral to the Disclosure and Barring Service if a member of Staff is suspended, or deployed to another area of work that is not regulated activity.
- 5 Resignation:** If a member of Staff tenders his or her resignation, or ceases to provide his or her services to the School at a time when 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.
- 6 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 he or she 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.

Appendix 10 Whistleblowing Policy

- 1 **Honesty and integrity:** The School is committed to conducting its business with honesty and integrity, and we expect all staff to maintain high standards in accordance with the Code of Conduct. All organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring and to address them when they do occur.
- 2 **Aims:** The aims of this policy are to:
 - 2.1 encourage staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected;
 - 2.2 provide staff with guidance as to how to raise those concerns; and
 - 2.3 reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.
- 3 **Staff:** This policy covers all employees, officers, governors, consultants, contractors, volunteers, work placement students, casual workers and agency workers.

Wrongdoing at work

- 4 **Whistleblowing:** Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:
 - 4.1 criminal activity;
 - 4.2 safeguarding concerns (see paragraph 9 below);
 - 4.3 failure to comply with any legal or professional obligation or regulatory requirements;
 - 4.4 miscarriages of justice;
 - 4.5 danger to health and safety;
 - 4.6 damage to the environment;
 - 4.7 bribery;
 - 4.8 financial fraud or mismanagement;
 - 4.9 other unlawful or unethical conduct in the workplace;
 - 4.10 the deliberate concealment of any of the above matters.
- 5 **Whistleblower:** A whistleblower is a person who raises a genuine concern relating to any of the above. Reporting concerns about your own conduct or alleged conduct will not be considered whistleblowing but rather as part of your contractual duty of disclosure, with investigation commenced as appropriate. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities and such disclosure is in the public interest (a whistleblowing concern) you should report it under this policy.

- 6 **Grievances:** This procedure should not be used where you have a complaint relating to your personal circumstances in the workplace. The grievance procedure should be used in such cases.
- 7 **Detriment:** Provided that this procedure is used appropriately and correctly, you will not suffer any detriment as a result of reporting a suspected wrongdoing.
- 8 **Advice:** If you are uncertain whether something is within the scope of this policy you should seek advice from the Head, Head of HR and Compliance or Designated Safeguarding Lead, Protect, the NSPCC whistleblowing helpline or the Modern Slavery helpline.

Safeguarding

- 9 **Safeguarding:** Nothing within this policy is intended to prevent staff from complying with their statutory obligations in accordance with *KCSIE in education* (DfE, September 2025). In particular:
 - 9.1 **Safeguarding / child protection policy:** If you have any concerns about a pupil's welfare, action should be taken immediately (even if they are low level concerns). You should report the concern to the Designated Safeguarding Lead or the Deputy Designated Safeguarding Lead. See the School's child protection and safeguarding policy and procedures for full information about what to do if you have a concern about a pupil, including what to do if the Designated Safeguarding Lead is not available.
 - 9.2 **Safeguarding - member of staff:** You must raise any concerns about another staff member (even if they are low level concerns) with the Head or DSL in accordance with the procedure for managing concerns and allegations which is contained within the School's child protection and safeguarding policy.
 - 9.3 **Whistleblowing policy:** You should follow this procedure to raise concerns about poor or unsafe practices at the School or potential failures by the School or staff to properly fulfil its safeguarding responsibilities.
- 10 **The Modern Slavery helpline:** The School is committed to the prevention of modern slavery. If you have any queries relating to modern slavery please contact the DFO. Identified instances of modern slavery should be immediately notified to the police. If you think you have identified an instance of modern slavery, or if you consider that you may be a victim of modern slavery you may contact the Modern Slavery helpline on 0800 0121 700.
- 11 **Exit interviews:** All staff are trained so that they understand they are expected and encouraged to raise concerns they have, whether related to the safeguarding and welfare of pupils, the conduct of staff or other matters, during the course of their employment in accordance with this policy. Safeguarding children is at the centre of the School's culture and concerns should always be raised in accordance with paragraph 9 above. If issues have not been identified before, safeguarding will always be considered formally during staff performance development reviews and appraisal and finally at exit interviews which are held with all leavers. Staff who raise concerns about working practices at the School to the Designated Safeguarding Lead or an appropriate senior member of Staff will be protected from detriment under this policy.

Confidentiality

- 12 **Confidentiality:** We hope that staff will feel able to voice whistleblowing concerns openly under this policy. However, if you want to raise your concern confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.

- 13 **Anonymous disclosures:** We do not encourage staff to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible.

Stage one

- 14 **Procedure:** You should disclose the suspected wrongdoing first to your Head of Department / Line Manager. In the event that your Head of Department / Line Manager is involved in the suspected wrongdoing, you should proceed directly to Stage Two of this procedure.
- 15 **Response:** You can expect a response detailing to whom the disclosure has been notified or any action taken within seven days of your Head of Department / Line Manager becoming aware of the disclosure.

Stage two

- 16 **Procedure:** If no response is forthcoming after seven days from your Head of Department / Line Manager, if you are not satisfied with the way in which your concern has been handled or if your Head of Department / Line Manager is involved in the suspected wrongdoing you should notify the Head or DFO, as appropriate.
- 17 **Response:** You can expect a response detailing any action taken within seven days of the Head or DFO / Compliance Manager becoming aware of the disclosure.

Stage three

- 18 **Procedure:** If no such response is forthcoming after seven days from the Head or DFO, if you are not satisfied with the way in which your concern has been handled or if the Head / or DFO is involved in the suspected wrongdoing you should inform the Chair of Governors of the disclosure.

Relevant external reporting

- 19 **Outside body:** The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. The law recognises, as does paragraph 9 above, that in some circumstances it may be appropriate for you to report your concerns to a relevant outside body including:
- 19.1 the local authority's Designated Officer;
 - 19.2 Children's Social Care;
 - 19.3 the NSPCC;
 - 19.4 the Health and Safety Executive;
 - 19.5 the Environment Agency;
 - 19.6 the Information Commissioner;
 - 19.7 the Department for Education, where referrals can be made at <https://www.gov.uk/contact-dfe>;
 - 19.8 the Department for Business, Energy and Industrial Strategy;
 - 19.9 the police;

- 19.10 the Charity Commission;
 - 19.11 the Boarding Schools Association;
 - 19.12 the Independent Schools Inspectorate;
 - 19.13 the Office for Standards in Education, Children's Services and Skills (**Ofsted**); or
 - 19.14 the Channel Police Practitioner.
- 20 **Advice:** Staff are strongly encouraged to seek advice before reporting a concern to anyone external. In most cases you should not find it necessary to alert anyone external but before you do, as well as considering the internal help and support available which is identified above, please seek external advice from:
- 20.1 **Protect:** If you have any concerns about disclosing a suspected wrongdoing the independent whistleblowing charity, Protect, operates a confidential helpline. Staff can call 020 3117 2520 for advice.
 - 20.2 **NSPCC:** The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call 0808 800 5000 (12.00 pm to 4.00 pm Monday to Friday) or email help@nspcc.org.uk.
 - 20.3 **The Modern Slavery helpline:** The Modern Slavery helpline is available for staff who do not feel able to raise concerns about modern slavery internally. Staff can call on 0800 0121 700.
- 21 **The media:** You should under no circumstances approach a commercial body or the media with details of the suspected wrongdoing. If you approach any such body and / or where your concern is disclosed in a malicious manner or for personal gain, the protection given to you by this procedure may be lost. Additionally, the School may consider this to be gross misconduct and disciplinary action may be taken against you.
- 22 **Queries:** If you have any queries about this procedure, you should contact the Head of HR and Compliance.

Appendix I I

12.1.1 Low Level Concerns

A Low-Level Concern is any concern – no matter how small, even if no more than a ‘nagging doubt’ – that any member of staff may have acted in a manner which:

- does not meet the allegations threshold or is not considered serious enough to refer to the Local Authority Designated Officer (LADO)
- is not consistent with an organisation’s Code of Conduct and values
- undermines trust in expected behaviours
- relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult’s suitability to work with children.

Examples of low-level concerns could include:

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone
- shouting at children
- using inappropriate, sexualized, intimidating or offensive language

To help prevent low-level concerns (LLC), staff codes of conduct, behaviour policies and safeguarding policies and procedures should be implemented effectively and appropriate action should be taken to deal with any concern.

Staff do not need to be able to determine in each case whether their concern is a low-level concern, or if it is in fact serious enough to consider a referral to the LADO, or meets the threshold of an allegation. Once staff share what they believe to be a low-level concern that determination should be made by the Safeguarding Lead or Head.

Low-level concerns at the School should be reported to the Head or the DSL. The Safeguarding Lead should share the low-level concern immediately with the Head. If there are concerns about this DSL, these should be reported to the Head. If the concern is about the Head it should be shared with the Chair of Governors.

The School aims to create an environment where staff are encouraged and feel confident to self-refer if they have found themselves in a situation which might be misinterpreted or they have behaved in a way that falls below professional standards.

Low-level concerns 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.

The Head keeps a written record of concerns. Records should include the details of the concern, how the concern arose and the actions taken. Records should be reviewed so that patterns of concerning behaviour can be recognised and appropriate action can be taken. When reviewing patterns of behaviour the School must consider if any wider cultural issues in School contributed to or enabled the behaviour to occur and if so whether further training or a revision of policies is required.

Version control

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