



# Wellsway Multi Academy Trust

## Code of Conduct

### for Safer Working Practice

#### 1 INTRODUCTION

Wellsway Multi Academy Trust (WMAT) is required to set out a Code of Conduct for Safer Working Practice for all Trust employees. The purpose of this document is to keep children safe in education and to give clear guidance for safer working practice for adults who work with children and young people in WMAT.

In addition to this policy, all staff employed under Teachers' Terms and Conditions of Employment have a statutory obligation to adhere to the 'Teachers' Standards' (updated 2013) and in relation to this policy, Part 2 of the Teachers' Standards - Personal and Professional Conduct.

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/301107/Teachers\\_Standards.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/301107/Teachers_Standards.pdf)

Employees should be aware that a failure to comply with the following Code of Conduct for Safer Working Practice could result in disciplinary action including dismissal.

This document has been adapted from the 'Guidance for safer working practice for those working with children and young people in education settings, October 2015' and was adapted and updated by the Safer Recruitment Consortium and issued as part of the South Gloucestershire HR Safer Recruitment training delivered in the academic year 2015-2016.

#### **Definitions**

For ease of reading, references are made to 'Trust' and/or 'school' and setting. These terms encompasses the different types of educational establishments within WMAT, including academies, free schools, sixth form provisions, Early Years settings and WMAT central support services.

References made to 'child' and 'children' refer to children and young people under the age of 18 years. However, the principles of the document apply to professional behaviours towards all students/pupils, including those over the age of 18 years. 'Child' should therefore be read to mean any student/pupil at the education establishment.

References made to adults and staff refer to all those who work with students/pupils in any of the Trust/school settings, including WMAT central support services, in either a paid or unpaid capacity.

This would also include, for example, those who are not directly employed by the Trust/school e.g. Local Authority staff, sports coaches etc.

The term 'allegation' means where it is alleged that a person who works with children has

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child; or,
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children.

References are made in this document to legislation and statutory guidance which differ dependent on the setting and alter over time. However, the behavioural principles contained within the document remain consistent, hence, wherever possible, such references have been removed in order that the document does not appear to quickly become out of date or to apply only to certain staff or settings.

## **2 PURPOSE, SCOPE AND PRINCIPLES**

The Code of Conduct is designed to give clear guidance on the standards of behaviour all WMAT employees are expected to observe. In order to achieve this WMAT should notify all employees of this code and the expectations therein.

WMAT staff are role models and are in a unique position of influence and must adhere to behaviour that sets a good example to all students/pupils within the Trust. As a member of a school community, each WMAT employee has an individual responsibility to maintain their reputation and the reputation of the Trust, either inside or outside working hours.

This Code of Conduct applies to all people working at any WMAT schools or settings whether they are paid, contracted or volunteers; including the Chief Executive Officer (CEO) and Principals/Headteachers.

## **3 OVERVIEW**

It is important WMAT provides clear guidance to clarify the conduct expected of all staff working or volunteering at WMAT and its schools to ensure all steps are taken to safeguard children and ensure adults working with them do so safely.

All staff have a responsibility to be aware of systems within WMAT and its schools which support safeguarding and these should be explained as part of staff induction and in regular staff training sessions. This includes the Trust/school's Child Protection Policy and this staff Code of Conduct for Safer Working Practice.

There may be times when professional judgements are made in situations not covered by this document, or which directly contravene the guidance given by their employer. It is expected that in these circumstances staff will always advise their senior colleagues of the justification for any such action already taken or proposed.

This document aims to clarify what is expected in terms of professional behaviour; it gives clear advice about what constitutes illegal behaviour and what might be considered as misconduct. It also describes safe practice and which behaviours should be avoided.

#### **4 UNDERLYING PRINCIPLES**

- The welfare of the child is paramount
- Staff must know who the Designated Safeguarding Lead (DSL) and/or Deputy Designated Safeguarding Lead (DDSL) is in their work location
- Staff should understand their responsibilities to safeguard and promote the welfare of students/pupils
- Staff are responsible for their own actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motivation and intentions
- Staff should work, and be seen to work, in an open and transparent way
- Staff should acknowledge that deliberately invented/malicious allegations are extremely rare and that all concerns should be reported and recorded
- Staff should discuss and/or take advice promptly from their line manager if they have acted in a way which may give rise to concern
- Staff should apply the same professional standards regardless of culture, disability, gender, language, racial origin, religious belief and sexual orientation
- Staff should not consume or be under the influence of alcohol or any substance, including prescribed medication, which may affect their ability to care for children
- Staff should be aware that breaches of the law and other professional guidelines could result in disciplinary action being taken against them, criminal action and/or other proceedings including barring by the Disclosure & Barring Service (DBS) from working in regulated activity, or for acts of serious misconduct prohibition from teaching by the National College of Teaching & Leadership (NCTL).
- Staff and managers should continually monitor and review practice to ensure this guidance is followed
- Staff should be aware of and understand their establishment's child protection policy, arrangements for managing allegations against staff, staff behaviour policy, whistle blowing procedure and their Local Safeguarding Children Board LSCB procedures.

#### **5 CONDUCT AND DRESS CODE EXPECTED OF ALL STAFF**

As role models to students/pupils in our schools WMAT expects staff to dress in a professional manner which expresses both personal dignity and appropriate modesty. Staff should ensure they are dressed decently, safely and appropriately for the tasks they undertake. Those who dress or appear in a manner which could be viewed as offensive or inappropriate will render themselves vulnerable to criticism or allegation.

The Trust is aware that we have many young pupils, students and young adults who are at a very impressionable stage of their development therefore WMAT requires the following dress code to apply to all staff:

- ‘Business dress’ (including ties for men) unless the role dictates otherwise (e.g. PE Teachers)
- Where the school/Trust has provided polo shirts/outerwear or other PPE clothing and equipment, this should be worn at all times e.g. catering staff, site staff etc.
- No denim (unless participating in a trip/visit that would require harder wearing clothing)
- Clothing that is not likely to be viewed as offensive, revealing or sexually provocative (e.g. the wearing of tight clothing such as female members of staff wearing leggings)
- Clothing that does not distract, cause embarrassment or give rise to misunderstanding
- Clothing that is not considered to be discriminatory and is culturally sensitive
- Visible tattoos are discouraged and must be discreet
- Discreet piercings are acceptable.

Staff should seek guidance from the Principal/Headteacher if they are unclear on the requirements for dressing in a professional manner.

In the context of a primary school it is acknowledged there are practicalities that need to be taken into account in relation to dress and working with younger children. Therefore the Principal/Headteacher will establish reasonable expectations of dress within the primary setting that uphold the principle of professionalism in respect of the dress standards that WMAT seeks to establish.

Where there is a refusal to comply with the dress code then this may result in disciplinary action.

Where staff badges are issued these must be worn at all times. Name badges not only enhance site security making it easier to identify people who should not be on the site but also supports the Trusts’ continual focus and drive on implementing systems aimed at safeguarding children whilst they are in our care.

Any enquiries regarding the operation of our dress code (including whether an article of clothing is suitable to wear to work) should be made to your Principal/Headteacher, Business Manager, WMAT Business Director or WMAT HR Manager.

## 6 GUIDANCE

Adults have a crucial role to play in the lives of children. Each section provides general guidance about a particular aspect of work and, in the right hand column, specific guidance about which behaviours should be avoided and which are recommended.

Some settings will have additional responsibilities arising from their regulations (e.g. Early Years Foundation Stage (EYFS), Quality Standards) or their responsibility towards young people over the age of 18. Not all sections of the guidance will, therefore, be relevant to all educational establishments within WMAT.

### 1. Introduction

Adults have a crucial role to play in the lives of children. This Code of Conduct for Safer Working Practice will help all staff establish the safest possible learning and working environments which safeguard children and reduce the risk of staff being falsely accused of improper or unprofessional conduct.

### This means that these guidelines:

apply to all adults working in Education and Early Years settings whatever their position, role or responsibilities.

## 2. Responsibilities

WMAT staff are accountable for the way in which they: exercise authority; manage risk; use resources; and safeguard children.

All staff have a responsibility to keep students/pupils safe and to protect them from abuse (sexual, physical and emotional), neglect and safeguarding concerns.

Students/pupils have a right to be safe and to be treated with respect and dignity. It follows that trusted adults are expected to take reasonable steps to ensure their safety and well-being. Failure to do so may be regarded as professional misconduct.

The safeguarding culture of a school is, in part, exercised through the development of respectful, caring and professional relationships between adults and students/pupils and behaviour by the adult that demonstrates integrity, maturity and good judgement.

The public, local authorities, employers and parents/carers will have expectations about the nature of professional involvement in the lives of children. When individuals accept a role working in an education setting they should understand and acknowledge the responsibilities and trust involved in that role.

WMAT has a duty of care towards their employees and others under Health and Safety legislation which requires them to take steps to provide a safe working environment for them.

Legislation also imposes a duty on employees to take care of themselves and anyone else who may be affected by their actions or failings. An employer's Health and Safety duties and the adults' responsibilities towards children should not conflict. Safe practice can be demonstrated through the use and implementation of these guidelines.

## 3. Making professional judgements

This guidance does not provide a complete checklist of what is, or is not, appropriate behaviour for staff. It does highlight however, behaviour which is illegal, inappropriate or inadvisable.

There will be rare occasions and circumstances in which staff have to make decisions or take action in the best interest of a student/pupil which could contravene this guidance or where no guidance exists. Individuals are expected to make judgements about their behaviour in order to secure the best

### **This means that staff should:**

- Understand the responsibilities which are part of their employment or role, and be aware that sanctions will be applied if these provisions are breached.

- Always act, and be seen to act, in the child's best interests.

- Avoid any conduct which would lead any reasonable person to question their motivation and intentions.

- Take responsibility for their own actions and behaviour

### **This means that WMAT should:**

- Promote a culture of openness and support.

- Ensure that systems are in place for concerns to be raised.

- Ensure that adults are not placed in situations which render them particularly vulnerable.

- Ensure that all adults are aware of expectations, policies and procedures.

### **This means that WMAT and Governing Bodies should:**

- ensure that appropriate safeguarding and child protection policies and procedures are distributed, adopted, implemented and monitored.

### **This means that where no specific guidance exists staff should:**

- Discuss the circumstances that informed their action, or their proposed action, with their line manager or, where appropriate, the school's Designated Safeguarding Lead. This will help to ensure that the safest practices are employed and

<p>interests and welfare of the students/pupils in their charge and, in so doing, will be seen to be acting reasonably. These judgements should always be recorded and shared with a manager.</p> <p>Adults should always consider whether their actions are warranted, proportionate, safe and applied equitably.</p>	<p>reduce the risk of actions being misinterpreted.</p> <ul style="list-style-type: none"> <li>- Always discuss any misunderstanding, accidents or threats with the Principal/Headteacher or Designated Safeguarding Lead.</li> <li>- Always record discussions and actions taken with their justifications.</li> <li>- Record any areas of disagreement and, if necessary refer to another agency/the LA/Ofsted/NCTL/other Regulatory Body.</li> </ul>
<p><b>4. Power and positions of trust and authority</b></p> <p>As a result of their knowledge, position and/or the authority invested in their role, all those working with children in a school or education setting are in a position of trust in relation to all students/pupils on the roll.</p> <p>The relationship between a member of staff working with a student/pupil is one in which the adult has a position of power or influence. It is vital for adults to understand this power; that the relationship cannot be one between equals and the responsibility they must exercise as a consequence.</p> <p>The potential for exploitation and harm of vulnerable students/pupils means that adults have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.</p> <p>Staff should always maintain appropriate professional boundaries, avoid behaviour which could be misinterpreted by others and report and record any such incident.</p> <p>Where a person aged 18 or over is in a position of trust with a child under 18, it is an offence (Sexual Offences Act 2013) for that person to engage in sexual activity with or in the presence of that child, or to cause or incite that child to engage in or watch sexual activity.</p> <p>Where a person aged 18 or over is in a position of trust established with a person who has only recently left the school, any attempt to engage in sexual activity with that person will be a cause for concern and will be treated as a breach of trust established in that prior relationship</p>	<p><b>This means that staff should not:</b></p> <ul style="list-style-type: none"> <li>- Use their position to gain access to information for their own advantage and/or a student/pupil's or family's detriment.</li> <li>- Use their power to intimidate, threaten, coerce or undermine students/pupils.</li> <li>- Use their status and standing to form or promote relationships with students/pupils which are of a sexual nature, or which may become so.</li> </ul>

## 5. Confidentiality

The storing and processing of personal information is governed by the Data Protection Act 1998. WMAT provide clear advice to staff about their responsibilities under this legislation so that, when considering sharing confidential information, those principles should apply. This advice and guidance can be found in the WMAT Data Protection Policy.

Staff may have access to confidential information about students/pupils and their families which must be kept confidential at all times and only shared when legally permissible to do so and in the interest of the child. Records should only be shared with those who have a legitimate professional need to see them.

Staff should never use confidential or personal information about a student/pupil or her/his family for their own, or others advantage (including that of partners, friends, relatives or other organisations). Information must never be used to intimidate, humiliate, or embarrass the child.

Confidential information should never be used casually in conversation or shared with any person other than on a need-to-know basis. In circumstances where the student/pupil's identity does not need to be disclosed the information should be used anonymously.

There are some circumstances in which a member of staff may be expected to share information about a student/pupil, for example when abuse is alleged or suspected. In such cases, individuals have a responsibility to pass information on without delay, but only to those with designated safeguarding responsibilities.

If a child – or their parent / carer – makes a disclosure regarding abuse or neglect, the member of staff should follow the setting's procedures. The adult should not promise confidentiality to a child or parent/carer, but should give reassurance that the information will be treated sensitively.

Additionally concerns and allegations about adults should be treated as confidential and passed to the Principal/Headteacher without delay.

If a member of staff is in any doubt about whether to share information or keep it confidential he or she should seek guidance from their Designated Safeguarding Lead (this information will be provided as part of an employee's induction).

### This means that staff:

- Need to know the name of their local Designated Safeguarding Lead (DSL) and be familiar with LSCB child protection procedures and guidance (this information will be provided as part of an employee's induction when they join the school).

- Are expected to treat information they receive about students/pupils and families in a discreet and confidential manner.

- Should seek advice from a senior manager (Designated Safeguarding Lead) if they are in any doubt about sharing information they hold or which has been requested of them.

- Need to be clear about when information can/ must be shared and in what circumstances.

- Need to know the procedures for responding to allegations against staff and to whom any concerns or allegations should be reported.

- Need to ensure that where personal information is recorded using modern technologies that systems and devices are kept secure.

<p>Any media or legal enquiries should be passed to senior management.</p>	
<p><b>6. Standards of behaviour</b>  All staff have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of children. They should adopt high standards of personal conduct in order to maintain confidence and respect of the general public and those with whom they work.</p> <p>There may be times where an individual’s actions in their personal life come under scrutiny from the community, the media or public authorities, including with regard to their own children, or children or adults in the community. Staff should be aware that their behaviour, either in or out of the workplace, could compromise their position within the work setting in relation to the protection of children, loss of trust and confidence, or bringing the employer into disrepute. Such behaviour may also result in -, prohibition from teaching by the NCTL, a bar from engaging in regulated activity, or action by another relevant regulatory body.</p> <p>The Childcare (Disqualification) Regulations 2009 set out grounds for disqualification under the Childcare Act 2006 where the person or a person living in the same household or employed in the same household meets certain criteria set out in the Regulations. For example, an individual will be disqualified where they have committed a relevant offence against a child; been subject to a specified order relating to the care of a child; committed certain serious sexual or physical offences against an adult; been included on the DBS children’s barred list; been made subject to a disqualification order by the court; previously been refused registration as a childcare provider or provider or manager of a children’s home or had such registration cancelled.</p> <p>A disqualified person is prohibited from providing relevant early or later year’s childcare as defined in the Childcare Act 2006 or being directly concerned in the management of such childcare. Schools and private childcare settings are also prohibited from employing a disqualified person in respect of relevant early or later years childcare.</p>	<p><b>This means that staff should not:</b></p> <ul style="list-style-type: none"> <li>- Behave in a manner which would lead any reasonable person to question their suitability to work with children or to act as an appropriate role model.</li> <li>- Behave in such a way where private interests and behaviour conflict with public duty/ professional standards such as drink driving.</li> <li>- Make, or encourage others to make sexual remarks to, or about, a student/pupil.</li> <li>- Use inappropriate language to or in the presence of students/pupils.</li> <li>- Discuss their personal or sexual relationships with or in the presence of students/pupils.</li> <li>- Make (or encourage others to make) unprofessional personal comments which scapegoat, demean or humiliate, or might be interpreted as such.</li> </ul> <p><b>This means that staff should:</b></p> <ul style="list-style-type: none"> <li>- Be aware that behaviour by themselves, those with whom they share a household, or others in their personal lives, may impact on their work with children.</li> <li>- Understand that a person who provides Early Years education or Childcare may be disqualified because of their “association” with a person living or employed in the same household who is disqualified.</li> </ul>
<p><b>7. Dress and appearance</b>  A person's dress and appearance are matters of personal choice and self-expression and some individuals will wish to exercise their own cultural customs. However staff should select a manner of dress and appearance appropriate to their</p>	<p><b>This means that staff should wear clothing which:</b></p> <ul style="list-style-type: none"> <li>- Promotes a positive and professional image.</li> </ul>

<p>professional role and which may be necessarily different to that adopted in their personal life. Smart and professional appearance is expected at all times by staff.</p> <p>Staff should ensure they are dressed decently, safely and appropriately for the tasks they undertake. Those who dress or appear in a manner which could be viewed as offensive or inappropriate will render themselves vulnerable to criticism or allegation.</p> <p>Staff should familiarise themselves with the WMAT Dress Code – See Section 5</p>	<ul style="list-style-type: none"> <li>- Is appropriate to their role.</li> <li>- Is not likely to be viewed as offensive, revealing, or sexually provocative.</li> <li>- Does not distract, cause embarrassment or give rise to misunderstanding.</li> <li>- Is absent of any political or otherwise contentious slogans.</li> <li>- Is not considered to be discriminatory.</li> <li>- Is compliant with professional standards.</li> </ul> <p>See Section 5 for the WMAT Dress Code</p>
<p><b>8. Gifts, rewards, favouritism and exclusion</b></p> <p>Schools will have policies in place regarding the giving of gifts or rewards to students/pupils and the receiving of gifts from them or their parents/carers; staff should ensure they are aware of and understand what is expected of them.</p> <p>Staff need to take care that they do not accept any gift that might be construed as a bribe by others, or lead the giver to expect preferential treatment.</p> <p>There are occasions when students/pupils or parents/carers wish to pass small tokens of appreciation to staff e.g. at Christmas or as a thank-you and this is usually acceptable. However, it is unacceptable to receive gifts on a regular basis or of any significant value. Any member of staff concerned about whether they or their colleagues may be at risk of giving or receiving a bribe (financial or otherwise) should contact the Principal/Headteacher.</p> <p>Similarly, it is inadvisable to give such personal gifts to students/pupils or their families. This could be interpreted as a gesture either to bribe or groom. It might also be perceived that a 'favour' of some kind is expected in return. It is acceptable for staff to offer prizes of <u>small</u> value in certain tasks or competitions.</p> <p>Any reward given to a student/pupil should be small in value, accordance with agreed practice, consistent with the school's</p>	<p><b>This means that staff should:</b></p> <ul style="list-style-type: none"> <li>- Be aware of and understand their school's relevant policies, e.g. rewarding positive behaviour, behaviour policy.</li> <li>- Ensure that gifts received or given in situations which may be misconstrued are declared and recorded.</li> <li>- Only give gifts to a student/pupil as part of an agreed reward system.</li> <li>- Where giving gifts other than as above, ensure that these are of insignificant value and given to all students/pupils equally.</li> <li>- Ensure that all selection processes of students/pupils are fair and these are undertaken and agreed by more than one member of staff.</li> <li>- Ensure that they do not behave in a manner which is either favourable or unfavourable to individual students/pupils.</li> </ul>

<p>behaviour and/or rewards policy, recorded and not based on favouritism.</p> <p>Adults should exercise care when selecting children for specific activities, jobs or privileges in order to avoid perceptions of favouritism or injustice. Similar care should be exercised when pupils are excluded from an activity. Methods of selection and exclusion should always be subject to clear, fair, agreed criteria.</p>	
<p><b>9. Infatuations and ‘crushes’</b></p> <p>Staff need to be aware that it is not uncommon for students/pupils to be strongly attracted to a member of staff and/or develop a ‘crush’ or infatuation. Staff should make every effort to ensure that their own behaviour cannot be brought into question, does not appear to encourage this and be aware that such infatuations may carry a risk of their words or actions being misinterpreted.</p> <p>Any member of staff who receives a report, overhears something, or otherwise notices any sign, however small or seemingly insignificant, that a young person has become or may be becoming infatuated with either themselves or a colleague, should immediately report this to the Principal/Headteacher or most senior manager. If the Principal/Headteacher has the concern that a young person is becoming infatuated with them, they should report this to the chair of Governors. In this way appropriate early intervention can be taken which can prevent escalation and avoid hurt, embarrassment or distress for those concerned.</p> <p>The Principal/Headteacher (or senior manager) should give careful thought to those circumstances where the staff member, student/pupil and their parents/carers should be spoken to and should ensure a plan to manage the situation is put in place. This plan should respond sensitively to the child and staff member and maintain the dignity of all. This plan should involve all parties, be robust and regularly monitored and reviewed.</p>	<p><b>This means that staff should:</b></p> <ul style="list-style-type: none"> <li>- report any indications (verbal, written or physical) that suggest a student/pupil may be infatuated with a member of staff</li> <li>- always maintain professional boundaries and be mindful if they are alone in a room with a student</li> </ul> <p><b>This means that Principal/Headteacher (or senior manager, Chair of Governors) should:</b></p> <ul style="list-style-type: none"> <li>- put action plans in place where concerns are brought to their attention.</li> </ul>
<p><b>10. Social contact outside of the workplace</b></p> <p>It is acknowledged that staff may have genuine friendships and social contact with parents/carers of students/pupils, independent of the professional relationship.</p> <p>Staff should, however, also be aware that professionals who sexually harm children often seek to establish relationships and contact outside of the workplace with both the child and their parents, in order to ‘groom’ the adult and the child and/or create opportunities for sexual abuse.</p>	<p><b>This means that staff should:</b></p> <ul style="list-style-type: none"> <li>- Always approve any planned social contact with students/pupils or parents/carers with senior colleagues e.g Principal/Headteacher, for example when it is part of a reward scheme.</li> <li>- Advise senior management of any regular social contact they have with a</li> </ul>

<p>It is also important to recognise that social contact may provide opportunities for other types of grooming such as for the purpose of sexual exploitation or radicalisation.</p> <p>Staff should recognise that some types of social contact with students/pupils or their families could be perceived as harmful or exerting inappropriate influence on children, and may bring the setting into disrepute (e.g. attending a political protest, circulating propaganda).</p> <p>If a student/pupil or parent/carer seeks to establish social contact, or if this occurs coincidentally, the member of staff should exercise her/his professional judgement. This also applies to social contacts made through outside interests or the staff member's own family.</p> <p>Some staff may, as part of their professional role, be required to support a parent/carer. If that person comes to depend upon the staff member or seeks support outside of their professional role this should be discussed with senior management and where necessary referrals made to the appropriate support agency.</p>	<p>student/pupil which could give rise to concern.</p> <ul style="list-style-type: none"> <li>- Refrain from sending personal communication to students/pupils or parents/carers unless agreed with senior managers.</li> <li>- Inform senior management of any relationship with a parent/carer where this extends beyond the usual parent/professional relationship.</li> <li>- Inform senior management of any requests or arrangements where parents/carers wish to use a staff members services outside of the workplace e.g. babysitting, tutoring.</li> </ul>
<p><b>11. Communication with children (including the use of technology)</b></p> <p>In order to make best use of the many educational and social benefits of new and emerging technologies, students/pupils need opportunities to use and explore the digital world. E-safety risks are posed more by behaviours and values than the technology itself.</p> <p>Staff should ensure that they establish safe and responsible online behaviours, working to local and national guidelines and acceptable use policies which detail how new and emerging technologies may be used.</p> <p>Communication with children both in the 'real' world and through web based and telecommunication interactions should take place within explicit professional boundaries. This includes the use of computers, tablets, phones, texts, e-mails, instant messages, social media such as Facebook and Twitter, chat-rooms, forums, blogs, websites, gaming sites, digital cameras, videos, web-cams and other hand held devices. (Given the ever changing world of technology it should be noted that this list gives examples only and is not exhaustive.)</p> <p>Staff should not request or respond to any personal information from children other than which may be necessary in their professional role. They should ensure that their communications are open and transparent and avoid any</p>	<p><b>This means that staff should:</b></p> <ul style="list-style-type: none"> <li>- Not seek to communicate/make contact or respond to contact with students/pupils outside of the purposes of their work.</li> <li>- Not give out their personal details.</li> <li>- Where appropriate use only equipment and Internet services provided by the school or Trust.</li> <li>- Follow the school / Trust's Acceptable Use of IT policy.</li> <li>- Follow procedures in relation to accessing the Trusts' network and drives via remote access and never store Trust information on personal devices e.g. home PC, memory stick etc.</li> <li>- Ensure that their use of technologies could not bring WMAT into disrepute.</li> <li>- Be cautious in their contact with ex-pupils.</li> </ul>

communication which could be interpreted as 'grooming behaviour'.

Staff should not give their personal contact details to children for example, e-mail address, home or mobile telephone numbers, details of web based identities. If children locate these by any other means and attempt to contact or correspond with the staff member, the adult should not respond and must report the matter to their manager. The child should be firmly and politely informed that this is not acceptable.

Staff should, in any communication with children, also follow the guidance in section 6 'Standards of Behaviour'.

Staff should adhere to the relevant school/Trust policies, including those with regard to communication with parents and carers and the information they share when using the internet.

Communication with ex-students who are over 18 is left to staff discretion. However staff should be aware of the fact that ex-students may be in touch with current students/pupils.

**12. Physical contact**

There are occasions when it is entirely appropriate and proper for staff to have physical contact with children, however, it is crucial that they only do so in ways appropriate to their professional role and in relation to the student/pupil's individual needs and any agreed care plan.

Not all children feel comfortable about certain types of physical contact; this should be recognised and, wherever possible, adults should seek the student/pupil's permission before initiating contact and be sensitive to any signs that they may be uncomfortable or embarrassed.

Staff should acknowledge that some students/pupils are more comfortable with touch than others and/or may be more comfortable with touch from some adults than others. Staff should listen, observe and take note of the child's reaction or feelings and, so far as is possible, use a level of contact and/or form of communication which is acceptable to the student/pupil.

It is not possible to be specific about the appropriateness of each physical contact, since an action that is appropriate with one student/pupil, in one set of circumstances, may be inappropriate in another, or with a different child. Any physical contact should be in response to the child's needs at the time, of limited duration and appropriate to their age, stage of

**This means that staff should:**

- Be aware that even well intentioned physical contact may be misconstrued by the student/pupil, an observer or any person to whom this action is described.
- Never touch a pupil in a way which may be considered indecent.
- Always be prepared to explain actions and accept that all physical contact be open to scrutiny.
- Never indulge in horseplay or fun fights.
- Always allow/encourage students/pupils, where able, to undertake self-care tasks independently.
- Ensure the way they offer comfort to a distressed student/pupil is age appropriate.
- Always tell a colleague when and how they offered comfort to a distressed student/pupil.
- Establish the preferences of students/pupils.
- Consider alternatives, where it is anticipated that a student/pupil might

development, gender, ethnicity and background. Adults 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 by them or a colleague could be misinterpreted, or if an action is observed which is possibly abusive the incident and circumstances should be immediately reported to the school Designated Safeguarding Lead (DSL) and recorded. Where appropriate, the DSL should consult with the Local Authority Designated Officer (the LADO).

Extra caution may be required where it is known that a child has suffered previous abuse or neglect. Staff need to be aware that the child may associate physical contact with such experiences. They also should recognise that these students/pupils may seek out inappropriate physical contact. In such circumstances staff should deter the child sensitively and help them to understand the importance of personal boundaries.

A general culture of 'safe touch' should be adopted, where appropriate, to the individual requirements of each child. Students/Pupils with disabilities 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 student/pupil's needs, consistently applied and open to scrutiny.

Staff working with students/pupils with challenging behaviour i.e. social, emotional and mental health (SEMH) setting, should ensure they focus on promoting positive relationships with students/pupils and focus on positive behaviour support approaches; they should apply appropriate de-escalation techniques and strategies to actively reduce risk and the need for restraint. Where there is a need to for restraint this should be done by a staff member who has received the appropriate training in line with the schools Positive Behaviour Management Policy. Team Teach training is utilised in this setting and all students have a Positive Handling Plan which covers de-escalation techniques through to restraint.

### **13 PE and other activities that require physical contact**

In certain curriculum areas, such as PE, drama, dance or music, staff may need to initiate some physical contact with children, for example, to demonstrate technique in the use of a piece of equipment, adjust posture, or support a child so they can perform an activity safely or prevent injury.

Physical contact should take place only when it is necessary in relation to a particular activity. It should take place in a safe and

misinterpret or be uncomfortable with physical contact.

- Always explain to the student/pupil the reason why contact is necessary and what form that contact will take.
- Report and record situations which may give rise to concern.
- Be aware of cultural or religious views about touching and be sensitive to issues of gender.

#### **This means that WMAT should:**

- Ensure they have a system in place for recording incidents and the means by which information about incidents and outcomes can be easily accessed by senior management.
- Provide staff, on a 'need to know' basis, with relevant information about vulnerable children in their care.

#### **This means that WMAT should:**

- Ensure the SEMH school setting has a system in place for recording incidents and the means by which information about incidents and outcomes can be easily accessed and regularly reviewed by senior management.
- Provide staff with the necessary training and support in line with its Positive Behaviour Management Policy i.e. Team Teach training.
- Provide staff, on a 'need to know' basis, with relevant information about vulnerable children in their care

#### **This means that staff should:**

- Treat students/pupils with dignity and respect and avoid contact with intimate parts of the body.
- Always explain to a student/pupil the reason why contact is necessary and what form that contact will take.

open environment i.e. one easily observed by others and last for the minimum time necessary. The extent of the contact should be made clear and undertaken with the permission of the student/pupil. Contact should be relevant to their age / understanding and adults should remain sensitive to any discomfort expressed verbally or non-verbally by the student/pupil.

Guidance and protocols around safe and appropriate physical contact may be provided, e.g., by sports governing bodies and should be understood and applied consistently. Any incidents of physical contact that cause concern or fall outside of these protocols and guidance should be reported to the senior manager and parent/carer.

It is good practice if all parties clearly understand at the outset, what physical contact is necessary and appropriate in undertaking specific activities. Keeping parents/carers and students/pupils informed of the extent and nature of any physical contact may also prevent allegations of misconduct or abuse arising.

- Seek consent of parents where a student/pupil is unable to give this e.g. because of a disability.
- Consider alternatives, where it is anticipated that a student/pupil might misinterpret any such contact.
- Be familiar with and follow recommended guidance and protocols
- conduct activities where they can be seen by others.
- Be aware of gender, cultural and religious issues that may need to be considered prior to initiating physical contact.

**This means that WMAT schools should:**

- Have in place up to date guidance and protocols on appropriate physical contact, that promote safe practice and include clear expectations of behaviour and conduct.
- Ensure that staff are made aware of this guidance and that it is continually promoted.

**14 Intimate / personal care**

Schools and settings should have clear nappy or pad changing and intimate / personal care policies which ensure that the health, safety, independence and welfare of children is promoted and their dignity and privacy are respected. Arrangements for intimate and personal care should be open and transparent and accompanied by recording systems.

Students/pupils should be encouraged to act as independently as possible and to undertake as much of their own personal care as is possible and practicable. When assistance is required, this should normally be undertaken by one member of staff, however, they should try to ensure that another appropriate adult is in the vicinity who is aware of the task to be undertaken and that, wherever possible, they are visible and/or audible. Intimate or personal care procedures should not involve more than one member of staff unless the student/pupil's care plan specifies the reason for this.

A signed record should be kept of all intimate and personal care tasks undertaken and, where these have been carried out in another room, should include times left and returned.

**This means that WMAT schools should:**

- Have written care plans in place for any student/pupil who could be expected to require intimate care.
- Ensure that students/pupils are actively consulted about their own care plan.

**This means that staff should:**

- Adhere to their school's intimate and personal care and nappy changing policies.
- Make other staff are aware of the task being undertaken.
- Always explain to the student/pupil what is happening before a care procedure begins.
- Consult with colleagues where any variation from agreed procedure/care plan is necessary.
- Record the justification for any variations to the agreed

<p>Any vulnerability, including those that may arise from a physical or learning difficulty should be considered when formulating the individual student/pupil's care plan. The views of parents, carers and the student/pupil, regardless of their age and understanding, should be actively sought in formulating the plan and in the necessary regular reviews of these arrangements.</p> <p>Students/pupils are entitled to respect and privacy at all times and especially when in a state of undress, including, for example, when changing, toileting and showering.</p> <p>However, there needs to be an appropriate level of supervision in order to safeguard pupils, 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.</p>	<p>procedure/care plan and share this information with the student/pupil and their parents/carers.</p> <ul style="list-style-type: none"> <li>- Avoid any visually intrusive behaviour.</li> <li>- Where there are changing rooms announce their intention of entering.</li> <li>- Always consider the supervision needs of the student/pupil and only remain in the room where their needs require this.</li> </ul> <p><b>This means that adults should not:</b></p> <ul style="list-style-type: none"> <li>- Change or toilet in the presence or sight of students/pupils.</li> <li>- Shower with students/pupils.</li> <li>- Assist with intimate or personal care tasks which the student/pupil is able to undertake independently.</li> </ul>
<p><b>15 Behaviour management</b></p> <p>Corporal punishment and smacking is unlawful in all schools and early years' settings.</p> <p>Staff should not use any form of degrading or humiliating treatment to punish a child. The use of sarcasm, demeaning or insensitive comments towards children is completely unacceptable.</p> <p>Where students/pupils display difficult or challenging behaviour, adults should follow the school's behaviour and discipline policy using strategies appropriate to the circumstance and situation.</p> <p>Where a student/pupil has specific needs in respect of particularly challenging behaviour, a positive handling plan, including assessment of risk, should be drawn up and agreed by all parties, including, for example, a medical officer where appropriate.</p> <p>Senior managers should ensure that the establishment's Behaviour policy includes clear guidance about the use of isolation and seclusion. The legislation on these strategies is complex and staff should take extreme care to avoid any practice that could be viewed as unlawful, a breach of the student/pupil's human rights and/or false imprisonment.</p>	<p><b>This means that staff should:</b></p> <ul style="list-style-type: none"> <li>- not use force as a form of punishment</li> <li>- try to defuse situations before they escalate e.g. by distraction</li> <li>- keep parents/carers informed of any sanctions or behaviour management techniques used</li> <li>- be mindful of and sensitive to factors both inside and outside of the school or setting which may impact on a student/pupil's behaviour</li> <li>- follow the school's behaviour management policy</li> <li>- behave as a role model</li> <li>- avoid shouting at children other than as a warning in an emergency/safety situation</li> <li>- refer to national and local policy and guidance regarding Restrictive Physical Intervention (RPI)</li> </ul> <p><a href="#">Restrictive physical intervention - Gov.uk</a></p> <ul style="list-style-type: none"> <li>- be aware of the legislation and potential risks associated with the use of isolation and seclusion</li> <li>- comply with legislation and guidance in relation to human rights and restriction of liberty.</li> </ul>

## **16 The use of control and physical intervention**

Early years providers must take all reasonable steps to ensure that corporal punishment is not given by any person who cares for or is in regular contact with a child, or by any person living or working in the premises where care is provided.

A person will not be taken to have used corporal punishment if the action was taken for reasons that include averting an immediate danger of personal injury to, or an immediate danger of death of, any person including the child (para 3.52 EYFS and The Early Years Foundation Stage (Welfare Requirements) Regs 2012, Reg 7).

The law and guidance for schools states that adults may reasonably intervene to prevent a child 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

Great care must be exercised in order that adults do not physically intervene in a manner which could be considered unlawful.

Under no circumstances should physical force be used as a form of punishment. The use of unwarranted or disproportionate physical force is likely to constitute a criminal offence. Where the school judges that a child's behaviour presents a serious risk to themselves or others, they must always put in place a robust risk assessment which is reviewed regularly and, where relevant, a physical intervention plan.

In all cases where physical intervention has taken place, it would be good practice to record the incident and subsequent actions and report these to a manager and the child's parents/carers. (In a children's home it is a legal requirement to record such incidents.)

Similarly, where it can be anticipated that physical intervention is likely to be required, a plan should be put in place which the student/pupil and parents/carers are aware of and have agreed to. Parental consent does not permit settings to use unlawful physical intervention or deprive a student/pupil of their liberty.

### **This means that WMAT schools should:**

- Ensure that they have a lawful physical intervention policy consistent with local and national guidance.
- Regularly acquaint staff with the Physical Intervention Policy and guidance.
- Ensure that staff are provided with appropriate training and support.
- Have an agreed policy for when and how physical interventions should be recorded and reported

### **This means that staff should:**

- Adhere to the school's physical intervention policy.
- Always seek to defuse situations and avoid the use of physical intervention wherever possible.
- Where physical intervention is necessary, only use minimum force and for the shortest time needed.

### **This means that staff should not:**

- use physical intervention as a form of punishment

## **17 Sexual conduct**

Any sexual behaviour by a member of staff with or towards a student/pupil is unacceptable. It is an offence for a member of staff in a position of trust to engage in sexual activity with a

### **This means that staff should:**

- Not have any form of sexual contact with a student/pupil from the school/Trust.

<p>student/pupil under 18 years of age (Sexual Offences Act 2003: abuse of position of trust) and sexual activity with a child could be a matter for criminal and/or disciplinary procedures.</p> <p>Students/Pupils are protected by the same laws as adults in relation to non-consensual sexual behaviour. They are additionally protected by specific legal provisions depending on their age and understanding. This includes the prohibition of sexual activity with children by adults in a position of trust.</p> <p>Sexual activity involves physical contact including penetrative and non-penetrative acts, however it also includes non-contact activities, such as causing pupils to engage in or watch sexual activity or the production of pornographic material.</p> <p>There are occasions when adults embark on a course of behaviour known as 'grooming' where the purpose is to gain the trust of a child, and manipulate the relationship so sexual abuse can take place. All staff should undertake appropriate training so they are fully aware of those behaviours that may constitute 'grooming' and of their responsibility to always report to a senior manager any concerns about the behaviour of a colleague which could indicate that a student/pupil is being groomed.</p>	<ul style="list-style-type: none"> <li>- Avoid any form of touch or comment which is, or may be considered to be, indecent.</li> <li>- Avoid any form of communication with a student/pupil which could be interpreted as sexually suggestive, provocative or give rise to speculation e.g. verbal comments, letters, notes, by email or on social media, phone calls, texts, physical contact.</li> <li>- Not make sexual remarks to or about a student/pupil.</li> <li>- Not discuss sexual matters with or in the presence of students/pupils other than within agreed curriculum content or as part of their recognised job role.</li> </ul>
<p><b>18 One to one situations</b></p> <p>Staff working in one to one situations with students/pupils at school, including visiting staff from external organisations can be more vulnerable to allegations or complaints.</p> <p>To safeguard both students/pupils and adults, a risk assessment in relation to the specific nature and implications of one to one work should always be undertaken. Each assessment should take into account the individual needs of each student/pupil and should be reviewed regularly.</p> <p>Arranging to meet with students/pupils from the school away from the work premises should not be permitted unless the necessity for this is clear and approval is obtained from a senior member of staff, the student/pupil and their parents/carers.</p>	<p><b>This means that staff should:</b></p> <ul style="list-style-type: none"> <li>- Ensure that wherever possible there is visual access and/or an open door in one to one situations.</li> <li>- Avoid use of 'engaged' or equivalent signs wherever possible. Such signs may create an opportunity for secrecy or the interpretation of secrecy.</li> <li>- Always report any situation where a student/pupil becomes distressed or angry.</li> <li>- Consider the needs and circumstances of the student/pupil involved.</li> </ul>
<p><b>19 Home visits</b></p> <p>All work with students/pupils and parents/carers should usually be undertaken in the school or other recognised workplace. There are however occasions, in response to an urgent, planned or specific situation or job role, where it is necessary to make one-off or regular home visits.</p>	<p><b>This means that staff should:</b></p> <ul style="list-style-type: none"> <li>- agree the purpose for any home visit with their manager</li> <li>- adhere to agreed risk management strategies</li> <li>- avoid unannounced visits wherever possible</li> </ul>

It is essential that appropriate policies and related risk assessments are in place to safeguard both staff and students/pupils, who can be more vulnerable in these situations.

A risk assessment should be undertaken prior to any planned home visit taking place. The assessment should include an evaluation of any known factors regarding the student/pupil, parents/carers and any others living in the household. Consideration should be given to any circumstances which might render the staff member becoming more vulnerable to an allegation being made e.g. hostility, child protection concerns, complaints or grievances.

Specific thought should be given to visits outside of 'office hours' or in remote or secluded locations. Following the assessment, appropriate risk management measures should be put in place, before the visit is undertaken. In the unlikely event that little or no information is available, visits should not be made alone.

- ensure there is visual access and/or an open door in one to one situations
- always make detailed records including times of arrival and departure
- ensure any behaviour or situation which gives rise to concern is discussed with their manager

**This means that WMAT schools should:**

- ensure that they have home visit and lone-working policies which all adults are made aware of. These should include arrangements for risk assessment and management
- ensure that all visits are justified and recorded
- ensure that staff are not exposed to unacceptable risk
- make clear to staff that, other than in an emergency, they should not enter a home if the parent/carer is absent
- ensure that staff have access to a mobile telephone and an emergency contact.

**20 Transporting students/pupils**

In certain situations staff or volunteers may be required or offer to transport students/pupils as part of their work. As for any other activity undertaken at work, the employer has a duty to carry out a risk assessment covering the health and safety of their staff and to manage any known risks (see also <https://www.gov.uk/government/publications/health-and-safety-advice-for-schools>)

Staff should not offer lifts to students/pupils unless the need for this has been agreed by a manager. A designated member of staff should be appointed to plan and provide oversight of all transport arrangements and respond to any concerns that may arise.

Wherever possible and practicable it is advisable that transport is undertaken other than in private vehicles and with at least one adult additional to the driver acting as an escort.

It is a legal requirement that all passengers wear seatbelts and the driver should ensure that they do so. They should also be aware of and adhere to current legislation regarding the use of car seats for younger children.

**This means that staff should:**

- Plan and agree arrangements with all parties in advance.
- Respond sensitively and flexibly where any concerns arise.
- Take into account any specific or additional needs of the student/pupil
- have an appropriate licence/permit for the vehicle.
- Ensure they are fit to drive and free from any drugs, alcohol or medicine which is likely to impair judgement and/ or ability to drive.
- Ensure that if they need to be alone with a student/pupil this is for the minimum time.

Staff should ensure that their behaviour is safe and that the transport arrangements and the vehicle meet all legal requirements. They should ensure that the vehicle is roadworthy and appropriately insured and that the maximum carrying capacity is not exceeded.

Staff should never offer to transport students/pupils outside of their normal working duties, other than in an emergency or where not doing so would mean the child may be at risk. In these circumstances the matter should be recorded and reported to both their manager and the child's parents/carers. The Health and Safety policy and/or Educational Visits policy sets out the arrangements under which staff may use private vehicles to transport students/pupils.

- Be aware that the safety and welfare of the student/pupil is their responsibility until this is safely passed over to a parent/carer.

- Report the nature of the journey, the route and expected time of arrival in accordance with agreed procedures.

- Ensure that their behaviour and all arrangements ensure vehicle, passenger and driver safety. This includes having proper and appropriate insurance (and training) for the type of vehicle being driven and for the purpose of the journey.

- Ensure that any impromptu or emergency arrangements of lifts are recorded and can be justified.

- Refer to Local and National guidance for educational visits.

## 21 Educational visits

Staff responsible for organising educational visits should be familiar with the Department for Education's advice on Health and Safety available at

<https://www.gov.uk/government/publications/health-and-safety-advice-for-schools> (guidance is also available from the Outdoor Education Advisers' Panel <http://oeapng.info/> )

The duties in the Health and Safety at Work etc. Act 1974 and the supporting regulations apply to activities taking place on or off the school premises (including school visits) in Great Britain. All school employers must have a Health and Safety policy. This should include policy and procedures for off-site visits, including residential visits and any school-led adventure activities.

The Management of Health and Safety at Work Regulations (1999) impose a duty on employers to produce suitable and sufficient risk assessments. This would include assessment of any risks to employees, children or others during an educational visit, and the measures that should be taken to minimise these risks. For regular activities, such as taking pupils to a local swimming pool, the risks should be considered under the school's general arrangements and a check to make sure that the precautions remain suitable is all that is required.

For annual or infrequent activities, a review of an existing assessment may be all that is needed. For new higher-risk

### This means that staff should:

- Adhere to the school's educational visits guidance.

- Always have another adult present on visits, unless otherwise agreed with senior staff.

- Undertake risk assessments.

- Have parental consent to the activity.

- Ensure that their behaviour remains professional at all times.

- Never share beds with a student/pupil.

- Never share bedrooms unless it involves a dormitory situation and the arrangements have been previously discussed with Principal/Headteacher, parents/carers and students/pupils.

- Refer to local and national guidance for Educational visits, including

<p>activities or trips, a specific assessment of the significant risks should be carried out.</p> <p>Staff should take particular care when supervising students/pupils in the less formal atmosphere of an educational visit where a more relaxed discipline or informal dress and language code may be acceptable.</p> <p>However, 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.</p> <p>Where out of school or setting activities include overnight stays, careful consideration needs to be given to sleeping arrangements. Students/pupils, adults and parents/carers should be informed of these prior to the start of the trip. In all circumstances, those organising trips and outings should pay careful attention to ensuring there is a safe staff/child ratio and suitable gender mix of staff.</p>	<p>exchange visits (both to the UK and abroad).</p>
<p><b>22 First Aid and medication</b></p> <p>All schools within the Trust should have an adequate number of qualified first-aiders. Parents/carers should be informed when first aid has been administered.</p> <p>Any member of school staff may be asked to become a qualified first-aider or to provide support to students/pupils with medical conditions, including the administering of medicines, but they cannot be required to do so unless this forms part of their contract of employment (teachers cannot be required to do these tasks but other members of staff, whose contracts are agreed locally, can be required to do so if their contracts provide for it).</p> <p>Staff should receive sufficient and suitable training and achieve the necessary level of competency before they take on responsibility to support children with medical conditions. Advice on managing medicines is included in the statutory guidance on supporting students/pupils at school with medical conditions. In circumstances where a pupil needs medication regularly, this would usually be recorded in their individual healthcare plan. This provides details of the level and type of support a child needs to manage effectively their medical condition in school and should include information about the medicine to be administered, the correct dosage and any storage requirements.</p> <p>After discussion with parent/carers, children who are competent should be encouraged to take responsibility for managing their own medicines and procedures. This could</p>	<p><b>This means that WMAT schools should:</b></p> <ul style="list-style-type: none"> <li>- Ensure there are trained and named individuals to undertake first aid responsibilities, including paediatric first aid if relevant.</li> <li>- Ensure training is regularly monitored and updated.</li> <li>- Refer to local and national First Aid guidance and guidance on meeting the needs of children with medical conditions.</li> <li>- Adhere to the policy for Health and Safety and supporting students/pupils with medical conditions policy.</li> <li>- Make other staff aware of the task being undertaken.</li> <li>- Have regard to students/pupils' individual healthcare plans.</li> <li>- Always ensure that an appropriate health/risk assessment is undertaken prior to undertaking certain activities.</li> </ul>

<p>include for example, the application of any ointment or sun cream, or use of inhalers or Epipens.</p> <p>If a member of staff is concerned or uncertain about the amount or type of medication being given to a student/pupil this should be discussed with the Designated Safeguarding Lead (DSL).</p> <p>Adults taking medication which may affect their ability to care for children should seek medical advice regarding their suitability to do so and providers should ensure that they only work directly with children if that advice confirms that the medication is unlikely to impair their ability to look after children.</p> <p>Employers are also responsible for managing the performance of their employees and for ensuring they are suitable to work with children.</p> <p>Risk assessment is likely to recommend that staff medication on the premises must be securely stored and out of reach of children at all times.</p>	<ul style="list-style-type: none"> <li>- Explain to the student/pupil what is happening.</li> <li>- Always act and be seen to act in the student/pupil's best interest.</li> <li>- Make a record of all medications administered.</li> <li>- Not work with students/pupils whilst taking medication unless medical advice confirms that they are able to do so.</li> </ul>
<p><b>23 Photography, videos and other images</b></p> <p>Many educational activities involve recording images. These may be undertaken for displays, publicity, to celebrate achievement and to provide records of evidence of the activity. Under no circumstances should staff be expected or allowed to use their personal equipment to take images of pupils at or on behalf of the Trust/school.</p> <p>Each school should have arrangements with regard to the taking and use of images, which is linked to their safeguarding and child protection policy. This should cover the wide range of devices which can be used for taking/recording images e.g. cameras, mobile-phones, smart phones, tablets, web-cams etc. and arrangements for the use of these by both staff, parents and visitors.</p> <p>Whilst images are regularly used for very positive purposes, adults need to be aware of the potential for these to be taken and/or misused or manipulated for pornographic or 'grooming' purposes. Particular regard needs to be given when images are taken of young or vulnerable children who may be unable to question why or how the activities are taking place.</p> <p>Students/pupils who have been previously abused in a manner that involved images may feel particularly threatened by the use of photography, filming etc. Staff should remain sensitive to any</p>	<p><b>This means that staff should:</b></p> <ul style="list-style-type: none"> <li>- Adhere to the Trust/school policy.</li> <li>- Only publish images of students/pupils where they and their parent/carer have given explicit written consent to do so.</li> <li>- Only take images where the student/pupil is happy for them to do so.</li> <li>- Only retain images when there is a clear and agreed purpose for doing so.</li> <li>- Store images in an appropriate secure place in the school.</li> <li>- Ensure that a senior member of staff is aware that the photography/image equipment is being used and for what purpose.</li> <li>- Be able to justify images of students/pupils in their possession.</li> </ul>

<p>student/pupil who appears uncomfortable and should recognise the potential for misinterpretation.</p> <p>Making and using images of students/pupils will require the age appropriate consent of the individual concerned and their parents/carers. Images should not be displayed on websites, in publications or in a public place without such consent. The definition of a public place includes areas where visitors to the Trust/school have access.</p> <p>For the protection of children, it is recommended that when using images for publicity purposes that the following guidance should be followed:</p> <ul style="list-style-type: none"> <li>- if the image is used, avoid naming the child, (or, as a minimum, use first names rather than surnames)</li> <li>- if the child is named, avoid using their image</li> <li>- schools should establish whether the image will be retained for further use, where and for how long</li> <li>- images should be securely stored and used only by those authorised to do so.</li> </ul>	<ul style="list-style-type: none"> <li>- Avoid making images in one to one situations.</li> </ul> <p><b>This means that adults should not:</b></p> <ul style="list-style-type: none"> <li>- Take images of students/pupils for their personal use.</li> <li>- Display or distribute images of students/pupils unless they are sure that they have parental consent to do so (and, where appropriate, consent from the child).</li> <li>- Take images of children using personal equipment.</li> <li>- Take images of children in a state of undress or semi-undress.</li> <li>- Take images of children which could be considered as indecent or sexual.</li> </ul>
<p><b>24 Exposure to inappropriate images</b></p> <p>Staff should take extreme care to ensure that children and young people are not exposed, through any medium, to inappropriate or indecent images.</p> <p>There are no circumstances that will justify adults: making, downloading, possessing or distributing indecent images or pseudo-images of children (child abuse images). Accessing these images, whether using the Trust's/school's or personal equipment, on or off the premises, or making, storing or disseminating such material is illegal.</p> <p>If indecent images of children are discovered at the establishment or on the Trust/school equipment an immediate referral should be made to the Local Authority Designated Officer, (LADO) and the police contacted. The images/equipment should be secured and there should be no attempt to view or delete the images as this could jeopardise necessary criminal action. If the images are of children known to the school, a referral should also be made to children's social care in line with local arrangements.</p> <p>Under no circumstances should any adult use Trust/school equipment to access pornography. Personal equipment containing pornography or links to it should never be brought into or used in the workplace. This will raise serious concerns about the suitability of the adult to continue working with children and young people.</p>	<p><b>This means that staff should:</b></p> <ul style="list-style-type: none"> <li>- Abide by the Trust's acceptable use and e-safety policies.</li> <li>- Ensure that children cannot be exposed to indecent or inappropriate images.</li> <li>- Ensure that any films or material shown to children are age appropriate.</li> </ul>

<p>Staff should keep their passwords confidential and not allow unauthorised access to equipment. In the event of any indecent images of children or unsuitable material being discovered on a device the equipment should not be tampered with in any way. It should be secured and isolated from the network, and the LADO contacted without delay. Adults should not attempt to investigate the matter or evaluate the material themselves as this may lead to a contamination of evidence and a possibility they will be at risk of prosecution themselves.</p>	
<p><b>25 Personal living accommodation including on site provision</b>  Generally, staff should not invite any students/pupils into their living accommodation unless the reason to do so has been firmly established and agreed with their manager and the student/pupil’s parents/carers.</p> <p>It is not appropriate for staff to be expected or requested to use their private living space for any activity, play or learning. This includes seeing students/pupils for e.g. discussion of reports, academic reviews, tutorials, pastoral care or counselling. Managers should ensure that appropriate accommodation for such activities is found elsewhere in the Trust/school. Under no circumstances should students/pupils be asked to assist adults with jobs or tasks, either for or without reward, at or in their private accommodation. This guidance should also apply to all other persons living in or visiting the private accommodation.</p>	<p><b>This means that staff should:</b></p> <ul style="list-style-type: none"> <li>- Be vigilant in maintaining their privacy, including when living in on-site accommodation.</li> <li>- Be mindful of the need to avoid placing themselves in vulnerable situations.</li> <li>- Refuse any request for their accommodation to be used as an additional resource for the Trust/school.</li> <li>- Be mindful of the need to maintain appropriate personal and professional boundaries.</li> <li>- Not ask students/pupils to undertake jobs or errands for their personal benefit.</li> </ul>
<p><b>26 Overnight supervision and examinations</b>  There are occasions during exam periods when timetables clash and arrangements need to be made to preserve the integrity of the examination process. In these circumstances examination boards may allow candidates to take an examination the following morning, including Saturdays.</p> <p>The supervision of a candidate on journeys to and from the centre and overnight may be undertaken by the candidate’s parent/carer or centre staff.</p> <p>The examination board requires the centre to determine a method of supervision which ensures the candidate’s wellbeing. As a result in some circumstances staff may be asked to volunteer to supervise students perhaps in their own homes.</p> <p>The overriding consideration should be the safeguarding of both the student and staff, therefore many local authorities, professional associations and unions do not endorse the practice of staff supervising candidates overnight in their own</p>	<p><b>This means that:</b></p> <ul style="list-style-type: none"> <li>- Schools should ensure that all arrangements reflect a duty of care towards students and staff.</li> </ul> <p><b>Where staff do supervise candidates overnight:</b></p> <ul style="list-style-type: none"> <li>- A full health and safety risk assessment should have been undertaken.</li> <li>- All members of the household should have had appropriate vetting including, where eligible, DBS and barred list checks.</li> <li>- All arrangements should be made in partnership and agreement with the student/pupil and parents/carers.</li> </ul>

<p>homes. Some schools employ alternatives such as a 'sleep-over' on the school premises.</p> <p>Where arrangements are made for a staff member to supervise a pupil overnight then all necessary safeguards should be in place.</p> <p>Also refer to Section 2 of the examination board instructions: <a href="http://www.jcq.org.uk/exams-office/ice---instructions-for-conducting-examinations/instructions-for-conducting-examinations-2016-2017">http://www.jcq.org.uk/exams-office/ice---instructions-for-conducting-examinations/instructions-for-conducting-examinations-2016-2017</a></p>	<ul style="list-style-type: none"> <li>- Arrangements involving one to one supervision should be avoided wherever possible.</li> <li>- As much choice, flexibility and contact with 'the outside world', should be incorporated into any arrangement so far as is consistent with appropriate supervision.</li> <li>- Whenever possible, independent oversight of arrangements should be made.</li> <li>- Any situation which gives rise to complaint, disagreement or misunderstanding should be reported.</li> <li>- Staff should have regard to any local and national guidance.</li> </ul>
<p><b>27 Curriculum</b></p> <p>Many areas of the curriculum can include or raise subject matter which is sexually explicit or of a political or sensitive nature. Care should be taken to ensure that resource materials cannot be misinterpreted and clearly relate to the learning outcomes identified by the lesson plan.</p> <p>This can be supported by developing ground rules with students/pupils to ensure sensitive topics can be discussed in a safe learning environment. This plan should highlight particular areas of risk and sensitivity and care should especially be taken in those areas of the curriculum where usual boundaries or rules are less rigorously applied e.g. drama</p> <p>The curriculum can sometimes include or lead to unplanned discussion about subject matter of a sexually explicit, political or otherwise sensitive nature. Responding to children's questions requires careful judgement and staff should take guidance in these circumstances from the Designated Safeguarding Lead (DSL).</p> <p>Care should be taken to comply with the Trust/school's policy on spiritual, moral, social, cultural (SMSC) which should promote fundamental British values and be rigorously reviewed to ensure it is lawful and consistently applied.</p> <p>Staff should also comply at all times with the policy for sex and relationships education (SRE). It should be noted that parents/carers have the right to withdraw their children from all or part of any sex education provided but not from the National Curriculum for Science.</p>	<p><b>This means that staff should:</b></p> <ul style="list-style-type: none"> <li>- Have clear evidence of planning.</li> <li>- Take care when encouraging students/pupils to use self-expression, not to overstep personal and professional boundaries.</li> <li>- Be able to justify all curriculum materials and relate these to clearly identifiable lessons plans.</li> </ul> <p><b>This means that adults should not:</b></p> <ul style="list-style-type: none"> <li>- Enter into or encourage inappropriate discussions which may offend or harm others.</li> <li>- Undermine fundamental British values.</li> <li>- Express any prejudicial views.</li> <li>- Attempt to influence or impose their personal values, attitudes or beliefs on students/pupils.</li> </ul>
<p><b>28 Whistleblowing</b></p> <p>Whistleblowing is the mechanism by which staff can voice their concerns, made in good faith, without fear of repercussion.</p>	<p><b>This means that WMAT should:</b></p> <ul style="list-style-type: none"> <li>- Have a Whistleblowing Policy in place the WMAT Concern at Work Policy.</li> </ul>

<p>Educational settings should have a clear and accessible whistleblowing policy that meets the terms of the Public Interest Disclosure Act 1998. Staff who use whistle blowing procedures should have their employment rights protected.</p> <p>Staff should recognise their individual responsibilities to bring matters of concern to the attention of senior management and/or relevant external agencies and that to not do so may result in charges of serious neglect on their part where the welfare of children may be at risk.</p>	<ul style="list-style-type: none"> <li>- Have, as part of their safeguarding and child protection policy, clear procedures for dealing with allegations against persons working in or on behalf of the Trust/school.</li> </ul> <p><b>This means that staff should:</b></p> <ul style="list-style-type: none"> <li>- Report any behaviour by colleagues that raises concern- report allegations against staff and volunteers to their manager, or registered provider, or where they have concerns about the manager's response report these directly to the DSL.</li> </ul>
<p><b>29 Sharing concerns and recording incidents</b></p> <p>All staff should be aware of their establishment's safeguarding procedures, including the procedures for dealing with allegations against staff and volunteers.</p> <p>In the event of an allegation being made, by any person, or incident being witnessed, the relevant information should be immediately recorded and reported to the Principal/Headteacher, senior manager or Designated Safeguarding Lead (DSL) as appropriate.</p> <p>Members of staff should feel able to discuss with their line manager any difficulties or problems that may affect their relationship with or behaviour towards students/pupils, so that appropriate support can be provided and/or action can be taken.</p> <p>In order to safeguard and protect students/pupils and colleagues, where staff have any concerns about someone who works with children they should immediately report this to the Principal/Head teacher or senior manager in line with the setting's procedures.</p>	<p><b>This means that staff should:</b></p> <ul style="list-style-type: none"> <li>- Be familiar with their establishment's arrangements for reporting and recording concerns and allegations made against staff – Trust Policy for Dealing with Allegations of Abuse Against Staff.</li> <li>- Be familiar with the school's CP Policy.</li> <li>- Know how to contact the LADO / DSL and Ofsted/regulatory body directly if required.</li> <li>- Take responsibility for recording any incident, and passing on that information where they have concerns about any matter pertaining to the welfare of an individual in the Trust/school.</li> </ul> <p><b>This means that WMAT should:</b></p> <ul style="list-style-type: none"> <li>- Have an effective, confidential system for recording and managing concerns raised by any individual regarding adults' conduct and any allegations against staff and volunteers.</li> </ul>