

# Reigate Grammar School Group

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## Staff Code of Conduct Including Early Years Foundation Stage

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## I. Introduction

### “It’s everyone’s responsibility and it could happen here”

All staff across the Reigate Grammar School Group have a crucial role to play in shaping the lives of young people. They have a unique opportunity to interact with children and young people in ways that are both affirming and inspiring. This guidance has been produced to help staff across the RGS Group establish the safest possible learning and working environments which safeguard young people and reduce the risk of staff being falsely accused of improper or unprofessional conduct.

We recognise our moral and statutory responsibility to safeguard and promote the welfare of all children.

The purpose of this policy is to provide staff with the framework they need in order to keep children safe and secure in our school by ensuring all staff uphold the expected professional standards and behaviours. Adults whose practice deviates from this code of conduct may bring into question their suitability to work with pupils or children and young people.

### **Equality, Diversity and Inclusion**

The School is committed to creating a workplace that is inclusive and compassionate, where we value diversity and can be ourselves at work.

The School is committed to the principles of Equality, Diversity and Inclusion and all staff are expected to demonstrate commitment to these principles in carrying out their work. The School is bound by the Equality Act 2010 which protects any person from being discriminated against or harassed on the basis of age, disability, gender reassignment, marriage of civil partnership status, pregnancy or maternity, race or ethnicity, religion or belief, sex, or sexual orientation. All staff are responsible for helping the School meet its obligations under the Equality Act which include:

- Eliminating discrimination, harassment and victimisation
- Advancing equality of opportunity
- Fostering good relations between groups of people with different protected characteristics

Staff Induction provides clear guidance to new staff on their responsibilities and we expect staff to use appropriate language, in accordance with the Equality Act (2010) staff must avoid unlawful discriminatory behaviour and they should at all times demonstrate the highest standards of professionalism. This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004 and the Education Act 2002. It also reflects KCSIE (2025), Teacher Standards 2012 and Surrey Safeguarding Children Partnership (SSCP) procedures. The **Teachers’ Standards (2012)**, set out the minimum expectations for teachers’ professional practice and personal conduct. These standards provide the framework within which teachers must operate to maintain high-quality teaching and uphold public trust in the profession. Staff should familiarise themselves with the standards, which can be accessed here: Teachers’ Standards – GOV.UK.

This document should be read in conjunction with the following:

- Behaviour Policy
- Boarding Staff Handbook (RGS SH)
- Keeping Children Safe in Education
- Online Behaviours – Staff
- Prevent
- Recruitment Policy
- Reigate Grammar School Group of Schools Safeguarding and Child Protection Policy
- Staff Induction Policy

### **This means that these guidelines:**

- apply to **all** adults working at Reigate Grammar School whatever their position, roles or responsibilities.

- [Teachers' Standards](#)
- Trips Policy
- Visiting Speaker Procedures
- Whistleblowing Policy
- Working together to safeguard children

## 2. Duty of Care

The RGS Group requires that all staff have read and agree to comply with the policy. All staff, whether paid or voluntary, have a duty to keep young people safe and to protect them from sexual, physical and emotional harm. Children 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 the safety and well-being of pupils. Failure to do so may be regarded as professional neglect.

The duty of care is, in part, exercised through the development of respectful, caring and professional relationships between staff and pupils and behaviour by staff that demonstrates integrity, maturity and good judgement.

**Boarding staff have a particular duty of care to ensure students are safe, well supervised and supported beyond the school day. They are expected to maintain clear routines and professional boundaries while fostering a warm, inclusive community where pupils feel at home. By modelling integrity, kindness and respect, staff help create an environment in which young people can grow in confidence and independence. (for further details about boarding, refer to our Boarding Staff Handbook.**

## 3. Professional Behaviour and Conduct

All staff are expected to demonstrate consistently high standards of personal and professional conduct. All staff must uphold public trust in their professional position and maintain high standards of ethics and behaviour, within and outside school, by:

- treating children with dignity, building relationships rooted in mutual respect, and at all times observing proper boundaries appropriate to professional position
- having regard for the need to safeguard children's well-being, in accordance with statutory provisions
- showing tolerance of and respect for the rights of others not undermining fundamental British values, including democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs
- ensuring that personal beliefs are not expressed in ways which exploit children's vulnerability or might lead them to break the law
- All staff must have proper and professional regard for the ethos, policies and practices of the school in which they work, teach, and maintain high standards in their own attendance and punctuality.
- All staff must have an understanding of, and always act within, the statutory frameworks which set out their professional duties and responsibilities
- All staff should avoid any conflict of interest between activities undertaken outside school and responsibilities within school.
- Staff must **model safe and responsible online behaviour**, including recognising and challenging **misinformation, disinformation, and AI-generated content** in their professional role
- Personal data (about pupils or staff) must not be entered into generative AI tools unless sanctioned by the school

### **This means that all adults 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 intentions.*
- *take responsibility for their own actions and behaviour.*

### **This means that the school should:**

- *foster a culture of openness and support.*
- *ensure that systems are in place for concerns to be raised.*
- *Ensure that there is in place effective recording systems which confirm discussions, decisions and the outcomes of any actions taken.*
- *ensure that staff are not placed in situations which render them particularly vulnerable.*

### **This means that the Governing Body should:**

*ensure that appropriate safeguarding and child protection policies and procedures are adopted, implemented and monitored in school.*

Allegations against staff (including supply staff, volunteers, contractors and any adult working with children) will be dealt with in accordance with the Safeguarding and Child Protection Policy.

Staff need to be aware that in accordance with KCSIE 2025 schools must also manage low-level concerns.

#### 4. Exercise of Professional Judgement

This guidance cannot provide a complete checklist of what is or is not, appropriate behaviour for staff. It does highlight, however, behaviour that is illegal, inappropriate or inadvisable. There will be occasions and circumstances in which staff have to make decisions or take action in the best interests of the child or young person 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 interests and welfare of the children in their charge and in so doing, will be seen to be acting reasonably.

Staff should always consider whether their actions are warranted, proportionate, safe and applied equitably.

#### 5. Power and Positions of Trust

As a result of their knowledge, position and/or the authority invested in their role, all adults working at the school are in positions of trust in relation to the young people in their care. A relationship between a member of staff and a pupil cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable young people and staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.

Wherever possible, staff should avoid behaviour which might be misinterpreted by others, and report and record any incident with this potential.

Where a person aged 18 or over is in a position of trust with a child under 18, it is an offence for that person to engage in sexual activity with or in the presence of that child or to cause or incite that that child to engage in or watch sexual activity.

#### 6. Confidentiality

Members of staff may have access to confidential information about pupils in order to undertake their everyday responsibilities. In some circumstances staff may be given highly sensitive or private information. They should never use confidential or personal information about a 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 pupil.

Confidential information about a child or young person should never be used casually in conversation or shared with any person other than on a need-to-know basis. In circumstances where the child'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 child, for example when abuse is alleged or suspected. In such cases, individuals have a duty to pass information on without delay, but only to those with designated child protection responsibilities or directly to the Surrey Single Point of Access – C-SPA. Staff have a legal duty to report any cases of Female Genital Mutilation to the police. **See Safeguarding and Child Protection Policy.**

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

- *discuss the circumstances that informed their action or their proposed action, with a senior colleague. This will help to ensure that the safest practices are employed and reduce the risk of actions being misinterpreted.*
- *always discuss any misunderstanding, accidents or threats with a senior manager.*
- *always record discussions and actions taken with their justifications.*

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

- *use their position to gain access to information for their own advantage and/or a child's or family's detriment.*
- *use their power to intimidate, threaten, coerce or undermine pupils.*
- *use their status and standing to form or promote relationships with pupils, which are of a sexual nature or which may become so.*

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

- *are expected to treat information they receive about children and young people in a discreet and confidential manner. However, information which may affect a child's welfare MUST always be passed on to the DSL or directly to the C-SPA*
- *should seek advice from a senior member of staff if they are in any doubt about sharing information they hold or which has been requested of them.*
- *need to be cautious when passing information to others about a pupil.*
- *need to know the procedures for handling allegations against staff and to whom any concerns or allegations should be reported.*

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 a senior member of staff. Any media or legal enquiries should be passed to senior management.

The storing and processing of personal information about pupils is governed by the Data Protection Act 2018.

Staff must never upload or share **confidential or personal data via external AI systems**

"What To Do If You're Worried a Child Is Being Abused" contains further guidance on sharing information to protect children.<sup>1</sup>

## 7. Propriety and Behaviour

All staff have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of children and young people. They should adopt high standards of personal conduct in order to maintain the confidence and respect of their peers, pupils and the public in general and all those with whom they work.

There may be times, for example, when an adult's behaviour or actions in their personal life come under scrutiny from local communities, the media or public authorities. This could be because their behaviour is considered to compromise their position in the workplace or indicate an unsuitability to work with pupils. Misuse of drugs, alcohol or acts of violence would be examples of such behaviour.

Adults in contact with pupils should therefore understand and be aware that safe practice also involves judgement and integrity about behaviours in places other than the work setting.

Staff should **not use AI-generated images, text, or deepfakes** in ways that could demean, humiliate, or mislead pupils.

## 8. Dress and Appearance

While a person's dress and appearance are matters of personal choice and self-expression, staff must ensure their dress, personal appearance and personal hygiene is appropriate to the professional nature of their role in the school and promotes a professional image. The school supports the diversity of cultures and religions of its employees and will take a sensitive approach where this affects dress and uniform requirements and please do discuss these requirements with SLT.

Members of staff are required to set positive examples in terms of their dress and appearance, given that we, as much as the pupils, reflect the image of the school. Staff must, therefore, in all respects be smart, professional and business like.

- In and around the Senior Schools, all staff, teaching and non-teaching should wear a business jacket and male members of staff should also wear a tie. Exceptions to this will be staff when they are specifically carrying out technical or manual duties as part of their role. Staff should not wear sport's trainers with their formal business dress.
- In the Prep and Pre-Preps to reflect the more practical nature of teaching, staff should be professionally dressed but jackets/ties are not required, except for outward facing events or meetings, involving

- need to know the name of those with delegated child protection responsibilities in school and be familiar with local child protection arrangements.

**This means that staff should not:**

- behave in a manner which would lead any reasonable person to question their suitability to work with children or act as a role model.
- make sexual remarks to or about, a pupil.
- discuss their own sexual relationships with or in the presence of pupils.
- discuss a pupil's sexual relationships in inappropriate settings or contexts.
- make (or encourage others to make) unprofessional personal comments which scapegoat, demean or humiliate or might be interpreted as such.

**This means that adults should:**

- be aware that behaviour in their personal lives may impact upon their work with pupils.

**This means that adults should wear clothing which:**

- promotes a positive and professional image.
- is appropriate to their role.
- is not likely to be viewed as offensive, or provocative.
- does not distract, cause embarrassment or give rise to misunderstanding.
- is absent of any political or other contentious slogans

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<sup>1</sup> [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/419604/What\\_to\\_do\\_if\\_you\\_re\\_worried\\_a\\_child\\_is\\_being\\_abused.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf)

- parents or the wider community.
- In all schools dress should be appropriate to the activities an employee is engaged in and any related health and safety requirements.
- Suitable protective equipment must be worn where provided and appropriate.
- Uniforms should be worn where provided.
- Employees should wear their identity badges on their official school lanyard at all times (there are exemptions in some cases as agreed by SLT)
- Staff who teach or coach PE/Sport can wear their School Branded Sports Kit but should revert to smart business dress for outward facing events or meetings involving parents or the wider community for formal events.
- When working remotely and taking part in video meetings (for example via Teams), staff appearance should be in line with the standards of this guidance, particularly when holding meetings with parents or other external stakeholders.

## 9. Behaviour Management

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

**Please refer to the relevant *Behaviour Policy for your school***

### ***This means that adults should:***

- *not use force as a form of punishment.*
- *try to defuse situations before they escalate.*
- *keep parents informed of any sanctions.*
- *adhere to the school's policy on sanctions.*

## 10. Physical Education and Other Activities that Require Physical Contact

Some staff, for example, those who teach PE and Games or who offer music tuition, will on occasions have to initiate physical contact with pupils in order to support a child so they can perform a task safely, to demonstrate the use of a particular piece of equipment/instrument or assist them with an exercise. This should be done with the pupil's agreement.

Contact under these circumstances should be for the minimum time necessary to complete the activity and take place in an appropriate environment. Staff should remain sensitive to any discomfort expressed verbally or non-verbally by the child.

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

- *consider alternatives, if it is anticipated that a pupil might misinterpret any such contact, perhaps involving another member of staff or a less vulnerable pupil in the demonstration.*
- *be familiar with and follow the guidance contained in this document.*
- *always explain to a pupil the reason why contact is necessary and what form that contact will take.*

## 11. Showers and Changing

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

Staff therefore need to be vigilant about their own behaviour and ensure they follow agreed guidelines and be mindful of the needs of the pupils.

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

- *avoid physical contact when children are in a state of undress.*
- *announce if entering a changing room.*
- *avoid remaining in the room unless pupil needs require it.*

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

- *change in the same place as pupils.*
- *shower with pupils or watch pupils changing or showering.*

## 12. Care, Control and Physical Intervention

The circumstances in which staff can intervene with a pupil are covered by the *2006 Education and Inspections Act*.

The use of physical intervention should, wherever possible, be avoided. It should only be used to manage a child or young person's behaviour if it is

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

- *avoid physical intervention unless absolutely essential.*
- *always use minimum force for the shortest period necessary.*

necessary to prevent injury to the child, other children or an adult, to prevent serious damage to property or in what can reasonably be described as exceptional circumstances.

Staff should have regard to the health and safety of themselves and others and the scale and nature of any physical intervention must be proportionate to both the behaviour of the individual to be controlled and the nature of the harm they may cause. The minimum force should be used.

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

In all cases where physical intervention is deemed necessary, the incident and subsequent actions should be documented and reported to senior management immediately. This should include written and signed accounts of all those involved, including the child or young person. The parents/carers must be informed on the same day.

### 13. Gifts, Rewards and Selection of Pupils

There are occasions when children or parents wish to pass small tokens of appreciation to staff e.g. at Christmas or as a thank-you - which is perfectly acceptable. However, it is unacceptable to receive gifts or hospitality on a regular basis or of any significant value.

Similarly, it is highly inadvisable to give such personal gifts to pupils, even after the pupil has left school. This could be misinterpreted as a gesture either to bribe, single out or groom the young person. It might be perceived that a 'favour' of some kind is expected in return.

Any reward given to a child should be consistent with the school's rewards policy, recorded and not based on favouritism. If in doubt, please seek guidance from a senior member of staff.

Staff should exercise care when selecting pupils for school teams, productions, trips and/or specific work tasks 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, agreed criteria.

### 14. Social Contact

Staff should not establish or seek to establish social contact with pupils for the purpose of securing a friendship or to pursue or strengthen a relationship. If a pupil or parent seeks to establish social contact or if this occurs coincidentally, the member of staff should exercise her/his professional judgement in making a response. There will be occasions when there are social contacts between pupils and staff, where for example the parent and teacher are part of the same social circle. These contacts, however, will be easily recognised and openly acknowledged.

If staff wish to organise an event for pupils e.g. at the end of an A Level course/show/sporting season then they must have this agreed and authorised in advance by a member of the SLT.

Staff need to be particularly aware of the potential dangers of contacts made through outside interests or the staff member's own family and be aware that such social contact could be misconstrued.

It is recognised that staff can support a pupil or parent who may be in particular difficulty. Care needs to be exercised in those situations where the pupil/parent comes to depend upon the staff member for support outside their professional role. This situation should be discussed with senior management and where necessary referrals made to the appropriate support agency.

- Always seek to diffuse situations
- record and report as soon as possible after the event any incident where physical force has been used.

#### **This means that adults should:**

- ensure that gifts received or given in situations which may be misconstrued are declared.
- only give gifts to an individual child as part of an agreed reward system and in consultation with SLT
- where giving gifts other than as above, ensure that these are of insignificant value and given to all children equally.
- ensure that all selection processes are fair and that, wherever practicable, these are undertaken and agreed by more than one member of staff.

#### **This means that adults should:**

- have no secret social contact with pupils.
- always be aware of the potential dangers of social contact with pupils or parents.
- advise senior management of any social contact they have with a pupil which may give rise to concern.
- report and record any situation, which they feel might compromise the school or their own professional standing.

## 15. Communication with Pupils (including the use of technology)

In order to make best use of the many educational and social benefits of new technologies, pupils need opportunities to use and explore the digital world, using multiple devices from multiple locations. It is now recognised that e-safety risks are posed more by behaviours and values than the technology itself. Adults working in this area must therefore ensure that they establish safe and responsible online behaviours. This means complying with your school's **Acceptable Use Policy**.

Communication between pupils and adults, by whatever method, should take place within clear and explicit professional boundaries. This includes the wider use of technology such as mobile phones, text messaging, e-mails, digital cameras, videos, webcams, websites, social media and networking sites and blogs. Staff should be particularly careful with regard to social media such as WhatsApp where mobile phone numbers are used and should not join student chat groups. The only acceptable method of contact is via the use of school email accounts, Office 365, school media or school telephone devices.

In communications with pupils (and parents), staff should keep the tone formal and professional at all times.

Staff should exercise caution in use of social media or any other web-based presence they have. This includes written content, videos or photographs and views expressed whether directly or by 'liking' certain pages or posts or following certain individuals or groups.

Staff must be vigilant when using dating websites/apps where staff could encounter pupils or ex-pupils.

**Staff should not make contact with a child's family member, accept or initiate friend requests or follow a child's family member's account on any social media platform.** However, we acknowledge that where staff are also parents, they may make contact with other parents, who are friends, over social media. Staff must exercise caution and professional judgement in these circumstances and should not have any contact with pupils' family members via social media if that contact is likely to constitute a conflict of interest or call into question their professionalism.

Adults should not share any personal information with a child or young person. They should not request or respond to, any personal information from the child/young person, other than that which might be appropriate as part of their professional role. Adults should ensure that all communications are transparent and open to scrutiny.

Adults should also be circumspect in their communications with children so as to avoid any possible misinterpretation of their motives or any behaviour which could be construed as grooming. They should not give their personal contact details to pupils including e-mail, home or mobile telephone numbers or social media unless the need to do so is agreed with SLT.

Staff should avoid unnecessary or excessive communication with pupils out of hours e.g. late in the evening, or during school holidays.

Email or text communications between an adult and a child/young person outside agreed protocols may lead to disciplinary and/or criminal investigations. This also includes communications through internet-based web sites or social networking sites.

If at any point a member of staff feels that communications with a pupil are escalating in frequency or that a pupil is showing dependency or informality, that member of staff should discuss the situation as soon as possible with a member of SLT.

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

- ensure that any communication is justifiable and cannot be misinterpreted.
- ensure that personal social networking sites are set at private and pupils are never listed as approved contacts.
- never use or access social networking sites of pupils.
- not give their personal contact details to pupils, including their mobile telephone number.
- only make contact with children for professional reasons and in accordance with any school policy.
- recognise that text messaging should only be used as part of an agreed protocol and when other forms of communication are not possible.
- not use internet or web-based communication channels to send personal messages to a child/young person.

Staff must not use AI chatbots or generative AI platforms as a medium to communicate directly with pupils.

Staff are responsible for reinforcing **school filtering and monitoring standards** (VPNs blocked, reporting of inappropriate use) when supervising online activity

### Communication with School Leavers

There should not be any informal or social contact with former students for **until they have reached their 19<sup>th</sup> birthday and in the case of the Senior Schools, have, in addition, left for at least a year**. If, for recent leavers, there is any significant contact beyond formal school arrangements, then it should be referred to the DSL. Even after the first year, staff should be cautious about any contact, in real life or online, with former students and for a number of years should remain careful and not develop relationships or have behaviours towards former students that might reasonably be seen as controversial or worrying or would appear to be an abuse of their position of trust and responsibility.

If staff need to make contact with school leavers on official school business e.g. to support them with a post qualification application, then this should be conducted through formal channels such as school email. Staff should not accept friend requests on social media from recent leavers and should not meet up with them socially.

Just as above, parents as employees should ensure that they uphold boundaries between the two roles and that their behaviour does not constitute a conflict of interest. For example, they must maintain the same level of confidentiality despite social expectations. Parent-staff should discuss any inter-role conflict with their line manager.

Through being parent, staff they may have contact with former pupils at the school within their own home (meals, sleepovers, parties) or in everyday situations such as giving a lift to pupils in their car as a result of their children's friendships. These are considered entirely normal acts of parenting, and it is logistically unrealistic to expect staff members to alert the safeguarding team every time they are going to have contact with a pupil (i.e. a friend of their son or daughter) outside of the school context.

### 16. Physical Contact

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

When physical contact is made with pupils this should be in response to their needs at the time, of limited duration and appropriate to their age, stage of development, gender, ethnicity and background. Staff must seek the child's permission before initiating contact. Staff must observe and take note of the child's reaction or feelings and use a level of contact which is acceptable to the child for the minimum time necessary. Staff must use their professional judgement at all times.

Staff must never touch a child in a way which may be considered inappropriate.

Staff must not engage in rough play, tickling or fun fights with pupils.

Extra caution should be exercised where a child is known to have suffered previous abuse or neglect. Such experiences may sometimes make a child exceptionally needy and demanding of physical contact. Staff should respond sensitively by deterring the child through helping them to understand the importance of personal boundaries.

Staff supervising PE and games or providing musical tuition should demonstrate the use of a particular piece of equipment/instrument on another member of staff if possible. However, they may be required to

#### ***This means that adults should:***

- *be aware that even well-intentioned physical contact may be misconstrued by the child, an observer or by anyone to whom this action is described.*
- *never touch a child in a way which may be considered indecent.*
- *always be prepared to explain actions and accept that all physical contact be open to scrutiny.*
- *always encourage children, where possible, to undertake self-care tasks independently.*

initiate physical contact to support a child to perform a task safely or to assist them. Contact under these circumstances must be done with the pupil's agreement, for the minimum time necessary and in an open environment.

Physical contact must never be secretive, for the gratification of the adult or abuse a position of trust. If a member of staff believes that an action could be misinterpreted, the incident and circumstances should be reported to their line manager, recorded and, if appropriate, a copy placed on the child's file.

There may be occasions when a pupil is in distress and in need of reassurance. This may include age-appropriate physical contact. Staff should remain self-aware at all times in order to avoid misinterpretation of their actions. Such incidents should always be recorded and shared with their line manager. If staff have a particular concern about the need to provide this type of care and reassurance they should seek further advice from their line manager.

### 17. First Aid, Administration of Medicine and Pupils in Distress

Health and safety legislation places duties on all employers to ensure appropriate health and safety policies and equipment are in place and an appropriate person is appointed to take charge of first-aid arrangements. Appropriate training should be given before an individual takes on a role which may require administering first aid or medication.

Some pupils may need medication during school hours. In circumstances where children need medication regularly a health care plan should be drawn up to ensure the safety and protection of pupils and staff. With the permission of parents, children should be encouraged to self-administer medication or treatment including, for example any ointment, sun cream or use of inhalers.

If a member of staff is concerned or uncertain about the amount or type of medication being given to a pupil, this should be discussed with the appropriate senior colleague at the earliest opportunity. When administering first aid, wherever possible, staff should ensure that another adult is present or aware of the action being taken. Parents should be informed when first aid has been administered.

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

Where a member of staff has a particular concern about the need to provide this type of care and reassurance s/he should seek further advice from a senior manager.

**Staff 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. Staff should discuss their personal health circumstances confidentially with HR.

Staff medication on the premises must be responsibly stored and out of reach of children at all times.

### 18. One to One Situations, Home Visits and Transporting Pupils

Staff working in one-to-one situations with children and young people may be more vulnerable to allegations. Staff should recognise this possibility and plan and conduct such meetings accordingly. Every attempt should be made to ensure the safety and security needs of both staff and pupils are met.

#### ***This means that adults should:***

- *explain to the child what is happening when administering First Aid*
- *always act and seem to be acting in the best interests of the child*
- *have regard to any health plan which is in place*
- *ensure that an appropriate risk assessment is undertaken prior to undertaking certain activities e.g. overnight trips*

#### ***This means that adults should:***

- *consider the way in which they offer comfort to a distressed pupil.*
- *Never touch a child in a way that could be considered indecent*
- *Not assume that all children seek physical comfort if they are distressed.*
- *always tell a colleague when and how they offered comfort to a distressed child.*
- *record situations which may give rise to concern.*

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

- *ensure that when lone working is an integral part of their role, staff have taken necessary precautions to ensure the safety and security of the*

Pre-arranged meetings with pupils away from the school premises should not be permitted unless there is good reason and approval is obtained from their parent(s) and a member of senior management. This includes visits to the pupil's home which should happen only in exceptional circumstances (such as where a pupil is taking a public exam at home due to poor health and arrangements are made to invigilate them) and only with prior agreement of SLT.

If staff wish to engage in any tutoring this must be agreed by the relevant Headteacher. It is not usually the case that staff would tutor pupils in their own school. Staff should never tutor children in their own home and if in an exceptional circumstance the Headteacher has agreed to a member of staff offering tutoring, this should not take place in the member of staff's home. If agreed, the member of staff might tutor the child in the child's home in which case a parent or guardian should be present.

In exceptional situations staff or volunteers may agree to transport children. Wherever possible and practicable it is advisable that transport is undertaken other than in private vehicles, with at least one adult in addition to the driver acting as an escort. Children should sit on the back seat. Parental consent should be sought before a child is transported by a member and of staff and a member of the SLT consulted.

Where a private vehicle is used adults should ensure that the vehicle is roadworthy, appropriately insured, with an up-to-date MOT and that the maximum capacity is not exceeded.

It is a legal requirement that all passengers should wear seatbelts and it is the responsibility of the staff member to ensure that this requirement is met.

Where adults transport children in a vehicle which requires a specialist license/insurance e.g. PCV or LGV<sup>2</sup> – staff should ensure that they have an appropriate licence to drive such a vehicle. Staff wishing to drive the school minibus must take the school's minibus test.

It is inappropriate for adults to offer lifts to children outside their normal working duties, unless there has been prior agreement with SLT. There may be occasions where the child requires transport in an emergency situation or where not to give a lift may place a child at risk. Such circumstances must always be recorded and reported to a member of the SLT.

## 19. Infatuations/approaches from students

Staff need to be aware that it is not uncommon for pupils to become strongly attracted to a member of staff and/or develop a heterosexual or homosexual infatuation. All situations should be responded to sensitively to maintain the dignity of all concerned. Staff should also be aware that such circumstances always carry a high risk of words or actions being misinterpreted and for allegations to be made against staff and should make every effort to ensure that their own behaviour is above reproach.

Any adult who becomes aware that a pupil may be infatuated with a member of staff should discuss this at the earliest opportunity with the DSL or Headteacher. In this way, steps can be taken to avoid hurt and distress for all concerned.

## 20. Sexual Contact

**Any sexual behaviour by a member of staff with or towards a pupil is both inappropriate and illegal.** Children and young people are protected by the same laws as adults in relation to non-consensual sexual

*pupil and themselves*

- avoid meetings with pupils in remote, secluded areas of school.
- ensure there is visual access and/or an open door in one-to-one situations.
- inform other staff of the meeting beforehand, assessing the need to have them present or close by.
- avoid use of 'engaged' or equivalent signs wherever possible. Such signs may create an opportunity for secrecy or the interpretation of secrecy.
- always report any situation where a child becomes distressed or angry to a senior colleague.
- agree the purpose of any home visit with a member of the SLT in advance.

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

- ensure that they are fit to drive and free from any drugs, alcohol or medicine which is likely to impair their judgement and/or ability to drive.
- ensure that their behaviour is appropriate at all times.
- ensure that there are proper arrangements in place to ensure vehicle, passenger and driver safety.
- ensure that any emergency arrangements of lifts are recorded and can be justified when questioned.

### **This means that adults should:**

- report any indications (verbal, written or physical) that suggest a pupil may be infatuated with a member of staff.
- always maintain professional boundaries.

### **This means that adults should:**

- not pursue sexual relationships with children and young people either in or out of school.
- avoid any form of communication

<sup>2</sup> For further information, please see [www.dvla.gov.uk](http://www.dvla.gov.uk)

behaviour. They are additionally protected by specific legal provisions. This includes the prohibition on adults in a position of trust.

The sexual activity referred to does not just involve physical contact. It may also include non-contact activities, such as causing children to engage in, discuss or watch sexual activity or the production of pornographic material including sending or receiving nudes, semi-nudes or sexual videos. Sexual abuse can be defined as “forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening”.<sup>3</sup>

There are occasions when adults embark on a course of behaviour known as 'grooming' where the sole purpose is to gain the trust of a child and manipulate that relationship so sexual abuse can take place. Staff should be aware that conferring special attention and favour upon a child might be construed as being part of a 'grooming' process, which is an offence.

## 21. Educational Visits and After School Activities

Staff should take particular care when supervising pupils in the less formal atmosphere such as an after-school activity. Adults remain in a position of trust and need to ensure that their behaviour remains professional at all times and stays within clearly defined professional boundaries.

Where out of school activities include overnight stays, careful consideration needs to be given to sleeping arrangements. Pupils, staff and parents should be informed of these prior to the start of the trip. In all circumstances, those organising trips and outings must pay careful attention to ensuring safe staff/child ratios and to the gender mix of staff especially on overnight stays.

## 22. Curriculum

Many areas of the curriculum can include or raise subject matter which is sexually explicit or of an otherwise sensitive nature. Care should be taken to ensure that resource materials cannot be misinterpreted and clearly relate to the learning outcomes identified by the lesson plan. This plan should highlight particular areas of risk and sensitivity.

The curriculum can sometimes include or lead to unplanned discussion about subject matter of a sexually explicit or otherwise sensitive nature. Responding to pupils' questions can require careful judgement and staff may wish to take guidance in these circumstances from an appropriate colleague.

## 23. Photography and Videos

Please see separate **Acceptable Use Policy** for further details.

Working with pupils may involve the taking or recording of images. Any such work should take place with due regard to the law and the need to safeguard the privacy, dignity, safety and well-being of pupils.

Careful consideration should be given as to how activities involving the taking of images are organised and undertaken. Care should be taken to ensure that all parties understand the implications of the image being taken especially if it is to be used for any publicity purposes or published in the media or on the Internet.

Adults need to remain sensitive to any children who appear uncomfortable,

*with a child or young person which could be interpreted as sexually suggestive or provocative, including verbal comments, letters, notes, email, phone calls, texts, social media messages or physical contact.*

- *not make sexual remarks to or about a child/young person*
- *not discuss their own sexual relationships with or in the presence of pupils*
- *take care that their language or conduct does not give rise to comment or speculation. Attitudes, demeanour and language all require care and thought, particularly when members of staff are dealing with pupils.*

### **This means that adults should:**

- *ensure that their behaviour remains professional at all times.*
- *never share beds with pupils.*
- *not share bedrooms with pupils.*

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

- *have clear written lesson plans and be aware of the potential for unplanned discussion of a sexual nature.*

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

- *enter into or encourage inappropriate discussion about sexual activity.*

### **This means that adults should:**

- *be clear about the purpose of the activity and about what will happen to the photographs/film when the lesson/activity is concluded.*
- *ensure that all images/videos are available for scrutiny in order to screen for acceptability.*
- *be able to justify images of children taken.*
- *avoid making images/videos in one-to-one situations.*

### **This means that adults should**

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<sup>3</sup> KCSIE

for whatever reason, and should recognise the potential for such activities to raise concerns or lead to misunderstandings.

Adults must not take photographs of children for their personal use.

It is recommended that when using a photograph for public use the following guidance should be followed:

- if the photograph is used, avoid giving the full name of the pupil
- if the pupil is named, avoid using their photograph

All RGS group schools asks for parental consent for images to be used and the school keeps a record of children who have asked for their image not to be used.

Many school activities involve recording images. These may be undertaken as part of the curriculum, extra-curricular activities, for publicity or to celebrate achievement. Staff need to be aware of the potential for these aspects of school life to be misused.

Children who have been previously abused in this way may feel threatened by the use of photography, filming etc. in the teaching environment. Staff should remain sensitive to any children who appear uncomfortable and should recognise the potential for misinterpretation.

Using images of pupils for publicity purposes will require the consent of their parent(s). 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 school have access. If in doubt, please seek further guidance.

Staff must not create or manipulate pupil images using AI or editing software in ways that could be misleading, inappropriate, or breach safeguarding principles.

## 24. Inappropriate Images

Staff should take extreme care to ensure that children and young people are not exposed, through any medium, to inappropriate or indecent images or web links.

All staff are required to adhere to the school's **Acceptable Use Policy**. Under no circumstances should any adult use school equipment to access such material, including adult pornography. Personal equipment containing these images or links to them should never be brought into or used in the workplace. Breaches of this guidance will raise serious concerns about the suitability of the adult to continue working with children and young people.

Accessing indecent images of children on the internet, whether using school or personal equipment, on or off school premises and making, storing or disseminating such material is illegal. If proven, this will lead to criminal proceedings and the individual being barred from work with children and young people.

Where indecent images of children or other unsuitable material are found, the police and the Local Authority Officer (LADO) should immediately be informed. Adults should not attempt to investigate the matter themselves as this may lead to evidence being contaminated which in itself can lead to criminal prosecution.

**AI-generated indecent images of children** are treated as child sexual abuse material and will trigger immediate referral to police/LADO.

Staff must immediately report any incident where a pupil is found to be creating, sharing, or in possession of **AI-generated sexually inappropriate material**.

### **not:**

- take, display or distribute images of children unless they have consent to do so.
- take images/videos of children using personal devices.

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

- follow the school's Acceptable Use Policy).
- ensure that pupils are not, through the use of any medium, exposed to indecent or inappropriate images.

## 25. Whistleblowing

Whistleblowing is the mechanism by which staff can voice their concerns, made in good faith, without fear of repercussion.

Staff should be aware of their individual responsibilities to bring matters of concern to the attention of the Senior Leadership Team and/or relevant external agencies, especially where the welfare of children may be at risk.

If a member of staff reporting suspicions remains dissatisfied by a decision not to act by the SLT, he or she must as a responsible citizen report concerns directly to the Safeguarding Children Board, the Local Authority Designated officer (LADO) or to the police, depending on the nature of those concerns.

Staff may also contact the **NSPCC Whistleblowing helpline on 0808 800 5000** or [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

See *Safeguarding Policy* and *Whistleblowing Policy*.

## 26. Sharing Concerns and Recording Incidents

All staff should be aware of the school's child protection procedures, including procedures for dealing with allegations against staff. All allegations must be taken seriously and properly investigated in accordance with local procedures and statutory guidance. Staff who are the subject of allegations are advised to contact their professional association.

In the event of an incident occurring, which may result in an action being misinterpreted and/or an allegation being made against a member of staff, the relevant information should be clearly and promptly recorded and reported to the Headteacher.

Members of staff should feel able to discuss with their line manager any difficulties or problems that may affect their relationship with pupils so that appropriate support can be provided or action can be taken. It is essential that accurate and comprehensive records are maintained wherever concerns are raised about the conduct or actions of adults working with children or young people.

## 27. Smoking, Alcohol, E-cigarettes and Other Substances

School is a non-smoking site. Staff must not smoke or use e-cigarettes on the school premises or outside the school gates. Staff must not smoke or use e-cigarettes whilst supervising children in a residential setting or offsite. Staff must not consume or be under the influence of alcohol, drugs or unlawful substances on or near school premises.

## 28. Parents as Employees

Some staff also have children who attend the school. It is recognised that in these cases the staff fulfil a dual role of parent and employee. There are many advantages to having children attending school where you work but it can also bring some challenges, for example as a member of staff you will be privy to a wealth of information and data which parents cannot access quite so readily. You will also have relationships with the colleagues you work with, who are also your son/daughter's teacher. This can quite easily lead to a conflict of interest and where possible, it is helpful to observe the following guidelines.

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

- *report any behaviour by colleagues that raises concern.*
- *report any behaviour by children which might put staff at risk.*

### ***This means that the school will not:***

- *take action against any member of staff who reports concerns to external agencies.*

### ***This means that adults:***

- *should take responsibility for passing information where they have concerns about any matter pertaining to the welfare of an individual in the school.*

### ***This means that adults:***

*should not consume alcohol or drugs or smoke while at work. There may be occasions such as an end of term party held on school premises out of working hours where staff may enjoy a drink socially.*

## How to manage the dual role with respect to the child

There can be a temptation for both parent-staff and school-staff informally to expect to be able to talk about the pupil/their child's concerns, where the pupil's parent is also a teacher at the school. While this might seem entirely natural, it can lead to conflicts of interest.

We would encourage staff who are also parents, to raise any concerns in the usual way another parent might i.e. via email, request for a meeting or a phone-call.

Staff who are also parents should not expect colleagues to answer concerns about their child, for example, while they are having lunch, or a break in the staff room.

Conversely, teaching staff should not raise concerns with a colleague who is also a parent informally, they should make contact through email, or a call, asking for an appointment to talk or to meet. This helps to keep the boundaries between the role of parent and the role of staff clear for all.

Parents as employees should ensure that they uphold boundaries between the two roles and that their behaviour does not constitute a conflict of interest. For example, they must maintain the same level of confidentiality despite social expectations. Parent-staff should discuss any inter-role conflict with their line manager.

## Parent-teacher role and safeguarding

We recognise and want to support effective parenting within families and the community. Notwithstanding that, anyone working in a school should always keep safeguarding in mind. In in doubt, please do consult with and/or refer to the DSL.

Through being parent-staff, they may have contact with pupils at the school within their own home (meals, parties) or in everyday situations such as giving a lift to pupils in their car as a result of their children's friendships. These are considered entirely normal acts of parenting, and it is logistically unrealistic to expect staff members to alert the safeguarding team every time they are going to have contact with a pupil (i.e. a friend of their son or daughter) outside of the school context.

Common sense should apply – whilst we would not expect staff members to inform us of such situations, it would be wise to follow normal safeguarding principles, such as:

- Not being in a 1-to-1 situation alone with that child, including giving them a lift.
- Maintaining good and open communication with the child's parent/s.
- Adapting behaviour and/or dress if necessary, just as would be considered normal when having a guest in the home.
- Informing the DSL/safeguarding team as a matter of urgency of any situation which may have been/may be uncomfortable, compromising or inappropriate or a situation which could be open to misunderstanding.

Staff members have been trained in safeguarding and should follow normal procedures if they have a concern about the welfare or safety of a child. This is probably the most important principle of all: any safeguarding concerns must be raised through the procedures set out in the Safeguarding Policy. The training staff members have received should be used regardless of whether they become aware of a concern in school or at home/outside of school.

**In the event of a staff member being made aware in their capacity as a parent of abuse or suspicion of abuse, the local authority and police **MUST** be informed in the normal way and within the normal timeframes.**

## 29. Declaration of Personal Interests and Outside Commitments

Staff are responsible for ensuring that their private interests, beliefs and personal associations do not conflict with their professional duties.

All employees should declare any non-financial or financial interest which might conflict with the ethos or work of the school or any relationship which, by the employee's association with that person, might adversely affect the school's reputation, attract negative publicity or potentially bring into question the employee's suitability to work with children and young people.

Declarations should be made via the School Bursar and Headteacher who should ensure that a written record is made in accordance with the school's procedure.

Declarations must extend to acknowledging the involvement of a relative or partner of an employee in an organisation with which the school does business (or seeks to do business), particularly if they are directors, partners or hold senior managerial positions in those organisations.

Where employees are in any doubt about whether any personal relationships, interests, or outside commitments should be declared in particular circumstances, they should either declare the information in any case, or else seek further advice from the Bursar or the Headteacher.

Staff must declare any **involvement in external AI/edtech projects** where there may be a **conflict of interest** with safeguarding, data protection, or the school's Acceptable Use Policy.

## 30. Sexual Harassment at work related events

We are committed to ensuring a safe and inclusive environment for all employees, both in the workplace and at work-related events, including work related social events. This includes a duty to take reasonable steps to prevent sexual harassment in all contexts.

When planning work-related events, it is essential to consider the risks of harassment and take reasonable steps to mitigate these risks. This duty extends to preventing sexual harassment by visitors, or other third parties that employees may interact with during work or at social events.

Sexual harassment is strictly prohibited, unlawful, and will not be tolerated. Any incidents of sexual harassment are likely to result in disciplinary action.

## 31. Personal living accommodation including on-site provision

Staff must not invite pupils to their home, visit pupils at their home or attend private parties or socialise with pupils.

Where a member of staff has a child at the School and this child invites over School friends to the house privately this will be considered acceptable as long as the member of staff acts always in a way consistent with the expectations placed on School staff regarding conduct. Similarly, parent to parent friendships are permitted with parents of School friends of a member of staff's child, as long as the member of staff acts always in a way consistent with the expectations placed on School staff regarding conduct.

No boarders are to access staff residential accommodation (other than in exceptional circumstances. Where this occurs, a one-to-one situation should be avoided with pupils with another adult always present).

All staff living in boarding houses that have visitors to stay must abide by the Visitor Policy and ensure that visitors are kept under sufficient staff supervision to prevent them gaining unsupervised access to boarders or their accommodation. Please note that swipe cards will not ordinarily be issued to visitors. Different arrangements are in place for resident family

### ***This means:***

**Be vigilant** in maintaining their privacy, including when living in on-site accommodation

**Be mindful** of the need to avoid placing themselves in vulnerable situation

**Be mindful** of the need to maintain personal and professional boundaries

**Not ask** pupils to undertake jobs or errands for their personal benefit

members or family members who are non-resident but frequently stay overnight.

For all members of staff households who are aged 16 and over (not on the roll of, nor employed by, the School) and who live on the same premises as boarders, an Enhanced Certificate with a check of the Children's Barred List will be obtained from the Disclosure and Barring service (DBS).

### 32. Access to pupil accommodation (Boarding)

In line with the National Minimum Boarding Standards and other guidance staff are reminded that boarding houses are where pupils live and that they have a right to privacy. Boarding colleagues must always knock on the door of a study bedroom before going in. It is not appropriate to remain in the room if a pupil is changing.

Any member of staff wishing to speak to/meet with a boarder in a boarding house must report to the member of staff on duty. They must not under any circumstances go to the room of the pupil.

It is vital that boarding accommodation is reserved for the use of those children designated to use it and is protected from access by unauthorised persons. Any member of staff who is organising any use of School facilities by individuals and/or groups must not allow members of the public unsupervised access to boarders, or to boarding accommodation while occupied by boarders.

Within a School context, the risks of and opportunities for abuse by staff are evidently greater within a boarding setting. Boarding pupils should be seen as vulnerable pupils in this context. There is a designated Independent Listener and the Childline, ISI and LADO numbers are all advertised clearly in the boarding house.

Colleagues are not expected to routinely patrol bathrooms unless there is a particular need (arising perhaps from the suspected misuse of such rooms). Colleagues should announce their intention of entering and only remain in the room when essential.

There are times when it might be considered appropriate to engage in physical contact in order to give emotional support, for example when a pupil is upset. In such cases, it is recommended that contact be restricted to a gentle pat on the shoulders, back, upper or lower arm. This sort of physical contact should not be long lasting or open to sexual misinterpretation. At other times, physical contact might be reasonable for greeting (shaking hands, a gentle pat on the shoulders, back or upper arm), or for encouragement (a gentle pat on the shoulder, back or upper arm).

Boarding House staff must particularly avoid spending unequal amounts of time with a given child or group of children and be wary of forming 'special' relationships with particular children's families that might compromise them professionally.

Staff must ensure that there are no initiation ceremonies carried out by the boarders on new pupils, intended to cause pain, anxiety or humiliation.

Staff must follow the procedures for searching for and reporting a missing child (Missing Child Policy). The incident should be recorded with the action taken and the reasons given by the child for being missing.

Staff supervising should carry a House mobile phone.