

Staff Code of Conduct

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'College' refers to Bristol International College; 'parents' refers to parents, guardians and carers.

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1. Purpose and application

- 1.1. **Purpose:** Relationships with fellow staff, employees, governors, proprietors, contractors, visitors, volunteers, students and their parents, guardians or carers should be reasonable and mutually respectful at all times. This Code has been produced to place the welfare of students at the centre of the College and its culture and to ensure that all those who work in the College and may have contact with students are clear on the rules of conduct and the expectations of the College. Students place trust in those connected to the College creating obligations which we must all meet to ensure the successful outcomes achieved by the students in our care.
- 1.2. This Code has regard to the College's Child Protection and Safeguarding Policy and Procedures and the following (collectively referred to in this Code as the **Guidance**):
 - 1.2.1. Keeping Children Safe in Education (September 2020) (**KCSIE**) (which refers to the non-statutory advice for practitioners: What to do if you're worried a student is being abused (March 2015));
 - 1.2.2. Working together to safeguard children (July 2018) (**WT**) - WT refers to the non-statutory advice: Information sharing (July 2018).
 - 1.2.3. Prevent Duty Guidance: for England and Wales (2015) (**Prevent**). Prevent is supplemented by:
 - a) The Prevent duty: Departmental advice for schools and childminders (June 2015);
 - b) Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism (2015)
 - c) The use of social media for online radicalisation (July 2015).
 - 1.2.4. Guidance on female genital mutilation, to include:
 - a) Multi-agency statutory guidance on female genital mutilation (October 2018)
 - b) Home Office statutory guidance Mandatory Reporting of Female Genital Mutilation: procedural information (October 2015).
 - c) Guidance published by the Department for Health which provides useful information and support for health professionals which will be taken into account by the College's medical staff.
- 1.3. The purpose of the Code is to:
 - 1.3.1. confirm and reinforce the professional responsibilities of all Staff;
 - 1.3.2. clarify the legal position in relation to sensitive aspects of Staff / student relationships and communication including the use of social media;
 - 1.3.3. set out the expectations of standards and behaviour to be maintained within the College; and
 - 1.3.4. to help adults establish safe practices and reduce the risk of false accusations or improper conduct.

2. Application of the Code:

- 2.1. The Code of Conduct (**Code**) applies to all Staff working in the College, whether paid or unpaid, whatever their position, role or responsibilities and **Staff** includes employees, governors, proprietors, contractors, students and volunteers.

3. Staff duty:

- 3.1. It is the contractual duty of every member of staff to observe the rules and obligations in this Code. They should also follow the Guidance. The College also has a duty of care to its Staff, parents, guardians or carers and students and the implementation of the practices in this Code will help to discharge that duty.
- 3.2. **Wrongdoing:** All staff are required to report their own wrongdoing, or any wrongdoing or proposed wrongdoing of any other member of staff or any conduct which they may suspect to be inappropriate to the Principal. The College operates a whistleblowing policy which is contained within this Employment Manual.

4. Application with other policies:

- 4.1. The Code should be read in conjunction with the College's Child protection and Safeguarding Policy and Procedures and Whistleblowing Policy.

Guiding principles

5. Principles for all staff

- 5.1. All staff should put the well-being, development and progress of all students first by:
 - 5.1.1. taking all reasonable steps to ensure the safety and well-being of students under their supervision;
 - 5.1.2. using professional expertise and judgment for the best interests of students in their care;
 - 5.1.3. demonstrating self-awareness and taking responsibility for their own actions and for providing help and support to students;
 - 5.1.4. raising concerns about the practices of teachers or other professionals where these may have a negative impact on students' learning or progress, or may put students at risk;
 - 5.1.5. being familiar with the College's Child Protection and Safeguarding Policy and Procedures;
 - 5.1.6. reading and understanding Part 1, and where appropriate Annex A, of KCSIE (September 2020);
 - 5.1.7. knowing the role, identity and contact details of the current Designated Safeguarding Lead and her Deputies;
 - 5.1.8. knowing the role, identity and contact details of the Nominated Safeguarding Governor; and
 - 5.1.9. being aware that they are in a position of trust (i.e. the adult is in a position of power or influence over the student due to his or her work); that the relationship is not a relationship between equals and that this position must never be used to intimidate, bully, humiliate, coerce or threaten students.
- 5.2. All Staff should demonstrate respect for diversity and take steps to promote equality by:

- 5.2.1. acting appropriately and in accordance with this Code of Conduct, towards all students, parents, guardians or carers and Staff;
 - 5.2.2. complying with the College's Anti-Bullying, Equal Opportunities and Dignity at Work policies and this Code of Conduct;
 - 5.2.3. addressing issues of discrimination and bullying whenever they arise; and
 - 5.2.4. helping to create a fair and inclusive College environment.
- 5.3. All Staff should work as part of a unified staff body by:
- 5.3.1. developing productive and supportive relationships with colleagues;
 - 5.3.2. exercising any management responsibilities in a respectful, inclusive and fair manner;
 - 5.3.3. complying with all College policies and procedures;
 - 5.3.4. participating in the College's development and improvement activities;
 - 5.3.5. recognising the role of the College in the life of the local community; and
 - 5.3.6. upholding the College's reputation and standing within the local community and building trust and confidence in it.
- 5.4. All Staff should understand that the College has a legal duty to have regard to the need to prevent people from being drawn into terrorism, and consequently should be aware of:
- 5.4.1. what extremism and radicalisation means and why people – including students and fellow staff members - may be vulnerable to being drawn into terrorism as a consequence of it;
 - 5.4.2. what measures are available to prevent people from becoming drawn into terrorism and how to challenge the extremist ideology that can be associated with it; and
 - 5.4.3. how to obtain support for people who may be being exploited by radicalising influences.
- 5.5. All Staff should maintain public trust and confidence in the College and in their profession by:
- 5.5.1. demonstrating honesty and integrity;
 - 5.5.2. understanding and upholding their duty to safeguard the welfare of children and young people;
 - 5.5.3. understanding and demonstrating fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs;
 - 5.5.4. maintaining reasonable standards of behaviour whether inside or outside of normal College hours and whether on or off the College's site; and
 - 5.5.5. maintaining an effective learning environment.
- 5.6. All Staff should raise any concerns relating to female genital mutilation (**FGM**) with the Designated Safeguarding Lead and involve children's social care as appropriate in accordance with the College's Child Protection and Safeguarding Policy and Procedures. Teachers must also report to the police cases where they discover

(either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a girl under the age of 18. The report should be made orally by calling 101, the single non-emergency number. It will be rare for teachers to see visual evidence, and they should not be examining students but those failing to report such cases will face disciplinary sanctions.

6. Additional principles for teachers

- 6.1. Teachers should take responsibility for maintaining the quality of their teaching practice by:
 - 6.1.1. meeting the professional standards for teaching applicable to their role and position within the College;
 - 6.1.2. reflecting on their current practice and seeking out opportunities to develop knowledge, understanding and skills;
 - 6.1.3. helping students to become confident and successful learners; and
 - 6.1.4. establishing productive relationships with parents, guardians or carers by:
 - a) providing accessible and accurate information about their student's progress;
 - b) involving them in important decisions about their student's education; and
 - c) complying with this Code.

7. Guidance on Staff / student relationships

- 7.1. **Application:** Allegations of unprofessional conduct or improper contact or words can arise at any time. Professionalism and vigilance are required so as to ensure the safety of students in our care, and to reduce the risk of an allegation of impropriety against a member of Staff. This guidance applies to all staff.
- 7.2. **Sexual contact:** Staff must not:
 - 7.2.1. have any type of sexual relationship with a student or students;
 - 7.2.2. have sexually suggestive or provocative communications with a student;
 - 7.2.3. make sexual remarks to or about a student; and
 - 7.2.4. discuss their own sexual relationships in the presence of students.
- 7.3. Abuse of a position of trust and inappropriate relationships with College students: Sexual relationships or sexual contact with any students, or encouraging a relationship to develop in a way which might lead to a sexual relationship or any relationship just considered inappropriate with any student at the College is a grave breach of trust that will usually lead to disciplinary action and may also lead to criminal prosecution. It is the criminal offence of an abuse of a position of trust to have any sexual relationship with any College student under the age of 18, and whilst not a criminal offence, it is a breach of this Code and considered to be gross misconduct to have a sexual relationship with any student of this College, even if over the age of 18.
- 7.4. Inappropriate relationships with students at another school: Forming relationships with children or young people who are students or students at another school will be a criminal offence if they are under 16 but may also be a criminal offence if under

the age of 18 and will be regarded as gross misconduct. Such behaviour tends to bring the College into disrepute and gives rise to concern that the staff involved cannot be trusted to maintain professional boundaries with students and students at the College. Whilst not necessarily a criminal offence, the College considers it inappropriate for staff to form inappropriate relationships with a student of any school, irrespective of their age.

- 7.5. **General guidance:** Staff should be aware of the general guidance that will apply in all cases. In particular staff:
- 7.5.1. need to exercise professional judgment but always act within the spirit of these guidelines. If staff are involved in a situation where no specific guidance exists, they should discuss the circumstances with the Designated Safeguarding Lead. A written record should be kept that includes justification for any action taken;
 - 7.5.2. must be aware of the risks of peer-on-peer abuse and be familiar with procedures for handling allegations against other students and bullying as set out in the College's Child Protection and Safeguarding Policy and Procedures. Examples of peer-on-peer abuse are bullying (including cyberbullying), physical abuse, sexual violence and sexual harassment, sexting and initiation and hazing;
 - 7.5.3. must be familiar with procedures for reporting concerns in accordance with the College's whistleblowing policy and be aware that if staff raise concerns about working practices at the College to the Designated Safeguarding Lead or an appropriate senior member of Staff that they will be protected from detriment under the whistleblowing policy;
 - 7.5.4. must be familiar with the local reporting guidelines and the Local Safeguarding Children Board¹ reporting threshold document in respect of any concerns relating to children;
 - 7.5.5. must be familiar with procedures for handling allegations against Staff as set out in the College's Child Protection and Safeguarding Policy and Procedures;
 - 7.5.6. must seek guidance from the Designated Safeguarding Lead if there is any doubt about appropriate conduct; and
 - 7.5.7. must report any actions which could be misinterpreted, any misunderstandings, accidents or threats involving a member of staff and a student or a group of students to the Designated Safeguarding Lead.
- 7.6. Behaviour giving particular cause for concern: Staff should take particular care when dealing with a student who:
- 7.6.1. appears to be emotionally distressed, or generally vulnerable and/or who is seeking expressions of affection;
 - 7.6.2. appears to hold a grudge against a member of staff;
 - 7.6.3. acts in a sexually provocative way, or who is inclined to make exaggerated claims about themselves and others, or to fantasise, or one whose manner with adults is over-familiar; and
 - 7.6.4. may have reason to make up an allegation to cover the fact that he or she has not worked hard enough for public examinations.

- 7.7. **Procedure to be followed in these cases:** Some of these behaviours may be indications that a student has been, or is currently being, abused and should therefore be reported to the Designated Safeguarding Lead under the College's Child Protection and Safeguarding Policy and Procedures.
- 7.8. **Record keeping:** Comprehensive records are essential. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing. Any incident involving students that could give cause for concern, must always be reported promptly to the Designated Safeguarding Lead in accordance with the College's Child Protection and Safeguarding Policy and Procedures. If there is any doubt about recording requirements this should be discussed with the Designated Safeguarding Lead.
- 7.9. **Good order and discipline:** Staff in charge or control of students must maintain good order and discipline at all times when students are present on College premises and whenever students are engaged in authorised College activities, whether on College premises or elsewhere.

8. General conduct

- 8.1. **College property:** Staff must take proper care when using College property and must not use College property for any unauthorised use or for private gain.
- 8.2. **Use of premises:** Staff must not carry out any work or activity on College premises other than pursuant to their terms and conditions of employment without the prior permission of the Principal.
- 8.3. **Behaviour of others:** Staff should be aware that the behaviour of their partner or other family members or any member of their household may raise concerns which could affect the welfare of a member of the College community, a member of the public, or bring the College into disrepute and staff should bring any such behaviour to the immediate attention of the College. Such concerns will be given careful consideration as to whether they constitute a potential risk to students at the College or to its reputation.

9. Meetings with students

- 9.1. **One-to-one meetings:** If staff are teaching one student, or conducting a one-to-one meeting or teaching session with a student, they should take particular care in the following ways:
 - 9.1.1. when working alone with a student is an integral part of a member of staff's role, carry out and agree full risk assessments with the Principal and/or Designated Safeguarding Lead];
 - 9.1.2. use a room that has sufficient windows onto a corridor so the occupants can be seen, or keep the door open, or inform a colleague that the lesson/meeting is taking place;
 - 9.1.3. arrange the meeting during normal College hours when there are plenty of other people about;
 - 9.1.4. do not continue the meeting for any longer than is necessary to achieve its purpose;
 - 9.1.5. avoid sitting or standing in close proximity to the student, except as necessary to check work;

- 9.1.6. avoid using "engaged" or equivalent signs on doors or windows;
 - 9.1.7. avoid idle discussion;
 - 9.1.8. avoid all unnecessary physical contact and apologise straight away if there is accidental physical contact;
 - 9.1.9. avoid any conduct that could be taken as a sexual advance;
 - 9.1.10. report any incident that causes concern to the Designated Safeguarding Lead under the College's Child Protection and Safeguarding Policy and Procedures, and make a written record (signed and dated); and
 - 9.1.11. report any situation where a student becomes distressed or angry to the Designated Safeguarding Lead.
- 9.2. **Pre-arranged meetings:** Pre-arranged meetings with students outside College should not be permitted unless approval is obtained from their parents, guardians or carers and the Principal. If such a meeting is held, colleagues must be informed before the meeting.
- 9.3. **24 Home visits:** In some circumstances home visits are necessary. Staff should:
- 9.3.1. discuss the purpose of any visit with the Principal and Designated Safeguarding Lead] and adhere to any agreed work plan/contract;
 - 9.3.2. follow the risk management strategy and ensure appropriate risk assessments are in place. Where there is insufficient information to complete a risk assessment, staff must ensure that they are accompanied by a colleague;
 - 9.3.3. not visit unannounced if this can be avoided;
 - 9.3.4. leave the door open where staff will be alone with a student;
 - 9.3.5. keep records detailing times of arrival and departure, and work undertaken;
 - 9.3.6. ensure that any behaviour or situation that gives rise to a concern is reported and actioned;
 - 9.3.7. discuss with the Designated Safeguarding Lead anything that gives cause for concern in accordance with the College's Child Protection and Safeguarding Policy and Procedures; and
 - 9.3.8. have a mobile telephone and an emergency contact.
- 9.4. **The use of personal living space:** Students should not be in or invited into the personal living space of any member of Staff, unless agreed with the parents, guardians or carers and the Principal/Designated Safeguarding Lead and in accordance with the College's guidelines for Boarding Staff. It is accepted that students of Staff (whether in College accommodation or not) may at times invite their friends to their homes. In these instances, staff are reminded to comply with this Code of Conduct, must ensure that the Principal and/or Designated Safeguarding Lead is informed in advance and that any overnight visit is subject to a written risk assessment.
- 9.5. **Chores:** Students should not be asked to assist with chores or tasks in personal living space. Personal living spaces should not be used as an additional resource for the College. This also applies to on site Staff accommodation.

- 9.6. **Boarding Houses:** Boarding staff accommodation may have private living quarters which include areas into which current and prospective students and parents may be invited, under supervision. This may be in order for communication between the relevant parties to be effective and at times confidential and to allow for entertaining of parents and students in line with the College's guidelines for Boarding Staff. Students may only enter the designated public areas of the private living quarters of the house at the invitation of and with the express permission of Boarding Staff for pastoral, academic or medical reasons.

10. Language and appearance

- 10.1. **Language:** Staff should use appropriate language at all times. They should:

- 10.1.1. avoid words or expressions that have any unnecessary sexual content or innuendo; avoid displays of affection either personally or in writing (e.g. messages in birthday cards, text messages, emails etc);
- 10.1.2. avoid any form of aggressive or threatening words;
- 10.1.3. avoid any words or actions that are over-familiar;
- 10.1.4. not swear, blaspheme or use any sort of offensive language in front of students;
- 10.1.5. avoid the use of sarcasm, discriminatory or derogatory words when punishing or disciplining students and avoid making unprofessional personal comments about anyone. Any sanctions should be in accordance with the College's Behaviour and Discipline Policies; and
- 10.1.6. be aware that some parts of the curriculum may raise sexually explicit subject matters. Care should be taken in subjects where rules / boundaries are relaxed (e.g. drama or art). Staff should have clear lesson plans and should take care to avoid overstepping personal and professional boundaries.

- 10.2. **Dress:** Staff should dress appropriately and in a professional manner. Dress must not be offensive, distracting, revealing, or sexually provocative, embarrassing or discriminatory. Political or other contentious slogans or badges are not allowed.

11. The use of force or physical restraint

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

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

- 11.2.1. committing a criminal offence;
- 11.2.2. injuring themselves or others;

- 11.2.3. causing damage to property, including their own; or
 - 11.2.4. engaging in any behaviour prejudicial to good order and discipline at the College or among any of its students, whether that behaviour occurs in a classroom or elsewhere.
- 11.3. **Before intervening:** Before intervening physically staff should, wherever practicable, tell the student to stop and what will happen if he or she does not. Staff should continue attempting to communicate with the student throughout the incident and should make it clear that physical contact or restraint will stop as soon as it ceases to be necessary. Staff should always avoid touching or holding a student in a way that might be considered indecent. Staff should also avoid any form of aggressive contact such as holding, pushing, pulling or hitting which could amount to a criminal assault, nor act in a way that might reasonably be expected to cause injury.
- 11.4. **Inform senior staff:** Staff should inform the Principal immediately following an incident where force has been used. This is to help prevent any misunderstanding or misrepresentation of the incident, and it will be helpful in the event of a complaint. Staff should provide a written report as soon as possible afterwards. This should include written and signed accounts of those involved, including the student. The parents, guardians or carers of the student should be informed about serious incidents involving the use of force. The Principal will advise as to when parents should be contacted.
- 11.5. **Action taken in self-defence** or in an emergency: The law allows anyone to defend themselves against an attack provided they do not use more force than is necessary. Similarly, where a student is at risk of immediate injury or on the point of inflicting injury on someone else, any member of staff (whether authorised or not) would be entitled to intervene.
- 11.6. **Using reasonable force:** There is no legal definition of "reasonable force". It will always depend on the circumstances. The term "reasonable force" covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain students. This can range from guiding a student to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. "Reasonable" in these circumstances means "using no more force than is needed". The use of force may involve either passive physical contact, such as standing between students or blocking a student's path, or active physical contact such as leading a student by the arm out of the classroom. Note that:
- 11.6.1. any use of force should be proportionate to the behaviour of the student involved and the seriousness of the harm prevented;
 - 11.6.2. staff should recognise the additional vulnerability of students with SEN, disabilities and certain medical conditions before using reasonable force;
 - 11.6.3. physical force could not be justified to prevent a student from committing a trivial misdemeanour;
 - 11.6.4. any force should always be the minimum needed to achieve the desired result; and

- 11.6.5. whether it is reasonable to use force and the degree of force that could be reasonably employed might also depend on the age, understanding and sex of the student.

12. Physical contact in other circumstances

- 12.1. **When physical contact may be appropriate:** Physical contact with a student may be necessary and beneficial in order to demonstrate a required action, or a correct technique in, for example, singing and other music lessons or during PE, sports and games. Any physical contact should be in response to the student's needs, of limited duration and appropriate to the student's age, stage of development, gender, ethnicity and background. Physical contact can be easily misinterpreted and should be limited. Staff should use professional judgement.
- 12.2. **Guidance on using physical contact:** Staff should observe the following guidelines (where applicable):
 - 12.2.1. explain the intended action to the student;
 - 12.2.2. do not proceed with the action if the student appears to be apprehensive or reluctant, or if there are other concerns about the student's likely reaction;
 - 12.2.3. ensure the physical contact continues for as short a time as possible;
 - 12.2.4. ensure that the door is open and if there is any doubt, ask a colleague or another student to be present during the demonstration; and
 - 12.2.5. consider alternatives if it appears likely that the student might misinterpret the contact.
- 12.3. **Report concerns:** If staff are at all concerned about any instance of physical contact, they should inform the Principal without delay, and make a written record in the incident book and on the student's file if necessary.
- 12.4. **Offering comfort to distressed students:** Touching may be appropriate where a student is in distress and needs comforting. Staff should use their own professional judgement if it is felt that a student needs this kind of support and should be aware of any special circumstances relating to the student. For example, a student who has been abused may find physical contact particularly difficult. The Principal should be notified when comfort has been offered, record the action and should seek guidance if unsure whether it would be appropriate in a particular case.
- 12.5. **Administering first aid:** When administering first aid staff should explain to the student what is happening and ensure that another adult is present or is aware of the action being taken. The treatment must meet the College's health and safety at work rules and intimate care guidelines, and parents, guardians or carers should be informed. Staff should:
 - 12.5.1. adhere to the College's policies on first aid and administering medication;
 - 12.5.2. comply with the necessary reporting requirements;
 - 12.5.3. make other adults aware of the task that is being undertaken;
 - 12.5.4. explain what is happening;
 - 12.5.5. report and record the administration of first aid;
 - 12.5.6. have regard to any health plans; and

- 12.5.7. ensure that an appropriate health / risk assessment is undertaken prior to undertaking certain activities.
- 12.6. **Students' entitlement to privacy:** Students are entitled to privacy when changing or showering. However there still must be an appropriate level of supervision to ensure safety. Staff should:
 - 12.6.1. avoid physical contact or visually intrusive behaviour when students are undressed;
 - 12.6.2. announce themselves when entering changing rooms and avoid remaining unless required;
 - 12.6.3. not shower or change in the same place as students; and
 - 12.6.4. not assist with any personal care task which a student can undertake themselves.
- 12.7. **Where a student has been abused:** Where a student has previously been abused, Staff should be informed on a 'need to know' basis, and should be extra cautious when considering the necessity of physical contact. Some students may seek inappropriate physical contact. Staff should sensitively deter the student and help them understand the importance of personal boundaries. Such incidents should be reported and discussed with the Designated Safeguarding Lead and where appropriate parents, guardians or carers.
- 12.8. Students with special educational needs or disabilities: Some students may need more physical contact to assist their everyday learning, which should be agreed and understood by all concerned, justified, openly applied and open to scrutiny. The Designated Safeguarding Lead will establish whether any reasonable adjustments are required for such students.

13. Code of conduct for contact outside College

- 13.1. **Contact outside College:** Staff should avoid unnecessary contact with students outside College. Staff should:
 - 13.1.1. not give students their home address, home telephone number, mobile telephone number or email address;
 - 13.1.2. not send personal communications (such as birthday cards or faith cards, text messages etc) to students unless agreed with the Principal;
 - 13.1.3. not make arrangements to meet students, individually or in groups, outside College other than on College trips authorised by the Principal;
 - 13.1.4. avoid contacting students at home unless this is strictly necessary, and should keep a record of any such occasion;
 - 13.1.5. not give a student a lift in their own vehicle other than on College business and with permission from the Principal;
 - 13.1.6. avoid inviting students (groups or individuals) to their home unless there is a good reason and it has been approved by Principal. This prohibition also applies if staff have on site accommodation;
 - 13.1.7. report and record any situation which may place a student at risk or which may compromise the College's or their professional standing;

- 13.1.8. ensure that students do not see anything in a member of staff's home that may cause embarrassment or that might become the subject of inappropriate gossip or rumour; and
- 13.1.9. never engage in secretive social contact with students or their parents, guardians or carers.
- 13.2. **Social contact:** Staff should be aware that where students or parents, guardians or carers are met socially, such contact could be misinterpreted as inappropriate, an abuse of a position of trust or as grooming. Any social contact that could give rise to concern should be reported to the Principal.
- 13.3. **Friendships with parents,** guardians or carers and students: Members of Staff who are friends with parents, guardians or carers of students or who, for example, are voluntary workers in youth organisations attended by students, will of course have contact with those students outside college. However, members of Staff should still respect the above advice wherever possible and should keep the Principal informed of such relationships.
- 13.4. **Scope of application of code on contact outside college:** The same guidelines should be applied to after college clubs, college trips, and especially trips that involve an overnight stay away from the College. There are separate, more detailed guidelines for college trips in the educational visits policy. The principles of this guidance also apply to contact with students or young people who are students at another school.
- 13.5. **Transporting students:** There may be some situations when Staff are required to transport students. Staff should:
 - 13.5.1. ensure that they are fit to drive and free from any substances that may impair their judgement or ability to drive;
 - 13.5.2. be aware that until the student is passed over to a parent / carer, the member of staff has have responsibility for that student's health and safety;
 - 13.5.3. record the details of the journey;
 - 13.5.4. record, be able to justify impromptu or emergency lifts and notify the Principal;
 - 13.5.5. ensure that there are proper arrangements in place to ensure vehicle, passenger and driver safety, including appropriate insurance, seat belts, adherence to maximum capacity guidelines etc; and
 - 13.5.6. wherever practicable, staff should avoid using private vehicles and should try and have one adult additional to the driver to act as an escort.
- 13.6. **After College activities:** When taking part in after College activities, staff should:
 - 13.6.1. be accompanied by another adult unless otherwise agreed with the Principal;
 - 13.6.2. undertake a risk assessment; and
 - 13.6.3. obtain parental consent.
- 13.7. **Educational visits:** When taking part in educational visits, staff should:
 - 13.7.1. follow the College's educational visits policy;

- 13.7.2. be accompanied by another adult unless otherwise agreed with the Principal;
 - 13.7.3. undertake a risk assessment; and
 - 13.7.4. obtain parental consent.
- 13.8. **Overnight supervision:** Where overnight supervision is required to preserve the integrity of the examination process:
- 13.8.1. Staff should ensure that a risk assessment has been undertaken and that all members of the household have had the appropriate checks;
 - 13.8.2. arrangements should be made with and agreed by parents, guardians or carers and the student;
 - 13.8.3. one to one supervision should be avoided where possible;
 - 13.8.4. choice, flexibility and contact with "the outside world" should be incorporated, so far as it is consistent with appropriate supervision and the College's guidelines;
 - 13.8.5. whenever possible, independent oversight of the arrangements should be made; and
 - 13.8.6. any misinterpretation, misunderstanding or complaint should be reported.

14. **Communication with students (including the use of technology)**

- 14.1. Communicating with students and parents, guardians or carers: All communication with students or parents, guardians or carers should conform to College policy and be limited to professional matters. Except in an emergency communication should only be made using College property.
- 14.2. **Application:** These rules apply to any form of communication including new technologies (including 3G / 4G technologies) such as mobile telephones, web-cameras, social networking websites and blogs. Staff should also ensure they comply with the more detailed IT acceptable use policy, and social media policy.
- 14.3. **Dealing with "crushes":** Crushes, fixations or infatuations are part of normal adolescent development. However they need sensitive handling to avoid allegations of exploitation. Such crushes carry a high risk of words, actions and expressions being misinterpreted, therefore, the highest levels of professionalism are required. If it is suspected that a student has a crush on a member of staff or on another colleague this should be brought to the attention of the Principal at the earliest opportunity. Suggestions that a student may have developed a crush should be recorded. Staff should avoid being alone with students who have developed a crush on them and if the student sends personal communications to the member of Staff, this should be reported to the Principal and recorded.
- 14.4. **Acceptable use:** Adults must establish safe and responsible online behaviours and must comply with the IT acceptable use policy, and social media policy. Adults should report to senior colleagues, any new and emerging technologies which may have a bearing on College practices and on the review of the IT acceptable use policy. Local and national guidelines on acceptable user policies should be followed. Staff should also:

- 14.4.1. ensure that their own personal social networking sites are set as private and ensure that students are not approved contacts;
 - 14.4.2. ensure that they do not use any website or application, whether on a College or personal device, which publicly identifies their location while on College premises or otherwise in the course of their employment;
 - 14.4.3. never use or access social networking sites of students and do not use internet or web-based communication channels to send personal messages to students;
 - 14.4.4. never use their own equipment (e.g. mobile telephones) to communicate with students - use equipment provided by the College and ensure that parents, guardians or carers have given permission;
 - 14.4.5. only make contact with students for professional reasons; and
 - 14.4.6. recognise that text messaging should only be used as part of an agreed protocol and only when other forms of communication are not possible.
- 14.5. **Personal details:** Adults should not give their personal contact details to students, including email addresses, home or mobile telephone numbers, unless the need to do so is agreed with the Principal and parents, guardians or carers.
- 14.6. **Personal mobile telephones and electronic devices:** It is understood that staff may need to check text messages and / or personal emails in the case of an emergency or during break times. Personal use must not interfere with their work commitments (or those of others). It is a privilege and not a right. Staff shall set an example and shall never use their own mobile telephones or other electronic devices whilst they are on duty (whether in a classroom or otherwise) and any such mobile devices should be switched off except in the case of an emergency and be kept out of sight of parents or students.
- 14.7. **Communicating outside the agreed protocols:** Email or text communications between an adult and any student outside agreed protocols may lead to a report to external agencies in accordance with the College's Child Protection and Safeguarding Policy and Procedures, disciplinary action and / or criminal investigations. This also includes communications through internet based websites.

15. Code of conduct for photographs and videos

- 15.1. **Permission required:** Permission should be sought from the Principal before taking photographs or video camera footage of any students in class, at any College events or on a trip. Permission should also be sought before displaying these photographs. Staff must not take images of students using personal mobile telephones.
- 15.2. **Consent:** Subject to paragraph 63 below, appropriate consents for taking and displaying photographs should be obtained from parents, guardians, carers or from the students themselves if sufficiently mature (most students are seen as being sufficiently mature from the age of 12 years). Consent must be freely given so it must be a genuine choice. The consent obtained must be specific for the purpose that the photographs will be used for - for instance if the photographs will be used in a College promotion, specific consent should be obtained for this use, and the photographs should not then be used for any other use without new consent being

requested and obtained. There are additional rules around seeking consent. Please see the guidance for staff on the use of photographs and videos of students by the College for further information. Any consent will need to be sought from either the parent, the student or both depending on the maturity of the student.

- 15.3. Where the use of a photograph or video is less privacy intrusive (e.g. used in an internal College display) it is sufficient for parents and students to have been informed about this in the College's privacy notices, in which case consent is not required. Please speak to the Principal if guidance is required on whether consent should be obtained.
- 15.4. Some students cannot be featured in photographs or videos under any circumstances (for example, because of safeguarding concerns). Please speak to the Principal in cases of uncertainty.
- 15.5. **Guidance where permission obtained:** Where permission and consent (if appropriate) has been obtained, the following should be considered:
 - 15.5.1. the purpose of the activity should be clear as should what will happen to the photographs or videos. Staff must be able to justify images in their possession;
 - 15.5.2. all images should be made available to Principal in order to determine acceptability;
 - 15.5.3. images should not be made during one-to-one situations;
 - 15.5.4. ensure that the student is appropriately dressed;
 - 15.5.5. ensure that the student understands why the images are being taken and has agreed to the activity;
 - 15.5.6. only use equipment provided or authorised by the College;
 - 15.5.7. if a photograph or video is to be displayed in a place to which the public have access (e.g. on the College's website) it should not display the student's name unless specific consent has been obtained. If the use of a photograph or video is more privacy intrusive consent may need to be obtained even if the student's name is not used (e.g. using an unnamed photograph of a student in an advertisement). Consent should be obtained from the student and / or their parents as appropriate;
 - 15.5.8. all images of students should be stored securely and only accessed by those authorised to do so; and
 - 15.5.9. images must not be taken secretly.
- 15.6. **Consent:** Students are usually considered mature enough to exercise their own data protection rights when they are aged 12 years or older. Whether consent should be obtained from the parents, the student or both will depend on the age of the student. The College's policy is that when consent is required it should be obtained as follows:
 - 15.6.1. where the student is in Year 10 or 11, consent should be sought from both the student and their parent, guardian or carer;
 - 15.6.2. where the student is in Year 12 or 13, only the student's consent will need to be obtained.

- 15.7. **Personal social media:** Staff must not publish anything which could identify students, parents or guardians on any personal social media account, personal webpage or similar platform without the prior consent of the Principal in writing. This includes photos, videos, or other materials such as student work.
- 15.8. **Appropriate material:** The College recognises that many students have unlimited and unrestricted access to the internet via 3G and 4G. Staff must ensure students are not exposed to inappropriate or indecent images. Viewing, retrieving or downloading of pornographic, terrorist or extremist material, or any other material which the College believes is unsuitable is strictly prohibited and constitutes gross misconduct. This includes at any time when on College premises or otherwise in the course of employment, including using the College's ICT network, or via 3G or 4G, whether or not on a College or personal device. Staff should not allow unauthorised access to College equipment and should keep their computer passwords safe. If staff discover material that is potentially illegal or inappropriate, they must isolate the equipment and contact the Designated Safeguarding Lead in accordance with the College's Child Protection and Safeguarding Policy and Procedures immediately. Students must not be exposed to unsuitable material on the internet and Staff should ensure that any film or material shown is age appropriate.

16. Gifts and rewards

- 16.1. **Anti-bribery and corruption policy:** Before accepting or giving any gifts or rewards, Staff must familiarise themselves with the College's Anti-Bribery and Corruption Policy.
- 16.2. **If a gift is received:** If staff receive a gift from a student or parent they should:
- 16.2.1. declare the gift where there is a possibility it could be misconstrued, or in any event where the gift is of a value of more than £100. The Principal may in her absolute discretion require that the gift is declined; and
 - 16.2.2. decline outright gifts that could be perceived as a bribe or that have created an expectation of preferential treatment. Although it is accepted for parents, guardians or carers or students to make small gifts to show appreciation, staff must not receive gifts on a regular basis or receive anything of significant value.
- 16.3. **Giving gifts and rewards:** if staff are thinking of giving a gift or reward:
- 16.3.1. it should only be provided as part of an agreed reward system;
 - 16.3.2. in all cases except the above, the gift or reward should be of little monetary value and should be discussed and agreed with the Principal and where appropriate the parent, guardian or carer;
 - 16.3.3. selection processes should be fair and where possible should be agreed by more than one member of Staff; and
 - 16.3.4. gifts should be given openly and not based on favouritism.
- 16.4. **Allocation of gifts and rewards:** Decisions regarding entitlement to benefits or privileges such as admission to College trips, activities or classroom tasks must avoid perceptions of bias, grooming or favouritism. The selection process must be based on transparent criteria.

17. Reporting Obligations

- 17.1. **The College's position:** It is a contractual requirement as well as in staff's interests to follow this Code so as to maintain appropriate standards of behaviour and their own professional reputation. A breach of this Code may be treated as misconduct and will render staff liable to disciplinary action including in serious cases, dismissal.
- 17.2. **Exit interviews:** All staff are trained so that they understand they are expected and encouraged to raise concerns they have, whether related to the safeguarding and welfare of students, the conduct of staff or other matters, during the course of their employment in accordance with the College's policies (including the Whistleblowing Policy, the Child Protection and Safeguarding Policy and Procedures and this Code). Safeguarding students is at the centre of the College's culture and is accordingly considered formally during staff performance development reviews and appraisal and finally at exit interviews which are held with all leavers.
- 17.3. **Termination of employment:** If the College ceases to use the services of a member of Staff because they are unsuitable to work with students, a settlement agreement (formerly known as a compromise agreement) will not be used and a referral to the Disclosure and Barring Service will be made promptly if the criteria for a referral are met. Any such incidents will be followed by a review of the safeguarding procedures within the College, with a report being presented to the Governors without delay. The College may also need to consider a referral to the Disclosure and Barring Service if a member of Staff is suspended, or deployed to another area of work that is not regulated activity.
- 17.4. **Resignation:** If a member of Staff tenders his or her resignation, or ceases to provide his or her services to the College at a time when Child Protection concerns exist in relation to that person, those concerns will still be investigated in full by the College and a referral to the Disclosure and Barring Service will be made promptly if the criteria for a referral are met.
- 17.5. **Teaching Regulation Agency (TRA) (previously known as the National College for Teaching and Leadership):** Separate consideration will also be given to making a referral to the TRA where a teacher has been dismissed (or would have been dismissed had he or she not resigned) because of unacceptable professional conduct, conduct that may bring the profession into disrepute, or a conviction at any time for a relevant offence. An interim referral to the TRA may also be considered and made if appropriate.