COGNITA
TEACHING EXCELLENCE

St. Mary's School

Code of Conduct for Staff and Volunteers

Acceptable Use Policy

September 2016

KEY FACTS

- Applies to all Cognita staff including school based employees and volunteers.
- Clear set of rules outlining the responsibilities and expected standards of behaviour.
- Policy based on mutual dignity and respect which helps everyone to provide high quality, safe and nurturing environments for children and young people.
- Staff are in a position of trust and have a duty to protect children from harm and to maintain professional boundaries.
- Avoid behaviour that might be misinterpreted by others.
- No member of staff must ever work behind a locked door with a pupil.

1. Introduction

1.1. Cognita is required to set out a Code of Conduct for all school-based staff and volunteers, as well as all Cognita regional office staff

1.2. This Code of Conduct applies to:

- all staff who are employed by Cognita including those in the Early Years;
- all temporary and agency staff, peripatetic staff, contract staff;
- young people and other adults on work experience placements;
- non-school based Cognita staff and any other adults working at the School;
- volunteers working in school; and
- the Proprietor and their representative/s.

1.3. This Code of Conduct should be read and understood in the context of:

- an agreed job description or contract;
- appropriate professional standards;
- school and Cognita policies and procedures; and
- statutory requirements and regulations that apply to schools - in particular safeguarding and promoting the welfare of children in schools.

1.4. Adults have crucial roles to play in the lives of children. The welfare of children and young people is paramount: this Code of Conduct helps establish the safest possible learning and working environment which safeguards children and reduces the risk of adults being falsely accused of improper or unprofessional conduct. The purpose of this Code of Conduct is to provide a clear framework of expected and appropriate standards and behaviour to which all staff, volunteers and proprietors are required to adhere and to raise awareness of illegal, unsafe and inappropriate conduct. This Code is not an exhaustive list of unacceptable or inappropriate behaviours but is designed to provide guidance and raise awareness of issues and situations which may arise. There will therefore be times when staff are required to exercise their professional judgement in situations not covered explicitly by this Code. In such cases, staff are expected to provide the highest possible standards at all times, consistent with this policy.

1.5. The Head must provide this Code to all staff and volunteers on induction and should notify staff of the expectations therein. This document is provided so that members of staff are clear about professional conduct and boundaries. School staff and volunteers are in a unique position of influence and must adhere to behaviour that maintains public trust and set good example to other staff and to all the pupils within the school.

1.6. This document is intended to help ensure that Cognita schools are safe places for pupils, provide clarity as regards expectations of staff and avoid any conduct which would lead any reasonable person to question their motivation and intention. Deviation by a member of staff from this guidance may bring into question the staff member's suitability to work with children and young people.

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

1.8. References to adults and staff refer to all those who work in a paid or unpaid capacity in a school. This also includes those who visit the school, e.g. sports coaches, contractors, supply staff and Cognita personnel.

1.9. Staff are reminded that under section 16 of the Sexual Offences Act 2003, it is a criminal offence for a person aged 18 or over to have a sexual relationship with children under 18 where that person is in a position of trust in respect of that child; even if the relationship is consensual or where the person does not teach the child.

1.10. If a teacher (anyone engaged to carry out teaching work) in the course of their work discovers that an act of female genital Mutilation appears to have been carried out on a girl under the age of 18 the teacher must report this to the police. Other adults should report this to the DSL immediately.

2. Conduct outside Work

2.1. Staff must not engage in conduct (including through other employment) outside work which could reasonably be expected to damage the reputation and standing of the school, Cognita or other members of the school community. Staff must exercise caution when using information technology, including social networking sites, and be aware of the risks to themselves and others. Staff may undertake work outside school, either paid or voluntary, subject to the contractual obligations and consent from the Head which will not be unreasonably withheld.

2.2. Staff must inform the Head immediately if they are arrested or subject to a criminal conviction or caution. Where safeguarding concerns arise, the Head will inform the designated officer of the Local Authority ("Designated Officer") and carry out a formal risk assessment to identify and mitigate any potential risks to pupils and staff.

3. Setting an example

3.1. All adults who work in schools set examples of behaviour and conduct which may be used as a model by other staff and by pupils. All adults must, therefore, demonstrate the highest standards of conduct. All adults must behave in a way that cannot risk giving rise to allegations of abusive or unprofessional conduct. This Code is intended to support all adults to understand what behaviour is and is not acceptable.

4. Making professional judgements

4.1. This guidance cannot provide a complete checklist of what is, or is not, appropriate behaviour for staff. It does highlight, however, some examples of behaviour that is unlawful, inappropriate or inadvisable. There will be rare occasions and circumstances in which staff have to make decisions or take action in the best interests of the pupil which are not dealt with in this guidance. Individuals are expected to make professional judgements in order to secure the best interests

and welfare of the pupils in their charge. Such judgements should always be shared with a senior member of staff, who may inform the child's parent/carer. Adults should always consider whether their actions are warranted, proportionate, safe and applied equitably.

4.2. Although this Code of Conduct gives advice and instruction on how to deal with specific situations, it should not replace professional common sense and good judgement. In all matters relating to pupil/staff relationships, adults must bear in mind how an action might reasonably be regarded by a third party.

5. Safeguarding Children

5.1. Teachers and other adults are accountable for the way in which they exercise authority, manage risk, use resources, and protect pupils from discrimination and from the risk of harm. All staff, whether paid or voluntary, have a duty to keep children safe and do their utmost to protect them from abuse (sexual, physical and emotional, neglect). 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 or misconduct.

5.2. The safeguarding culture of a school is, in part, exercised through the development of respectful, caring and professional relationships between adults and pupils and behaviour by adults that demonstrates a duty of care, integrity, maturity and good judgement. All staff and volunteers should be familiar with and adhere to the School's Safeguarding and Child Protection Policy.

6. Relationships in School

6.1. Relationships between staff and pupils should be positive and mutually respectful. This Code has been formulated in order to help staff to maintain this balance. The purpose of the Code is to:

- confirm and reinforce the professional responsibilities of staff;
- clarify the legal position in relation to sensitive aspects of staff/pupil relationships; and
- set out the expectations of standards to be maintained within the School.

6.2. It is hoped that staff will be reassured by this Code. Its purpose is to promote the highest standards of care for pupils and to protect teachers and other adults from making professional misjudgements and from the potentially devastating consequences of false allegations, without compromising bona-fide school activities.

7. Staff/Pupil/Former Pupil Contact

7.1. As a general rule, staff should avoid contact with pupils outside school.

- They must not give pupils their personal contact details (including but not limited to mobile phone numbers and personal email addresses). Thank you letters to pupils or parents should not contain these personal details. If children locate these by any other means and attempt to contact or correspond, the adult should not respond and must report the matter to the DSL.
- They must not make arrangements to meet pupils, individually or in groups, outside school other than on school visits authorised by the Head and in keeping with the policy of Learning Outside the Classroom: Educational Visits.
- They should not contact or visit pupils at home without prior agreement of their Line Manager or Headteacher. They should keep a record of any such occasion and ensure they are never alone with the pupil if they visit the pupil's home.

- They must not attend private pupil parties and should be aware of their professional standing and responsibilities when attending external events at which pupils are also present.

7.2. Some pupils may be reluctant to end the pupil-adult relationship they have enjoyed with members of staff in school. When a pupil leaves school the professional duty of care ends. However, it is important to continue to maintain professional standards of behaviour. Although current and former pupils may request meetings with staff for help with university applications, gap year advice or references for future careers, these meetings and any associated correspondence should be conducted at school within office hours and in a professional manner.

7.3. If you are in any doubt regarding appropriate contact with a current or former pupil you should seek advice from member of the leadership team.

7.4. Members of staff who are parents of pupils, friends with parents of pupils or who, for example, are voluntary workers in youth organisations attended by pupils, will of course have contact with pupils outside school. However, they should still use their professional judgement to respect the spirit of this Code.

7.5. There are occasions when adults deliberately set out to groom children where the sole purpose is to gain the trust of a child, and manipulate that relationship so sexual abuse can take place. This frequently starts with adults who are known to them in a position of trust. Adults should be aware that consistently conferring special attention and favour upon a child might be construed as being part of a grooming process and as such would be treated as unacceptable conduct.

7.6. It is accepted that the effective use of technology brings benefits to learning. Adults must ensure that they establish and adhere to safe and responsible practices. All adults must adhere to the stated Acceptable Use Policy. Communication between pupils and adults, by whatever method, should take place within clear and explicit boundaries. This includes the wider use of technology and social networking. Adults should ensure that all communications are transparent and open to scrutiny. Adults should be circumspect in their communications with pupils so as to avoid any possible misinterpretation of their motives or any behaviour which could be construed as grooming. Staff should not request or respond to any personal information from children other than that which may be necessary in their professional role. They should ensure that their communications are open and transparent and avoid any communication which could be interpreted as 'grooming behaviour'. Emails or text communications between staff member and a child outside agreed protocols may lead to disciplinary and/or criminal investigations.

7.7. Staff, volunteers using social media should be aware or privacy settings and understand that they could easily be identified as employees of the school. Staff who use sites such as Facebook, should ensure maximum privacy settings. Staff must not be friends with or follow current pupils on social media should avoid other similar links. Any invitation to become a friend or similar should be politely declined and the member of staff should remind the pupil of the school rules relating to social media and personal contact details. The incident should be reported to the DSL so that s/he can make a decision as to whether a record should be made and/or any further action taken. If staff have links with parents or former pupils on social networking sites they should ensure that their privacy settings are such as to prevent friends' friends (who may be current pupils) from accessing their profile or other data.

7.8. Email, messaging or use of social media sites between adults and pupils outside agreed protocols may lead to disciplinary and/or criminal investigations.

8. Language

8.1. Staff must not swear, blaspheme or use any sort of offensive or inappropriate language in front of pupils. They should not use language which is discriminatory or demeaning in relation to gender (including gender reassignment), religion, race, nationality, ethnicity, sexual orientation, disability or age. Staff should not make sexual remarks or innuendos, patronise or humiliate pupils. Discussion of issues of a sexual nature (other than in the context of the curriculum as specified in schemes of learning) should be kept to a minimum and only conducted where necessary from a pastoral perspective. Any concerns arising from such discussions should be reported to the DSL.

9. Physical Contact

9.1. There are occasions when it is entirely appropriate and proper for staff to have physical contact with children. However, it is crucial that they only do so in ways appropriate to their professional role and in relation to the school's known assessment of a pupil's welfare needs and/or any agreed care plan.

9.2. Physical contact with pupils should be avoided.

9.3. Any physical contact should be in response to the child's needs at the time, of limited duration and appropriate to the age, stage of development, gender, ethnicity and teaching context.

9.4. Physical contact may be appropriate where a pupil is in distress and needs comforting or if a member of staff has to give first aid. This is sometimes unavoidable with young children. Staff should listen, observe and take note of the child's reaction or feelings and, so far as possible, use a level of contact and/or form of communication which is acceptable to the pupils and job role. Parents should always be informed when first aid has been administered. Staff should use their own professional judgement when they feel a pupil needs this kind of support and should be aware of any special circumstances relating to the pupil. Particular care must be taken in instances which involve the same pupil over a period of time.

9.5. Physical contact should never be secretive, for the gratification of the adult or represent a misuse of authority. If a member of staff believes that an action by them or a colleague could be misinterpreted, or if an action is observed which is possibly abusive, the incident and circumstances should be immediately reported to the DSL or Headteacher.

9.6. In certain curriculum areas, such as PE, music, drama, staff may need to initiate some physical contact with children, for example, to demonstrate a technique in the use of equipment or an instrument. Physical contact should only take place when it is necessary in relation to a particular activity. The extent of contact should be made clear and undertaken with the permission of the pupil. Contact should be relevant to their age and understanding. Adults should remain sensitive to any discomfort expressed verbally or non-verbally by the pupil.

9.7. It is good practice if all parties clearly understand at the outset, what physical contact is necessary and appropriate in undertaking specific activities. Keeping parents and pupils informed of the extent and nature of any physical contact may also prevent misunderstanding and potential allegations.

9.8. In certain circumstances intimate physical contact with children may be necessary, for example assisting young children with toileting, providing intimate care for children with disabilities or in the provision of medical care. When administering intimate care staff should apply the principles set out above and be particularly alert to children's rights to safety, privacy and dignity. As with other types of physical contact, the responses of the child should be carefully and sensitively observed, and where necessary, any concerns passed to the DSL. See Intimate Care Policy.

Use of Reasonable Force

By law, any member of staff put in charge of pupils by the Head may reasonably intervene to prevent a child from:

- hurting themselves or others
- damaging property
- causing disorder

9.9. This applies when a teacher or other adult is on school premises and when he or she is in charge of the pupil elsewhere, for example on a field trip or other authorised out of school activity.

9.10. Reasonable force is only appropriate where no other form of control or restraint is available and where it is necessary to intervene. Any force used must always be the minimum needed to achieve the desired result and must be appropriate for the age, sex and understanding of the pupil and in keeping with the school's behaviour policy.

9.11. Before intervening physically a member of staff must, wherever practicable, tell the pupil to stop and what will happen if he or she does not. The member of staff must continue attempting to communicate with the pupil throughout the incident and must make it clear that physical contact or restraint will stop as soon as it ceases to be necessary.

9.12. Staff must always avoid touching or holding a pupil in a way that might be considered indecent or could cause harm. Staff should follow the school policy on the Use of Reasonable Force.

9.13. Any member of staff who is involved with or witnesses use of force on a pupil (including where it is used to restrain or control the pupil) must inform the DSL or Headteacher immediately following the incident. This is to help prevent any misunderstanding or misrepresentation of the incident, and it will be helpful in the event of a complaint. The member of staff involved must always provide a written report as soon as possible afterwards and parents must be notified by a senior member of staff.

Action taken in self-defence or in an emergency

9.14. The law allows anyone to defend themselves or another person against an attack provided they act within the law in using reasonable force.

Searching pupils

9.15. Staff have powers to search pupils including to tackle cyber-bullying. Staff use this power under the specific authority of the Headteacher only and where there is good reason to do so, i.e. that something, if not found, could be used to harm children or adults, disrupt teaching or break the school rules. No staff member will search pupils in a blanket way. Staff would always seek to carry out any exceptional search of pupils with prior consent, where appropriate, and in keeping with the law. For further details, please see the Use of Reasonable Force Policy.

10. Isolation and One-to-One Working

10.1. If an adult is alone with a pupil he/she should ensure that any such meeting or lesson is as visible as possible and that it takes place in public or semi-public places such as the library or classrooms. As such, he/she should ensure that the door to the room has a glass panel which is not obscured or is left open. If this is not possible then another adult must be close by. Furniture should also be positioned to allow easy access into or out of the room.

10.2. Staff working in one to one situations with children and young people may be more vulnerable to allegations and pupils may be more vulnerable to harm by those seeking to abuse their trust. All

staff should recognise this possibility and plan and conduct such meetings or lessons accordingly. Every attempt should be made to ensure that the safety and security needs of both staff and pupils are met. Heads should undertake a risk assessment in relation to the nature and implications of one-to-one working and individual risk assessments should be carried out in respect of adults for whom lone working is an integral part of their role. Any arrangements should be reviewed on a regular basis. It may be necessary to amend these to take account of particular pupil needs. This does not mean that working one-to-one is unacceptable; it just requires a proportionate risk assessment.

10.3. No member of staff must ever be behind a locked door with a pupil. Staff should never arrange a one to one meeting in a remote or secluded area. Any meetings which take place outside agreed working arrangements should not take place without the agreement of the DSL and parents. Staff should always report any incidents or concerns to the DSL or Headteacher.

11. Relationships

11.1. As a result of their knowledge, position and/or the authority invested in their role, all those working with children in a school are in a position of trust in relation to the pupils on roll. The relationship between a person working with children is one where the adult has a position of power or influence. It is vital for all adults to understand this power; that the relationship cannot be one between equals and the responsibility they must exercise as a consequence. The potential for exploitation and harm of vulnerable pupils means that adults have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.

11.2. We best serve the pupils in our care by a pastoral approach that is concerned, collective and thorough, but professionally detached. We do not serve pupils or parents well by encouraging situations in which pupils develop excessive reliance on individual teachers or members of staff.

11.3. All teachers and adults in school have a relationship of trust with all pupils by virtue of their position and the work they undertake. This relationship of trust must not be distorted by fear or favour and those in positions of trust must exercise responsibility as a consequence of the power they have over those they teach and/or care for. Where a relationship of trust exists, allowing a relationship to develop in a way that might lead to a sexual relationship is wrong and could lead to a disciplinary action resulting in dismissal.

11.4. It is unacceptable for a member of staff to have any kind of sexual or intimate relationships/contact with a pupil of any age or to encourage such relationships/contact. Such relationships/contact are a serious breach of trust and professional standards even where the pupil is over 18. The Sexual Offences Act 2003 makes it a criminal offence for a teacher to involve a pupil under 18 in a sexual activity regardless of whether or not the pupil consents to that activity. The sexual activity referred to does not just involve physical contact including penetrative and nonpenetrative acts. It may also include non-contact activities, such as causing children to engage in or watch sexual activity or the production of pornographic material. Keeping Children Safe in Education (2016), defines sexual abuse 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”.

12. Punishments

12.1. All staff must follow the agreed School Behaviour Policy and Anti-Bullying Strategy. Corporal punishment, or the threat of corporal punishment, is not acceptable and is unlawful. Staff may

not smack, strike or otherwise physically punish a pupil; deprive a pupil of food or drink; enforce food or drink; prevent contact by telephone to parents or any independent listener or helpline; use sarcasm or demeaning comments towards children; withhold any aids or equipment needed by the pupil or impose any punishment which is intended to distress or humiliate a pupil.

12.2. Staff should try to diffuse situations before they escalate (e.g. by distraction) and should not shout at children other than as a warning in an emergency situation.

13. Confidentiality and Data Protection

13.1. Staff must respect the privacy of pupils, parents and colleagues and must not pass confidential or sensitive information to any third parties (including addresses or telephone numbers), without checking first with the person concerned.

13.2. In some circumstances staff may have access to confidential information relating to pupils. These details must be kept confidential at all times and only shared when legally permissible and in the interests of the child.

13.3. Information about pupils, parents or colleagues must never be disclosed to telephone enquirers. Staff should ask the enquirer to put the request in writing so that it can be dealt with appropriately.

13.4. The storing and processing of personal information about pupils and staff is governed by the Data Protection Act 1998 and when handling such information all staff must comply with the Data Protection Principles which are set out in this Act. For further information please see https://ico.org.uk/for-organisations/guide-to-data-protection/data-protection-principles/

13.5. If a staff member is in any doubt about whether to share information or keep it confidential he or she should seek guidance from the DSL. Any actions should be in line with locally agreed information sharing protocols. Staff should never use confidential or personal information about a pupil or his/her family for their own, or others advantage. Information must never be used to intimidate, humiliate or embarrass the child. Confidential information should never be used casually in conversation or shared with any person other than on a need-to-know basis.

13.6. There are circumstances in which a member of staff may be expected to share information about a pupil, for example when abuse is alleged or suspected. In such cases, individuals have a responsibility to pass information on without delay, but only to those with designated safeguarding responsibilities. The School's Safeguarding and Child Protection Policy and Procedures must always be followed. Fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children.

14. Comments and Discussions with Pupils

14.1. Staff must avoid comments to or about pupils which could be taken to have sexual overtones. It is equally unacceptable for staff to encourage debate and discussion between groups of pupils, which could be interpreted as having sexual overtones, which are not justified in the context of the teaching programme. Schemes of Learning should highlight particular areas of risk and sensitivity. Specific guidance may be needed to assist newly qualified or other staff who are new to this area of work. This will call for the exercise of careful judgment in responding to questions raised by pupils.

14.2. Notwithstanding the advice given above it is recognised that, in order to discharge particular pastoral responsibilities, staff may from time to time need to engage in conversation with pupils which cover sensitive matters. Teachers and other adults must use their professional judgement

to ensure that they are not drawn into areas inappropriate to their duties or their relationship with the pupils concerned. Staff must also use their discretion to ensure that, for example, any probing for details cannot be construed as unjustified intrusion.

14.3. Staff must respect the rights of others and respect those with different beliefs. Staff must not express extreme views without balance on sensitive topics such as sexual orientation or religious belief. The use of sarcastic, demeaning or insensitive comments towards young people can also be potentially very damaging and must be avoided. In particular staff must not make any racist, sexist, homophobic or otherwise discriminatory comments. Where an adult is suspected of promoting extreme political, religious or extremist views either formally through the curriculum or informally, advice will be sought from the Prevent officer in the local authority.

15. Infatuations and Crushes

15.1. These can involve pupils and adults of both sexes on both a heterosexual and homosexual basis. They need to be handled sensitively. Careless and insensitive reactions may cause distress to those involved and have been known to provoke false accusations.

15.2. It is in the interests of all parties to avoid adding to the problem. Anyone finding themselves in this situation should not do or say anything which could be construed as encouraging the crush or making jokes about the situation. In such situations the advice of the DSL or Head must be sought.

15.3. Other members of staff have a part to play in alerting a colleague to the possibility of an infatuation in order that appropriate steps can be taken to minimise hurt and distress and the risk to the adult concerned.

15.4. Whilst the risk of infatuation is not limited to any particular group of members of staff, new staff and volunteers must recognise their particular vulnerability to adolescent infatuation. If a member of staff is concerned that he/she is developing a friendship with a pupil which would have the potential to become an unacceptable relationship, he/she must seek guidance from the DSL or Head and must ensure that the relationship does not develop further.

16. Out of School and After School Activities

16.1. Staff must take particular care when supervising pupils in the less formal atmosphere of a residential setting or after-school activity. The more relaxed adult-pupil relationships that may promote successful activities can be misinterpreted by young people. It is important to emphasise that the standards of professional conduct and behaviour expected of staff outside and after school are no different from those which apply within school. Staff should be aware of the particular care which should be taken with older, more mature pupils in these circumstances.

17. Transporting Children

17.1. In certain situations e.g. out of school activities, staff or volunteers may agree to transport children. A designated member of staff is appointed to plan and provide oversight of all transport arrangements and respond to any difficulties that may arise. Staff should not transport pupils in their own vehicles or alone unless this is unavoidable; in which case specific approval from the designated member of staff should be obtained in advance, or as soon as possible thereafter. Where this is not possible, for example in an emergency, the incident should be reported to the Head.

17.2. Staff should ensure that their behaviour is safe and that the transport arrangements and the vehicle meet all legal requirements. They should ensure that the vehicle is roadworthy and

appropriately insured for business purposes and that the maximum capacity is not exceeded. All adults, whether staff or volunteers, in regulated activity must have undergone an enhanced DBS with barred list check. People whose suitability has not been checked will not have unsupervised contact with children being cared for.

18. Personal Letters, Gifts and Electronic Communication

18.1. Staff should only write letters or send emails to individual pupils about routine matters of academic study or pastoral care, congratulations on recent achievements or other purely professional issues.

18.2. Adults should not give presents to an individual pupil (as opposed to small gifts to a whole group) outside of the school rewards system. If an adult believes it to be necessary to write a personal note or give a present to an individual pupil, s/he should discuss the purpose and context with a senior colleague, who should refer to the Head if they require further advice.

18.3. Adults need to be aware that the giving of gifts can be misinterpreted by others as a gesture either to bribe or groom a young person.

18.4. All staff using e-mail should be aware of the less formal style that can characterise this form of communication and should ensure that e-mails do not convey an inappropriate or overly familiar tone. There are occasions when children, young people or parents wish to pass small tokens of appreciation to adults e.g. on special occasions or as a thank you and this is acceptable although if the member of staff feels that this may indicate a crush or infatuation he/she should refer this matter to the DSL or Head. However, it is unacceptable to receive gifts on a regular basis or of any significant value.

19. Socialising, alcohol and drugs

19.1. Adults have a professional duty to set a responsible example to pupils. Adults should not put themselves in a position which may compromise their professional status. Adults should bear in mind that most pupils have mobile recording and photographic technology to hand, and the potential this has for comments or actions to be recorded out of context.

19.2. On occasions when adults are socialising in groups, in public locations, it is important that professional standards are maintained and no opportunity is given to pupils to compromise these. If adults become aware that pupils are socialising in the same venue, staff are encouraged to consider changing their plans. There may be times when this is difficult, for example at a restaurant, and in these circumstances staff are strongly advised to moderate their behaviour accordingly.

19.3. Adults must maintain the highest professional standards at school social events and they must not continue to socialise with pupils after the official finishing time or at alternative locations. Adults must not drink alcohol on school premises, unless at an approved School function.

19.4. Use of or being under the influence of illicit drugs is strictly prohibited and will render the user liable to dismissal for gross misconduct. Use of or being under the influence of alcohol is strictly prohibited, including on school trips (whether a day trip or residential visit). Smoking is only ever permitted in pre-authorised areas. Any breach of these rules or of the Anti-Drugs, Alcohol and Smoking Policy may result in disciplinary action.

20. Use of images

20.1. There are no circumstances that will justify adults making, downloading, possessing or distributing indecent images or pseudo-images of children (child abuse images). Accessing these images, whether using the school or personal equipment, on or off the premises, or making, storing or disseminating such material is illegal.

20.2. If indecent images of children are discovered at the establishment or on the school's equipment an immediate referral will be made by the DSL or Headteacher to the (Local Authority) Designated Officer and reported to the police.

20.3. Under no circumstances should any adult use school equipment to access pornography. Personal equipment containing pornography or links to it should never be brought into or used in the workplace. This would raise serious concerns about the suitability of the adults to continue working with children and young people.

21. Photography, videos and other images

21.1. Staff should not be expected or allowed to use their own personal equipment to take images of pupils at or on behalf of the school.

21.2. Staff should follow the School's agreed policy on photography and use of images. Whilst images are regularly used for very positive purposes, adults need to be aware of the potential for these to be taken and/or misused or manipulated for pornographic of 'grooming' purposes. Particular regard needs to be given when images are taken of young or vulnerable children who may be unable to question why or how the activities are taking place.

21.3. Images must not be used in the public domain unless parental permission has been given.

22. Dress and appearance

22.1. Adults should dress and present with appearance appropriate to their professional role; this may be different to that adopted in their personal life. Staff should ensure they are dressed smartly, decently, safely and appropriately for the tasks they undertake. Those who dress or appear in a manner which could be viewed as offensive or inappropriate will render themselves vulnerable to criticism or allegation.

23. Acceptable use of ICT

23.1. The Acceptable Use Policy defines and describes the acceptable use of technology and mobile devices for all staff. Its purpose is to establish clear expectations about the safe use of technology for staff and pupils. Cognita does not permit the use of personal mobile phones and cameras by staff where children are present.

24. Curriculum

24.1. The use of teaching resources of an explicit or sensitive nature, particularly in relation to language or sexual behaviour, must be given careful consideration to ensure that its selection is not subsequently misinterpreted. There must always, therefore, be a clear link with the scheme of work. A conversation about the use of such resources should take place beforehand with a member of the school's leadership team.

24.2. Some areas of the curriculum can include or raise subject matter which is sexually explicit or of a political or sensitive nature. Care should be taken to ensure that resource materials cannot be misinterpreted and clearly relate to the learning outcomes identified by the scheme of work or

lesson plan. This can be supported by developing ground rules with pupils to ensure sensitive topics can be discussed in a safe environment. The plan should highlight particular areas of risk and plans for how to address should be noted.

24.3. The curriculum can sometimes include or lead to unplanned discussion about subject matter of a sexually explicit, political or otherwise sensitive nature. Responding to children's questions requires careful judgement and staff should take guidance from the DSL.

24.4. Care should be taken to comply with the School's policy on Spiritual, Moral, Social and Cultural Education which will make explicit reference to the adoption of our core values of democracy, the rule of law, individual liberty, mutual respect for and tolerance of those with different faiths and beliefs and for those without faith. Staff should also comply at all times with the policy for Sex and Relationships Education (SRE).

25. Reporting of concerns

25.1. If a staff member has any concerns about a child s/he should complete a 'Cause for Concern' form and hand it to the DSL or in their absence to the DDSL. Where an adult has a concern (whether low or higher level) about another adult or wishes to self-report, they should follow the procedure set out in section E of the Safeguarding policy. As set out in this policy, all low level concerns and self-reports should be made to the DSL or Headteacher and all higher level concerns and allegations should be made to the Headteacher.

25.2. Staff should recognise their individual responsibilities to bring matters of concern to the attention of senior management and/or relevant external agencies and that to not do so may result in charges of serious neglect on their part where the welfare of children may be at risk.

26. Whistleblowing

26.1. All adults have a responsibility to report any concerns about poor or unsafe practice, including in relation to the care and protection of a pupil or pupils. If a member of staff believes that best practice in this area is not being adhered to or that practice may put a pupil or pupils at risk they should in the first instance report their concern to the Headteacher/Principal, unless their concern relates to the Headteacher/Principal in which case they should report their concern to the Cognita Assistant Director of Education (ADE).

26.2. Concerns raised under this policy are distinct from concerns or allegations about an adult's suitability to work with or have access to children, which should be reported in accordance with Section E of the Safeguarding Policy.

26.3. No member of staff will suffer a detriment or be disciplined for raising a genuine concern about unsafe practice, provided that they do so in good faith and following the whistleblowing procedures.

26.4. Where an adult feels unable to raise a concern about poor safeguarding practice with the Headteacher/Principal or ADE, or where they feel that their concern is not being addressed, they can raise their concern externally:

General guidance can be found at - https://www.gov.uk/whistleblowing

The NSPCC whistleblowing helpline is available for adults who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00am to 8:00pm, Monday to Friday or email: help@nspcc.org.uk

Ownership and consultation: Code of Conduct	
Document sponsor (role)	Director of Education
Document author (name)	Simon Camby
Specialist advice	Farrers and Co. (Lawyers) Katie Rigg, Solicitor: April – June 2016
Consultation	Headteachers at: Downsend Epsom, Breaside Prep, Hendon Prep, Salcombe Prep, Southbank Hampstead, Southbank Kensington, NBH Canonbury, Huddersfield Grammar, Hastings Madrid. Danuta Tomasz (ADE), Marian Harker (Education Officer, QA), Ros Vahey (Head of Education Compliance), Lucy Jeffrey (Independent Chair of Safeguarding).

Audience	
Audience	All school based staff and volunteers

Document application and publication	
England	Yes
Wales	Yes
Spain	No

Version control	
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Related documentation	○ All safeguarding related policies ○ School behaviour policy ○ Employee handbook ○ School staff handbook ○ Keeping Children Safe in Education, as amended ○ Working Together to Safeguard Children, as amended ○ Independent School Standards (Regulations) – for schools in England, as amended ○ Independent School Standards (Regulations) – for schools in Wales, as amended

Acceptable Use Policy

1 Purpose

1.1 This policy defines and describes the acceptable use of ICT (Information and Communications Technology) and mobile phones for school-based employees. Its purpose is to outline the standards staff must observe when using school ICT systems, minimise the risk to pupils of inappropriate contact from staff, to protect employees and schools from litigation and to minimize the risk to ICT systems.

2 Scope

2.1 This policy deals with the use of ICT facilities in schools in the Cognita Group and applies to all school-based employees and other authorised users, e.g. suppliers, contractors and volunteers.

2.2 This policy does not form part of any employee's contract of employment and Cognita may amend it at any time.

3 School responsibilities

3.1 Cognita, acting as the school's Governing Body, is responsible for ensuring that its employees act in a lawful manner, making appropriate use of school technologies for approved purposes only.

3.2 Cognita is responsible for adopting relevant policies and the Headteacher of the school is responsible for ensuring that the school adopts the policy and staff are aware of its contents.

3.3 The Headteacher is responsible for maintaining an inventory of ICT assets (hardware and software), including any equipment issued to staff for personal use, such as a laptop or mobile phone.

3.4 If the Headteacher has reason to believe that any ICT equipment has been misused, they should consult the Regional ICT Manager and their Education Lead Officer without delay. They will agree with the Headteacher an appropriate strategy for the investigation of the allegations. Incidents will be investigated in a timely manner in accordance with agreed procedures.

3.5 Headteachers should make it clear that internal school staff should not carry out any investigations unless they are qualified and authorised to do so.

4 User responsibilities

4.1 Staff found to be in breach of this policy may be disciplined in accordance with the school's disciplinary procedure. In certain circumstances, breach of this policy may be considered gross misconduct resulting in termination of employment. Users must report all suspected breaches of this policy to the Headteacher.

4.2 Users and their managers are responsible for ensuring that adequate induction, training and support is undertaken to implement this policy.

4.3 By logging on to the school's ICT systems, users agree to abide by this Acceptable Use policy and other policies that relate to the use of ICT.

4.4 All users are expected to act in a responsible, ethical and lawful manner. Users should uphold privacy and confidentiality, especially the privacy and confidentiality of school pupils, in accordance with the Data Protection Act 1998 (as amended, extended or re-enacted from time to time) and Cognita's Data Protection Policy as amended from time to time. Care must also be taken not to breach another person's copyright, trademark or design, nor to publish any defamatory

content.

4.5 Staff provided with any portable ICT equipment, such as a laptop or mobile phone, are expected to sign for its use on receipt. Staff may use school equipment for authorised business use only.

4.6 Staff must follow authorised procedures when relocating ICT equipment or taking mobile devices offsite.

4.7 No one may use ICT resources in violation of license agreements, copyrights, contracts or national laws.

4.8 Users of the ICT system are required to protect and keep confidential their password and not share their account details with others for their use, nor utilise another users' account or misrepresent their identity for any reason. Users must not under any circumstances reveal their password to anyone else.

4.9 No user shall use (e.g. read, write, modify, delete, copy, move) another user's personal electronic documents (including email) without the owner's permission or as allowed by this policy or by law.

4.10 Users must not load or download software on any device without the authorisation of the Headteacher. Periodic audits of software held on ICT equipment will be undertaken.

4.11 Users must not take personal data (in particular, any data relating to pupils) away from the school without authorisation from the Headteacher. Any electronic data that is taken offsite must be password protected and encrypted. This includes data held on portable equipment (laptops, USB drives) and Internet based file synchronisation tools, such as Dropbox. You must be particularly vigilant if you use the school's IT equipment outside the workplace and take such precautions as we may require from time to time against importing viruses or compromising system security. The system contains information which is confidential and/or subject to data protection legislation. Such information must be treated with extreme care and in accordance with Cognita's Data Protection Policy.

4.12 Any device connecting to the school network must have school approved anti-virus software installed and activated. Users may not turn off anti-virus software. All users of ICT resources have the responsibility to take precautions to prevent the initial occurrence and subsequent spreading of a computer virus. No one may knowingly create, install, run, or distribute any malicious code (e.g. viruses, Trojans, worms) or another destructive program on any ICT resource.

4.13 No one may knowingly or willingly interfere with the security mechanisms or integrity of ICT resources. No one may use ICT resources to attempt unauthorised use, or interfere with the legitimate use by authorised users, of other computers on internal or external networks. Access to networks will be monitored.

4.14 In accordance with the Data Protection Act 1998, Human Rights Act 1998, Regulation of Investigatory Powers Act 2000 and the Telecommunications (Lawful Business Practice) (Interception of Communications) Regulations 2000 as amended, extended or re-enacted from time to time, Cognita or the school may record or inspect any information transmitted through or stored in its computers, including e-mail communications and individual login sessions, without notice in certain circumstances including, but not limited to, the following:

- there is reasonable cause to believe the user has violated or is violating this policy, any guidelines or procedures established to implement this policy;
- an account appears to be engaged in unusual or unusually excessive activity;
- it is necessary to do so to protect the integrity, security, or functionality of ICT resources or to protect Cognita or its partners from liability;

- establishing the existence of facts relevant to the business;
- ascertaining or demonstrating standards which ought to be achieved by those using the ICT facilities;
- finding lost messages or to retrieve messages lost due to computer failure;
- preventing or detecting crime;
- investigating or detecting unauthorised use of ICT facilities;
- ensuring effective operation of ICT facilities;
- determining if communications are relevant to the business (for example, in the last resort where an employee is off sick or on holiday and business continuity is threatened); or
- it is otherwise permitted or required by law.

E-mail communication and any user data held on school equipment may be inspected by the Central ICT Support team with the agreement of the Headteacher for the reasons provided above. Other Internet based communication, such as web browsing, is monitored using automated software.

A CCTV system monitors the exterior of the building 24 hours a day. This data is recorded.

4.15 Do not send private, sensitive or confidential information by unencrypted email – particularly to an external recipient - if accidental disclosure could lead to significant harm or embarrassment. Anonymise personal data where possible, e.g. by using initials. Use passwords on sensitive documents that must be sent to external recipients. The ICT Support Team can provide advice and guidance on email encryption solutions if this is required.

4.16 Websites should not be created on school equipment without the written permission of the Headteacher.

4.17 No one may use ICT resources to transmit abusive, threatening, or harassing material, chain letters, spam, or communications prohibited by law, or may impact the image or reputation of the school or Cognita. No one may abuse the policies of any newsgroups, mailing lists and other public forums through which they participate from a school account.

4.18 Users should adhere to the 'good practice guidelines for email communication', contained within the school Induction Pack.

4.19 The following content must not be downloaded from, created or accessed on ICT equipment at any time:

- pornographic material (that is, writing, pictures, film and video clips of a sexually explicit nature);
- material that gratuitously displays images of violence, injury or death.
- material that is likely to lead to the harassment of others;
- junk email;
- material that promotes intolerance and discrimination because of race, sex, disability, sexual orientation, religion or age;
- material relating to criminal activity;
- music or video files or other material in breach of copyright; or
- material that may generate security risks and encourage computer misuse.

4.20 It is possible to access or be directed to unacceptable Internet sites by accident. These can be embarrassing and such sites can be difficult to get out of. If staff have accessed unacceptable

content or are in receipt of unacceptable material via email, they must inform the Headteacher. This may avoid problems later should monitoring systems be alerted to the content.

4.21 Remote access to school based systems must be authorised by the Headteacher and configured by the ICT Support Team. Examples of remote access methods include: webmail or other mobile email solution (Blackberry, Windows Mobile), email forwarding to a personal account, Virtual Private Network (VPN) connection, Log Mein or other remote desktop connection, web portals, and file synchronisation tools such as DropBox. Any member of staff authorised for remote access must sign-up to its specific terms of use.

4.22 Users must not connect any personal ICT equipment (e.g. laptop, netbook) to the school network without the authorisation of the Headteacher.

4.23 All portable ICT equipment must be locked away or safely secured when not in use. Any staff authorised to use portable equipment, such as a laptop, for home or roaming use must take all reasonable efforts to keep the equipment safe and secure.

4.24 For security purposes users must log off or lock their computer if they expect to be absent from their desk for any length of time. Users must shutdown their computer at the end of the day.

4.25 Staff must not copy or install school software to any personal equipment without authorisation from the Headteacher.

4.26 Digital recording equipment e.g. cameras may be available for staff to use as part of delivering ICT and the broader curriculum. Safe and appropriate use of recording equipment must be discussed with the pupils as part of the curriculum and referred to whenever recording is to take place

4.27 Staff must not use images and recordings for activities and purposes beyond school endorsed projects. The materials are not to be circulated in the public domain and are not to be used for personal gain.

5. Mobile phone communication and instant messaging

5.1. Staff must not give their home telephone number or their mobile phone number to pupils. Mobile phone communication should be used sparingly and only when deemed necessary.

5.2. Photographs and videos of pupils must not be taken with mobile phones or any other device.

5.3. Staff are advised not to make use of pupils' mobile phone numbers either to make or receive phone calls or to send to or receive from pupils text messages other than for approved school business.

5.4. Staff should only communicate electronically with pupils from school accounts on approved school business, e.g. coursework.

5.5. Staff should not enter into online messaging communications with pupils other than via the school and ICT System and for approved school business.

5.6. Staff should not make or take personal calls or engage in personal texting when they are on duty.

6. Social networking sites

6.1. Staff must not communicate or connect with any current pupil or former pupil under the age of 18 on any social networking site without the written permission of the Headteacher.

6.2. Staff should not create any social networking group that links directly to the school or Cognita without the written permission of the Headteacher.

6.3. Staff should not use social networking sites to discuss work related issues or to use their position at the school to further their own interests.

Ownership and consultation: Acceptable Use Policy	
Document sponsor (role)	Chief Information Officer
Document author (name)	Rob Birkett
Specialist advice	Arjun Majumdar, Solicitor - EMW Law LLP

Audience	
Audience	All school based staff and volunteers

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Related documentation	
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