Mortimer

Leader:

Review Date:

Mr S Hignett

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MORTIMER COMMUNITY COLLEGE STAFF CODE OF CONDUCT/SAFER WORKING PRACTICE

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1. Context

Staff working at Mortimer Community College have a crucial role to play in shaping the lives of young people. They have a unique opportunity to interact with children and young people in ways that are both affirming and inspiring. This code of conduct has been produced to help staff establish the safest possible learning and working environments which safeguard children and young people and reduce the risk of staff working with them being falsely accused of improper or unprofessional conduct.

The content of this code of conduct is based on the DfE document:

Keeping Children Safe In Education 2024

2. Duty of Care

All staff, whether paid or voluntary, have a duty to keep young people safe and to protect them from sexual, physical and emotional harm. Children have a right to be safe and to be treated with respect and dignity. It follows that trusted adults are expected to take reasonable steps to ensure the safety and well-being of pupils. Failure to do so may be regarded as professional neglect. The duty of care is, in part, exercised through the development of respectful, caring and professional relationships between staff and pupils and behaviour by staff that demonstrates integrity, maturity and good judgement.

The public, local authority, governors and parents have legitimate expectations about the nature of professional involvement in the lives of pupils. When individuals accept a role that involves working with children and young people, they need to understand and acknowledge the responsibilities and trust inherent in that role.

Employers have a duty of care towards their employees under the Health and Safety at Work Act 1974 which requires them to provide a safe working environment for staff and guidance about safe working practices. Thus, employers have a duty of care for the well-being of employees and to ensure that employees are treated fairly and reasonably in all circumstances. Staff who are subject to an allegation should therefore be supported and the principles of natural justice applied.

The Health and Safety Act 1974 also imposes a duty on employees to take care of themselves and anyone else who may be affected by their actions or failings. An employer's duty of care and the staff duty of care towards children should not conflict. This 'duty' can be demonstrated through the use and implementation of the safer working practices contained in this document.

The Governing Body controls the use of the school premises both during and outside school hours, except where a trust deed allows a person other than the governing body to control the use of premises, or a transfer of control agreement has been made. Where the Governing Body provides services or activities directly under the supervision or management of school staff the school's arrangements for safeguarding must be followed.

3. Confidentiality

Members of staff may have access to confidential information about pupils in order to undertake their every day responsibilities. In some circumstances staff may be given highly sensitive or private information. They should never use confidential or personal information about a pupil or her/his family for their own, or others' advantage (including that of partners, friends, relatives or other schools/services). Information must never be used to intimidate, humiliate, or embarrass the pupil.

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

There are some circumstances in which a member of staff may be expected to share information about a child, for example when abuse is alleged or suspected. In such cases, individuals have a duty to pass information on without delay, but only to those with designated child protection responsibilities. If a member of staff is in any doubt about whether to share information or keep it confidential, they should seek guidance from the school's Designated Safeguarding Lead (or Deputies).

Any media or legal enquiries should be passed to senior management as soon as possible.

4. Making a Professional Judgement

This document cannot provide a complete checklist of what is, or is not appropriate behaviour for staff in all circumstances. There may be occasions and circumstances in which staff have to make decisions or take action in the best interests of the child or young person which could contravene this guidance or where no guidance exists. Individuals are expected to make judgements about their behaviour in order to secure the best interests and welfare of the children in their charge. Such judgements should always be recorded and shared a member of the senior management team (and with the parent or carer if appropriate). In undertaking these actions individuals will be seen to be acting reasonably. Staff should always consider whether their actions are warranted, proportionate and safe and applied equitably.

5. Power and Positions of Trust

As a result of their knowledge, position and/or the authority invested in their role, all staff are in positions of trust in relation to the young people in their care. Broadly speaking, a relationship of trust can be described as one in which one party is in a position of power or influence over the other by virtue of their work or the nature of their activity. It is vital for all those in positions of trust to understand the power this can give them over those they care for and the responsibility they must exercise as a consequence of this relationship.

A relationship between an adult and a child or young person is not a relationship between equals. There is potential for exploitation and harm of vulnerable young people. Adults therefore have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.

Adults should always maintain appropriate professional boundaries and avoid behaviour which might be misinterpreted by others. They should report and record any incident with this potential.

Where a person aged 18 or over is in a specified position of trust with a child under 18, it is an offence (Sexual Offences Act 2003, Section 16) for that person to engage in sexual activity with or in the presence of that child, or to cause or incite that child to engage in or watch sexual activity.

6. Propriety and Behaviour

All staff working with pupils have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of pupils. It is therefore expected that they will adopt high standards of personal conduct in order to maintain the confidence and respect of their colleagues, pupils or students, public in general and all those with whom they work.

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

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

The behaviour of an adult's partner or other family members may raise similar concerns and require careful consideration by an employer as to whether there may be a potential risk to pupils in the workplace.

All staff are also expected to take care when using social networking sites. All personal social networking sites should be set at private and there should be no reference made to/or about Mortimer Community College that could have negative consequences for the school.

7. Dress and Appearance

A person's dress and appearance are matters of personal choice and self-expression. However, staff should dress in ways which are appropriate to their role and this may need to be different to how they dress when not at work.

Staff should ensure they are dressed appropriately for the tasks and the work they undertake. For example, their clothing should not be revealing, or sexually provocative and should not contain political or other contentious slogans.

Those who dress in a manner which could be considered as inappropriate could render themselves vulnerable to criticism or allegations.

8. The Use of Personal Living Space

No pupil should be in or invited into, the home of a member of staff, unless the reason for this has been firmly established and agreed with parents/carers and a senior member of staff.

It is not appropriate for private living space be used for work with pupils. Neither is it appropriate for school authorities to expect or request that private living space be used to see pupils for e.g. discussion of reports, academic reviews, tutorials, pastoral care or counselling. If these activities are required, appropriate accommodation will be provided.

Under no circumstances should pupils assist with chores or tasks in the home of a member of staff (unless they are a member of the family of the member of staff).

9. Gifts, Rewards and Favouritism

The giving of gifts or rewards to pupils should only be done be part of an agreed reward system for supporting positive behaviour or recognising particular achievements. In some situations, the giving of gifts as rewards may be accepted practice for a group of pupils, whilst in other situations the giving of a gift to an individual child or young person will be part of an agreed plan, recorded and discussed with senior member of staff and the parent or carer.

It is acknowledged that there may specific occasions when staff may consider it appropriate to give a child or young person a small personal gift of insignificant value. This is only acceptable practice where, in line with this code of conduct, the adult has first discussed the giving of the gift and the reason for it, with a senior member of staff and the parent or carer and the action is recorded.

Any gifts should be given openly and not be based on favouritism. Staff need to be aware however, that the giving of gifts can be misinterpreted by others as a gesture either to bribe or 'groom' a young person.

Staff should exercise care when selecting pupils for school teams, productions, trips and/or specific work tasks in order to avoid perceptions of favouritism or injustice. Similar care should be exercised when pupils are excluded from an activity. Methods of selection and exclusion should always be subject to clear, agreed criteria.

Care should also be taken to ensure that staff do not accept any gift that might be construed as a bribe by others, or lead the giver to expect preferential treatment.

There are occasions when pupils or parents wish to pass small tokens of appreciation to staff e.g. on special occasions or as a thank you and this is acceptable. However, it is unacceptable to receive gifts on a regular basis or of any significant value.

10. Communication with Pupils (including the Use of Technology)

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

Communication between pupils and staff, by whatever method, should take place within clear and explicit professional boundaries, using **ONLY** school systems and emails. This includes the wider use of technology such as; social media, messaging apps, mobile phones, text messaging, emails, digital cameras, videos, web-cams, websites and blogs.

Staff should **not share** any personal information with pupils. They should **not request**, or **respond to**, any personal information from the pupil, other than that which might be appropriate as part of their professional role. Staff should ensure that all communications are transparent and open to scrutiny.

This means that staff should:

- ensure that personal social networking sites are set at private and pupils and their parents/carers are never listed as approved contacts
- ensure ex-pupils are not listed as contacts unless they are at least 18 years old
- never use or access social networking sites of pupils
- not give their personal contact details to pupils, including their mobile telephone number. If this is necessary due to an educational visit and a school phone is not available, then staff need to ensure that a senior member of staff and parents/carers are aware of this
- only make contact with pupils for professional reasons via parent/carer contact details that are recorded on our school system, via student school email only using your Mortimer staff email account or via organised Teams/Zoom (using protocols stated in our Remote and Home Learning Policy 2021).
- recognise that text messaging should only be used as part of an agreed protocol and when other forms of communication are not possible. Any text messages should be sent using the schools internal messaging system and not a personal mobile device.
- not use internet or web-based communication channels to send personal messages to pupils
- not post in, any way information concerning pupils

11. Social Contact

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

This means that staff should:

- have no secret social contact with pupils or their parents
- consider the appropriateness of the social contact according to their role and nature of their work
- always approve any planned social contact with pupils or parents with senior colleagues

- advise senior management of any social contact they have with a pupil or a parent with who whom they work, which may give rise to concern
- report and record any situation, which may place a child at risk or which may compromise the school or their own professional standing
- be aware that the sending of personal communications such as birthday cards should always be discussed and recorded with their line manager

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

12. Sexual Contact

All staff should clearly understand the need to maintain appropriate boundaries in their contacts with pupils. Intimate or sexual relationships between pupils and the adults who work with them will be regarded as a grave breach of trust. Allowing or encouraging a relationship to develop in a way which might lead to a sexual relationship is also unacceptable.

Any sexual activity between an adult and the child or young person with whom they work may be regarded as a criminal offence and will always be a matter for disciplinary action. All children and young people are protected by specific legal provisions in this respect regardless of whether the child or young person consents or not. The sexual activity referred to does not just involve physical contact including penetrative and non-penetrative 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.

This means that staff should not:

- have sexual relationships with pupils
- have any form of communication with a pupil which could be interpreted as sexually suggestive or provocative i.e. verbal comments, letters, notes, email, phone calls, texts, physical contact
- make sexual remarks to, or about, a pupil
- discuss their own sexual relationships with or in the presence of pupils

This means that staff should:

- ensure that their relationships with pupils clearly take place within the boundaries of a respectful professional relationship
- take care that their language or conduct does not give rise to comment or speculation. Attitudes, demeanour and language all require care and thought in the presence of pupils

13. Physical Contact

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

It is not possible to be specific about the appropriateness of each physical contact, since an action that is appropriate with one pupil in one set of circumstances may be inappropriate in another, or with a different pupil. Staff should therefore, use their professional judgement at all times.

Physical contact should never be secretive. If a member of staff believes that an action could be misinterpreted, the incident and circumstances should be recorded and reported as soon as possible to a senior member of staff and, if appropriate, a copy placed on the pupils file.

Physical contact, which occurs regularly with an individual pupil, is likely to raise questions unless the justification for this is part of a formally agreed plan (for example in relation to pupils with SEN or physical disabilities). Any such contact should be the subject of an agreed and open school policy and subject to review. Where feasible, staff should seek the pupil's permission before

initiating contact. Staff should listen, observe and take note of the pupil's reaction or feelings and – so far as is possible - use a level of contact and/or form of communication which is acceptable to the situation for the minimum time necessary.

The general culture of 'no touch' is considered the culture to follow. Pupils with special needs may require more physical contact to assist their everyday learning. The arrangements should be understood and agreed by all concerned, justified in terms of the child's needs, consistently applied and open to scrutiny.

It is recognised that some pupils may seek inappropriate physical contact. Adults should be particularly aware of this especially when it is known that a child has suffered previous abuse or neglect. In the pupil's view, physical contact might be associated with such experiences and lead to some actions being misinterpreted. In all circumstances where a pupil initiates inappropriate physical contact, it is the responsibility of the member of staff to sensitively deter the pupil and help them understand the importance of personal boundaries. Such circumstances must always be reported and discussed with a senior member of staff and the parent/carer.

14. Other Activities that require Physical Contact

Some staff who work in certain areas/teach specific subjects, for example PE, drama, music or outdoor activities, will have to initiate some physical contact with pupils, for example to demonstrate technique in the use of a particular piece of equipment, adjust posture, or perhaps to support a pupil so they can perform an activity safely or prevent injury. Such activities should be carried out in accordance with existing codes of conduct, regulations and best practice.

Physical contact should take place only when it is necessary in relation to a particular activity. It should take place in a safe and open environment i.e. one easily observed by others and last for the minimum time necessary. The extent of the contact should be made clear to the parent/carer and once agreed, should be undertaken with the permission of the pupil.

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

15. Behaviour Management

All pupils have a right to be treated with respect and dignity even in those circumstances where they display difficult or challenging behaviour. Staff should not use any form of degrading treatment to punish a pupil. The use of sarcasm, demeaning or insensitive comments towards pupils is not acceptable in any situation and any sanctions used should be part of the school's Behaviour for Learning Policy.

The use of corporal punishment is not acceptable and is unlawful in schools. Where pupils display difficult or challenging behaviour, staff must follow the school's Behaviour for Learning Policy and use strategies appropriate to the circumstance and situation. The use of physical intervention can only be justified in exceptional circumstances and must only be used as a last resort when other behaviour management strategies have failed.

Where a pupil has specific needs in respect of particularly challenging behaviour, a positive handling plan may be drawn up and agreed by all parties. Only in these circumstances should an adult deviate from the school's Behaviour for Learning Policy

16. Use of Control and Physical Intervention

There are circumstances in which staff working with pupils displaying extreme behaviours can legitimately intervene by using either non-restrictive or restrictive physical interventions. Please

refer to the section on Power to Use Reasonable Force in the school's Behaviour for Learning Policy.

In all cases where physical intervention is employed the incident and subsequent actions should be documented and reported. This should include written and signed accounts of all those involved, including the pupil. The parent/carer should be informed on the same day whenever possible.

17. Children and Young People in Distress

There may be occasions when a distressed pupil needs comfort and reassurance and this may involve physical contact. Staff should use their professional judgement to comfort or reassure a child in an age-appropriate way whilst maintaining clear professional boundaries.

Where an adult has a particular concern about the need to provide this type of care and reassurance, or is concerned that an action may be misinterpreted, this should be reported and discussed with a senior member of staff as soon as possible.

18. Personal Care

Young people are entitled to respect and privacy at all times and especially when in a state of undress, changing clothes, bathing or undertaking any form of personal care. However, there is also a need for an appropriate level of supervision in order to safeguard young people and/or satisfy health and safety considerations. This supervision should be appropriate to the needs and age of the pupils concerned and sensitive to the potential for embarrassment.

This means that staff should:

- avoid any physical contact when pupils are in a state of undress
- avoid any visually intrusive behaviour
- where there are changing rooms announce their intention of entering

This means that staff should not:

- change in the same place as pupils
- shower or bathe with pupils
- assist with any personal care task which a pupil can undertake by themselves

19. First Aid and Administration of Medication

Only trained staff should administer First Aid and/or medication.

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

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

20. One to One Situations

It is not realistic to state that a one to one situation should never take place. It is however, appropriate to state that where there is a need, agreed with a senior member of staff and/or parent/carer, for a member of staff to be alone with a pupil, certain procedures and safeguards must be in place.

This means that staff should:

- ensure that when lone working is an integral part of their role, full and appropriate risk assessments are conducted and agreed
- avoid meetings with a pupil in a remote or secluded area
- always inform other colleagues and/or parents/carers about the contact(s) beforehand, assessing the need to have them present or close by
- avoid use of 'engaged' or equivalent signs wherever possible. Such signs may create an
 opportunity for secrecy or the interpretation of secrecy
- always report any situation where a child becomes distressed or angry to a senior member of staff as soon as possible
- carefully consider the needs and circumstances of the pupil when in a one to one situation

Pre-arranged meetings with pupils away from the school premises are not permitted unless approval is obtained from their parent/carer and the Headteacher.

21. Home Visits

All work with pupils and parents should, wherever possible, be undertaken in the school or other recognised workplace. There are however occasions, in response to urgent or specific situations where it is necessary to make one-off or regular home visits. In these circumstances it is essential that appropriate procedures are in place to safeguard pupils and staff.

This means that staff should:

- agree the purpose for any home visit with senior management, unless this is an acknowledged and integral part of their role
- always make detailed records including times of arrival and departure and work undertaken
- ensure any behaviour or situation which gives rise to concern is discussed with their line manager and, where appropriate action is taken
- never make a home visit outside agreed working arrangements
- ensure that they have access to a mobile telephone and an emergency contact person
- carry out home visits in pairs and notify one of the following people: AH Safeguarding, DH Pastoral, Headteacher.
- Carry out a thorough risk assessment of the address and context of the visit

Where a programme of work is to be undertaken in the home an appropriate works space should be provided and a written work plan/contract should be agreed with the pupil and parent. This should include: clear objectives; content; timing; and duration of sessions; ground-rules; child protection and confidentiality statements. The plan should take into account the preferences of pupil and parent. There should also be an agreement that the parent or other suitable adult will remain in the home throughout the session.

Where the situation is such that changes in agreed work arrangements are required, a quick assessment will be necessary to determine if the session can continue. The line manager should then be informed as soon as is practically possible. Emergency situations should be reported to the police or social care and to the Head Teacher and parent/carer as appropriate.

22. Transporting Pupils

In certain situations e.g. out of school activities, staff or volunteers may agree to transport children. The member of staff with responsibility for the activity should plan and provide oversight of all transporting arrangements and respond to any difficulties that may arise.

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

There will be occasions however when staff may need to use their own vehicles for transporting pupils. Staff in these situations should only use their own vehicle if it is roadworthy, appropriately insured and that the maximum capacity is not exceeded. Wherever possible, a member of staff should not travel alone with a pupil (i.e. a one to one situation). If this is unavoidable, the member of staff must inform a colleague prior to the start of the journey.

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

Where staff transport children in a vehicle which requires a specialist license/insurance e.g. PCV or LGV staff should ensure that they have an appropriate licence and insurance to drive such a vehicle.

It is inappropriate for staff to offer lifts to pupils outside their normal working duties, unless this has been brought to the attention of the line manager and has been agreed with the parents/carers.

There may be occasions where a pupil requires transport in an emergency situation or where not to give a lift may place a pupil at risk. Such circumstances must always be recorded and reported to a senior member of staff and parents/carers.

23. Educational Visits and After-School Activities

Staff to follow EVC policy.

24. Photography, Videos and Other Images

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

A school device should be used to take or record images of pupils. Staff should not use their personal devices to take or record images of pupils.

Staff should ensure that informed consent from parents or carers and/or student has been given before an image is taken for any purpose.

Careful consideration should be given as to how activities involving the taking of images are organised and undertaken. Care should be taken to ensure that all parties understand the implications of the image being taken especially if it is to be used for any publicity purposes or published in the media. It is not appropriate for adults to take photographs of children for their personal use.

It is recommended that when using a photograph, the following guidance should be followed:

- if the photograph is used, avoid naming the pupil
- if the pupil is named, avoid using their photograph
- whether the image will be destroyed or retained for further use
- if retained, images should be securely stored and used only by those authorised to do so

25. Access to Inappropriate Images and Internet Usage

There are no circumstances that will justify staff possessing indecent images of children. Staff who access and possess links to such websites will be viewed as a significant and potential threat to our pupils. Accessing, making and storing indecent images of children is illegal. This will lead to criminal investigation and the individual being barred from working with children and young people, if proven.

Staff should not use electronic equipment belonging to the school to access adult pornography; neither should personal equipment containing these images or links to them be brought into the workplace. This will raise serious concerns about the suitability of the member of staff to continue to work with children.

Staff should not use electronic equipment belonging to the school to access their own personal messaging platforms (e.g. WhatsApp), social media accounts or to access any third-party social media accounts.

School issued electronic equipment is monitored both inside and outside of school by device monitoring software (Securus). Any misuse of school equipment could lead to disciplinary measures being taken against staff.

Staff should ensure that pupils are not exposed to any inappropriate images or web links. Staff need to ensure that internet equipment used by pupils have the appropriate controls with regards to access e.g. any films or material shown to pupils are age appropriate and personal passwords remain confidential.

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

26. Curriculum

Many areas of the curriculum can include or raise subject matter which is sexually explicit, or of an otherwise sensitive nature. Care should be taken to ensure that resource materials cannot be misinterpreted and clearly relate to the learning outcomes identified by the lesson plan. This plan should highlight particular areas of risk and sensitivity and care should especially be taken in those areas of the curriculum where usual boundaries or rules may be less rigorously applied, eg drama, SMC.

This means that staff should:

- have clear curriculum plans
- take care when encouraging pupils to use self expression, not to overstep personal and professional boundaries
- be able to justify all curriculum materials and relate these to clearly identifiable lessons plans

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

Staff should not enter into or encourage inappropriate discussions about sexual activity or any behaviours which may offend or harm others.

27. Covid-19

All staff to follow Government guidance with regards to Covid-19 protocols.

28. Low Level Concerns

Please see the separate - Staff Low Level Concerns Policy.

29. Whistle Blowing

Whistle blowing is the mechanism by which staff can voice their concerns, made in good faith, without fear of repercussion. The Governing Body have adopted the LA policy which is available on the staff safeguarding webpage or directly on the South Tyneside Council website by <u>clicking</u> <u>here</u>.

30. Sharing Concerns and Recording Incidents

All staff should be fully aware and familiar with our Child Protection Policy, the use of CPOMS, and of the DfE's Keeping Children Safe in Education 2024.

All allegations must be taken seriously and properly investigated in accordance with local procedures and statutory guidance. Staff who are the subject of allegations are advised to contact their professional association.

In the event of any allegation being made, to someone other than the relevant senior member of staff, information should be clearly and promptly recorded and reported to the relevant senior member of staff without delay.

Staff should always feel able to discuss with their line manager any difficulties or problems that may affect their relationship with pupils so that appropriate support can be provided or action can be taken.

It is essential that accurate and comprehensive records are maintained wherever concerns are raised about the conduct or actions of staff working with or on behalf of pupils.