

Policy Statement

Policy	Staff Conduct Policy
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Date Written	10 th October 2018
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Approved by	G Sutton
Next major review date	31 st August 2019
Location and disseminations	A copy of the policy can be found in the safeguarding handbook, in the college admin office and on the college website.

Content

1	Policy Statement
2	Duty of Care
3	Making Professional Judgements
4	Power and Positions of Trust
5	Confidentiality
6	Behaviour
7	Dress and Appearance
8	Gifts
9	Infatuations
10	One to One Situations
11	Personal Living Space
12	Social Contact
13	Communication with Students
14	Social Networking Sites and Online Gaming
15	Physical Contact
16	Students in Distress
17	Behaviour Management

18	Control and Physical Intervention
19	Sexual Contact with Students
20	Transporting Students
21	Curriculum
22	Photography, videos and other creative arts
23	Control of inappropriate imagery exposure
24	Whistleblowing
25	Overnight supervision and examinations
26	Sharing Concerns and recording incidents
27	Notes

1. Policy Statement

St Georges College seeks to provide a safe and supportive environment for both Students and Staff, which provides the well-being and best outcomes for students in our care.

This policy seeks to clarify what is expected in terms of behaviour, conduct and responsibilities from Staff and Volunteers within the college and provides aware about what constitutes illegal, unsafe and unprofessional behaviours. The policy should assist staff and volunteers in monitoring their own standards and practice, reducing the risk of allegations being made against them. The principles and guidance found in this policy should be followed by any person whose work bring them into contact with students at the college.

The college recognise that whilst the majority of the adults who work with children act professionally, it is not always straight forward, as many situations can enable misunderstandings to occur. This policy is intended to reduce the risk of these.

While every attempt has been made to cover a range of situations, we recognise that a written policy is unable to cover all eventualities. There may be times that a member of staff will need to use their professional judgement to cover situations laid

out by this document and in these situations, staff should ensure a member of the Senior Management Team, and provide justification for any action taken or proposed to take.

The college recognises that there may be allegations which are genuine as despite prevention measures, there may be people who will seek to exploit opportunities to harm children and additionally there are allegations which may be false and could arise from differing perceptions of the same event.

Underpinning principles

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

2. Duty of Care and Responsibilities

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

All staff, whether paid or voluntary, have a duty to keep young people safe and to protect them from harm (physical, sexual and emotional). Children have a right to be safe and trusted adults are expected to safeguard their wellbeing. There are legitimate high expectations about the nature of the professional involvement of staff in the lives of pupils/students. 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 and under health and safety legislation which requires them which requires them to provide a safe working environment for staff and guidance about safe working practices.

This means that the College must:

- Promote a culture of openness and support
- Create a clear safeguarding culture.
- Ensure that systems are in place for concerns to be raised
- Ensure that adults are not placed in situations which render them particularly vulnerable
- Ensure that all adults are aware of expectations, policies and procedures

When individuals accept a role working in the College they should understand and acknowledge the responsibilities and trust involved in that role.

This means that staff must:

- understand the responsibilities which are part of their employment or role, and be aware that sanctions will be applied if these provisions are breached
- always act, and be seen to act, in the pupil's/student's best interests
- avoid any conduct which would lead any reasonable person to question their motivation and intentions
- take responsibility for their own actions and behaviour

3. Making Professional Judgements

This Policy cannot provide a complete checklist of what is, or is not, appropriate behaviour for staff. It does highlight however, behaviour that is illegal, inappropriate or inadvisable. There will be rare occasions and circumstances in which staff have to make decisions or take action in the best interests of the child which could contravene this policy 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 pupils/students in their charge and in so doing, will be seen to be acting reasonably. Judgements should be recorded on welfare concern forms and shared with the DSL.

This means that where no specific guidance exists staff must:

- discuss the circumstances that informed their action, or their proposed action, with the Safeguarding Lead. This will help to ensure that the safest practices are employed and reduce the risk of actions being misinterpreted
- always discuss any misunderstanding, accidents or threats with a Safeguarding Lead or Senior Manager
- always record discussions and actions taken with their justifications
- record any areas of disagreement and if necessary refer to an external agency

4. Power and Positions of Trust

All adults working with children in education settings are in positions of trust in relation to the young people in their care.

A relationship between a person working with a child is one where the adult has a position of influence, and is not a relationship between equals. There is potential for exploitation and harm of vulnerable young people; staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.

Staff should always maintain appropriate professionalism and wherever possible, they should avoid behaviour which might be misinterpreted by others, and report and record any incident with this potential.

According to the Sexual Offence Act 2003, where a person aged 18 or over is in a position of trust with a child under 18, it is a criminal offence 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.

Any sexual behaviour by a member of staff with or towards a student is both inappropriate and illegal. Students are protected by the same laws as adults in relation to non-consensual sexual behaviour. They are additionally protected by specific legal provisions regardless of whether the child or young person consents or not.

There are occasions when adults embark on a course of behaviour known as 'grooming' where the sole purpose is to gain the trust of a child, and manipulate that relationship so sexual abuse can take place. Staff should be aware that conferring

special attention and favour upon a child might be construed as being part of a 'grooming' process, which is an offence.

This means that staff must not:

- use their position to gain access to information for their own advantage and/or a student's or family's detriment
- use their power to intimidate, threaten, coerce or undermine students
- use their status and standing to form or promote a relationship with a student, which is of a sexual nature
- have any form of communication with a child or young person which would be interpreted as sexually suggestive or provocative i.e. verbal comments, letters, notes, electronic mail, phone calls, text, physical contact.

5. Confidentiality

Every effort is made to protect the security and confidentiality of information stored on the College's networks. This has to be balanced against the College's responsibility to maintain internal rules and governance by the Data Protection Act 1998 and General Data Protection Regulations 2018.

Members of staff may have access to confidential information about students in order to undertake their everyday responsibilities. Information should only be shared with those who have a legitimate need to know. Confidential information about students must never be used casually in conversation or shared with any person other than on a need to know basis. In circumstances where the student's identity does not need to be disclosed the information must be used anonymously.

In some circumstances staff may be given additional highly sensitive or private information. They should never use confidential or personal information about a student or his/her family for their own, or others' advantage. Information must never be used to intimidate, humiliate, or embarrass the student.

There are some circumstances in which a member of staff may be expected to share information about a student, 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 he or she must seek guidance from the Designated Safeguarding Lead. Any media or legal enquiries should be passed to the Designated Safeguarding Lead and Public Relations.

Adults need to be aware that although it is important to listen to and support students, they must not promise confidentiality or request pupils/students to do the same under any circumstances, however, reassurance that the information will be treated as sensitive can be provided.

This means that staff:

- Need to know the name of their Designated Safeguarding Lead and be familiar with safeguarding guidance.
- are expected to treat information they receive about pupils/students in a discreet and confidential manner
- in any doubt about sharing information they hold or which has been requested of them should seek advice from the Designated Safeguarding Lead.
- need to be cautious when passing information to others about a pupil/student
- need to know to whom any concerns or allegations should be reported
- need to be clear about what information can be shared in what circumstances.
- Understand and follow GDPR legislation

6. Behaviour

All staff have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of students. They should adopt high standards of personal conduct in order to maintain the confidence and respect of their peers, students and the public in general.

An individual's behaviour, either in or out of the workplace, should not compromise her/his position within the work setting so it is important to exercise due care and attention when outside of the college environment. There may be times when behaviour comes under scrutiny from the local community, local authorities or media. Staff should be aware that their behaviour, both in or outside of their workplace, could compromise their position within the college. Serious cases could also lead to prohibition from teach by the NCTL, a bar from regulated activities or criminal charges.

Membership of organisations whose goals are in conflict with the values and equality policies of the college is not acceptable.

This means that staff should not:

- behave in a manner which would lead any reasonable person to question their suitability to work with students or act as a role model
- drink alcohol with current students in public or private places, nor purchase alcohol for students.

- drink alcohol when supervising students or on college trips. This applies even when there are no students present, as the member of staff may be called to act if an emergency occurs
- make, or encourage others to make, inappropriate or sexual remarks to a student
- discuss their own sexual relationships with or in the presence of students
- discuss a student's sexual relationships in inappropriate settings or contexts
- make, or encourage others to make, unprofessional personal comments in any form of communication, which have potential detriment.

Staff should:

- Be aware that their behaviour from themselves or those in their personal lives may impact upon their work with students.

There may be exceptional circumstances where a member of staff may be personal friends with a parent which means that normal social life will bring the pupil/student into social contact with a member of staff. However, the member of staff should exercise caution.

If a member of staff finds themselves in a pub or other meeting place in which current students are drinking, the member of staff should not join them and may need to draw the attention of bar staff to the age of the students.

7. Dress and Appearance

Dress and appearance are a matter of personal choice and individuals will want to dress according to their own cultural or religious customs or with self-expression. However, staff must dress and adopt an appearance in a manner which is appropriate to their professional role, which may differ from dress styles in their personal life. Smart and professional appearance is expected at all times for staff. Staff should ensure they are dressed decently, safely and appropriately for the tasks they undertake.

Those who dress or appear in a manner which could be considered as inappropriate could render themselves vulnerable to criticism or allegation. Appropriate personal presentation is expected of staff.

This means that staff should ensure their appearance and clothing:

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

- is compliant with professional standards

8. Gifts

Staff should take care to ensure that they do not that might be construed as a bribe by others, or lead the giver to expect preferential treatment.

There are occasions when pupils/students or parents wish to pass small tokens of appreciation to staff, for example at Christmas 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.

Similarly, it is ill-advised to give such gifts to children or their families as this could be interpreted as a bribe or grooming behaviour and could carry the perception of a “favour” being expected in return. Any rewards given should be in line with the college policies.

Staff should take care when selecting students for activities, jobs of privileges to avoid perceptions of favouritism.

This means that staff should:

- ensure that gifts received or given in situations which may be misconstrued are declared and recorded
- only give gifts to an individual young person as part of an agreed reward system
- where giving gifts other than as above, ensure that these are of insignificant value and given to all students equally.
- Ensure that the selection processes of children are fair
- Guard against any behaviour that may give rise to an allegation of ‘favouritism’.

9. Infatuations

Staff need to be aware that it is not uncommon for pupils/students to be strongly attracted to a member of staff and/or develop an infatuation. They should be cautious and ensure their own behaviour cannot be brought into question. Staff should be aware that such circumstances always carry a high risk of words or actions being misinterpreted and for allegations to be made against staff.

A member of staff who becomes aware that a pupil/student may be infatuated with them or a colleague should discuss this at the earliest opportunity with the

Designated Safeguarding Lead so that appropriate action can be taken. In this way, steps can be taken to avoid hurt and distress for all concerned.

This means that staff must:

- Report any indications (verbal, written or physical) that suggest a student may be infatuated with a member of staff to the Designated Safeguarding Lead
- Be mindful if they are alone in a room with a pupil/student.
- Maintain professional boundaries.

10. One to One

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

Pre-arranged meetings with pupils/students away from the college premises should not be permitted unless approval is obtained from their parent and the Proprietor or other senior colleague with delegated authority.

This means that staff must:

- avoid meetings with pupils/students in remote, secluded areas of the college
- ensure there is visual access and/or an open door in one to one situations
- inform other staff of the meeting beforehand, assessing the need to have them present or close by
- avoid use of 'engaged' or equivalent signs wherever possible. Such signs may create an opportunity for secrecy or the interpretation of secrecy
- always report any situation where a child becomes distressed or angry to a senior colleague
- consider the needs and circumstances of the pupil(s)/student(s) involved.

11. Personal Living Space

Staff must not invite any student into their living accommodation. It is not appropriate for a member of staff to be requested to use their living space for any activity, tutorial or learning. Under no circumstances should a student be asked to assist staff with jobs or tasks at or in their private accommodation.

This means that staff should:

- be vigilant in maintaining their privacy and mindful of the need to avoid placing themselves in vulnerable situations

- be mindful of the need to maintain professional boundaries
- refuse any request for their accommodation to be used as an additional resource for the college
- not ask children to undertake jobs or errands for their personal benefits.

12. Social Contact

Staff should not establish or seek to establish social contact with students, or their families, for the purpose of securing a friendship or to pursue or strengthen a relationship. Even if a young person seeks to establish social contact, or if this occurs coincidentally, the member of staff should exercise her/his professional judgement in making a response but should always discuss this with a senior leader.

Staff must be aware that social contact, in certain situations, could be misconstrued as grooming and often those who sexually harm children seek to establish relationships outside of the workplace with both the child and their parents, in order to groom both the child and the adult to create opportunities.

Staff must not give their personal details such as their home or e-mail address; social network sites, gamer tags or web pages to pupils/students unless the need to do so is agreed with senior leadership.

Staff should recognise that social contact with children or families could be perceived as harmful and may bring the college in to disrepute.

The college recognises that staff may have genuine pre-existing friendships and social contact with parents of children, independent of the professional relationship. Staff should notify the Designated Safeguarding Lead if this is the case with any new admission and should exercise caution.

This means that staff must:

- Always approve social contact with children or parents with a senior manager.
- Advise a senior manager of any regular social contact they have which could give rise to concern
- have no secret social contact with pupils/students
- Report and record any situation, which they feel, might compromise the college or their own professional standing.
- Only communicate with students or parents via college approved medias.
- Ensure that pre-existing friendships are discussed with the DSL
- Direct any concerns about another member of staff through the appropriate channels according to the Safeguarding Policy.

13. Communication with Students

In order to capitalise on the benefits of the new technologies in the digital world, students are exposed to many forms of technology. Technology carries a risk resulting from human behaviours, as opposed to technology itself. Staff should adopt responsible online behaviour, working to college guidelines.

Communication between students and adults, by whatever method, must take place within clear and explicit professional boundaries. This includes the wider use of technology such as mobile phones, text messaging, e-mails, digital cameras, videos, web-cams, websites, social networking sites, online gaming and blogs. Adults must not share any personal information with a student. They must not request, or respond to, any personal information from the student, other than that which might be appropriate as part of their professional role. Adults must ensure that all communications are transparent and open to scrutiny.

Adults must also be circumspect in their communications with pupils/students so as to avoid any possible misinterpretation of their motives or any behaviour which could be construed as grooming. They must not give their personal contact details to students including e-mail, home or mobile telephone numbers, unless the need to do so is agreed with senior leadership and parents. E-mail or text communications between an adult and a student outside agreed protocols may lead to disciplinary or criminal investigations. This also includes communications through internet based web sites, such as social networking, instant messaging or gaming.

Communication with ex-students is left to staff discretion.

This means that staff must:

- Not seek contact with students outside of professional purposes
- Not respond to contact with students outside of professional purposes
- Communicate with students in an appropriate and professional manner
- not use internet or web-based communication channels to send personal messages to a pupil/student
- not to have images of pupils/students stored on personal cameras, devices or home computers
- not make images of students available on the internet, other than through the college medias, and only with photo consent
- Be cautious in their contact with ex-pupils, as there is still a professional relationship and there may be contact with current pupils/students
- Be aware that actions that bring the college into disrepute could lead to disciplinary procedures being taken.

- Ensure that social media privacy settings are switched on to the highest levels.
- Not express personal opinions or view on social medias which can be linked to the college.

14. Social Networking Sites and Online Gaming

St Georges College staff may use social networking sites for personal use. However, the college requires that profile and photos of the member of staff are 'locked down' as private so that pupils/students or parents do not have access to your personal data or images.

Staff must deny current or recent pupils/students access to your profile so you do not put yourself in a vulnerable position.

Staff should be aware that they leave themselves open to a charge of professional misconduct if images of a member of staff in a compromising situation are made available on a public profile by anyone.

If a pupil/student does gain access to the profile of a member of staff by fraudulent means (impersonation or hacking) senior leadership should be informed immediately.

Where relationships exist between staff and those who are also parents at the college, or personal friends who are parents at the college, social networking is acceptable but caution must be exercised so that professional standards are maintained and staff do not compromise themselves or the college.

As soon as a member of staff becomes aware that they are in an online game with a pupil/student of St Georges College, the member of staff should cease to play against that pupil/student and must not enter any games containing that player as part of the group.

Under no circumstances should staff seek out pupils/students and/or share their own gamer tags/ID with pupils/students, or use college equipment to play online games.

This means that staff must:

- Lock down their profile to ensure that data and images are not freely available - Seek advice if you are unsure how to do this
- Do not permit current and recent students or parents to have access to your profile

- Ensure all your passwords are kept strong and secure
- Be aware that images of others should be protected and be treated as carefully as you would your own

15. Physical Contact

The experience of physical contact is a highly subjective issue which will be experienced by each child in a different way subject to their own previous experiences or perception. This can lead to misinterpretation or allegations against a member of staff, and therefore staff should consider whether it is necessary to have physical contact with the student.

There are occasions when it is entirely appropriate to have physical contact, however, it is crucial what it is only ever conducted in a way appropriate to the professional duty. Physical contact must never be secretive, or for the gratification of the adult, or represent a misuse of authority. If a member of staff believes that an action could be misinterpreted, the incident and circumstances must be made clear to senior staff.

It is not possible to be specific about the exact appropriateness of each incident of physical contact, since every child and every circumstance is different.

If a member of staff has concerned about another member of staff or believes an incident may be misinterpreted, they should notify the DSL immediately.

Staff need to be aware that when a student has a past incident of abuse, they could associate physical contact with past experiences. They should also recognise that students may seek out inappropriate physical contact. It is important that staff deter the student in a sensitive manner and highlight the importance of personal boundaries.

This means that staff should:

- be aware that even well intentioned physical contact may be misconstrued by the student or observer
- never touch a student in a way which may be considered indecent
- always be prepared to explain actions and accept that all physical contact be open to scrutiny
- never indulge in play/fun fights
- always encourage students to undertake self-care tasks independently where able
- inform the DSL when they have comforted a distressed child
- report and record situations which may give rise to concerns

16. Students in Distress

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

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

This means that staff must:

- consider the way in which they offer comfort to a distressed pupil/student
- always tell a colleague when and how they offered comfort to a distressed pupil/student
- record situations which may give rise to concern

17. Behaviour Management

St George's College does not use corporal punishment or physical punishment and it is unlawful in schools.

All students have a right to be treated with respect and dignity. Staff must not use any form of degrading treatment to punish a student. The use of sarcasm, belittling or insensitive comments is unacceptable. Where students show challenging behaviour, staff should follow the behaviour policy to use appropriate strategies.

This means that staff should:

- not use force as a form of punishment
- not use sarcasm or insensitive comments towards students
- adhere to and follow the behaviour management policies
- behave as a role model
- not use aggression to deal with students
- try to defuse situations before they escalate
- keep parents informed of any sanctions
- be mindful of situations inside or outside of the college which may impact on behaviour

18. Control and Physical Intervention

The law and guidance for colleges' states that adults may reasonably intervene to prevent a child from:

- committing a criminal offence
- injuring themselves or others
- causing damage to property
- engaging in behaviour prejudicial to good order
- maintain good order and discipline.

Staff should have regard to the health and safety of themselves and others.

Under no circumstances must physical force be used as a form of punishment. The use of unwarranted physical force is likely to constitute a criminal offence. Where deemed that the behaviour presents a serious risk, a robust risk assessment, and if relevant, physical intervention plan, must be implemented, which would be approved by the parents. Parental consent does not allow the college to use unlawful physical interventions.

In all cases where physical intervention is deemed necessary, the incident and subsequent actions should be documented and reported.

This means that staff should:

- always seek to defuse situations
- always use minimum force for the shortest period necessary

This means that staff should:

- use physical intervention as a form of punishment

19. Sexual Contact

Any sexual behaviour by a member of staff with or towards a student is both inappropriate and illegal. Students are protected by the same laws as adults in relation to non-consensual sexual behaviour. They are additionally protected by specific legal provisions regardless of whether the child or young person consents or not, including the prohibition of sexual activity between a student and adult in a position of trust.

The sexual activity referred to is not limited to physical contact including penetrative and non-penetrative acts. It may also include noncontact activities, such as causing children to engage in or watch sexual activity or the production of pornographic material.

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

This means that staff must:

- Not have any form of sexual contact with a student from the college.
- Avoid any form of touch or language which is considered to be indecent.
- not pursue sexual relationships with students either in or out of college
- avoid any form of communication with a child or young person which could be interpreted as sexually suggestive or provocative i.e. verbal comments, letters, notes, electronic mail, phone calls, texts, physical contact.

20. Transporting Students

In certain situations, for example out of college activities, staff or volunteers may agree to transport pupils/students. A designated member of staff should be appointed to 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. The driver must also have appropriate insurance.

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

Staff should never offer to transport students outside of their normal working duties, other than in an emergency or where not doing so mean the child would be at risk. In these situations, a report should be made to the DSL.

This means that staff should:

- plan and agree arrangements with all parties in advance, responding sensitively and flexibly to disagreements
- ensure that they are alone with a student for the minimum time possible
- be aware that the safety and welfare of the student is their responsibility until this is safely passed over to a parent/carer

- report the nature of the journey, the route and expected time of arrival in accordance with agreed procedures
- ensure that their behaviour and all arrangements ensure vehicle, passenger and driver safety
- take into account any specific needs that the pupil/student may have.

21. Curriculum

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

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

Care should also be taken to abide by the college's required policy on sex and relationships education and the wishes of parents. Parents have the right to withdraw their child(ren) from all or part of any sex education provided (but not from the biological aspects of human growth and reproduction necessary under the science curriculum).

This means that staff should:

- have clear written lesson plans.
- Seek permission of parents where required.
- Take-care when encouraging a student to use self-expression, so as to not overstep personal boundaries
- Address sexual exploitation and harassment

This means that staff must not:

- enter into or encourage inappropriate or offensive discussion about sexual activity
- undermine British values

22. Photography, Videos and other Creative Arts

Many college activities involve recording images. These may be undertaken as part of the curriculum, out of college activities, for publicity, or to celebrate achievement. Staff should not use their personal equipment to take images of children at or on behalf of the school.

Staff need to be aware of the potential for imagery to be misused for pornographic or 'grooming' purposes. Careful consideration should be given as to how these activities are organised and undertaken. Staff should be sensitive to any child who appears uncomfortable in the use of photography and recognise the potential for misinterpretation.

Using images of students for the college's publicity purposes has already had consent in line with GDPR legislation.

This means that staff must:

- be clear about the purpose of the activity and about what will happen to the photographs when the lesson/activity is concluded
- ensure that a senior member of staff is aware that the photography/image equipment is being used and for what purpose.
- ensure that all images are available for scrutiny in order to screen for acceptability
- be able to justify images of children in their possession
- avoid making images in one to one situations.

This means that staff should not:

- have images of students stored on personal cameras, devices or home computers
- make images of students available on the internet or in publicity materials without consent
- use an image and name the child (if possible, use one name and initials instead of two full names)
- take images for personal use
- take indecent images
- take images using personal equipment

23. Control of inappropriate imagery exposure

Staff should take extreme care to ensure that students are not exposed to inappropriate or indecent imagery through any medium.

There are no circumstances which justify an adult viewings, making, possessing or distributing indecent images of children and this is illegal. If indecent image of

children are discovered at the school an immediate referral will be made to the police and SPOA. Images/equipment should be secured and there should be no attempt to view or delete the images as this could impact criminal investigations. If there is any implication of professional misconduct then the managing allegations procedures should be followed, which will include consultations with the LADO.

Staff should not attempt to investigate the matter or evaluate materials themselves as this will not only contaminate the evidence, but put them at risk of prosecution themselves.

Under no circumstances should any staff use school equipment to access pornography. Personal equipment which contains pornography or links to it should not be brought into the workplace. This would raise concerns about the suitability of the adult to continue working with children.

This means that staff should:

- Abide by the college's acceptable use guidance
- Ensure that children cannot be exposed to inappropriate images
- Ensure any materials are age appropriate

24. Whistleblowing

Whistleblowing is the mechanism by which staff can voice their concerns, made in good faith, without fear of repercussion. The college has a clear and accessible whistleblowing procedure in the safeguarding policy.

Staff should acknowledge their individual responsibilities to bring matters of concern to the attention of senior leadership and/or relevant external agencies. This is particularly important where the welfare of student may be at risk.

This means that staff must:

- report any behaviour by colleagues that raises concern.
- Report allegations against staff and volunteers to the DSL
- Contact SPOA or the LADO if you do not feel able to use the college reporting systems through the DSL.

25. Overnight Supervision and Examinations

There are occasions during exam periods when timetables clash and arrangements need to be made to preserve the integrity of the examination process. In these circumstances examination boards may allow candidates to take an examination the following morning, including Saturdays.

The college should ensure that all arrangements reflects safeguarding and a duty of care towards the children and staff. The normal boarding arrangements will be in operation and additional staff may be deployed.

26. Sharing Concerns and Recording Incidents

All staff should be aware of the college's safeguarding procedures, including the procedures including allegations procedures.

Staff who are the subject of allegations are advised to contact their professional association.

If there is an allegation made against a member of staff in the Boarding House, whilst under investigation it may be necessary to move that member of staff to a different place of residence as a safeguarding response.

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

Discussion with a parent should only be done after consultation with the LADO/Police and under direction of the DSL.

Members of staff should feel able to discuss with their line manager any difficulties or problems that may affect their relationship with pupils/students so that appropriate support can be provided or action can be taken.

This means that staff:

- must be familiar with St Georges College's Child Protection and Safeguarding Policy and Procedures
- must take responsibility for recording any incident, and passing on that information where they have concerns about any matter pertaining to the welfare of an individual in the college or workplace.
- Know how to contact the LADO/regulatory body if required

Notes

This Policy has due regard to the following legislation, guidance and advice:

- The Children Act 1989
- Data Protection Act 1998
- The Children Act 2005
- United Nations Convention of the Rights of the Child
- Equality Act 2010
- General Data Protection Regulations, 2018
- Counter Terrorism and Security Act 2015
- Working Together to Safeguard Children, July 2018
- Prevent Duty Guidance for England and Wales, 2015
- What to do if you're worried about a child being abused: advice for practitioners, 2015
- Information Sharing Advice for Practitioners Providing Safeguarding Services, 2015
- Guidance for safer working practice for those working with children and young people in education settings 2015
- Boarding Colleges National Minimum Standards, 2015
- Keeping Children Safe in Education (KCSIE), September 2018