



Code of Conduct

Sherborne Short Course Staff

2024 - 2025

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Introduction

All adults who come into contact with children and young people in their work have a duty of care to safeguard and promote their welfare, both on and off-site. This applies to all those who work with students in an educational establishment, in either a paid or unpaid volunteering capacity.

The Children Act 2004 places a duty on organisations to safeguard and promote the well-being of children and young people. This includes the need to ensure that all adults who work with or on behalf of children and young people in these organisations are competent, confident, and safe to do so.

There are some specific issues and responsibilities which flow from this general legal framework. These relate not only to child protection and the promotion of child welfare, but also to the need for staff to protect themselves as professional people. Colleagues can sometimes appear unclear about what is acceptable and what is unacceptable in terms of professional good practice. It is appropriate to publish this guidance in the belief that it will assist colleagues to work safely and professionally so as not to place students or staff at risk of harm or of allegations of harm to a student. Colleagues should be aware that their behaviour within their personal lives and also towards other colleagues may bring into question their professionalism and/or their suitability to work with children.

Whilst all colleagues are expected to adhere to this guidance, it is recognised that not all of the guidance is equally relevant to all roles. Any colleague who has concerns or queries in this respect should raise them at the earliest opportunity with their line manager, or appropriate senior colleagues.

Whilst every attempt has been made to cover a wide range of situations in this guidance, it is recognised that it cannot cover all eventualities. There may be times when professional judgements are made in situations not covered by this document, or which directly contravenes the guidance given. It is expected that in these circumstances staff will always advise their senior colleagues of the justification of any such action already undertaken or proposed.

It is recognised that the vast majority of adults who work with children act professionally and aim to provide a safe and supportive environment which secures the well-being and the very best outcomes for the students in their care. Achieving these aims relies on positive student and staff interactions. Unfortunately, tensions and misunderstandings can occur in such interactions. This guidance aims to reduce the risk of such situations.

The sections which follow are intended as a summary of the lengthier document *Guidance for safer working practice for those working with children and young people in education settings (Safer Recruitment Consortium – October 2015)*. This guidance booklet is often referred to as the Code of Conduct for staff as it lays out the School's expectations of the behaviour of all staff. It should be noted that unacceptable behaviour by staff will not be tolerated and, where appropriate, legal or disciplinary action will follow.

This guidance will be reviewed annually.

1. Underpinning principles

- The welfare of the child is paramount.
All staff should:
- Understand their responsibilities to safeguard and promote the welfare of students
- Understand the School's Safeguarding Policy, arrangements for managing allegations against staff, staff Code of Conduct and Whistleblowing Policy.
- Accept that they are responsible for their own actions and avoid any conduct which would lead any reasonable person to question their motivation and intentions
- Work, and be seen to work, in an open and transparent way
- Acknowledge that deliberately invented or malicious allegations are extremely rare and ensure that all concerns are reported and recorded
- Discuss promptly with their line manager if they have acted in such a way which may give rise to concern
- Apply the same professional standards regardless of culture, disability, gender, language, racial origin, religious belief, and sexual orientation
- Not consume or be under the influence of alcohol or any substance, including prescribed medication, which may affect the ability to care for children
- Be aware that breaches of the law and other professional guidelines could result in criminal and/or disciplinary action being taken. Other action that could be taken includes barring by the Disclosure & Barring Service (DBS) and prohibition from teaching by the Teaching Regulation Agency (TRA).
- Review and monitor practice to ensure that this guidance is followed.

2. Duty of care

All colleagues have a legal 'duty of care' towards children under their protection. This involves a duty to keep young people safe, to treat them with respect and dignity, and to protect them from abuse (sexual, physical emotional or neglect) and safeguarding concerns. This means that they must always act and be seen to act in the child's best interest, avoiding any conduct which would lead any reasonable person to question their actions. In relation to the handling of risks, the law requires that prudent and reasonable precautions be taken in relation to foreseeable harm. Risk assessments are required of us in order to fulfil that obligation. The concept of what it is 'reasonable' to expect is important in any legal consideration of a duty of care. Failure to take reasonable steps to ensure the safety and well-being of students may be regarded as professional misconduct.

This means that colleagues should:

- Always act, and be seen to act, in the child's best interests
- Understand the responsibilities which are part of their role, and be aware that sanctions will be applied if these provisions are breached
- Exercise respectful, caring, and professional relationships that demonstrate integrity, maturity, and good judgement
- Understand the responsibilities which are part of their employment or role
- Avoid any conduct which would lead any reasonable person to question their motivation and intentions

- Take responsibility for their own actions and behaviour

3. Professional judgements

This guidance cannot provide a complete checklist of what is, or is not, appropriate behaviour for staff. It does highlight however, behaviour which is illegal, inappropriate, or inadvisable. There may be rare occasions in which colleagues have to make decisions or take action in the best interests of a student which could contravene this guidance or where no guidance exists. Colleagues are expected to make judgements about their behaviour in order to secure the best interest and welfare of students in their care and, in so doing, will be seen to be acting reasonably. These judgements must always be recorded and shared with a manager. Colleagues should always consider whether their actions are warranted, proportionate, safe, and applied equitably.

This means that where no specific guidance exists colleagues should:

- Discuss the circumstances that informed their action, or proposed action, with their line manager or, where appropriate, the Designated Safeguarding Lead (DSL). 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 the DSL
- Always record discussions and actions taken with their justifications
- Record any areas of disagreement and, if necessary, refer to another agency such as Dorset Social Care

4. Position of trust

All adults working with children and young people in a school are in positions of trust in relation to all students and must maintain appropriate professional boundaries. This is not a relationship of equals, and adults clearly cannot use their position of authority either for their own personal advantage or gratification, or to intimidate, coerce or undermine children. For instance, under the Sexual Offences 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 not only for that person to engage in sexual activity with or in the presence of that child, but also to cause or incite that child to engage in or watch sexual activity. This applies, even if, in the case of those over 16, the relationship is consensual.

This means that colleagues should 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 relationships with students which are of a sexual nature, or which may become so

5. Confidentiality

Colleagues may have access to confidential information about the School, its students and their families which must be kept confidential at all times and only shared when legally permissible to do so and in the interest of the child. This might include personal details of parents, students,

and staff or financial information and marketing plans. Records should only be shared with those who have a legitimate professional need to see them. Such confidential or personal information about a student or their family should not be used for personal advantage or the advantage of partners, friends, relatives, or other organisations. Information must never be used to intimidate, humiliate, or embarrass the student. Confidential information should 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 should be used anonymously.

You should also take care that any electronically stored confidential information which is taken off the School premises is kept safe and secure at all times. Colleagues should seek advice from a senior member of staff if they are in any doubt about sharing information they hold, or which has been requested of them.

There are some circumstances in which a colleague may be expected to share information about a student, for example when abuse is alleged or suspected. In such cases, colleagues should not promise confidentiality but should give reassurance that the information will be treated sensitively before passing the information on without delay to the DSL.

Press or other media inquiries concerning School business or information should be passed on to either the Headmaster, the SLT (Senior Leadership Team) member on duty, or the Head of Marketing.

This means that colleagues should:

- Treat information they receive about students and families in a discreet and confidential manner
- Seek advice from a senior member of staff if they are in any doubt about sharing information
- Be clear about when information can and must be shared
- Know the procedures for responding to allegations against staff
- Ensure that personal information (electronically stored or not) is kept secure

6. Propriety and behaviour

Colleagues should adopt high standards of personal conduct in order to maintain the confidence and respect of their peers, students, and parents. An individual's behaviour, either in or out of School, should not compromise his or her position within the School in relation to the protection of children, loss of trust and confidence, or bringing the School into disrepute. This means that colleagues should not behave in a manner which would lead any reasonable person to question their suitability to work with children.

It is the responsibility of colleagues to update the School if they have received any driving endorsements, convictions, cautions, reprimands, or warnings regardless of the nature of the offence.

In addition, colleagues must be even-handed, consistent, and unambiguous in the way they treat students, avoiding any actions that would be considered 'unprofessional'. For instance, the verbal slighting in public of a student (or another member of staff), whether intended or

unintended, would be regarded as unprofessional. Colleagues should report to the DSL and record any incident where their behaviour has been such that it might be misinterpreted by others.

This means that colleagues should not:

- Make, or encourage others to make sexual remarks to, or about, a student
- Use inappropriate language to or in the presence of students
- Discuss their personal or sexual relationships with or in the presence of students
- Make, or encourage others to make, unprofessional personal comments which scapegoat, demean or humiliate or might be interpreted as such

This means that colleagues should:

- Be aware that their own behaviour, the behaviour of those with whom they share a household, or others in their personal lives, may impact on their work with children
- Ensure that the Compliance Operations Manager and/or Human Resources (HR) are updated when their medical or personal details change
- Make the Compliance Operations Manager and/or HR aware of any driving endorsements, convictions, cautions, reprimands, or warnings regardless of the nature of the offence
- Be positive role-models for young people through their behaviour and conduct at School events. This includes when not on duty at a School event. The consumption of alcohol is permissible in such circumstances (when not on duty), but staff should drink responsibly in the presence of students and colleagues.

7. Dress and appearance

A person's dress and appearance are matters of personal choice and self-expression. However, colleagues should ensure that their appearance promotes a positive and professional image, and is appropriate to their role and status. Adults who work with students should ensure they are dressed appropriately for the tasks and the work they undertake. Those who dress or appear in a manner which could be considered as inappropriate could render themselves vulnerable to criticism or allegation.

This means that colleagues should wear clothing which:

- 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 not considered to be discriminatory and is culturally sensitive

8. Rewards, gifts and favouritism and business transactions

Rewards should be given in line with accepted practice and anything that might be considered to fall outside the norm should be discussed in advance with a member of the Short Course Management Team. Colleagues should ensure that gifts received or given in situations which may be misconstrued are declared and, generally, only give gifts to an individual young person

as part of an agreed reward system. Where giving gifts other than as above, you are to ensure that these are of insignificant value. Colleagues should exercise care when selecting students for specific activities or privileges, in order to avoid perceptions of favouritism or unfairness. Similar care should be exercised when students are excluded from an activity. Methods of selection and exclusion should always be subject to clear, fair, and agreed criteria.

Colleagues are able to receive tokens of appreciation from students or parents e.g. at the end of one of the courses, but they should not accept any gift that might be construed as a bribe or lead to an expectation of preferential treatment. All employees who accept or are offered hospitality or a gift to the value of more than £30, even if not accepted, must enter the details of the hospitality or gift in the Hospitality Book, which is kept by the Executive Assistant to the Chief Operating Officer.

Colleagues must not engage in personal business transactions with students relating to the purchase or sale of goods. Uncertainty over the appropriateness of such interaction with a student, must be discussed with the Director of Short Courses.

This means that colleagues should:

- Ensure that gifts received are recorded in line with School policy
- Only give gifts to a student as part of the agreed reward system
- Ensure that all selection processes of students are fair

9. Infatuations

Occasionally, a student can develop an infatuation with a colleague. Colleagues should deal with these situations sensitively and appropriately to maintain the dignity and safety of all concerned. They should remain aware, however, that such infatuations carry a high risk of words or actions being misinterpreted and should therefore make every effort to ensure that their own behaviour is above reproach.

Any colleague, who becomes aware of any such development, should discuss the matter with the Director of Short Courses so that the most appropriate course of action can be taken to prevent escalation, hurt, embarrassment or distress for those concerned. An appropriate plan to manage the situation will be put into place and will be regularly monitored and reviewed.

This means that colleagues should:

- Report any indications that a student may be infatuated with a member of staff
- Always maintain professional boundaries
- Expect an appropriate plan to be put into place where necessary

10. Social contact outside of School

It is acknowledged that staff may have genuine friendships and social contact with the parents, agents or other representatives of students. Colleagues should maintain appropriate personal and professional boundaries in any social contact with students or their families. Any concerns should be discussed with the Director of Short Courses.

Colleagues should have no secret social contact with students or their parents, agents or other representatives, and should always approve any planned social contact with children with the Director of Short Courses.

Colleagues should report and record any situation, which may place a child at risk, or which may compromise the School or their own professional standing.

Colleagues must not entertain students in their own homes.

This means that colleagues should:

- Always approve any planned social contact with children with the Director of Short Courses
- Advise the Director of Short Courses of any regular social contact they have with a student which could give rise to concern
- Inform the Director of Short Courses of any relationship with a parent where this extends beyond the usual professional relationship

11. Communication with students

Colleagues should be circumspect in their use of technology when communicating with students, so that there is no room for misinterpretation. Any communications should be transparent, open to scrutiny and be for professional purposes only.

Colleagues should ensure that personal social networking sites are set with maximum privacy settings and students are never listed as approved contacts. They should never inappropriately use or access social networking sites of students. They should not give their personal contact details to students, including their private mobile telephone number or email address, and details of any blogs or personal websites. Except in an emergency, they should only use equipment e.g. mobile phones, provided by the School to communicate with children. Colleagues must not use their personal mobile, internet or web-based communication channels to send personal messages to current students and should be circumspect about doing so with those who have left School within the last few years.

If students locate your personal contact details by other means and attempt to contact or correspond with you this must be reported to the Director of Short Courses . Do not respond to the student.

This means that colleagues should:

- Not make contact or respond to contact with students outside of the purposes of their work
- Not engage in inappropriate electronic communication with a student
- Not give out their personal details
- Follow the School's e-safety policies
- Ensure that their use of technology does not bring the School into disrepute

12. Physical contact

There are occasions when it is entirely appropriate for colleagues to have physical contact with students, but it is crucial that it should be appropriate to their professional role. It is not possible

to be specific about all situations, since it varies according to the particular set of circumstances, but a general culture of 'limited touch' should be adopted. Colleagues should be aware that even well-intentioned physical contact may be misconstrued, for example because of differing cultural or religious views about touching. Children should never be touched in a way that could be viewed as indecent; colleagues should never indulge in horseplay or 'play fights' with children and all physical contact will be open to scrutiny. Physical contact should never be secretive, or for the gratification of the adult, or represent a misuse of authority.

In certain curriculum areas, such as sport, drama, music, performing arts and outdoor activities, physical contact with students may be necessary to adjust posture or to support a student so they can perform an activity safely or prevent injury. Physical contact should take place only when absolutely necessary in relation to a particular activity. Such contact should be carried out in accordance with existing codes of conduct (such as those provided by national sporting bodies), regulations and best practice. Physical contact should take place in a safe and open environment (i.e. one that is easily observed by others) and last for the minimum time necessary. The extent of the contact should be made clear and undertaken with the permission of the student. Colleagues must remain sensitive to any discomfort expressed verbally or non-verbally by the student. It is vitally important that colleagues report to the Director of Short Courses and record any incident which has the potential to be misconstrued.

The School's policy on the physical restraint of students is published as a separate document (*Use of Force to Control or Restrain a Student*). Colleagues may reasonably intervene to prevent a child from committing a criminal offence, injuring themselves or others, causing damage to property or engaging in behaviour prejudicial to good order. However, great care must be exercised in order that colleagues do not physically intervene in a manner which could be considered unlawful. It would always be preferable to call a member of the Short Course Management Team to deal with any such incidents. If physical intervention is necessary, it is critical that colleagues report to the Director of Short Courses and record any incident of physical intervention as soon as possible after the incident.

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

This means that colleagues should:

- Treat students with dignity and respect and avoid contact with intimate parts of the body
- Always be prepared to explain actions and accept that all physical contact be open to scrutiny
- Consider alternatives to physical contact
- Always allow students, where able, to undertake self-care tasks independently
- Ensure that comfort offered to a distressed student is age appropriate and inform an appropriate senior colleague
- Report and record situations which may give rise to concern
- Be aware of cultural or religious views about touching and be sensitive to issues of gender

13. Privacy

All students have a right to personal privacy. Always knock before entering a student's room, announce your presence before going into any area where students might be changing, allow students to make private phone calls and do not read any personal correspondence. Avoid going into areas where students are changing, toileting or showering unless there is an urgent need in order to safeguard students and to ensure that bullying is not occurring. Colleagues should announce their intention of entering and only remain in the room when essential.

This means that colleagues should not:

- Change or toilet in the presence or sight of students
- Shower with students
- Assist with intimate or personal care tasks which the student is able to undertake independently

14. Behaviour management

Praise and encouragement should be used to reward good behaviour and achievement. Poor behaviour needs to be treated appropriately and according to the published guidelines. The use of sarcasm, demeaning or insensitive comments, racist, sexist, or homophobic remarks is unacceptable in any situation.

Under no circumstances should corporal punishment be used as it is illegal. Furthermore, the use of unwarranted or disproportionate physical force is likely to constitute a criminal offence.

Colleagues should also be clear about the different levels of sanctions and their responsibilities in this context. The promotion of good behaviour and discouragement of bad behaviour are the general responsibility of all members of staff.

Colleagues must use physical intervention only in accordance with the guidance published separately in the School policy '*Use of force to control or restrain students*'.

This means that colleagues should:

- Apply appropriate boundaries
- Try to defuse situations before they escalate
- Follow the School's policies for behaviour management
- Behave as a role model
- Avoid shouting at students other than as a warning in an emergency/safety situation

15. Sexual conduct

Sexual activity between a colleague and a student represents the abuse of a position of trust which is a criminal offence and will always be a matter for disciplinary/criminal action. Sexual activity involves physical contact including penetrative and non-penetrative acts and non-contact activities including causing students to engage in or watch sexual activity or the production of pornographic material.

Grooming children so allowing or encouraging a relationship to develop in a way which might lead to a sexual relationship is unacceptable. For example, colleagues should not have any form

of communication with a child or young person which could be interpreted as being sexually suggestive or provocative, make sexual remarks to, or about, a child/young person or discuss their own sexual relationships with or in the presence of students.

All concerns about the behaviour of a colleague should be reported to the Headmaster without delay.

This means that colleagues should:

- Not have any form of sexual contact with a student
- Avoid any form of touch which is, or may be considered to be, indecent
- Avoid any form of communication which is, or may be considered to be, indecent

16. One to one situations

Colleagues working in one-to-one situations with students are potentially more vulnerable to allegations. Such one-to-one situations may arise for a variety of reasons including academic support or scheduled lessons. It therefore makes sense to plan and conduct such meetings to ensure that the security of both students and colleagues is met. It is recommended that such meetings be pre-planned with other colleagues aware of their occurrence and that they should take place where there is visual access and/or an open door. It is also strongly recommended that notes are kept of any meeting likely to be difficult, and consideration given to having another member of staff in the room or close by. Certainly, colleagues would be advised to have informed their line manager in advance of such a meeting. If any student becomes distressed or angry in any such meeting, this should be reported to the Director of Short Courses or Academic Manager.

This means that colleagues should:

- Ensure that wherever possible there is visual access and / or an open door in one to one situations
- 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 student becomes distressed or angry
- Consider the needs and circumstances of the student involved

17. Transporting students

There are many occasions when colleagues transport students either in School or hired minibuses. The rules governing minibus use are dealt with separately, but there are certain important steps which we all need to take in relation to transporting students.

The first is that no alcohol or drugs (whether recreational or medicinal) should be consumed prior to driving. If you are faced with a sudden emergency, and you have drunk any alcohol at all you should use a taxi. The same rule applies to any drugs/medication that might impair judgement or driving ability. Taxi companies may only be used for transporting students if they have been authorised to do so by the School. For the most up to date list, please consult the list of Acceptable Taxi Companies maintained by the HR department and issued electronically each academic year.

There are some circumstances when it is permissible for staff to use their own cars to transport students, most usually by Matrons or House staff for attendance at medical appointments. In such circumstances the individual staff member should seek permission from their line manager. Any member of staff using their own car to transport students must have a valid driving licence, up to date insurance and a vehicle that is safe, and which meets all legal requirements. It is the driver's responsibility to ensure that seatbelts are worn. Never exceed the maximum capacity of the vehicle, drive for hours longer than are reasonably considered safe and ensure that you are adequately insured for such journeys.

If a single student is to be transported, s/he should sit in the back seat of the vehicle.

This means that colleagues should:

- Plan and agree arrangements in advance
- Have an appropriate licence and insurance for the vehicle
- Ensure that the vehicle is safe to use
- Ensure that they are fit to drive and free from any alcohol or drugs
- Ensure that if they need to be alone with a student this is for the minimum time
- Be aware that the safety and welfare of the student is their responsibility

18. Offsite visits

All staff undertaking offsite visits must adhere to the School's *Offsite Visits* policy which is available separately to this document.

19. First aid and administration of medication

It is expected that adults working with children and young people should be aware of basic first aid techniques. Colleagues undertaking such tasks should be suitably trained and qualified before administering first aid. Colleagues administering medication should also be suitably trained and adhere to the guidelines published in the *Medication Policy*.

20. Photographs, video, and other multimedia content

Given the rights of privacy and data protection which any individual should enjoy and the potential misuse of images of children, any such image-recording activity needs to have a clear professional purpose.

Staff may use their own mobile devices or photographic equipment to take photographs for school use only. However, it should be noted that staff are not expected to use personal devices. School cameras can be borrowed from the Marketing Department and/or event support can be requested in advance. There are a number of other departments which also have photographic equipment you may be able to use. Consideration must be given to what will happen to the images when the activity finishes. Storage of images should be either on School-owned devices or as part of the School network. For the protection of children, when using images for publicity purposes the child should not be named in full without permission and in all other circumstances the default naming convention of first name and first initial of the second name should be applied.

Colleagues should be particularly sensitive to students who are clearly uncomfortable with being filmed or photographed and realise the potential for misinterpretation of their activity. Students should be made aware when photography and/or filming is taking place, and, in some instances, this should be accompanied by clear signage. The use of any image recording device to take images of students or colleagues without their consent is forbidden by the School rules.

Unless the relevant student or his/her parent (or other representative) has requested otherwise, the School will use images of its students to keep the School community updated on the activities of the School, and for marketing and promotional purposes.

This means that colleagues should:

- Abide by the School's policies regarding e-safety.
- Only take images or film where the student is happy for them to do so
- Only retain images or film where there is a clear and agreed purpose for doing so
- Store images in an appropriate secure place in the School
- Be able to justify images of students in their possession
- Avoid making images in one-to-one situations

This means that colleagues should not:

- Take images of students for their personal use
- Display or distribute images of students unless they are sure that they have consent to do so from the students' parents (or their representative)
- Take images of children in a state of undress or semi-undress
- Take images of children that could be considered as indecent or sexual

21. Exposure to inappropriate images

Staff should take extreme care to ensure that students are not exposed, through any medium, to inappropriate or indecent images. Staff have a responsibility to keep their passwords confidential and not to allow unauthorised access by others to equipment.

There is no circumstance that justifies colleagues having indecent images or pseudo-images of children, because accessing, making, downloading, storing, or distributing such images is illegal. Accessing these images, whether on School or personal equipment, on or off the premises, or making, storing, or disseminating such material is illegal.

If indecent images of children are discovered at School then an immediate referral must be made to the DSL, the Headmaster, the LADO, and the Police contacted if relevant. If the images are of children known to the School, a referral will also be made to Children's Social Care.

If indecent images of children are discovered at School, then the images and equipment should be secured and isolated from the network and there should be no attempt to view or delete the images as this could jeopardise necessary criminal action. It is critical that colleagues do not attempt to investigate the matter or evaluate the material themselves as this may lead to a contamination of evidence and a possibility that they will be at risk of prosecution themselves.

Colleagues must not use School equipment to access pornography, nor must they have in School any personal equipment containing such images or links to them. Such behaviour will raise serious concerns about the suitability of the adult to continue working with children.

This means that colleagues should:

- Abide by the School's policies regarding e-safety.
- Ensure that students cannot be exposed to indecent or inappropriate images
- Ensure that all films or material shown to students are age appropriate
- Keep their passwords confidential and not allow unauthorised access to equipment

22. Personal living accommodation including on-site provision

Staff should not invite students into their private living accommodation.

Students must not access staff residential accommodation in boarding houses.

Staff living in boarding houses whilst temporarily working on Short Courses must not admit visitors to their accommodation.

This means that colleagues should:

- Be vigilant in maintaining their privacy, including when living in on-site accommodation
- Be mindful of the need to avoid placing themselves in vulnerable situations
- Be mindful of the need to maintain personal and professional boundaries
- Not ask students to undertake jobs or errands for their personal benefit

23. Access to student accommodation

Colleagues must always knock on the door of a bedroom before going in. It is not appropriate to remain in the room if a student is changing. However, if the student is dressed for bed or is in bed a conversation may take place.

For very obvious reasons, supervision in boarding houses is vital. Those colleagues involved in such supervision must always be aware of the students' need for privacy.

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

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

At other times, physical contact might be reasonable for greeting (shaking hands, a gentle pat on the shoulders, back or upper arm), or for encouragement (a gentle pat on the shoulder, back or upper arm).

It is critical that appropriate professionalism is employed at all times. Colleagues should apply the guidance for one to one situations given in section 16 above.

24. Curriculum

The curriculum can sometimes include or lead to unplanned discussion about subject matter of a sexually explicit, political, or otherwise sensitive nature. Responding to student questions requires careful judgement; colleagues should not engage in offensive or inappropriate discussion about sexual activity. It should also be noted that under the provisions of the Equality Act (2010), it is unlawful to discriminate either directly or indirectly on grounds of gender, sex, or sexual orientation. The School must use non-discriminatory practices and procedures, and colleagues must also ensure in their teaching and pastoral work that they do not display discrimination or extremism.

This means that teaching colleagues should:

- Take care when encouraging students to use self-expression, not to overstep personal and professional boundaries
- Be able to promptly shut down offensive or inappropriate discussions

This means that colleagues should not:

- Enter into or encourage inappropriate discussions which may offend or harm others
- Undermine fundamental British values
- Express any prejudicial views
- Attempt to influence or impose their personal values, attitudes, or beliefs on students

25. Whistleblowing

Whistleblowing is the mechanism by which staff can voice their concerns, made in good faith, without fear of repercussion. The School places a great deal of value upon having a culture of safety and of raising concerns allowing reflective practice. Further guidance for colleagues is available in the *Whistleblowing Policy*.

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

In addition, if you have concerns over how child protection issues are being handled in this or another organisation, you can talk to the NSPCC anonymously, 0800 0280285 or help@nspcc.org.uk. This advice line is not intended to replace any current practices or responsibilities of organisations working with children. Colleagues are encouraged to raise any concerns about a child to the DSLs in the first instance.

This means that colleagues should:

- Report any behaviour by colleagues that raises concerns
- Report allegations against colleagues, including volunteers, to their line manager
- If the allegation concerns sexual conduct involving students this must be reported without delay to the Headmaster

26. **Sharing concerns and recording incidents (including low level concerns)**

A culture in which all concerns about adults, including allegations that do not meet the harm threshold (referred to the Local Authority) are shared responsibly and with the right person, recorded and dealt with appropriately, is critical.

This will enable the School to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the school are clear about professional boundaries and act within these boundaries, and in accordance with the values, expectations and standards of Sherborne.

Concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent, or other adult within or outside of the School; or as a result of vetting checks undertaken.

In order to protect students and staff, all colleagues must be aware of the School's safeguarding procedures, including the procedures for dealing with allegations against staff and volunteers for concerns that meet the harm threshold and those that don't (known as low level concerns) outlined in the *Safeguarding Policy*.

What is a low-level concern?

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold set out in the Safeguarding Policy.

A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

- being over friendly with children
- having favourites
- taking photographs of children using a personal mobile phone without prior permission from the Director of Short Courses
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or
- using inappropriate sexualised, intimidating, or offensive language

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

It is crucial that any such concerns, including those which do not meet the harm threshold are shared responsibly and with the right person, and recorded and dealt with appropriately.

Ensuring they are dealt with effectively should also protect those working in or on behalf of schools and colleges from potential false allegations or misunderstandings. Therefore, if staff have ANY safeguarding concerns (including low level concerns) or an allegation is made about another member of staff (including supply staff, volunteers, and contractors) posing a risk of harm to children, then:

- this should be referred to the Headmaster
- where there are concerns / allegations about the Headmaster, this should be referred to the Chair of Governors as detailed above

All low-level concerns will be recorded in writing. The record will include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns will also be noted, if the individual wishes to remain anonymous then that will be respected as far as reasonably possible.

Records are kept confidential, held securely, and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

Records are reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.

Records will be retained at least until the member of staff leaves their employment at the School.

27. Confiscating the property of students

It is acceptable to confiscate the property of students (for instance a mobile device) as long as the confiscation is on School premises or elsewhere where the student was under the School's duty of care, and where the confiscation is 'reasonable'. 'Reasonableness' is defined as any clear breach of the School rules or where there is a clear concern about student safety. The confiscation must also be proportionate to the offence. For instance, any student using a mobile phone in class would run the risk of having it confiscated. It would also, for example, be reasonable to confiscate a device where a student was using it when crossing the road and was oblivious to any dangers it posed.

Any colleague who confiscates an item in School, during the School day, must hand it in to the Central Short Course Administration/Management Office with a written explanation of the reason and circumstances; if an item is confiscated after the School day it should be handed over to the student's Head of House, also with a written explanation of the reason and circumstances. The Short Course Management/Head of House will determine the length of the confiscation (reasonableness and proportionality will apply) and will be responsible for giving the item back to the student. Confiscation may also be accompanied by another disciplinary action where appropriate.

28. Knowledge of School policies

The School is required by law to have certain policies, and others have been produced in response to issues over time. These policies are published in full on the School's website and are also available in hard copy in the Staff Rooms. It is unrealistic to expect colleagues to have a detailed knowledge of all the policies, but they should know of their existence and be ready to look them up and apply them as needed and appropriate. There are, however, some policies which need to be well known by all members of staff. Of these the most important are the *Safeguarding policy*, the *Anti-bullying policy*, and this policy, the *Staff Code of Conduct*.