SAFER WORKING PRACTICES



Blundell's

FOUNDED 1604

SAFER WORKING PRACTICES

Policy Name:	Safer Working Practices
Applicable to:	Senior School
Name of Sponsor:	Second Master
Policy Reviewed	1st September 2026
Date for Next Review:	10th September 2027
Governing Body Oversight:	Yes
Date Approved by Governing Body:	13th March 2026
Date of Next Governing Body Review:	12th March 2027
Published Internally:	Yes
Published on School Website:	Yes

POLICY AMENDMENTS

Date of Amendment	Material Details
1st July 2024	Format Updated and references updated to reflect 2024 policies/guidance/DSL details.
10th September 2025	Update of DSL details
1st September 2026	Specific reference made to adult pupils.

CONTENTS

Overview	Page 5
What to do if you are worried a child is being abused	Page 6
Underpinning principles	Page 6
Introduction	Page 7
Status of document	Page 7
Responsibilities	Page 7
Making professional judgements	Page 8
Power and positions of trust and authority	Page 9
Confidentiality	Page 9
Standards of behaviour	Page 11
Dress and appearance	Page 12
Gifts, rewards, favouritism and exclusion	Page 12
Infatuations and 'crushes'	Page 13
Social contact outside of the workplace	Page 14
Communication with children (including the use of technology)	Page 15
Physical contact	Page 16
Other activities that require physical contact	Page 18
Intimate / personal care	Page 19
Behaviour management	Page 20
The use of care & control / physical intervention	Page 21
Sexual conduct	Page 22
One to one situations	Page 23
Home visits	Page 23
Transporting pupils	Page 25
Educational visits	Page 26
First Aid and medication	Page 27
Photography, video and other images	Page 29
Use of technology for online / virtual teaching	Page 30
Exposure to inappropriate images	Page 32

CONTENTS (CONTINUED)

Personal living accommodation including on site provision	Page 33
Overnight supervision and examinations	Page 33
Curriculum	Page 34
Duty to report concerns about an individual's suitability to work with children.	Page 36
Sharing concerns and recording incidents	Page 37

For Adults who Work with Children and Young People at Blundell's

OVERVIEW

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.

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.

This document gives detailed guidance regarding interactions with 'pupils' which is stated to apply to interactions with all pupils regardless of age, and specifically including adult pupils. Whilst a 'child' is legally defined as a person aged under 18, the school has nonetheless chosen to adopt a wider interpretation of its safeguarding responsibilities so that they apply to all pupils regardless of age (although there may be some additional considerations in relation to a pupil aged 18 or over in terms of how local agencies and/or partners respond).

Excellent relationships between staff and pupils are at the heart of any good school. Blundell's recognises the need for - and desirability of - warm, friendly and respectful social and professional contacts between staff and pupils; indeed it is one of the best and most important things about the School. Staff can play a crucial role in shaping the lives of the pupils in their care and their interaction can be supportive, affirming and inspiring. All members of staff are expected to act professionally and to seek to provide a safe and responsive environment, which secures the well-being and the very best outcomes for those in their care.

It is recognised that achieving these aims is not always straightforward. Much relies on pupil and staff interactions where tensions and misunderstandings can occur. It is here that the behaviour of adults can give rise to allegations being made against them. Allegations may be genuine, malicious or misplaced. They may arise from differing perceptions of the same event, but when they occur, they are inevitably distressing and difficult for all concerned.

In all cases it cannot be sufficiently stressed that trustworthiness, integrity and good sense are required to ensure that nothing is done either to take advantage of or abuse the children and young people in our care, or even to appear to do so by rash and poorly considered actions.

This guidance has been produced to help staff establish the safest possible learning and working environments where an atmosphere of trust exists in which colleagues can conduct their professional lives with confidence. The aims are to safeguard young people and reduce the risk of staff being falsely accused of improper or unprofessional conduct. It seeks to ensure that the duty to promote and safeguard the wellbeing of children is in part, achieved by raising awareness of illegal, unsafe and inappropriate behaviours. Whilst every attempt has

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

It is also recognised that not all adults who work with children and young people work as paid or contracted employees. The principles and guidance outlined in this document still apply and should be followed by all adults whose work brings them into contact with children and young people at Blundell's.

The guidance contained in this document is an attempt to identify what behaviour is expected of adults who work with children and young people. Adults whose practice deviates from this guidance and/or their professional or employment-related code of conduct may bring into question their suitability to work with children and young people.

This Guidance is taken from the document '*Guidance for Safer Working Practice for those working with Children and Young People in Education Settings*' which was published in September 2022. The full guidance with further advice can be found on the *Safer Recruitment Consortium* website: www.saferrecruitmentconsortium.org.

WHAT TO DO IF YOU ARE WORRIED A CHILD IS BEING ABUSED

Everyone working with children and young people should be familiar with local procedures and protocols for safeguarding the welfare of children and young people. Adults have a duty to report any child protection or welfare concerns to a designated member of staff in their organisation and/or report any concerns to the local social care office. Please refer to the Blundell's Safeguarding Policy for reference.

UNDERPINNING PRINCIPLES

The underlying principles of Safer Working Practices are:

- The welfare of the child is paramount (Children Act 1989).
- It is the responsibility of all adults to safeguard and promote the welfare of children and young people. This responsibility extends to a duty of care for those adults employed, commissioned or contracted to work with children and young people.
- Adults who work with children are responsible for their own actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motivation and intentions.
- Adults 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 if they have acted in a way which may give rise to concern.
- Staff should 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 should 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 Teaching Regulation Agency (TRA).

- Staff should be aware of and understand their establishment's Safeguarding Policy, arrangements for Managing Allegations against Staff, Staff Code of Conduct, Whistleblowing Policy and their Local Safeguarding procedures for contacting the Multi Agency Safeguarding Hub (MASH).
- The same professional standards should always be applied regardless of culture, disability, gender, language, racial origin, religious belief and/or sexual identity.
- Adults should continually monitor and review their practice and ensure they follow the guidance contained in this document.

THE GUIDANCE FOR SAFER WORKING PRACTICES

INTRODUCTION

1. Adults have a crucial role to play in the lives of children. This guidance has been produced to help them establish the safest possible learning and working environments which safeguard children and reduce the risk of them being falsely accused of improper or unprofessional conduct.

2. **This means that these guidelines apply to all adults working in Education and Early Years settings whatever their position, role or responsibilities**.

STATUS OF DOCUMENTS

3. This document is endorsed and recommended by the Safer Recruitment Consortium. It should inform and assist employers to develop and review their guidelines on safer working practices. It may be used as reference by managers and Local Authority Designated Officers (the LADO) when responding to allegations made against staff in education settings. This is not statutory guidance.

RESPONSIBILITIES

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

5. All staff have a responsibility to keep pupils safe and to protect them from abuse (sexual, physical and emotional), neglect and safeguarding concerns. Pupils 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 their safety and well-being. Failure to do so may be regarded as professional misconduct.

6. The safeguarding culture of a school is, in part, exercised through the development of respectful, caring and professional relationships between adults and pupils and behaviour by the adult that demonstrates integrity, maturity and good judgement.

7. The public, local authorities, employers and parents/carers will have expectations about the nature of professional involvement in the lives of children. When individuals accept a role working in an education setting they should understand and acknowledge the responsibilities and trust involved in that role.

8. **This means that Managers / Proprietors/ Governing Bodies should:**

   - **ensure that appropriate safeguarding and child protection policies are distributed, adopted, implemented and monitored**
   - **ensure that if there is no trained DSL on site, a senior member of staff is identified to lead on safeguarding issues**

9. **This means that staff should:**

   - **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 child's best interests;**
   - **avoid any conduct which would lead any reasonable person to question their motivation and intentions; and**
   - **take responsibility for their own actions and behaviour.**

10. **This means that employers should:**

    - **promote a culture of openness and support;**
    - **ensure that systems are in place for concerns to be raised;**
    - **ensure that adults are not placed in situations which render them particularly vulnerable; and**
    - **ensure that all adults are aware of expectations, policies and procedures.**

MAKING PROFESSIONAL JUDGEMENTS

11. 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 will be rare occasions and circumstances in which staff have to make decisions or take action in the best interest of a pupil 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 pupils in their charge and, in so doing, will be seen to be acting reasonably. These judgements should always be recorded and shared with a manager.

12. Adults should always consider whether their actions are warranted, proportionate, safe and applied equitably.

13. **This means that where no specific guidance exists staff should:**

- **discuss the circumstances that informed their action, or their proposed action, with their line manager or, where appropriate, the school's designated 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 the Head teacher or designated safeguarding lead**
- **always record discussions and actions taken with their justifications**
- **record any areas of disagreement and, if necessary refer to another agency/ the LA/ Ofsted/ NCTL/ other Regulatory Body Policy.**

POWER AND POSITIONS OF TRUST AND AUTHORITY

14. As a result of their knowledge, position and/or the authority invested in their role, all those working with children in a school or education setting are in a position of trust in relation to all pupils on the roll.

15. The relationship between a person working with a child/ren is one in which the adult has a position of power or influence. It is vital for adults to understand this power; that the relationship cannot be one between equals and the responsibility they must exercise as a consequence.

16. The potential for exploitation and harm of vulnerable pupils means that adults have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.

17. Staff should always maintain appropriate professional boundaries, avoid behaviour which could be misinterpreted by others and report and record any such incident.

18. Where a person aged 18 or over is in a position of trust with a child under 18, it is an 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.

19. **This means that staff should not:**

- **use their position to gain access to information for their own advantage and/or a pupil's or family's detriment**
- **use their power to intimidate, threaten, coerce or undermine pupils**
- **use their status and standing to form or promote relationships with pupils which are of a sexual nature.**

CONFIDENTIALITY

20. The storing and processing of personal information is governed by the Data Protection Act 1998. Employers should provide clear advice to staff about their responsibilities under this legislation so that, when considering sharing confidential information, those principles should apply.

21. Staff may have access to confidential information about pupils 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. Records should only be shared with those who have a legitimate professional need to see them.

22. Staff 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 organisations). Information must never be used to intimidate, humiliate, or embarrass the child. Confidential information should never be used casually in conversation or shared with any person other than on a need-to-know basis. In circumstances where the pupil's identity does not need to be disclosed the information should be used anonymously.

23. There are some circumstances in which a member of staff may be expected to share information about a pupil, for example when abuse is alleged or suspected. In such cases, individuals have a responsibility to pass information on without delay, but only to those with designated safeguarding responsibilities.

24. If a child – or their parent / carer – makes a disclosure regarding abuse or neglect, the member of staff should follow the setting's procedures. The adult should not promise confidentiality to a child or parent, but should give reassurance that the information will be treated sensitively.

25. If a member of staff is in any doubt about whether to share information or keep it confidential he or she should seek guidance from either the Designated Safeguarding Lead or their Deputies. Any media or legal enquiries should be passed to senior management.

26. This means that staff:

- **need to know the name of their Designated Safeguarding Lead and be familiar with MAP child protection procedures and guidance;**
- **are expected to treat information they receive about pupils and families in a discreet and confidential manner;**
- **should seek advice from a senior member of staff (designated safeguarding lead) if they are in any doubt about sharing information they hold or which has been requested of them;**
- **need to be clear about when information can/ must be shared and in what circumstances;**
- **need to know the procedures for responding to allegations against staff and to whom any concerns or allegations should be reported; and**
- **need to ensure that where personal information is recorded using modern technologies that systems and devices are kept secure.**

27. **The Designated Safeguarding Lead (DSL) is the Deputy Head (Pastoral), Mrs Nicky Klinkenberg. The Designated Deputy DSL is Mrs Tammy Winsley.**

28. **The Deputy Designated Safeguarding Leads are Mr Doug Morrison and Miss Jess Atkins.**

29. **The Second Master, Mrs Louise Guerrier (Lettings & Commercial Manager) and Miss Liz Cole (DDSL for Support Staff) are part of the wider safeguarding team.**

STANDARDS OF BEHAVIOUR

30. All staff have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of children. They should adopt high standards of personal conduct in order to maintain confidence and respect of the general public and those with whom they work.

31. There may be times where an individual's actions in their personal life come under scrutiny from the community, the media or public authorities, including with regard to their own children, or children or adults in the community. Staff should be aware that their behaviour, either in or out of the workplace, could compromise their position within the work setting in relation to the protection of children, loss of trust and confidence, or bringing the employer into disrepute. Such behaviour may also result in -, prohibition from teaching by the NCTL, a bar from engaging in regulated activity, or action by another relevant regulatory body.

32. The Childcare (Disqualification) Regulations 2009 set out grounds for disqualification under the Childcare Act 2006 where the person or a person living in the same household or employed in the same household meets certain criteria set out in the Regulations. For example, an individual will be disqualified where they have committed a relevant offence against a child; been subject to a specified order relating to the care of a child; committed certain serious sexual or physical offences against an adult; been included on the DBS children's barred list; been made subject to a disqualification order by the court; previously been refused registration as a childcare provider or provider or manager of a children's home or had such registration cancelled. A disqualified person is prohibited from providing relevant early or later years childcare as defined in the Childcare Act 2006 or being directly concerned in the management of such childcare. Schools and private childcare settings are also prohibited from employing a disqualified person in respect of relevant early or later years childcare.

33. **This means that staff should not:**

- **behave in a manner which would lead any reasonable person to question their suitability to work with children or to act as an appropriate role model**
- **make, or encourage others to make sexual remarks to, or about, a pupil**
- **use inappropriate language to or in the presence of pupils**
- **discuss their personal or sexual relationships with or in the presence of pupils**

- **make (or encourage others to make) unprofessional personal comments which scapegoat, demean or humiliate, or might be interpreted as such**

34. **This means that staff should:**

- **be aware that behaviour by themselves, those with whom they share a household, or others in their personal lives, may impact on their work with children**
- **understand that a person who provides Early Years education or Childcare may be disqualified because of their "association" with a person living or employed in the same household who is disqualified.**

DRESS AND APPEARANCE

35. A person's dress and appearance are matters of personal choice and self-expression and some individuals will wish to exercise their own cultural customs. However, staff should select a manner of dress and appearance appropriate to their professional role and which may be necessarily different to that adopted in their personal life. 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 viewed as offensive or inappropriate will render themselves vulnerable to criticism or allegation.

36. **This means that staff 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**
- **is compliant with professional standards**
- **in online engagement, is similar to the clothing they would wear on a normal school day.**

GIFTS, REWARDS FAVOURITISM AND EXCLUSION

37. Settings should have policies in place regarding the giving of gifts or rewards to pupils and the receiving of gifts from them or their parents/carers and staff should be made aware of and understand what is expected of them.

38. Staff need to take care that they do not accept any gift that might be construed as a bribe by others, or lead the giver to expect preferential treatment.

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

40. Similarly, it is inadvisable to give such personal gifts to pupils or their families. This could be interpreted as a gesture either to bribe or groom. It might also be perceived that a 'favour' of some kind is expected in return.

41. Any reward given to a pupil should be in accordance with agreed practice, consistent with the school or setting's behaviour policy, recorded and not based on favouritism.

42. Adults should exercise care when selecting children for specific activities, jobs or privileges 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, fair, agreed criteria.

43. **This means that staff should:**

- **be aware of and understand their organisation's relevant policies, e.g. rewarding positive behaviour**
- **ensure that gifts received or given in situations which may be misconstrued are declared and recorded**
- **only give gifts to a pupil 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 pupils equally**
- **ensure that all selection processes of pupils are fair and these are undertaken and agreed by more than one member of staff**
- **ensure that they do not behave in a manner which is either favourable or unfavourable to individual pupils.**

INFATUATION AND CRUSHES

44. All staff need to recognise that it is not uncommon for pupils to be strongly attracted to a member of staff and/or develop a 'crush' or infatuation. They should make every effort to ensure that their own behaviour cannot be brought into question, does not appear to encourage this and be aware that such infatuations may carry a risk of their words or actions being misinterpreted.

45. Any member of staff who receives a report, overhears something, or otherwise notices any sign, however small or seemingly insignificant, that a young person has become or may be becoming infatuated with either themselves or a colleague, should immediately report this to the Head teacher or most senior manager. In this way appropriate early intervention can be taken which can prevent escalation and avoid hurt, embarrassment or distress for those concerned. The Head (or senior manager) should give careful thought to those circumstances where the staff member, pupil and their parents/carers

should be spoken to and should ensure a plan to manage the situation is put in place. This plan should respond sensitively to the child and staff member and maintain the dignity of all. This plan should involve all parties, be robust and regularly monitored and reviewed.

46. **This means that staff should:**

- **report any indications (verbal, written or physical) that suggest a pupil may be infatuated with a member of staff**
- **always maintain professional boundaries**

47. **This means that senior managers should:**

- **put action plans in place where concerns are brought to their attention.**

SOCIAL CONTACT OUTSIDE OF THE WORKPLACE

48. It is acknowledged that staff may have genuine friendships and social contact with parents of pupils, independent of the professional relationship. Staff should, however, also be aware that professionals who sexually harm children often seek to establish relationships and contact outside of the workplace with both the child and their parents, in order to 'groom' the adult and the child and/or create opportunities for sexual abuse.

49. It is also important to recognise that social contact may provide opportunities for other types of grooming such as for the purpose of sexual exploitation or radicalisation.

50. Staff should recognise that some types of social contact with pupils or their families could be perceived as harmful or exerting inappropriate influence on children, and may bring the setting into disrepute (e.g. attending a political protest, circulating propaganda).

51. If a pupil or parent seeks to establish social contact, or if this occurs coincidentally, the member of staff should exercise her/his professional judgement. This also applies to social contacts made through outside interests or the staff member's own family.

52. Some staff may, as part of their professional role, be required to support a parent or carer. If that person comes to depend upon the staff member or seeks support outside of their professional role this should be discussed with senior management and where necessary referrals made to the appropriate support agency.

53. **This means that staff should:**

- **always approve any planned social contact with pupils or parents with senior colleagues, for example when it is part of a reward scheme**
- **advise senior management of any regular social contact they have with a pupil which could give rise to concern**
- **refrain from sending personal communication to pupils or parents unless agreed with senior managers**

- **inform senior management of any relationship with a parent where this extends beyond the usual parent/professional relationship**
- **inform senior management of any requests or arrangements where parents wish to use their services outside of the workplace e.g. babysitting, tutoring**

COMMUNICATION WITH CHILDREN (INCLUDING THE USE OF TECHNOLOGY)

54. In order to make best use of the many educational and social benefits of new and emerging technologies, pupils need opportunities to use and explore the digital world. E-safety risks are posed more by behaviours and values than the technology itself.

55. Staff should ensure that they establish safe and responsible online behaviours, working to local and national guidelines and the School's Acceptable User policies which detail how new and emerging technologies may be used.

56. Communication with children both in the 'real' world and through web based and telecommunication interactions should take place within explicit professional boundaries. This includes the use of computers, tablets, phones, texts, e-mails, instant messages, social media such as Facebook and Twitter, chat-rooms, forums, blogs, websites, gaming sites, digital cameras, videos, web-cams and other hand-held devices. (Given the ever-changing world of technology it should be noted that this list gives examples only and is not exhaustive.)

57. Staff should not request or respond to any personal information from children other than which may be necessary in their professional role. They should ensure that their communications are open and transparent and avoid any communication which could be interpreted as 'grooming behaviour'.

58. Staff should not give their personal contact details to children for example, e-mail address, home or mobile telephone numbers, details of web based identities. If children locate these by any other means and attempt to contact or correspond with the staff member, the adult should not respond and must report the matter to their manager. The child should be firmly and politely informed that this is not acceptable.

59. Staff should, in any communication with children, also follow the guidance in this paper on 'Standards of Behaviour'.

60. Staff should adhere to their establishment's policies, including those with regard to communication with parents and carers and the information they share when using the internet.

61. **This means that adults should:**

- **not seek to communicate/make contact or respond to contact with pupils outside of the purposes of their work**
- **not give out their personal details**
- **use only equipment and Internet services provided by the school or setting**

- **follow their school / setting's Acceptable Use policy**
- **ensure that their use of technologies could not bring their employer into disrepute**
- **not discuss or share data relating to children/parents/carers in staff social media groups**

62. **This means education settings should:**

- **wherever possible, provide school devices such as cameras, and mobile phones rather than expecting staff to use their own (e.g. on school trips, remote teaching etc).**

PHYSICAL CONTACT

63. There are occasions when it is entirely appropriate and proper for staff to have physical contact with children, however, it is crucial that they only do so in ways appropriate to their professional role and in relation to the pupil's individual needs and any agreed care plan.

64. Not all children feel comfortable about certain types of physical contact; this should be recognised and, wherever possible, adults should seek the pupil's permission before initiating contact and be sensitive to any signs that they may be uncomfortable or embarrassed. Staff should acknowledge that some pupils are more comfortable with touch than others and/or may be more comfortable with touch from some adults than others. Staff should listen, observe and take note of the child'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 pupil.

65. 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 child.

66. Any physical contact should be in response to the child's needs at the time, of limited duration and appropriate to their age, stage of development, gender, ethnicity and background. Adults should therefore, use their professional judgement at all times.

67. Physical contact should 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 by them or a colleague could be misinterpreted, or if an action is observed which is possibly abusive the incident and circumstances should be immediately reported to the manager and recorded. Where appropriate, the manager should consult with the Local Authority Designated Officer.

68. Extra caution may be required where it is known that a child has suffered previous abuse or neglect. Staff need to be aware that the child may associate physical contact with such experiences. They also should recognise that these pupils may seek out

inappropriate physical contact. In such circumstances staff should deter the child sensitively and help them to understand the importance of personal boundaries.

69. A general culture of 'safe touch' should be adopted, where appropriate, to the individual requirements of each child. Pupils with disabilities 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 pupil's needs, consistently applied and open to scrutiny.

70. This means that staff should:

- **be aware that even well-intentioned physical contact may be misconstrued by the pupil, an observer or any person to whom this action is described**
- **never touch a pupil 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 horseplay or fun fights**
- **always allow/encourage pupils, where able, to undertake self-care tasks independently**
- **ensure the way they offer comfort to a distressed pupil is age appropriate**
- **always tell a colleague when and how they offered comfort to a distressed pupil**
- **establish the preferences of pupils**
- **consider alternatives, where it is anticipated that a pupil might misinterpret or be uncomfortable with physical contact**
- **always explain to the pupil the reason why contact is necessary and what form that contact will take**
- **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**

71. This means that education settings should:

- **ensure they have a system in place for recording incidents and the means by which information about incidents and outcomes can be easily accessed by senior management**
- **provide staff, on a 'need to know' basis, with relevant information about vulnerable children in their care.**

OTHER ACTIVITIES THAT REQUIRE PHYSICAL CONTACT

72. In certain curriculum areas, such as PE, drama or music, staff may need to initiate some physical contact with children, for example, to demonstrate technique in the use of a piece of equipment, adjust posture, or support a child so they can perform an activity safely or prevent injury.

73. 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 and undertaken with the permission of the pupil. Contact should be relevant to their age / understanding and adults should remain sensitive to any discomfort expressed verbally or non-verbally by the pupil.

74. Guidance and protocols around safe and appropriate physical contact may be provided, for example, by sports governing bodies and should be understood and applied consistently. Any incidents of physical contact that cause concern or fall outside of these protocols and guidance should be reported to the senior manager and parent or carer.

75. 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 and pupils informed of the extent and nature of any physical contact may also prevent allegations of misconduct or abuse arising.

76. This means that staff should:

- **treat pupils with dignity and respect and avoid contact with intimate parts of the body**
- **always explain to a pupil the reason why contact is necessary and what form that contact will take**
- **seek consent of parents where a pupil is unable to give this e.g. because of a disability**
- **consider alternatives, where it is anticipated that a pupil might misinterpret any such contact**
- **be familiar with and follow recommended guidance and protocols**
- **conduct activities where they can be seen by others**
- **be aware of gender, cultural and religious issues that may need to be considered prior to initiating physical contact**

77. This means that schools/settings should:

- **have in place up to date guidance and protocols on appropriate physical contact, that promote safe practice and include clear expectations of behaviour and conduct.**

- **ensure that staff are made aware of this guidance and that it is continually promoted**

INTIMATE/PERSONAL CARE

78. Schools and settings should have clear nappy or pad changing and intimate / personal care policies which ensure that the health, safety, independence and welfare of children is promoted and their dignity and privacy are respected. Arrangements for intimate and personal care should be open and transparent and accompanied by recording systems.

79. Pupils should be encouraged to act as independently as possible and to undertake as much of their own personal care as is possible and practicable. When assistance is required, this should normally be undertaken by one member of staff, however, they should try to ensure that another appropriate adult is in the vicinity who is aware of the task to be undertaken and that, wherever possible, they are visible and/or audible. Intimate or personal care procedures should not involve more than one member of staff unless the pupil's care plan specifies the reason for this.

80. A signed record should be kept of all intimate and personal care tasks undertaken and, where these have been carried out in another room, should include times left and returned.

81. Any vulnerability, including those that may arise from a physical or learning difficulty should be considered when formulating the individual pupil's care plan. The views of parents, carers and the pupil, regardless of their age and understanding, should be actively sought in formulating the plan and in the necessary regular reviews of these arrangements.

82. Pupils are entitled to respect and privacy at all times and especially when in a state of undress, including, for example, when changing, toileting and showering. However, there needs to be an appropriate level of supervision in order to safeguard pupils, satisfy health and safety considerations and ensure that bullying or teasing does not occur. This supervision should be appropriate to the needs and age of the young people concerned and sensitive to the potential for embarrassment.

83. This means that education settings should:

- **have written care plans in place for any pupil who could be expected to require intimate care**
- **ensure that pupils are actively consulted about their own care plan**

84. This means that staff should:

- **adhere to their organisation's intimate and personal care and nappy changing policies**
- **make other staff aware of the task being undertaken**
- **always explain to the pupil what is happening before a care procedure begins**

- **consult with colleagues where any variation from agreed procedure/care plan is necessary**
- **record the justification for any variations to the agreed procedure/care plan and share this information with the pupil and their parents/carers**
- **avoid any visually intrusive behaviour**
- **where there are changing rooms announce their intention of entering**
- **always consider the supervision needs of the pupils and only remain in the room where their needs require this**

85. **This means that adults should not:**

- **change or toilet in the presence or sight of pupils**
- **shower with pupils**
- **assist with intimate or personal care tasks which the pupil is able to undertake independently**

BEHAVIOUR MANAGEMENT

86. Corporal punishment and smacking is unlawful in all schools and early years settings.

87. Staff should not use any form of degrading or humiliating treatment to punish a child. The use of sarcasm, demeaning or insensitive comments towards children is completely unacceptable.

88. Where pupils display difficult or challenging behaviour, adults should follow the school's or setting's behaviour and discipline policy using strategies appropriate to the circumstance and situation.

89. Where a pupil has specific needs in respect of particularly challenging behaviour, a positive handling plan, including assessment of risk, should be drawn up and agreed by all parties, including, for example, a medical officer where appropriate.

90. Senior managers should ensure that the establishment's behaviour policy includes clear guidance about the use of isolation and seclusion. The legislation on these strategies is complex and staff should take extreme care to avoid any practice that could be viewed as unlawful, a breach of the pupil's human rights and/or false imprisonment.

91. This means that staff should:

- not use force as a form of punishment
- try to defuse situations before they escalate e.g. by distraction
- keep parents informed of any sanctions or behaviour management techniques used
- be mindful of and sensitive to factors both inside and outside of the school or setting which may impact on a pupil's behaviour

- follow the establishment's behaviour management policy
- behave as a role model
- avoid shouting at children other than as a warning in an emergency/safety situation
- refer to national and local policy and guidance regarding Restrictive Physical Intervention (RPI)
- be aware of the legislation and potential risks associated with the use of isolation and seclusion
- comply with legislation and guidance in relation to human rights and restriction of liberty

THE USE OF CONTROL AND PHYSICAL INTERVENTION

92. Early years providers must take all reasonable steps to ensure that corporal punishment is not given by any person who cares for or is in regular contact with a child, or by any person living or working in the premises where care is provided. A person will not be taken to have used corporal punishment if the action was taken for reasons that include averting an immediate danger of personal injury to, or an immediate danger of death of, any person including the child.

93. The law and guidance for schools states that adults may reasonably intervene to prevent a child from:

    a. committing a criminal offence

    b. injuring themselves or others

    c. causing damage to property

    d. engaging in behaviour prejudicial to good order and to maintain good order and discipline.

94. Care staff in residential special schools which are also registered as children's homes are not permitted to use physical intervention to maintain good order or discipline and should refer to the Children's Homes Regulations (England) 2015 for information.

95. Great care must be exercised in order that adults do not physically intervene in a manner which could be considered unlawful.

96. 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. Where the school or setting judges that a child's behaviour presents a serious risk to themselves or others, they must always put in place a robust risk assessment which is reviewed regularly and, where relevant, a physical intervention plan.

97. In all cases where physical intervention has taken place, it would be good practice to record the incident and subsequent actions and report these to a manager and the child's parents. (In a children's home it is a legal requirement to record such incidents.)

98. Similarly, where it can be anticipated that physical intervention is likely to be required, a plan should be put in place which the pupil and parents/carers are aware of and have agreed to. Parental consent does not permit settings to use unlawful physical intervention or deprive a pupil of their liberty.

99. **This means that education settings should:**

- **ensure that they have a lawful physical intervention policy consistent with local and national guidance**
- **regularly acquaint staff with policy and guidance**
- **ensure that staff are provided with appropriate training and support**
- **have an agreed policy for when and how physical interventions should be recorded and reported This means that staff should: adhere to the school or setting's physical intervention policy**
- **always seek to defuse situations and avoid the use of physical intervention wherever possible**
- **where physical intervention is necessary, only use minimum force and for the shortest time needed**

100. **This means that staff should not**

- **use physical intervention as a form of punishment**

SEXUAL CONDUCT

101. Any sexual behaviour by a member of staff with or towards a pupil is unacceptable. It is an offence for a member of staff in a position of trust to engage in sexual activity with a pupil under 18 years of age and sexual activity with a child could be a matter for criminal and/or disciplinary procedures.

102. Pupils are protected by the same laws as adults in relation to non- consensual sexual behaviour. They are additionally protected by specific legal provisions depending on their age and understanding. This includes the prohibition of sexual activity with children by adults in a position of trust.

103. Sexual activity involves physical contact including penetrative and non-penetrative acts, however it also includes non-contact activities, such as causing pupils to engage in or watch sexual activity or the production of pornographic material.

104. There are occasions when adults embark on a course of behaviour known as 'grooming' where the purpose is to gain the trust of a child, and manipulate the relationship so sexual abuse can take place. All staff should undertake appropriate training so they are

fully aware of those behaviours that may constitute 'grooming' and of their responsibility to always report to a senior manager any concerns about the behaviour of a colleague which could indicate that a pupil is being groomed.

105. **This means that staff should:**

- **not have any form of sexual contact with a pupil from the school or setting**
- **avoid any form of touch or comment which is, or may be considered to be, indecent**
- **avoid any form of communication with a pupil which could be interpreted as sexually suggestive, provocative or give rise to speculation e.g. verbal comments, letters, notes, by email or on social media, phone calls, texts, physical contact**
- **not make sexual remarks to or about a pupil**
- **not discuss sexual matters with or in the presence of pupils other than within agreed curriculum content or as part of their recognised job role**

ONE TO ONE SITUATIONS

106. Staff working in one to one situations with pupils at the setting, including visiting staff from external organisations can be more vulnerable to allegations or complaints.

107. To safeguard both pupils and adults, a risk assessment in relation to the specific nature and implications of one to one work should always be undertaken. Each assessment should take into account the individual needs of each pupil and should be reviewed regularly.

108. Arranging to meet with pupils from the school or setting away from the work premises should not be permitted unless the necessity for this is clear and approval is obtained from a senior member of staff, the pupil and their parents/carers.

109. **This means that staff 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 pupil becomes distressed or angry**
- **consider the needs and circumstances of the pupil involved**
- **ensure prior to any online learning there are clear expectations of behaviour and conduct of all parties that have been agreed in advance**

HOME VISITS

110. All work with pupils and parents should usually be undertaken in the school or setting or other recognised workplace. There are however occasions, in response to an urgent,

planned or specific situation or job role, where it is necessary to make one-off or regular home visits.

111. It is essential that appropriate policies and related risk assessments are in place to safeguard both staff and pupils, who can be more vulnerable in these situations.

112. A risk assessment should be considered prior to any planned home visit taking place.

113. Such an assessment should include an evaluation of any known factors regarding the pupil, parents/carers and any others living in the household. Consideration should be given to any circumstances which might render the staff member becoming more vulnerable to an allegation being made e.g. hostility, child protection concerns, complaints or grievances. Specific thought should be given to visits outside of 'office hours' or in remote or secluded locations. Following the assessment, appropriate risk management measures should be put in place, before the visit is undertaken. In the unlikely event that little or no information is available, visits should not be made alone.

114. Whether not a risk assessment is completed, the Head or Second Master should be notified of any home visit before it is undertaken, and their agreement sought.

115. This means that staff should:

- **agree the purpose for any home visit with their manager**
- **adhere to agreed risk management strategies**
- **avoid unannounced visits wherever possible**
- **ensure there is visual access and/or an open door in one to one situations**
- **always make detailed records including times of arrival and departure**
- **ensure any behaviour or situation which gives rise to concern is discussed with their manager**
- **ensure that children are seen in open and observable spaces, e.g. livings rooms**
- **comply with Data Protection regulations in relation to any personal information carried or notes made about the child and/or family**

116. This means that education settings should:

- **ensure that they have home visit and lone-working policies which all adults are made aware of. These should include arrangements for risk assessment and management**
- **ensure that all visits are justified and recorded**
- **ensure that staff are not exposed to unacceptable risk**
- **make clear to staff that, other than in an emergency, they should not enter a home if the parent/carer is absent**

- **ensure that staff have access to a mobile telephone and an emergency contact**

TRANSPORTING PUPILS

117. In certain situations, staff or volunteers may be required or offer to transport pupils as part of their work. As for any other activity undertaken at work, the employer has a duty to carry out a risk assessment covering the health and safety of their staff and to manage any known risks.

118. Staff should not offer lifts to pupils unless the need for this has been agreed by a manager. A designated member of staff should be appointed to plan and provide oversight of all transport arrangements and respond to any concerns that may arise.

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

120. It is a legal requirement that all passengers wear seatbelts and the driver should ensure that they do so. They should also be aware of and adhere to current legislation regarding the use of car seats for younger children.

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

122. Staff should never offer to transport pupils outside of their normal working duties, other than in an emergency or where not doing so would mean the child may be at risk. In these circumstances the matter should be recorded and reported to both their manager and the child's parent(s). The school's health and safety policy and/or educational visits policy should set out the arrangements under which staff may use private vehicles to transport pupils.

123. **This means that staff should:**

- **plan and agree arrangements with all parties in advance**
- **respond sensitively and flexibly where any concerns arise**
- **take into account any specific or additional needs of the pupil**
- **have an appropriate licence/permit for the vehicle**
- **ensure they are fit to drive and free from any drugs, alcohol or medicine which is likely to impair judgement and/ or ability to drive**
- **ensure that if they need to be alone with a pupil this is for the minimum time**
- **be aware that the safety and welfare of the pupil 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. This includes having proper and appropriate insurance for the type of vehicle being driven**
- **ensure that any impromptu or emergency arrangements of lifts are recorded and can be justified**
- **refer to Local and National guidance for Educational visits**

124. **This means education settings should:**

- **seek evidence that the vehicle is safe. This means that it holds a valid MOT certificate, where relevant, that the driver certifies it has been serviced in line with the manufacturer's schedule, and that the driver carries out any pre-use checks specified by the manufacturer**
- **seek evidence that the driver is suitable. This means that they hold a valid licence for the type of vehicle and meet any employer requirements**
- **seek evidence that there is a valid insurance policy covering the driver and the vehicle for the intended use. This may require that the driver has 'business use' cover**
- **Retain evidence of the above with the risk assessment**

EDUCATIONAL VISITS

125. Staff responsible for organising educational visits should be familiar with the Department for Education's advice on Health and Safety available at https://www.gov.uk/government/publications/healthand-safety- advice-for-schools.

126. The duties in the Health and Safety at Work Act 1974 and the supporting regulations apply to activities taking place on or off the school premises (including school visits) in Great Britain. All school employers must have a Health and Safety policy. This should include policy and procedures for off-site visits, including residential visits and any school-led adventure activities.

127. The Management of Health and Safety at Work Regulations (1999) impose a duty on employers to produce suitable and sufficient risk assessments. This would include assessment of any risks to employees, children or others during an educational visit, and the measures that should be taken to minimise these risks. For regular activities, such as taking pupils to a local swimming pool, the risks should be considered under the school's general arrangements and a check to make sure that the precautions remain suitable is all that is required. For annual or infrequent activities, a review of an existing assessment may be all that is needed. For new higher- risk activities or trips, a specific

assessment of the significant risks should be carried out. See the Blundell's Risk Assessment Policy for further guidelines.

128. Staff should take particular care when supervising pupils in the less formal atmosphere of an educational visit where a more relaxed discipline or informal dress and language code may be acceptable. However, staff remain in a position of trust and need to ensure that their behaviour cannot be interpreted as seeking to establish an inappropriate relationship or friendship.

129. Where out of school or setting activities include overnight stays, careful consideration needs to be given to sleeping arrangements. Pupils, adults and parents should be informed of these prior to the start of the trip. In all circumstances, those organising trips and outings should pay careful attention to ensuring there is a safe staff/child ratio and suitable gender mix of staff.

130. This means that staff should:

- **adhere to their organisation's educational visits guidance**
- **always have another adult present on visits, unless otherwise agreed with senior staff**
- **undertake risk assessments**
- **have parental consent to the activity**
- **ensure that their behaviour remains professional at all times**
- **never share beds with a child/pupil**
- **never share bedrooms unless it involves a dormitory situation and the arrangements have been previously discussed with Head teacher, parents and pupils refer to local and national guidance for Educational visits, including exchange visits (both to the UK and abroad)**

FIRST AID AND MEDICATION

131. All settings should have an adequate number of qualified first- aiders. Parents should be informed when first aid has been administered.

132. Any member of school staff may be asked to become a qualified first-aider or to provide support to pupils with medical conditions, including the administering of medicines, but they cannot be required to do so unless this forms part of their contract of employment.

133. Staff should receive sufficient and suitable training and achieve the necessary level of competency before they take on responsibility to support children with medical conditions.

134. Advice on managing medicines is included in the statutory guidance on supporting pupils at school with medical conditions. In circumstances where a pupil needs medication regularly, this would usually be recorded in their individual healthcare plan.

This provides details of the level and type of support a child needs to manage effectively their medical condition in school and should include information about the medicine to be administered, the correct dosage and any storage requirements.

135. After discussion with parents, children who are competent should be encouraged to take responsibility for managing their own medicines and procedures. This could include for example, the application of any ointment or sun cream, or use of inhalers or Epipens.

136. 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 the Designated Safeguarding Lead.

137. Adults taking medication which may affect their ability to care for children should seek medical advice regarding their suitability to do so and providers should ensure that they only work directly with children if that advice confirms that the medication is unlikely to impair their ability to look after children. Employers are also responsible for managing the performance of their employees and for ensuring they are suitable to work with children.

138. Risk assessment is likely to recommend that staff medication on the premises must be securely stored and out of reach of children at all times.

139. Please refer to the Blundell's First Aid Policy for further guidelines.

140. This means that education settings should:

- **ensure there are trained and named individuals to undertake first aid responsibilities, including paediatric first aid if relevant**
- **ensure training is regularly monitored and updated**
- **refer to local and national First Aid guidance and guidance on meeting the needs of children with medical conditions that adults should:**
- **adhere to the school or setting's health and safety and supporting pupils with medical conditions policies**
- **make other staff aware of the task being undertaken**
- **have regard to pupils' individual healthcare plans**
- **always ensure that an appropriate health/risk assessment is undertaken prior to undertaking certain activities**
- **explain to the pupil what is happening.**
- **always act and be seen to act in the pupil's best interest**
- **make a record of all medications administered**
- **not work with pupils whilst taking medication unless medical advice confirms that they are able to do so**

PHOTOGRAPHY, VIDEOS AND OTHER IMAGES

141. Many educational activities involve recording images. These may be undertaken for displays, publicity, to celebrate achievement and to provide records of evidence of the activity. Under no circumstances should staff be expected or allowed to use their personal equipment to take images of pupils at or on behalf of the school or setting.

142. All settings should have arrangements with regard to the taking and use of images, which is linked to their Safeguarding Policy. This should cover the wide range of devices which can be used for taking/recording images e.g. cameras, mobile-phones, smart phones, tablets, web-cams etc. and arrangements for the use of these by both staff, parents and visitors.

143. Whilst images are regularly used for very positive purposes adults need to be aware of the potential for these to be taken and/or misused or manipulated for pornographic or 'grooming' purposes. Particular regard needs to be given when images are taken of young or vulnerable children who may be unable to question why or how the activities are taking place.

144. Pupils who have been previously abused in a manner that involved images may feel particularly threatened by the use of photography, filming etc. Staff should remain sensitive to any pupil who appears uncomfortable and should recognise the potential for misinterpretation.

145. It is Blundell's policy, in line with GDPR regulations that making and using images of pupils will require the age appropriate consent of the individual concerned and their parents/carers. Images should not be displayed on websites, in publications or in a public place without such consent. The definition of a public place includes areas where visitors to the setting have access.

146. For the protection of children, it is recommended that when using images for publicity purposes that the following guidance should be followed:

    a. if the image is used, avoid naming the child, (or, as a minimum, use first names rather than surnames)

    b. if the child is named, avoid using their image

    c. schools and settings should establish whether the image will be retained for further use, where and for how long

    d. images should be securely stored and used only by those authorised to do so.

147. **This means that staff should:**

    - **adhere to their establishment's policy**
    - **only publish images of pupils where they and their parent/carer have given explicit written consent to do so**

- only take images where the pupil is happy for them to do so
- only retain images when there is a clear and agreed purpose for doing so
- store images in an appropriate secure place in the school or setting
- ensure that a senior member of staff is aware that the photography/image equipment is being used and for what purpose
- be able to justify images of pupils in their possession
- avoid making images in one to one situations adhere to their establishment's policy
- only publish images of pupils where they and their parent/carer have given explicit written consent to do so
- only take images where the pupil is happy for them to do so
- only retain images when there is a clear and agreed purpose for doing so
- store images in an appropriate secure place in the school or setting
- ensure that a senior member of staff is aware that the photography/image equipment is being used and for what purpose
- be able to justify images of pupils in their possession
- avoid making images in one to one situations

148. This means that adults should <u>not</u>:

- take images of pupils for their personal use
- display or distribute images of pupils unless they are sure that they have parental consent to do so (and, where appropriate, consent from the child)
- take images of children using personal equipment
- take images of children in a state of undress or semi-undress
- take images of children which could be considered as indecent or sexual.
- take into account any advice published by the local authority, MAP or their online safety monitoring software provider

USE OF TECHNOLOGY FOR ONLINE / VIRTUAL TEACHING

149. All settings should review their online safety and acceptable use policies and amend these if necessary, ensuring that all staff involved in virtual teaching or the use of technology to contact pupils are briefed on best practice and any temporary changes to policy/procedures.

150. When selecting a platform for online / virtual teaching, settings should satisfy themselves that the provider has an appropriate level of security. Wherever possible, staff should use school devices and contact pupils only via the pupil school email address / log in. This ensures that the setting's filtering and monitoring software is enabled.

151. In deciding whether to provide virtual or online learning for pupils, senior leaders should take into account issues such as accessibility within the family home, the mental health and wellbeing of children, including screen time, the potential for inappropriate behaviour by staff or pupils, staff access to the technology required, etc. Virtual lessons should be timetabled and senior staff, DSL and/or heads of department should be able to drop in to any virtual lesson at any time – the online version of entering a classroom.

152. Staff engaging in online learning should display the same standards of dress and conduct that they would in the real world; they should also role model this to pupils and parents.

153. The following points should be considered:

- think about the background; photos, artwork, identifying features, mirrors – ideally the backing should be nondescript
- staff and pupils should be in living / communal areas – no bedrooms
- staff and pupils should be appropriately dressed
- filters at a child's home may be set at a threshold which is different to the school
- resources / videos must be age appropriate – the child may not have support immediately to hand at home if they feel distressed or anxious about content

154. It is the responsibility of the staff member to act as a moderator; raise any issues of suitability (of dress, setting behaviour) with the child and / or parent immediately and end the online interaction if necessary. Recording lessons does not prevent abuse. If staff wish to record the lesson they are teaching, consideration should be given to data protection issues; e.g., whether parental/pupil consent is needed and retention/storage. If a staff member believes that a child or parent is recording the interaction, the lesson should be brought to an end or that child should be logged out immediately. Staff, parent and pupil AUPs should clearly state the standards of conduct required.

155. If staff need to contact a pupil or parent by phone and do not have access to a work phone, they should discuss this with a senior member of staff and, if there is no alternative, always use 'caller withheld' to ensure the pupil / parent is not able to identify the staff member's personal contact details.

156. This means that senior leaders should:

- **ensure that all relevant staff have been briefed and understand the policies and the standards of conduct expected of them**

- **have clearly defined operating times for virtual learning**
- **consider the impact that virtual teaching may have on children and their parents/ carers / siblings**
- **determine whether there are alternatives to virtual teaching in 'real time' – e.g., using audio only, prerecorded lessons, existing online resources**
- **be aware of the virtual learning timetable and ensure they have the capacity to join a range of lessons**

157. **This means that staff should:**

- **adhere to their establishment's policy**
- **be appropriately dressed**
- **ensure that a senior member of staff is aware that the online lesson / meeting is taking place and for what purpose**
- **avoid one to one situations – request that a parent is present in the room for the duration, or ask a colleague or member of SLT to join the session**
- **only record a lesson or online meeting with a pupil where this has been agreed with the head teacher or other senior staff, and the pupil and their parent / carer have given explicit written consent to do so**
- **be able to justify images of pupils in their possession**

158. **This means that adults should not:**

- **contact pupils outside the operating times defined by senior leaders**
- **take or record images of pupils for their personal use**
- **record virtual lessons or meetings using personal equipment (unless agreed and risk assessed by senior staff)**
- **engage online while children are in a state of undress or semi-undress**

EXPOSURE TO INAPPROPRIATE IMAGES

159. Staff should take extreme care to ensure that children and young people are not exposed, through any medium, to inappropriate or indecent images.

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

161. If indecent images of children are discovered at the establishment or on the school or setting's equipment the Designated Safeguarding Lead should immediately be informed and an immediate referral should be made to the Local Authority Designated Officer

(LADO) and the police contacted if relevant. The images/equipment should be secured and there should be no attempt to view or delete the images as this could jeopardise necessary criminal action. If the images are of children known to the school, a referral should also be made to children's social care in line with local arrangements.

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

163. Staff should keep their passwords confidential and not allow unauthorised access to equipment. In the event of any indecent images of children or unsuitable material being discovered on a device the equipment should not be tampered with in any way. It should be secured and isolated from the network, and the LADO contacted without delay. Adults should not attempt to investigate the matter or evaluate the material themselves as this may lead to a contamination of evidence and a possibility they will be at risk of prosecution themselves.

164. This means that staff should:

- **abide by the establishment's acceptable use and e-safety policies**
- **ensure that children cannot be exposed to indecent or inappropriate images**
- **ensure that any films or material shown to children are age appropriate.**

PERSONAL LIVING ACCOMMODATION INCLUDING ON SITE PROVISION

165. Generally, staff should not invite any pupils into their living accommodation unless the reason to do so has been firmly established and agreed with their manager and the pupil's parents/carers.

166. It is not appropriate for staff to be expected or requested to use their private living space for any activity, play or learning. This includes seeing pupils for e.g. discussion of reports, academic reviews, tutorials, pastoral care or counselling. Managers should ensure that appropriate accommodation for such activities is found elsewhere in the setting.

167. Under no circumstances should pupils be asked to assist adults with jobs or tasks, either for or without reward, at or in their private accommodation.

168. This guidance should also apply to all other persons living in or visiting the private accommodation.

169. The school has separate guidance for pupils accessing private accommodation, and this is retained by the Second Master.

170. This means that staff 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**
- **refuse any request for their accommodation to be used as an additional resource for the school or setting**
- **be mindful of the need to maintain appropriate personal and professional boundaries**
- **not ask pupils to undertake jobs or errands for their personal benefit.**

OVERNIGHT SUPERVISION AND EXAMINATIONS

171. 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.

172. The supervision of a candidate on journeys to and from the centre and overnight may be undertaken by the candidate's parent/carer or centre staff.

173. The examination board requires the centre to determine a method of supervision which ensures the candidate's wellbeing. As a result in some circumstances staff may be asked to volunteer to supervise students perhaps in their own homes.

174. The overriding consideration should be the safeguarding of both the pupil and staff, therefore many local authorities, professional associations and unions do not endorse the practice of staff supervising candidates overnight in their own homes. Some schools employ alternatives such as a 'sleep-over' on the school premises.

175. Where arrangements are made for a staff member to supervise a pupil overnight then all necessary safeguards should be in place.

176. This means that:

- **schools should ensure that all arrangements reflect a duty of care towards pupils and staff**

177. Where staff do supervise candidates overnight:

- **a full health and safety risk assessment should have been undertaken**
- **all members of the household should have had appropriate vetting including, where eligible, DBS and barred list checks**
- **all arrangements should be made in partnership and agreement with the pupil and parents/carers**
- **arrangements involving one to one supervision should be avoided wherever possible.**

- **as much choice, flexibility and contact with 'the outside world', should be incorporated into any arrangement so far as is consistent with appropriate supervision**
- **whenever possible, independent oversight of arrangements should be made**
- **any situation which gives rise to complaint, disagreement or misunderstanding should be reported**
- **staff should have regard to any local and national guidance.**

CURRICULUM

178. Many areas of the curriculum can include or raise subject matter which is sexually explicit or of a political or sensitive nature. Care should be taken to ensure that resource materials cannot be misinterpreted and clearly relate to the learning outcomes identified by the lesson plan. This can be supported by developing ground rules with pupils to ensure sensitive topics can be discussed in a safe learning environment. 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 are less rigorously applied e.g. drama

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

180. Care should be taken to comply with the setting's policy on spiritual, moral, social, cultural (SMSC) which should promote fundamental British values and be rigorously reviewed to ensure it is lawful and consistently applied. Staff should also comply at all times with the Policy Relationships, Sex and Health Education (RSHE). It should be noted that parents have the right to withdraw their children from all or part of any sex education provided but not from the National Curriculum for Science.

181. **This means that staff should:**

- **have clear written lesson 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.**

182. **This means that adults 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 pupils**

WHISTLEBLOWING

183. Whistleblowing is the mechanism by which staff can voice their concerns, made in good faith, without fear of repercussion. Education settings should have a clear and accessible whistleblowing policy that meets the terms of the Public Interest Disclosure Act 1998. Staff who use whistle blowing procedures should have their employment rights protected.

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

185. Please see the Blundell's Whistleblowing Policy for more details.

186. This means that schools and settings should:

- **have a whistleblowing policy in place which is known to all**
- **have, as part of their safeguarding and child protection policy, clear procedures for dealing with allegations against persons working in or on behalf of the school or setting**

187. This means that staff should:

- **report any behaviour by colleagues that raises concern**
- **report allegations against staff and volunteers to their manager, or registered provider, or where they have concerns about the manager's response report these directly to the DO.**

DUTY TO REPORT CONCERNS ABOUT AN INDIVIDUAL'S SUITABILITY TO WORK WITH CHILDREN

188. There is a duty to report (including self-reporting) any incident in which an adult has or may have behaved in a way that is inconsistent with the organisation's staff code of conduct including inappropriate behaviours inside, outside of work or online.

189. Staff should recognise their individual responsibility to raise any concerns regarding behaviour or conduct (including low level concerns) that falls short of the principles outlined in this document and the setting's staff behaviour policy. It is crucial that any such concerns, including those which do not meet the harm threshold (see KCSiE), are shared responsibly and with the right person, and recorded and dealt with appropriately.

190. Failure to report or respond to such concerns would constitute a failure in professional responsibilities to safeguard children and promote welfare.

191. Whistleblowing is a mechanism by which staff can voice their concerns, made in good faith, without fear of repercussion in circumstances where their concerns have not been dealt with or they do not feel able to follow usual reporting lines for some reason. Education settings should have a clear and accessible whistleblowing policy that meets the terms of the Public Interest Disclosure Act 1998. Staff who use whistle blowing procedures should have their employment rights protected.

192. The NSPCC 'what you can do to report abuse' dedicated helpline is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally, or have concerns about the way a concern is being handled by their school or college. Staff can call 0800 028 0285 and the line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: help@nspcc.org.uk

193. This means that schools and settings should:

- **have clear systems in place for all reporting of adults' behaviour causing concern.**
- **have clear systems in place for whistleblowing that are promoted to all staff.**
- **promote an open and transparent culture where staff feel valued and are confident to report any concerns**
- **ensure all concerns about adult conduct are listened to, received in a sensitive manner, taken seriously, actioned, recorded with clear outcomes.**
- **ensure all concerns that do meet the harm threshold are reported to the DO within 24 hours.**

194. This means that staff should:

- **escalate their concerns if they believe a child or children are not being protected**
- **report any behaviour by colleagues that raises concern**
- **report allegations against staff and volunteers to the head teacher or senior manager, or where they have concerns about the head teacher/manager's response, report these directly to the chair/proprietor/DO.**
- **follow the organisation's whistleblowing procedures as appropriate.**
- **where a staff member feels unable to raise an issue with their employer or feels that their genuine concerns are not being addressed, they should utilise other whistleblowing channels that are open to them as outlined in KCSiE.**

SHARING CONCERNS AND RECORDING INCIDENTS

195. All staff should be aware of their establishment's safeguarding procedures, including the procedures for dealing with allegations against staff and volunteers.

196. In the event of an allegation being made, by any person, or incident being witnessed, the relevant information should be immediately recorded and reported to the Head, Second Master or Designated Safeguarding Lead as appropriate.

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

198. In order to safeguard and protect pupils and colleagues, where staff have any concerns about someone who works with children they should immediately report this to the Head, proprietor or senior manager in line with the school's Safeguarding Policy.

199. Please refer to the school's Safeguarding Policy for further information.

200. This means that staff should:

- **be familiar with their establishment's arrangements for reporting and recording concerns and allegations**
- **know how to contact the LADO / DO and Ofsted / regulatory body directly if required**
- **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 school or setting**

201. This means that education settings should:

- **have an effective, confidential system for recording and managing concerns raised by any individual regarding adults' conduct and any allegations against staff and volunteers.**

END

Blundell's School
Tiverton
Devon
EX16 4DN

Tel: 01884 252543
E.mail: info@blundells.org

www.blundells.org