TAUNTON
SCHOOL

PROFESSIONAL CODE OF CONDUCT POLICY

Policy Leads – HR Director and Designated Safeguarding Lead

Last Review – August 2026

Review Schedule - Annually or following a change in legislation

TAUNTON
SCHOOL

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INTRODUCTION

It is important that everyone working with children understands that the nature of their role and responsibilities places them in a position of trust. This policy provides clear guidance on appropriate and safe behaviours for all staff, workers, contractors, supply staff, volunteers, work experience placement, and governors, engaged in any capacity at Taunton School, and in doing so aims to minimise the risk of misplaced or malicious and vexatious allegations.

Everyone engaged by the school is expected to have read and understood the following most recent versions of statutory guidance and legislation, policies and documents, and should know how to access them and subsequent updates:

- Safeguarding Policy
- Keeping Children Safe in Education (KCSIE)
- Working together to safeguard children (DfE)
- Use of Reasonable Force Policy
- ICT Acceptable Use Policy
- First Aid Policy
- Whistleblowing Policy
- Disciplinary Procedure
- Behaviour Policy
- Equality, Diversity & Inclusion Policy
- Dignity at Work Policy
- Social Media Policy
- Guidance on Relationships at Work
- Anti-Bribery & Corruption Policy
- Data Protection Policy
- Gifts and Awards Policy

All employment-related policies can be found here: Policies & Procedures

SCOPE AND PRINCIPLES

It is the responsibility of everyone engaged with the school to safeguard and promote the welfare of children and young people. The welfare of the child is at the heart of everything we do.

Those 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 motivations. We all should work in an open and transparent way.

Every one of us is expected to:

- Read and understand KCSIE – Part One or the condensed version Annex A, if directed to do so by the DSL
- Know the role and contact details for the DSL and their deputies
- Know the role and contact details for the Governor with lead responsibility for Safeguarding

The expectation is that we all continually monitor and review our practice and ensure that we follow the guidance contained in this document and other relevant policies. Please be mindful that the code is not

exhaustive and, as such, if situations arise that are not covered by this policy you are expected to use your professional judgement and act in the best interests of the pupil and the school.

COMPLIANCE WITH THIS POLICY

It is the contractual duty of everyone to observe the rules in this code, in addition to following related guidance. The school has a duty of care to its staff, parents, guardians or carers, and pupils, and the implementation of this code will help to discharge this duty.

Any failure to comply with the code and the associated School policies (above) may result in disciplinary action being taken.

BEHAVIOUR AND CONDUCT

Professional Behaviour and Conduct

All staff are expected to adopt high standards of personal conduct (including online) in order to maintain the confidence and respect of all those with whom, and for whom, they work. They should understand the need to act as good role models for pupils. They also have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of pupils.

All staff should understand and be aware that safe practice also involves using judgement and integrity about behaviours outside the work setting. Behaviour in their personal lives may have an impact on their work with pupils and the reputation of the School, and the school expects everyone to be mindful of this.

All staff have a duty to keep young people safe, to protect them from physical and emotional harm. This duty is in part exercised through the development of respectful, caring and professional relationships between staff and pupils, and behaviour by staff that demonstrates integrity, maturity and good judgement. Openness and transparency are key.

Staff should be aware that any breach of this code, and/or any unlawful discriminatory behaviour or other conduct which brings the school or profession into disrepute will result in disciplinary action.

Those in Teaching roles should have specific regard to the Teachers' Standards, at all times: Teachers' standards - GOV.UK. These lay out that a teacher is expected to consistently demonstrate a high standard of professional and personal conduct.

Behaviour Management

Where children display difficult or challenging behaviour, staff must follow the School's Use of Reasonable Force' Policy. The use of physical intervention can only be justified in exceptional circumstances and must be used as a last resort when other behaviour management strategies have failed.

There are exceptional circumstances where shouting will be deemed acceptable, and it is recognised that shouting may be a part of sports sessions due to the nature of working with large groups and the location of the activities. However, staff should always be mindful of their tone and language if shouting is required; we should be aware that shouting can create a culture of fear.

Shouting may be necessary and acceptable in the following circumstances:

- Where a pupil is putting themselves or others at risk and staff need to gain the attention of the pupil immediately.
- Where it is necessary to gain the attention of groups of pupils in a loud or outdoor setting e.g. lunch queues, trips etc.

All pupils have a right to be treated with respect and dignity, even in circumstances where they display difficult and challenging behaviour.

Admonishing pupils will be necessary to ensure good discipline. All staff are expected to hold pupils accountable and uphold behavioural expectations. Nevertheless, any public admonishment of pupils should be limited to what is necessary to ensure good discipline can be maintained. Speaking to pupils quietly and out of the earshot of other pupils is likely to lead to a far better outcome, avoiding embarrassment and making it more likely the pupil listens and responds positively.

Staff should not use any form of degrading treatment to punish a child. Whilst the use of humour can help diffuse a situation, the use of demeaning, sarcastic or insensitive comments towards pupils is not acceptable in any situation.

Corporal punishment is unlawful in schools, and the use of unwarranted physical force is likely to constitute a criminal offence. The use of physical intervention should be avoided; however, there are circumstances in which it is appropriate for staff to use reasonable force, restrictive interventions and restraint to safeguard children. The purpose of any physical intervention is to reduce risk, but it should always be used as a last resort for staff. Actions can range from guiding a pupil to safety by the arm through to more extreme circumstances such as breaking up a fight. The minimum force required should be used, lasting for the shortest practicable time. All members of school staff have a legal power to use reasonable force in certain circumstances. There is a statutory duty to record the use of reasonable force, restrictive interventions and restraint using the online form found on Sharepoint and also for the relevant member of SMT or the DSL to report the intervention to the parent.

One-to-One Meetings with Pupils

This is not advised (see 'low-level concerns' section also), however if a staff member must spend time on a one-to-one basis with a pupil, they must ensure that:

- The DSL, DDSL, line manager or a teaching member of staff knows this is taking place
- The time together is in a public place that others can access
- Others can see into the room e.g. the door is open
- The meeting is during normal school hours
- The meeting does not go on for any longer than is necessary to achieve its purpose
- They avoid sitting or standing in close proximity to the pupil
- They avoid idle discussion
- They avoid physical contact
- They report any incident that causes them concern to the DSL under the school's 'Child Protection and Safeguarding' Policy and Procedures, making a written record (signed and dated)
- They report any situation where a pupil becomes distressed or angry to the DSL

Pre-arranged meetings with pupils outside of school should not be permitted unless approval is obtained from their parents/guardians/carers and the Head or DSL.

In some circumstances, home visits or visiting a child in hospital may be necessary; staff should discuss the purpose of any visit with the Deputy Head Pastoral/Assistant Head Pastoral. In these circumstances, staff must:

- Ensure the visit is planned and that appropriate risk assessments are in place. Where there is insufficient information to complete a risk assessment, ensure that you are accompanied by a colleague
- Leave the door open if you are alone with a pupil
- Keep a record of your visit, including times of arrival and departure, and work undertaken. The appropriate member of pastoral staff must record the visit on CPOMS
- Ensure you have a mobile phone
- Discuss with the DSL anything that gives cause for concern

Sexual Contact with Children

It is a criminal offence and an abuse of a position of trust to have any sexual relationship with any pupil at the School under the age of 18. Therefore, staff must not have any type of sexual relationship with a pupil or pupils.

Whilst it is not a criminal offence, it is a breach of this policy and considered to be gross misconduct to have a sexual relationship with any pupil of the School, even if the pupil is aged 18 or over.

Any sexual contact with a pupil within three years of the pupil leaving the School would also be considered inappropriate and a breach of this policy.

You should take particular care when dealing with a pupil who:

- appears emotionally distressed or vulnerable and/or who is seeking expressions of affection
- appears to hold a grudge against you
- acts in a sexually provocative way or who is inclined to make exaggerated claims about themselves and others, or to fantasise, or one whose manner with adults is over-familiar
- may have reason to make up an allegation
- appears to have a crush or fixation with you

In addition, staff must not:

- engage in any sexual activity with a pupil
- have sexually suggestive or provocative communications with a pupil
- make sexual remarks about a pupil
- discuss their own sexual relationships in the presence of pupils
- encourage a relationship to develop in a way which might lead to a sexual relationship or be considered inappropriate.

Any of the above behaviours will be considered a serious breach of trust and will normally lead to disciplinary action and also, potentially, to criminal prosecution.

Personal Behaviour and Conduct

Unacceptable behaviour such as discrimination against protected characteristics (which include race, gender, religion or culture, sexual orientation, disability or any special educational needs, or other physical attributes), bullying, harassment or intimidation will not be tolerated. This includes physical and verbal abuse and use of inappropriate language or unprofessional behaviour (including abusive emails) with colleagues, pupils and parents.

All staff are expected to demonstrate respect for diversity and take steps to promote equality having due regard to the applicable policies.

Everyone engaged with the school is expected to set an example to pupils. In particular, they will:

- Treat pupils and others with dignity and respect
- Show tolerance and respect for the rights of others
- Not undermine fundamental British values, including democracy, the rule of law, individual liberty and mutual respect, and the tolerance and acceptance of those with different faiths and beliefs
- Not express personal beliefs e.g. political views, religious views, in a way that will overly influence pupils and potentially exploit their vulnerability, or lead them to break the law
- Maintain high standards in attendance and punctuality
- Adhere to the school's Dress Code: Policies & Procedures
- Not use inappropriate or offensive language

Staff Relationships

Personal relationships between colleagues who work together can give rise to conflicts of interest. Therefore, staff who have entered into a close personal or romantic relationship with a colleague are required to disclose this fact to the Chief Operating Officer and the Head. Any information declared or disclosed will be recorded on both staff personnel files, stored confidentially and securely. The disclosure of personal or romantic relationships between colleagues is considered to ensure the existence of the relationship does not negatively impact on the operation and functioning of the School.

Staff who are also parents at the school

It is accepted that children of staff may at times invite their friends to their homes. In these circumstances, staff are reminded to inform the DSL if there are any issues or concerns which suggest a child could be at risk of harm, or the behaviour of the staff member could appear compromising to others.

We ask that you continue to use your professional judgement at all times but for those of you wearing the hat of parent and staff member, we ask that you do the following to protect yourself:

- If you have a long-standing arrangement such as a car share with another parent, please let us know
- If you intend to entertain a group of pupils at your house, you must discuss the arrangements with the DSL
- If taking photographs which may include Taunton School pupils (for example, at a celebratory event), avoid individual photos and exercise caution when posting photos on social media
- Report any safeguarding concerns arising from your contact with pupils outside of school, to the DSL. These should be reported as soon as possible.

Conduct outside of Work

For the avoidance of doubt 'Conduct Outside Work' is defined as staff outside of contractual working hours off site, or outside of contractual working hours on site. Staff must not bring the School's name into disrepute or undermine the trust and confidence of the school.

As a general rule, what staff do after working hours and away from the premises is a personal matter. The school does not concern itself with the private lives of its staff unless they affect its effective operation or its reputation. Further, the school will have regard to KCSIE and safeguarding protocol when considering conduct outside of work that may pose a transferrable risk.

The school will become involved in the following circumstances (where all of the school's policies will continue to apply):

- At work parties, events and other work-related social occasions
- At third-party (that is suppliers, parents) occasions where the staff member has been invited in their capacity as an employee and representative of the School
- At work-related conferences and training courses
- Where the staff member is away on business on behalf of the School
- Behaviour online which brings the school into disrepute
- Improper behaviour will lead to investigation and possible disciplinary action, including dismissal.

Harm Test & Transferrable Risk

Statutory Guidance outlined in Keeping Children Safe in Education (KCSIE) makes clear that there are types of behaviour which may indicate a person poses, or might pose, a risk of harm if they continue to work in regular or close contact with children. This is more commonly known as the 'harm test': a person has 'behaved or may have behaved in a way that indicates they may not be suitable to work with children'. This may be indicated when an incident occurs outside of work, did not involve children but could have an impact on a staff member's suitability to work with children, for example, being involved in a safeguarding issue or perhaps a domestic violence incident at home, where violent behaviour could pose a risk to children at school. The school considers that living with a person under police investigation or a known sex offender to be a transferable risk. In these cases, staff have a duty to make a controlled disclosure which allows the school to implement specific safeguarding boundaries and ensure minimisation of risk being introduced into the school environment.

Where concerns of this nature are known or raised, the Child Protection Policy and Procedures will be followed in relation to Allegations about Staff or Volunteers. For further information, staff should refer to the Disciplinary and Grievance Policies.

There may be times where an individual's conduct or 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 with the school in relation to the protection of children, loss of trust and confidence or bringing the school into disrepute. Such behaviour may also result in prohibition from teaching by the Teaching Regulations Agency, a bar from engaging in regulated activity, or action by another relevant regulatory body. Staff should therefore always refrain from behaving in a manner which would lead any reasonable person to question their suitability to work with children or act as an appropriate role model.

Staff must report any changes in personal circumstances including any association outside of work that could raise safeguarding questions or compromise the school's reputation.

SOCIAL CONTACT

Social Contact between staff and pupils

Staff should not seek to establish social contact with pupils, and must not give their personal contact details to pupils including email addresses, home or mobile phone numbers etc.

Staff should not share any inappropriate personal information with a pupil. They should not request, or respond to, any personal information from a pupil beyond that which might be appropriate as part of their professional role. All communications should be transparent and open to scrutiny so that they cannot be misconstrued as grooming.

The School is aware that some staff have personal businesses and at times pupils become aware of those businesses. Staff should be mindful that pupils may attempt to follow their business on social media and wherever possible ensure that they do not accept follow requests from pupils. Staff should notify the DSL as soon as they become aware a pupil has made a request to follow or interacted with a post online.

Staff must:

- Not share any personal details (home/mobile phone number or personal email, social media handles) with any pupil
- Not connect with pupils on social media sites unless the need to do so is agreed beforehand with the DSL
- Not send pupils text messages (unless using a school issued phone), personal emails or make contact through blogs, websites or apps
- Not plan to meet pupils, individually or in groups, outside of school other than on trips/activities authorised by the Head/Deputy Head (Co-curricular)
- Not contact pupils at home unless absolutely necessary. In such circumstances the school email or Teams must be used
- Not invite pupils (groups or individuals) to any staff home unless it has been approved by the Head or DSL
- Not engage in secretive social contact with pupils or their parents, guardian or carers
- Discourage pupils from any interaction with staff personal businesses and report any concerns to the DSL.

Staff may contact pupils on the school's email and Teams network but should avoid excessive one-to-one communications. Emails and messages should be kept to strictly professional matters relating to the pupil's academics or pastoral care. Staff should avoid communication which may appear overly familiar.

Staff may send pupils cards or messages on the school's email system and/or Teams which express congratulations; however, it is important that the use of such forms of personal communication is transparent, routine, appropriate, consistent, and in a manner that maintains professional standards. For the avoidance of doubt, staff are not permitted to engage in private tutoring of current Taunton School pupils without the express permission of the Head/CEO, DSL and HR Director.

Social Contact between staff and parents/guardians or carers

Members of staff who are friends with parents, guardians or carers of pupils, should ensure that they always maintain a professional image and avoid discussing School business or gossip.

Staff need to be careful when using Social Media and deciding whether to add parents to their social networks. Staff should be especially careful that any publicly available profile of themselves befits their role in School. Avoid using social media in a way which could compromise suitability to work in a position of trust with children.

REPORTING ALLEGATIONS AND LOW-LEVEL CONCERNS

Below offers clarity on the structure we use to report allegations and low-level concerns.

Allegations

Allegations against staff are defined in KCSIE: Keeping children safe in education - GOV.UK and should be reported to the Head (or the Chair of Governors in the case of allegations against the Head) in line with the Safeguarding Policy. These include allegations that someone who works with children has:

- Behaved in a way that has harmed a child, or may have harmed a child; and/or
- Possibly committed a criminal offence against or related to a child; and/or
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children; and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children

Low-level concerns

Where staff have a low-level concern, as outlined below, they do not need to determine how serious the concern is but should immediately refer these concerns to the Head of the School or the DSL.

The purpose of 'Low-level Concerns Reporting' is to keep pupils safe and to create and embed a culture of openness, trust and transparency in which Taunton Schools' values and expected behaviour, set out in the Professional Code of Conduct are constantly lived, monitored and reinforced by all staff.

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 (staff/agency worker/volunteer/contractor) may have acted in a way that is inconsistent with the professional code of conduct, including inappropriate contact outside of work, and does not meet the threshold of the harms test (an action which may cause harm or pose a risk of harm to a child) or is otherwise not considered serious enough to consider a referral to the LADO.

These behaviours can exist on a wide spectrum, from inadvertent to that which is ultimately intended to enable abuse. They include, for example:

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- using inappropriate sexualised, intimidating or offensive language
- not knocking on a door and using a verbal command before entry

Please note that these examples could still lead to a referral to LADO after initial investigations

These low-level concerns may form part of a wider pattern and need to be reported to the Head of the School and DSL.

When a low-level concern has been raised by a third party, the DSL will collect as much evidence as possible by speaking where possible with the person who raised the concern, to the individual involved

and to any witnesses. They will record in writing reports of low-level concerns, including details of the concern, the context in which it arose, and action taken.
The name of the person reporting will be noted and wishes to remain anonymous will be respected as far as is reasonably possible.

Records of low-level concerns will be reviewed on an ongoing basis so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and responded to. Where a pattern of behaviour is identified the school will decide on a course of action. This might be internal disciplinary procedures, or referral to the LADO if the harms threshold is met.

The School will consider if any wider cultural issues in school have enabled the behaviour to occur and if appropriate policies could be revised or extra training delivered to minimise the risk of recurrence.

The rationale for all decisions and actions taken will be recorded.

See Appendix 1 for more information on low-level concerns and how to report them.

PUPIL PRIVACY

Children are entitled to privacy when changing or showering. However, there still needs to be an appropriate level of supervision to ensure safety. Staff should:

- Avoid observing changing or showering
- Avoid physical contact or visually intrusive behaviour when children are undressing or undressed
- Knock first, then announce when entering changing rooms and avoid remaining unless required
- Never shower or change in the same place as children
- Never assist with any personal care task which the pupil can undertake themselves – where assistance is required e.g. an injury and assisting with removing clothes, staff should explain to the child what is happening, ask for consent, and ensure that another adult is in the vicinity and is aware of the task to be undertaken. Please note there is a Toileting and Nappy Changing Policy for staff working with the Pre-Prep and EYFS.

FIRST AID AND ADMINISTRATION OF MEDICATION

The school has a First Aid Policy which should be adhered to at all times. Some pupils may need medication during school hours. This medication must only be administered by one of the allocated and/or trained members of staff. 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 one of the Health Centre nurses and/or the parent/carer.

TRANSPORTING PUPILS

The school uses its own transport fleet to transport children to events and activities such as sports matches and educational visits. Only those staff that hold the relevant driving licence and have had the school's in-house training may drive a minibus). Staff who have to use their own vehicles to transport children should always consult the DSL beforehand.

For the avoidance of doubt, if a member of staff has to transport pupils in their private vehicle there are measures they should take to minimise the risk of false or mistaken allegation in this situation:

- Refer the use of any private vehicle to the DSL
- Pupils should sit in the rear of the car and not alongside the driver, if not with other pupils

- Ensure that another adult is in the car, if at all possible.
- If the same pupil is to be transported alone more than once, advice and permission should be sought from the DSL
- Always use a school vehicle as an alternative if at all possible
- If you have to use your own vehicle in an emergency, make sure you have appropriate vehicle insurance and MOT validation.

EDUCATIONAL VISITS AND AFTER SCHOOL ACTIVITIES

The following is in addition to the guidance in the Health and Safety Policy. Staff should take particular care when supervising pupils on trips and outings. Staff remain in a position of trust and need to ensure that their behaviour remains professional at all times and stays within clearly defined professional boundaries. When out of School activities include overnight stays, careful consideration needs to be given to sleeping arrangements. In all circumstances, staff organising trips and outings must pay careful attention to ensuring safe staff/child ratios, especially overnight, and follow all guidance given by the 'Trips, Tours and Educational Visits' Policy and the Educational Visits Co-ordinators.

BOARDING HOUSES AND SPECIALIST SETTINGS

Boarding Duty

When on duty in a boarding house staff must respect pupils' privacy and always knock and follow up with a verbal command before entering a room. Staff must not enter shower and toilet cubicles except in a genuine emergency.

The School's 'Supervision of Pupils Policy' makes it clear that at all times boarders must know which member of staff is responsible for them and has the means to contact them if necessary. The policy also clarifies the nature of the responsibility which older pupils, e.g. House Prefects, have for younger pupils.

There are written agreements between the School and any adult not employed by the School but living in a building with boarding accommodation (e.g. partners/adult children of boarding house staff). These agreements give clear guidance on contact with pupils.

Boarding/Residential Staff

Staff must not invite pupils into their personal living space unless agreed with the parents/guardians/carers, and the DSL, or the Head, and in accordance with the Resident's Handbook and the Visitor's Access and Security Policy. For these purposes, the garden is considered a shared and public space.

Pupils should only enter private living spaces under extenuating circumstances e.g. a genuine emergency, family bereavement. Staff are asked to stop and think – is the entry of the pupil needed, is it appropriate, is there another, better, way, will they be compromised. If entry is permitted, the member of staff must inform the DSL, or the Head.

Visitors to Boarding Houses

Residential staff are welcome to have guests to visit, but must ensure the following:

- That the guest is not left alone in the accommodation unless an enhanced DBS and risk assessment has been carried out via the school's HR Department

- That any guest who is going to be a regular visitor (more than 4 nights in 1 month) has an enhanced DBS carried out, the cost of which will be incurred by the host.
- That guests are supervised and accompanied at all times in the accommodation, and are not allowed free access to any part of the school
- That they notify the DSL and HR Director if any guest has been charged with or convicted of a criminal offence
- That they log visitors on the 'Private side visitors' spreadsheet during term time, and outside of term time when there are children in the boarding house.

Visitors should inform boarding staff when they arrive and when they are leaving and must not enter boarders' living spaces.

Meetings in staff houses

Some School accommodation have private living quarters that include designated public areas, such as a study, into which pupils and parents can be invited under supervision, noting the requirement of the National Minimum Standards for Boarding Schools (NMS) that boarders should not have access to staff residential accommodation other than in exceptional circumstances.

A one-to-one situation should be avoided with boarders, with another adult always present. There can be no inappropriate favouritism or inappropriate one-to-one contact between staff and boarders.

Specialist Settings

The School has many specialist settings such as performing arts and music rehearsal areas. Staff are given guidance detailing the additional measures taken to safeguard, for example in one-to-one or off-site tuition and performances away from the School.

ALCOHOL AND ILLEGAL DRUGS

The Director of Operations and Facilities is the licensee. Consumption of alcohol is permitted on site at selected School events and occasions; however, this must not adversely affect staff performance and conduct. To be clear, staff must not be under the influence of alcohol whilst in a supervisory role with children. Illegal drugs must not be consumed on the school premises at any time.

If alcohol or drug usage impacts on a staff member's working life, the school has the right to discuss the matter with the staff member and take appropriate action, having considered factors such as the School's reputation and public confidence.

SMOKING

To promote a healthy and pleasant working environment and because of the fire risk, smoking is not allowed on site; however, there is an outdoor designated smoking area, out of sight and out of bounds for pupils. This also applies to vaping devices.

EARLY YEARS SETTING

In order to comply with the requirements of the DfE Statutory Framework on EYFS, School staff must inform the Head, and the HR Director, should they be taking any medication which is likely to impair their ability to look after children properly. Medication on the premises must be stored securely.

Staff working in the nursery and TPPS must ensure phones are stored securely and smart watches or any other device with the capacity to take photos should be disabled.

USE OF SCHOOL PREMISES, EQUIPMENT AND COMMUNICATION SYSTEMS

This section is in addition to the school's ICT Acceptable Use Policy and the Social Media Policy.

School equipment, premises, and systems (phone, email and computers) are available only for school-related activities and should not be used for the fulfilment of another job or for personal use unless authorised by the Head. This includes photocopying facilities, stationery and premises. It also applies to access provided for remote use (e.g. hand-held portable devices) and to staff working outside of school premises and using their own IT equipment.

Illegal, inappropriate or unacceptable use of School equipment or communication systems may result in disciplinary action and in serious cases could lead to a staff member's dismissal. This list is not exhaustive and includes:

- Creating, sending or forwarding any message that would reasonably be considered inappropriate or unacceptable.
- Access, publication or circulation of illegal, offensive, unacceptable, inappropriate or non-work-related material.
- Any illegal activities.
- Posting confidential information about the School and/or other staff, children or parents.
- Unauthorised use of School facilities (or staff member's personal IT equipment) for personal use should be minimal, during working time.

Staff receiving inappropriate communication or material or who are unsure about whether something they propose to do might breach this policy should seek advice from the HR Director.

The school reserves the right to monitor e-mails, telephone calls, internet activity or document production, principally in order to avoid offensive or nuisance material and to protect systems from viruses, but also to ensure proper and effective use of systems.

Communication systems may be accessed when the school suspects that a staff member has been misusing systems or facilities, or for the investigation of suspected fraud or other irregularity.

Passwords should not be shared and access to computer systems must be kept confidential. Breach of this confidentiality may be subject to disciplinary action.

Accessing child sexual abuse imagery or indecent images of children on the internet, and making (including with AI technology), storing or sharing such material is illegal, and, if proven, will invariably lead to the individual being barred from working with children and young people.

MOBILE PHONES AND IPADS

Mobile phones should be switched off or set to a mode which will not disturb the member of staff whilst teaching. Mobile phones should not be used in front of pupils; however, the exception applies if the phone is required for School business or in other exceptional circumstances.

Personal calls on a mobile phone may be made in an office or in the classroom during a break time when children are not present.

Staff may keep their mobile telephones switched on for emergencies when off site on School business.

PHOTOGRAPHS AND VIDEOS

Personal mobile phones, devices or cameras must not be used to take images or record children; only school phones, tablets, video and photography equipment must be used unless you are using your School Teams account to take the photo. If there are extenuating circumstances which require you to use your own personal equipment, you should seek permission beforehand from the Head or DSL.

When taking photos or videos on any equipment the following should be considered:

- Ensure you have consent from parents or the child (where they are 12 years or older)
- The purpose of the activity must be clear
- All images should be open to scrutiny to ensure that they are appropriate
- Images should not be made during one-to-one situations
- Ensure that the pupil or pupils are appropriately dressed and consideration is given to the dignity of those in the picture
- Ensure that the pupils understand why the picture is being taken
- Images must not be taken secretively.

PREVENT DUTY

All staff have a statutory responsibility under the Counter Terrorism and Security Act 2015 to have due regard to the need to prevent people from being drawn into terrorism.

- Staff must remain alert to signs of radicalisation or extremism in pupils, including changes in behaviour, use of extremist language, or engagement with concerning online content.
- Concerns must be reported immediately to the DSL or a DDSL. Staff must not attempt to investigate concerns themselves.
- Staff are expected to complete annual Prevent training.

HONOUR BASED ABUSE AND FEMALE GENITAL MUTILATION (FGM)

Honour Based Abuse and FGM are forms of child abuse and a criminal offence in the UK. The school recognises that girls may be at risk both in the UK and abroad.

- All staff must be alert to signs that a pupil may be at risk of FGM or may have already been subjected to it.
- Staff must not promise confidentiality and must follow safeguarding procedures if FGM concerns arise.
- In line with the mandatory reporting duty, if a teacher becomes aware that an act of FGM appears to have been carried out on a girl under the age of 18, they are legally required to report this personally and directly to the police (via 101). The DSL must also be informed without delay.
- Any other concerns about possible risk of FGM must be reported immediately to the DSL in accordance with safeguarding procedures.

SOCIAL NETWORKING WEBSITES

This section is in addition to the ICT Acceptable Use Policy for Staff, Visitors and Governors. Staff must not access social networking websites for personal use during work time. Access to some journals, blogs and

social networking sites is permitted during work time for the purposes of undertaking job related duties only.

Staff must act in the best interests of the school and not disclose personal information or data about any individual including staff, pupils or parents. This includes images. Access may be withdrawn and disciplinary action taken if there is a breach of confidentiality or defamatory remarks are made about the school, staff, pupils or parents.

The School respects people's private life, however, it must also ensure that confidentiality and its reputation are protected. Staff using networking websites in their private life must:

- Refrain from identifying themselves as working for the School, in a way which has, or may have, the effect of bringing the school into disrepute.
- Not identify other School staff, children, parents or anyone associated with the school without their consent.
- Not make any defamatory remarks about the school, its staff, pupils, parents or anyone associated with the School, or conduct themselves in a way that is detrimental to the School, nor disclose personal data or information about the school, staff, children, parents or anyone associated with the school that could breach the Data Protection Act 2018, for example, by posting photographs or images of children or young people.
- Not allow pupils, or parents, to access their personal social networking accounts (including LinkedIn for a period of two years post Year 13) and where they are contacted by a pupil, they should bring it to the attention of the DSL.
- Ensure that privacy settings are set up on their accounts.

CRIMINAL ACTIONS

You must inform the Head, or in the case of the Head, the Chair of Governors, immediately if you are subject to a criminal conviction, caution, ban, police enquiry, investigation or pending prosecution which may affect your enhanced DBS or status under the Childcare (Disqualification) Regulations. The Head, or Chair of Governors, will discuss this with the staff member in the context of their role and responsibilities in order to help safeguard children and other staff at Taunton School.

TERMINATION OF EMPLOYMENT

If the school ceases to use the services of a member of staff, worker, supply teacher, volunteer, or contractor, because they are unsuitable to work with children, a referral to the Disclosure and Barring Service (DBS) will be made if the criteria for referral are met. Any such incident will be followed by a review of the safeguarding procedures within the school, with a report being presented to Governors as required and without undue delay. The school may also need to consider a referral to the DBS if a member of staff is suspended or deployed to another areas of work that is not regulated activity.

If a member of staff, worker, volunteer, or contractor, ceases tenders their resignation/ends their service of engagement with the school at a time when a child protection concern exists in relation to them, those concerns will still be investigated in full by the school and a referral made to the DBS as soon as possible if the criterion for referral is met.

TEACHING REGULATION AUTHORITY (TRA)

Separate consideration will be given to making a referral to the TRA where a teacher has been dismissed (or would have been dismissed had they not resigned) because of unacceptable professional conduct, conduct that could bring the profession into disrepute, or a conviction for a relevant offence. An interim referral to the TRA may also be considered and made if appropriate.

CONFIDENTIALITY

Everyone engaged with the school comes into contact with a significant volume of data and information in relation to pupils, staff, school activities and many other matters. There is an obligation to observe the requirements of the Data Protection Act 2018.

Under the Data Protection Act, staff are required to collect, maintain and dispose of sensitive or personal data in a responsible manner i.e. via confidential waste bags or a shredding machine.

DISCLOSURE OF DATA

Staff should not disclose sensitive information about the school or its staff to other parties, for example parents or colleagues. There are particular exceptions to this; for example, disclosure of suspected or alleged abuse of a pupil to Child Protection officers; discussion with a person accompanying or representing a member of staff in a formal meeting or disclosure under the Whistleblowing Policy.

There are circumstances in which staff are obliged to release pupil data, for example, to parents or other colleagues in the School seeking information about pupil progress, and this is permitted.

No communication should be had with the media.

Appendix 1: Low-level concerns

This appendix should be read in conjunction with the guidance in the school's Safeguarding and Child Protection policy and is designed to help staff understand their duty.

Staff behaviour can, from time to time, fall below these expectations in a school which is so busy: as teachers we will make mistakes. To be able to talk openly about these mistakes or errors keeps our pupils safe and keeps our staff safe and minimises the risk of abuse.

Taunton School understands that spotting the early signs of harmful behaviour towards children can be difficult, and that many will be hesitant to report concerns they have about their colleagues' behaviour, particularly the behaviour of their superiors. Staff are encouraged to maintain an attitude that recognises that abuse can happen anywhere, in any setting, and that anyone can be a perpetrator regardless of their age, sex, level of authority, personality, etc.

Taunton School will ensure that all staff members have received training as part of their induction that outlines appropriate behaviour towards pupils for staff members and the recognition and reporting of safeguarding concerns. Staff will address any questions they have regarding safeguarding to the DSL.

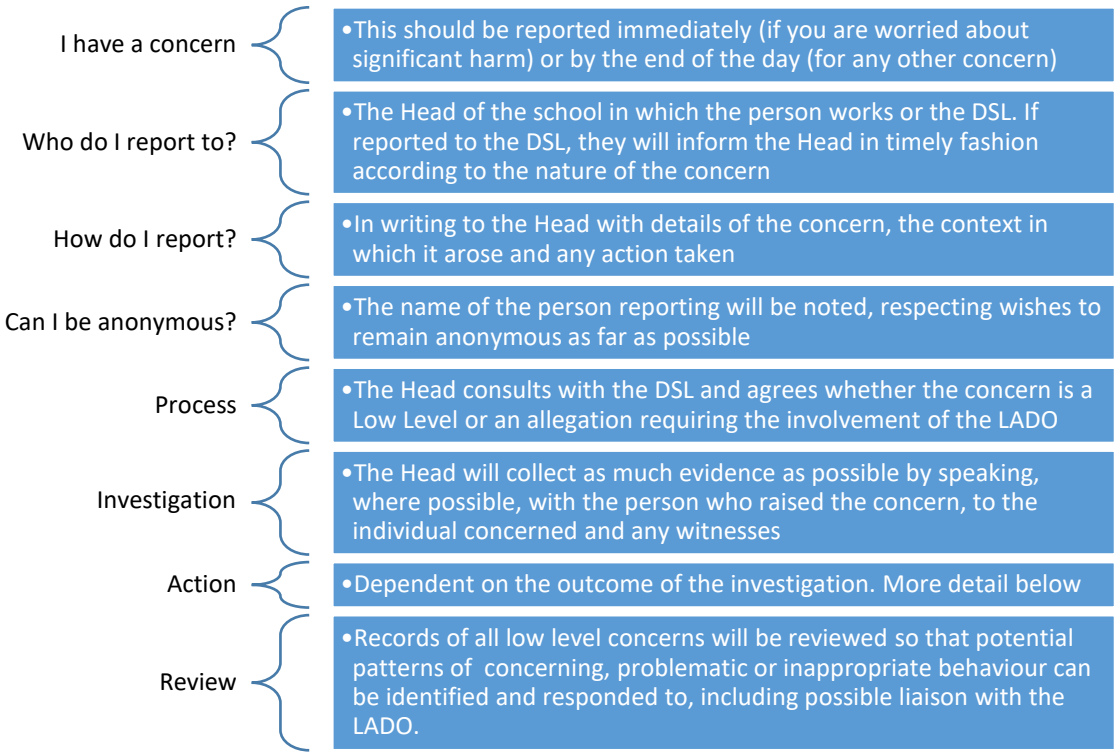
Definition of Low-level concerns

- A low-level concern is defined as any concern about an adult's behaviour towards, or concerning, a child that does not meet the harms threshold (see below) or is otherwise not serious enough to consider a referral at the time of its reporting.
- These are staff behaviours which are not consistent with the standards and values of Taunton School as laid out in the school's safeguarding and child protection policy, the Teaching Standards, and the school's Code of Conduct
- Staff should feel comfortable sharing any concern about another member of staff knowing Taunton School has the processes to ensure that it will be taken seriously and with consistent processes to support the concerns.
- 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 may have acted in a way which is inconsistent with Taunton School's code of conduct.

Reporting low-level concerns is encouraged as part of the school's culture of openness, trust, and transparency. Serious case reviews show that schools who do not report low-level concerns, report them to the wrong people or report them and they are not taken seriously, are more likely to endanger the safety and wellbeing of pupils.

The member of staff does not need to consider whether the behaviour they have seen is a 'low-level concern' or an 'allegation', this will be up to the Head and DSL, and the LADO. However, if the member of staff thinks the school has not dealt with it appropriately then they should follow the Whistleblowing procedure.

The procedure for reporting concerns:



Where a low-level concern relates to the Head, it should be reported to the Chair of Governors.

Where a low-level concern relates to a person employed by a supply agency or a contractor to work in the school, staff will also be required to report this to the headteacher, who will, in turn, inform the employer of the subject of the concern.

Action

If it is discovered that the low-level concern refers to behaviour that was not considered to be in breach of the Professional Code of Conduct, the law, or the School's Safeguarding culture, the Head will speak to the individual about whom the concern was made to discuss their behaviour, why and how the behaviour may have been misconstrued, and what they can do to avoid such misunderstandings in the future. The Head will also speak to the individual who shared the concern, outlining why the behaviour reported is consistent with school standards and the law. The Head will take care to ensure that conversations with individuals who reported concerns that transpired to be unfounded do not deter that individual from reporting concerns in the future.

The specific approach to handling low-level concerns will be adapted on a case-by-case basis. It is unlikely that a low-level concern will result in disciplinary procedures; however, individuals may be given warnings in line with the Disciplinary Policy and Procedure where behaviour does not improve once it is brought to their attention.

The Head may decide upon evaluation that a concern is more serious than the reporter originally thought, e.g., when viewed in conjunction with other evidence or other concerns made about the same individual. Where this decision is made, the concern will be escalated and dealt with as an allegation.

Records are kept of all low-level concerns within the school and the actions taken. These records are reviewed annually so that potential patterns of concerning, problematic and/or inappropriate behaviour can be identified and responded to. Where a pattern of low-level concerns is identified for a member of staff, the school will need to decide on a course of action which might be internal or referral to the LADO if it is felt that the pattern of behaviour meets one of the harm thresholds.

Self-reporting

On occasion, a member of staff may feel as though they have acted in a way that:

- Could be misinterpreted.
- Could appear compromising to others.
- They realise, upon reflection, falls below the expected professional standards set out in the Professional Code of Conduct or their behaviour was not aligned with the school's safeguarding culture.

The school will ensure that an environment is maintained that encourages staff members to self-report if they feel as though they have construed as inappropriate upon reflection. A self-report can be made using the QR code on posters around the School, or by scanning below (Appendix 2). Alternatively, staff are welcome to discuss self-reports with the DSL. The Head and DSL will, to the best of their abilities, maintain a culture of approachability for staff members, and will be understanding and sensitive towards those who self-report.

Staff members who self-report will not be treated more favourably during any resulting investigations than staff members who were reported by someone else; however, their self-awareness and intentions will be taken into consideration.

The LADO would be receptive to any member of staff calling them to talk through any self-reporting. Contact details: Somerset LADO: Anthony Goble / Stacey Davis: 01823 359029

Appendix 2: Self-Reporting (QR Code)