

NORMAN STREET PRIMARY SCHOOL

"Kind. Brave. Fair. That's the Normie Way."

CODE OF CONDUCT FOR STAFF AND OTHER ADULTS

At the time of publishing the following roles were held:	
Head teacher	Eleanor Dobson
Designated Safeguarding Lead (DSL)	Eleanor Dobson
Deputy Designated Safeguarding Lead (Deputy DSL)	Karen Hodges, Deputy Headteacher
Allegations/low-level concerns against staff and other adults must be reported to:	Eleanor Dobson (or Karen Hodges, Deputy DSL, in her absence)
Allegations/low-level concerns against the Head teacher must be reported to:	Rev. Keith Teasdale, Chair of Governors

Approved by	
Name	Rev. Keith Teasdale
Position	Chair of Governing Body
Date	September 2026
Version Number	16
Review date	September 2027

¹ Low-level concerns can be reported to the DSL rather than the Head teacher if desired, but where this is the case, the DSL must inform the Head teacher as soon as practically possible of any concerns raised.

Review sheet

The information in the table below details earlier versions of this document, with a brief description of the changes made since the last review.

Version	Description	Date
1	Original	Jan 2016
2	Updated to include changes in terminology as a result of revised 'Keeping Children Safe in Education' September 2016	Aug 2016
3	Revised to include section on staff and other adults' use of mobile phones in school	March 2017
4	Revised to reflect updated guidance & legislation including Data Protection Act/GDPR 2018 and the Childcare (Disqualification) Regulations 2018	Sept 2018
5	Revised in line with Safer Recruitment Consortium guidance, May 2019	May 2019
6	Updated to take account of Keeping Children Safe in Education 2019 and local guidance	Sept 2019
7	Reviewed in light of Keeping Children Safe in Education 2020 – minor addition	Sept 2020
8	Revised in line with Keeping Children Safe in Education 2021; added pandemic provisions	Sept 2021
9	Added model low-level concern record form	Oct 2021
10	Revised in accordance with Safer Recruitment Consortium guidance, February 2022	April 2022
11	Updated to reflect changes in KCSIE 2022; removed appendices in favour of links	Sept 2022
12	Minor changes; links to KAHub and other external websites; minor KCSIE 2023 changes	Sept 2023
13	Updated for changes to employment law on sexual harassment (EHRC/Equality Act)	Nov 2024
14	Minor update to change of name to Westmorland and Furness Multi-agency Children's Hub (MACH)	April 2025
15	Minor changes to update links to local Safeguarding Children Partnerships	Sept 2025
16	Updated in line with Keeping Children Safe in Education 2026 (in force from 1 September 2026) and Working Together to Safeguard Children 2026; added DfE guidance on mobile phones in schools and generative AI in education; updated child-on-child abuse terminology; added Deputy DSL to front matter; embedded the school's Normie Way values (Kind. Brave. Fair.).	Sept 2026

The information provided in this Code of Conduct is taken and adapted from 'Guidance for safer working practice for those working with children and young people in education settings', Safer Recruitment Consortium (February 2022), and updated to reflect Keeping Children Safe in Education 2026 and Working Together to Safeguard Children 2026.

Contents

1. Definitions
2. Objective and scope
3. Underpinning principles
4. Setting an example
5. Responsibilities
6. Making professional judgements
7. Power and positions of trust and authority
8. Confidentiality
9. Standards of behaviour
10. Dress and appearance
11. Gifts, rewards, favouritism and exclusion
12. Infatuations and 'crushes'
13. Social contact outside the workplace
14. Communication with children (including the use of technology and AI)
15. Use of mobile phones and other mobile technology
16. Physical contact
17. Other activities that require physical contact
18. Intimate/personal care
19. Behaviour management
20. The use of control and physical intervention
21. Sexual conduct
22. One-to-one situations
23. Home visits
24. Transporting pupils
25. Educational visits
26. First aid and medication
27. Use of technology for remote learning
28. Photography, videos and other images
29. Exposure to inappropriate images
30. Personal living accommodation
31. Curriculum
32. Duty to report concerns about an individual's suitability to work with children

1. Definitions

References made to 'child' and 'children' refer to children and young people under the age of 18 years. However, the principles of this Code of Conduct apply to professional behaviours towards all pupils, including those over the age of 18 years. 'Child' should therefore be read to mean any pupil at the setting. At Norman Street Primary School, our pupils are known as 'Normies', reflecting our identity as a Kind, Brave, Fair school community, and all references to 'pupils' or 'children' in this policy include our Normies.

References made to employees, adults and staff refer to all those who work with pupils in this setting, in either a paid or unpaid capacity. This also includes, for example, volunteers and those who are not directly employed by the school, e.g. Local Authority staff, sports coaches, independent supply staff and agency staff. Following the removal of the 'supervision exemption' from the definition of regulated activity by the Crime and Policing Act 2026 (in force from 1 September 2026), some supervised volunteers who previously fell outside regulated activity may now be within it; the School's Recruitment of Ex-Offenders Policy sets out how this is managed.

Wherever the term 'parent' is used, this includes any person with parental authority of the child concerned, e.g. carers, legal guardians etc.

The term 'allegation' means where it is alleged that a person who works with children has:

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

These are collectively known as the 'harm thresholds'.

2. Objective and scope

It is a requirement of the DfE Statutory Guidance 'Keeping Children Safe in Education 2026' (in force from 1 September 2026) that schools have a Code of Conduct or staff Behaviour Policy. This Code of Conduct (which aligns closely with our Child Protection Policy, our Relationships Policy and Working Together to Safeguard Children 2026) is designed to give clear guidance on the standards of behaviour all employees and other adults working with children in our school are expected to observe. School employees are role models and are in a unique position of influence and must adhere to behaviour that sets a good example to all pupils within the school. As a member of a school community, each employee has an individual responsibility to maintain both their own reputation and the reputation of the school – living out our Normie Way values of being Kind, Brave and Fair – whether inside or outside working hours. The Code of Conduct will also assist staff to monitor their own standards and practice and reduce the risk of allegations being made against them.

It is recognised that not all people who work with children at this school are paid or contracted employees. The principles and guidance outlined in this document still apply and should be followed by any person whose work brings them into contact with children, including supply staff, volunteers and contractors. This Code of Conduct does not form part of any employee's contract of employment.

In addition to this Code of Conduct, all employees engaged to work under Teachers' Terms and Conditions of Employment have a statutory obligation to adhere to the 'Teachers' Standards' and, in relation to this Code of Conduct, Part 2 of the Teachers' Standards – Personal and Professional Conduct.

All staff and regular volunteers have a responsibility to be aware of systems and practices in the school which support safeguarding, and these are explained to them as part of staff induction and in regular staff training sessions.

Creating a culture in which all concerns about adults (including allegations that do not meet the harm threshold, see 'Definitions' above) are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. This encourages an open and transparent culture, allows us to identify inappropriate, problematic or concerning behaviour early, and minimises the risk of abuse. A culture of vigilance will help ensure that adults working in or on behalf of the school are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of our school.

Any behaviours that fall short of the guiding principles outlined in this Code of Conduct must be shared responsibly and with the right person. All concerns that do not meet the harm threshold will be recorded and dealt with appropriately as a low-level concern, as outlined in section 32 below.

It is recognised that the vast majority of adults who work with children act professionally and aim to provide a safe and supportive environment which secures the wellbeing and very best outcomes for children in their care. This Code of Conduct aims to reduce the risk of tensions and misunderstandings occurring.

Unacceptable behaviour by adults in this school will not be tolerated and, where appropriate, legal or disciplinary action is likely to follow such behaviour. Once adopted, this Code of Conduct may be referred to in any disciplinary proceedings following unacceptable actions by staff or other adults.

3. Underpinning principles

- The welfare of the child is paramount.
- Staff should understand their responsibilities to safeguard and promote the welfare of pupils.
- Staff are responsible for their own actions and behaviour, both within and outside the school, and should avoid any conduct which would lead any reasonable person to question their motivation and intentions.
- Staff should work, and be seen to work, in an open and transparent way, including self-reporting if their conduct or behaviour falls short of the principles outlined in this Code of Conduct.
- Staff should acknowledge that deliberately invented/malicious allegations are extremely rare, and that all concerns should be reported and recorded.
- Staff should report to the Head teacher (or DSL/Deputy DSL) if they have low-level concerns or 'niggles' about the behaviour of any member of staff, supply staff, volunteer or contractor.
- 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 are encouraged to discuss with the Head teacher or other senior manager situations where their relationships and associations, both within and outside of the workplace (including online), may have implications for the safeguarding of children in school.
- Staff must apply the same professional standards regardless of culture, disability, gender, language, racial origin, religious belief and sexual orientation, and must actively challenge prejudice-based harm, including racism and faith-based prejudice, in line with Keeping Children Safe in Education 2026.
- Staff must not consume or be under the influence of alcohol or any substance, including prescribed medication, which may affect their ability to care for children, other than where authorised by the Head teacher or Governors for specific events.
- Staff should be aware that breaches of the law and other professional guidelines may result in disciplinary action, criminal action and/or barring by the Disclosure and Barring Service (DBS) or, for teachers, prohibition from teaching by the Teaching Regulation Agency (TRA).
- Staff must be aware of and understand the school's Child Protection Policy and procedures, Online Safety Policy and procedures, arrangements for managing allegations against staff, Whistleblowing procedure, and the Cumberland Safeguarding Children Partnership (CSCP) procedures.
- Above all, staff and other adults should reflect the school's Normie Way values – being Kind, Brave and Fair – in every interaction with pupils, colleagues, parents and the wider school community.

4. Setting an example

- All individuals who work or volunteer in school set examples of behaviour and conduct which can be copied by pupils. Staff must therefore always avoid using inappropriate or offensive language.
- All staff must demonstrate high standards of conduct to encourage our Normies to do the same.
- All staff must avoid putting themselves at risk of allegations of abusive or unprofessional conduct.
- This Code helps all staff understand what behaviour is and is not acceptable; regard should also be given to the disciplinary rules set out in the School's Disciplinary Policy and Procedure.
- All staff are expected to familiarise themselves with, and comply with, all school policies and procedures.

5. Responsibilities

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

All staff and other adults have a responsibility to keep pupils safe and protect them from abuse (sexual, physical and emotional), neglect and exploitation. Pupils have a right to be safe and to be treated with respect and dignity. Trusted adults are expected to take reasonable steps to ensure their safety and wellbeing; failure to do so may be regarded as professional misconduct.

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.

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

5.1 Governing Body

The Governing Body will:

- ensure that appropriate safeguarding and child protection policies and procedures are developed, distributed, adopted, implemented and monitored;
- ensure that if there is no trained DSL or Deputy DSL on site, a senior member of staff is identified to lead on safeguarding issues;
- promote a culture of openness, trust, transparency and support;
- ensure that systems are in place for concerns to be raised, by empowering staff to share those concerns at the earliest opportunity;
- take reasonable steps to ensure that procedures are in place to protect staff and others from sexual harassment, harassment and victimisation in the workplace.

5.2 Head teacher

The Head teacher will:

- ensure that all staff (at induction), supply staff, volunteers and contractors are made aware of the staff Code of Conduct and understand their role in promoting the welfare of children and keeping them safe; any updates will be explained to staff as they occur;
- ensure that all adults are aware of expectations and other related policies and procedures;
- ensure that staff are aware of the mechanisms in place for reporting both allegations and low-level concerns, so there are no barriers to speaking up;
- ensure that staff and other adults are aware that all low-level concerns must be recorded in writing, with follow-up actions recorded;
- maintain an 'open door' culture in school where staff feel confident to speak out about concerns they may have about another adult's behaviour or conduct, including where staff are experiencing harassment, unwanted, unwelcome or uninvited conduct by a pupil or other adult in the school community;
- provide a responsible, sensitive and proportionate handling of low-level concerns when they are raised;
- consult with the Local Authority Designated Officer (LADO) if there is any doubt as to whether information shared as a low-level concern in fact meets the harm threshold;
- ensure that staff and other adults are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from inappropriate, problematic or concerning behaviour in themselves and others;
- create an environment where staff are encouraged and feel confident to self-refer;

- address unprofessional behaviour and support the individual to correct it at an early stage;
- notify employers of supply staff and contractors of any low-level concerns which are shared, so that any potential patterns of inappropriate behaviour can be identified quickly;
- ensure that adults are not placed in situations which render them particularly vulnerable;
- promote calm, transparent and accessible communication with parents/carers, in line with the DfE's January 2026 guidance on parent/carer communication and managing complaints.

5.3 Staff and other adults (supply staff, volunteers and contractors)

Staff and other adults are expected to:

- read and understand their role as outlined in this Code of Conduct, the Child Protection Policy and other school safeguarding policies;
- understand the responsibilities which are part of their employment or role, and be aware that sanctions will be applied if these provisions are breached;
- treat all adults and others with dignity, kindness and respect; harassment of any description will not be tolerated;
- report any concerns, including low-level concerns, about a pupil or colleague to the Head teacher or other senior manager (e.g. DSL) at the first opportunity, or to the Chair of Governors where there is a conflict of interest, or where the concern relates to the Head teacher;
- 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;
- ensure that any relationships and associations, both within and outside of the workplace (including online), do not have implications for the safeguarding of children in school;
- take reasonable care of pupils under their supervision, with the aim of ensuring, as far as is reasonable, their health, safety and welfare;
- take responsibility for their own actions and behaviour.

6. Making professional judgements

This Code of Conduct does not provide an exhaustive list of what is, or is not, appropriate behaviour for staff. It does, however, highlight behaviour which is illegal, inappropriate or inadvisable. There will be rare occasions when staff have to make decisions or act in the best interest of a pupil which could contravene this Code of Conduct, or where no specific guidance exists. Individuals are expected to make judgements about their behaviour to secure the best interests and welfare of the pupils in their charge and, in doing so, will be seen to be acting reasonably. These judgements must be recorded and shared with a manager at the earliest opportunity.

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

Where no specific guidance exists, staff and other adults are expected to:

- discuss the circumstances that informed their action, or their proposed action, with their line manager or, where appropriate, the school's DSL or Head teacher;
- always discuss any misunderstanding, accidents or threats with the Head teacher or DSL;
- always record discussions and actions taken with their justifications;
- record any areas of disagreement and, if necessary, refer to another agency/LA/Ofsted/TRA/other regulatory body.

7. Power and positions of trust and authority

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

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

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.

Staff should always maintain appropriate professional boundaries, avoid behaviour which could be misinterpreted by others, and report any such incident to a senior manager. This applies equally online as in the classroom; staff engaging with pupils and/or parents online, including through any generative AI tools, have a responsibility to model safe practice at all times.

Where a person aged 18 or over is in a position of trust with a child under 18, it is an offence under the Sexual Offences Act 2003 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.

Staff and other adults in this school must 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 or others;
- use their status and standing to form or promote relationships with pupils which are of a sexual nature, or which may become so.

8. Confidentiality

The storing and processing of personal information is governed by the Data Protection Act 2018 and the UK General Data Protection Regulations (UK GDPR). The Governors have a Data Protection Policy which contains details on confidentiality.

Staff who have access to special category information about pupils and their families must keep this confidential at all times, and only share it when legally permissible and in the best interest of the child. Records should only be shared with those who have a legitimate professional need to see them. Staff must never use confidential or personal information about a colleague, other adult, pupil or their family for their own or others' advantage. Information must never be used to intimidate, humiliate or embarrass the child or another adult.

School leaders should ensure that all staff who need to share 'special category personal data' are aware that the Data Protection Act 2018 and UK GDPR contain 'safeguarding of children and

individuals at risk' as a processing condition that allows practitioners to share information without consent where it is not possible or appropriate to obtain consent.

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.

If a child (or their parent) makes a disclosure regarding abuse, neglect or exploitation, the member of staff must always take any such concerns seriously and follow the school's child protection procedures. The adult must not promise confidentiality to a child or parent, but should give reassurance that the information will be treated sensitively.

If a member of staff is in any doubt about whether to share information or keep it confidential, they should seek guidance from the DSL. Any media or legal enquiries will be passed to a senior manager.

Staff and other adults in this school are expected to:

- know the name of the Designated Safeguarding Lead (DSL) (Eleanor Dobson) and Deputy DSL (Karen Hodges);
- know how to access and be familiar with the Cumberland Safeguarding Children Partnership (CSCP) procedures and website;
- treat information they receive about pupils and families in a discreet and confidential manner;
- seek advice from a senior member of staff (DSL) if they are in any doubt about sharing information they hold or which has been requested of them;
- be clear about when information can/must be shared and in what circumstances;
- know the procedures for responding to allegations against staff, and to whom any concerns or allegations should be reported;
- know the procedures for responding to allegations made against the Head teacher (report to the Chair of Governors);
- ensure that where personal information is recorded using modern technologies, including any AI-enabled tools, systems and devices are kept secure in accordance with the school Online Safety Policy and staff Acceptable Use Agreement.

9. Standards of behaviour

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

Staff must not engage in conduct outside work which could seriously damage the reputation and standing of the school, or the employee's own reputation or that of other members of the school community. In particular, criminal offences involving violence, illegal substances or sexual misconduct or harassment are likely to be regarded as unacceptable.

The Governors will not re-check DBS Criminal Record Disclosures as a matter of course, but retain the right to do so should information come to light suggesting an individual may no longer be suitable to work with our children. It is the responsibility of all adults working in this school to

inform the Head teacher of any warnings, cautions, orders or convictions they receive which are not recorded on their current Disclosure Certificate, regardless of seriousness, or where they are involved in a Police investigation which may lead to a warning, caution, order or conviction, or disqualify them under the Childcare (Disqualification) Regulations 2018. Failure to do this may lead to disciplinary action.

Staff may undertake work outside school, either paid or voluntary, provided it does not conflict with the interests of the school, contravene the Working Time Regulations, or affect their work performance.

Governors and senior leaders recognise that we must create a culture and environment where staff feel comfortable discussing matters outside work which may have implications for the safeguarding of children in the school.

Staff and other adults in this school must 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 or other member of the school community;
- use inappropriate or offensive 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;
- post activity online, either in or out of school – including content created or edited using generative AI – which would bring the school or professional role into disrepute.

In addition, staff and other adults are expected to:

- inform the Head teacher of any warnings, cautions, convictions or relevant orders accrued during their employment, and/or if they are under Police investigation or charged with a criminal offence;
- be aware that behaviour by themselves, or by those with whom they have a relationship or association, may impact their work with children and the school's ability to safeguard pupils, and disclose any such issues to the DSL or another senior leader;
- inform the Head teacher of any name changes not previously declared.

10. Dress and appearance

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, ensuring they are dressed decently, safely and appropriately for the tasks they undertake; this also applies to online or virtual teaching.

Staff and other adults in our school are expected to wear clothing and accessories which:

- promote a positive and professional image;
- do not create a risk to the wearer or others and are appropriate to their role;
- are not likely to be viewed as offensive, revealing or sexually provocative;
- do not distract, cause embarrassment or give rise to misunderstanding;

- are free of any political or otherwise contentious slogans;
- are not discriminatory;
- are compliant with professional standards;
- in online engagement, resemble the clothing they would wear on a normal school day.

11. Gifts, rewards, favouritism and exclusion

Staff must maintain high standards of honesty and integrity in their work, including the handling and claiming of money and the use of school property and facilities.

Staff must take care that they do not accept any gift that might be construed as a bribe, or lead the giver to expect preferential treatment. Small tokens of appreciation are usually acceptable; it is unacceptable to receive gifts regularly or of significant value, and inadvisable to give personal gifts to pupils or their families.

Any reward given to a pupil should be in accordance with our Relationships Policy and procedures, recorded, and not based on favouritism. Adults are advised to exercise care when selecting children for activities, jobs or privileges, and when excluding pupils from an activity, to avoid perceptions of favouritism or injustice.

Staff and other adults in this school are expected to:

- be aware of and understand the school procedures on sanctions and rewards;
- ensure that gifts received or given in situations which may be misconstrued are declared and recorded, except for 'one-off' token gifts from a pupil or parent;
- only give gifts to a pupil as part of an agreed reward system, or ensure gifts of insignificant value are given to all pupils equally;
- ensure that all pupil selection processes are fair 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.

12. Infatuations and 'crushes'

All staff and other adults 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 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 words or actions being misinterpreted.

Any member of staff who receives a report, overhears something, or otherwise notices any sign that a young person may be becoming infatuated with themselves or a colleague, should immediately report this to the Head teacher or most senior manager (or, where the Head teacher is the concern, to the Chair of Governors).

The Head teacher will give careful thought to how the staff member, pupil and their parents should be spoken to, and will ensure a plan to manage the situation is put in place, sensitively responding to the child and staff member while maintaining the dignity of all.

Staff and other adults in this school are expected to:

- report any indications (verbal, written or physical) that suggest a pupil may be infatuated with a member of staff;
- always maintain professional boundaries;
- in the case of senior managers, put an action plan in place to deal with any concerns raised.

13. Social contact outside the workplace

It is acknowledged that staff may have genuine friendships and social contact with parents of pupils, independent of the professional relationship. Staff should be aware that professionals who sexually harm children often seek to establish relationships and contact outside 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.

Social contact may also provide opportunities for other types of grooming, such as for sexual exploitation or radicalisation. Staff should recognise that some types of social contact could be perceived as harmful, exert inappropriate influence on children, or bring the setting into disrepute.

If a pupil or parent seeks to establish social contact, or if this occurs coincidentally, the member of staff should exercise professional judgement. Where any contact with staff refers to or discusses a concern about the school or the child, parents/carers must be asked to contact the school directly rather than through a social network site; no response should be given by staff members.

Staff and other adults in this school are expected to:

- advise senior management of any regular social contact they have with a pupil which could give rise to concern;
- advise parents who contact the member of staff directly concerning the school or a child to contact the school direct;
- refrain from sending personal communication to pupils or parents unless agreed with senior managers;
- ensure that where senior staff have agreed to an exchange of mobile phone numbers, for example for safety purposes on educational visits, the numbers are deleted as soon as possible following the relevant activity;
- inform senior management of any relationship with a parent extending beyond the usual parent/professional relationship;
- report to senior staff immediately any unwelcome written or visual communications from pupils, parents or others;
- inform senior management of any requests or arrangements where parents wish to use their services outside the workplace, e.g. babysitting or tutoring.

14. Communication with children (including the use of technology and AI)

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. Online safety risks are posed more by behaviours and values than the technology itself.

Staff are expected to ensure they establish safe and responsible online behaviours, working to local and national guidelines and acceptable use agreements which detail how new and emerging technologies – including generative artificial intelligence (AI) tools – may be used. Staff should refer to the DfE guidance 'Generative artificial intelligence in education' when considering the use of AI tools with or in relation to pupils, and must never use AI tools to create, alter or share images, videos or text involving pupils in ways that could not be justified professionally.

Communication with children, both in the 'real' world and through web-based and telecommunication interactions, should take place within explicit professional boundaries. This includes computers, tablets, phones, texts, emails, instant messages, social media, chatrooms, forums, blogs, websites, gaming sites, AI chatbots, digital cameras, videos, webcams and other hand-held or wearable technology devices (this list is illustrative, not exhaustive).

Staff must not request or respond to any personal information from children other than that necessary in their professional role, and should avoid any communication which could be interpreted as 'grooming behaviour'.

Staff should not give their personal contact details to children, e.g. email address, home or mobile telephone numbers, or details of web-based identities. If children locate these by other means, the adult should not respond and must report the matter to their manager.

Staff at this school must adhere to the 'Acceptable Use Agreement' as outlined in the Online Safety Policy and procedures.

Staff and other adults in this school are expected to:

- not seek to communicate/make contact with, or respond to contact from, pupils outside the purposes of their work;
- not give out their personal details;
- not discuss their professional role in any capacity when using social media;
- not put online any text, image (including AI-generated content), sound or video that could upset or offend any member of the whole school community or be incompatible with their professional role;
- treat all pupil issues and those of other adults in school with the highest standards of confidentiality;
- use ICT appropriately, in accordance with the school's Online Safety Policy and staff Acceptable Use Agreement;
- be aware of and consider the possible implications for the school, colleagues and themselves when posting on social media;
- use online technology, including AI tools, appropriately and not compromise the professional integrity of colleagues or other adults in the school community;
- use only equipment and internet services provided by the school, unless school policies state otherwise;
- follow their school's Acceptable Use Agreement and online safety guidance;
- ensure that their use of technologies could not bring their employer into disrepute.

15. Use of mobile phones and other mobile technology by staff and other adults in school

It is recognised that many mobile phones and other mobile technology, such as smart watches, have inbuilt and enhanced features which could be misused and which also offer distractions and disruption to the working day. In line with the Department for Education's guidance on mobile phones in schools (2026), Norman Street Primary School operates a mobile-phone-free environment for pupils throughout the school day, and staff and other adults are expected to model the same high standard of restricted, purposeful use.

The aim is to ensure that all adults:

- have a clear understanding of what constitutes misuse;
- know how to minimise the associated risks with the use of mobile technology;
- avoid putting themselves into compromising situations which could be misinterpreted and lead to allegations;
- understand the need for professional boundaries and clear guidance regarding acceptable use;
- are responsible for self-moderation of their own behaviours;
- use social media applications with colleagues in relation to school business considerately, with respect given to the timing of messages, unless in an emergency;
- are aware of the importance of reporting concerns promptly.

Staff and other adults in this school:

- are not permitted to make/receive calls or texts during contact time with children; emergency contact should be made via the school office;
- must have their phones on silent or switched off and out of sight during class time;
- are not permitted to use mobile communication devices in a space where children are present;
- are advised to protect access to functions of their phone while on school premises (Bluetooth settings should be disabled);
- should inform the Head teacher of exceptional circumstances (e.g. an acutely sick relative) where permission is needed to have a phone available for an emergency call;
- are not permitted at any time to use recording equipment (images, video or voice) on personal or peripheral devices unless by prior agreement with the Head teacher or another senior leader; legitimate recordings should be captured using school equipment;
- should report to the Head teacher any usage of mobile devices that causes them concern.

16. Physical contact

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

Not all children feel comfortable about certain types of physical contact; wherever possible, adults should seek the pupil's permission before initiating contact and be sensitive to any signs of discomfort or embarrassment. Staff should listen, observe and take note of the child's reaction, and use a level of contact acceptable to the pupil.

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. Physical

contact must never be secretive, 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 observes possibly abusive action, the incident should be immediately reported to the Head teacher and recorded; the Head teacher will consult with the LADO where appropriate.

Extra caution may be required where a child has suffered previous abuse, neglect or exploitation, as the child may associate physical contact with such experiences and may seek out inappropriate physical contact; staff should deter the child sensitively and help them understand personal boundaries.

A general culture of 'safe touch' will be adopted, based on the individual requirements of each child. Pupils with disabilities may require more physical contact to assist their everyday learning and moving and handling; arrangements should be understood and agreed by all concerned, and may be explicit in the Education Health and Care Plan.

We have a system in place for recording incidents, accessible by senior management, and will provide staff, on a 'need to know' basis, with relevant information about vulnerable children in their care.

Staff and other adults in this school are expected to:

- 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 is 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 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.

17. Other activities that require physical contact

In certain curriculum areas, such as PE, drama or music, staff may need to initiate physical contact with children, for example to demonstrate technique, adjust posture, or support a child to perform an activity safely or prevent injury.

Physical contact should take place only when necessary in relation to a particular activity, in a safe and open environment easily observed by others, and for the minimum time necessary. The

extent of contact should be made clear and undertaken with the pupil's permission, and adults should remain sensitive to any discomfort expressed.

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. Incidents outside these protocols must be reported to the Head teacher/DSL and parent.

We have guidance and protocols on appropriate physical contact promoting safe practice, brought to staff attention regularly and included in induction.

Staff and other adults in this school are expected to:

- 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 it will take;
- seek consent from parents where a pupil is unable to give this, e.g. because of a disability;
- consider alternatives where a pupil might misinterpret 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.

18. Intimate/personal care

We have clear nappy and intimate care procedures which ensure that the health, safety, independence and welfare of children is promoted, and their dignity and privacy respected. Arrangements for intimate and personal care are open and transparent and accompanied by recording systems.

Anyone undertaking intimate/personal care in an education setting is in regulated activity and must be checked against the relevant DBS barred list, even if the activity only happens once.

Pupils are encouraged to act as independently as possible. When assistance is required, this will normally be undertaken by one member of staff, with another appropriate adult in the vicinity where possible. Neither students, volunteers nor temporary/visiting staff will be permitted to provide intimate care unless absolutely necessary and the individual is appropriately trained and authorised.

A signed record will be kept of all intimate and personal care tasks undertaken.

We have written Individual Healthcare Plans (IHCPs) in place for any pupil who could be expected to require intimate care, and will actively consult pupils about their own healthcare plan wherever possible.

Staff and other adults in this school are expected to:

- adhere to the school's intimate care procedures;
- 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 the agreed procedure/healthcare plan is necessary;
- record the justification for any variations and share this with the pupil and their parent;

- avoid any visually intrusive behaviour;
- where there are changing rooms, announce their intention of entering;
- always consider the supervision needs of pupils and only remain in the room where their needs require this.

Staff and other adults will not:

- change or toilet in the presence or sight of pupils;
- shower with pupils;
- allow any adult to assist with intimate or personal care without confirmation that the individual is not barred from working in regulated activity;
- assist with intimate or personal care tasks which the pupil can undertake independently.

19. Behaviour management

Corporal punishment and smacking are unlawful in all schools. Staff must 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.

Staff should understand the importance of challenging inappropriate behaviours between children, including child-on-child abuse (including harassment and violence), sexual violence and sexual harassment. Downplaying certain behaviours, e.g. dismissing sexual harassment as 'just banter' or 'boys being boys', can lead to a culture of unacceptable behaviours and, in the worst cases, normalise abuse.

Where pupils display difficult or challenging behaviour, adults must follow the school's Relationships Policy and procedures, which includes guidance on when it is appropriate to use reasonable force and appropriate strategies for the circumstances.

Where a pupil has specific needs in respect of challenging behaviour, a Behaviour Management Plan incorporating a positive handling plan will be drawn up and agreed by all parties.

From April 2026, there is a statutory duty to record all use of restrictive interventions (including seclusion) and to report these to parents/carers, in line with updated DfE guidance on restrictive interventions. Full details are set out in our Relationships Policy and positive handling procedures.

Staff and other adults in this school are expected to:

- 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 school which may impact on a pupil's behaviour;
- follow the school's Relationships Policy and procedures;
- 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 risks associated with the use of isolation and seclusion, and the new duty to record and report such use to parents/carers from April 2026;

- comply with legislation and guidance in relation to human rights and restriction of liberty;
- be clear about the school's policy and procedures on child-on-child abuse (including harassment and violence) and how and to whom to report concerns;
- be able to reassure victims that they are being taken seriously and will be supported and kept safe.

20. The use of control and physical intervention

The law and guidance for schools state that adults may reasonably intervene to prevent a child from committing a criminal offence, injuring themselves or others, causing damage to property, or engaging in behaviour prejudicial to good order and discipline.

Great care must be exercised so that adults do not physically intervene in a manner which could be considered unlawful. The School has procedures for the use of physical intervention consistent with national guidance, and staff are trained in appropriate techniques where required.

Under no circumstances will physical force be used as a form of punishment. Where a child's behaviour presents a serious risk to staff or others, a robust risk assessment in the form of a Behaviour Management Plan (BMP) will be put in place and reviewed regularly, including a physical intervention plan where relevant.

In all cases where physical intervention has taken place, a record will be made of the incident and subsequent actions, using the school's physical intervention recording system, which is regularly reviewed by the Head teacher/senior manager and reported to parents/carers as required from April 2026.

Staff and other adults in this school are expected to:

- adhere to the school's physical intervention procedures;
- 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.

21. Sexual conduct

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.

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

Sexual activity involves physical contact, including penetrative and non-penetrative acts, but also includes non-contact activities, such as causing a pupil to engage in or watch sexual activity, or the production of pornographic or AI-generated sexual material involving a child.

All staff have attended appropriate training so they are fully aware of behaviours that may constitute 'grooming', and of their responsibility to always report to the Head teacher any concerns about a colleague's or other adult's behaviour which could indicate that a pupil is being groomed.

Staff and other adults in this school are expected to:

- not have any form of sexual contact with a pupil from the school;
- 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;
- 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.

22. One-to-one situations

Staff working in one-to-one situations with pupils, including visiting staff from external organisations, can be more vulnerable to allegations or complaints. To safeguard both pupils and adults, a risk assessment in relation to the specific nature and implications of one-to-one work will be undertaken and reviewed regularly.

Arranging to meet with pupils away from the work premises is not permitted unless clearly necessary and approved by the Head teacher, the pupil and their parent. Where staff work one-to-one with a pupil on a virtual platform, clear expectations will be set out for all involved, reflecting the school's safeguarding policies.

Staff and other adults in this school are expected to:

- work one-to-one with a child only when absolutely necessary (in person or online) and with the knowledge and consent of a senior leader;
- be aware of relevant risk assessments, policies and procedures, including child protection, behaviour management and acceptable use agreements;
- ensure, 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;
- ensure, prior to any online learning, there are clear expectations of behaviour and conduct agreed in advance;
- always report any situation where a pupil becomes distressed or angry;
- consider the needs and circumstances of the pupil involved.

23. Home visits

All work with pupils and parents will usually be undertaken in the school or other recognised workplace. There are, however, occasions where it is necessary to make one-off or regular home visits; we ensure all visits are justified, understood, recorded, and that staff are not exposed to unacceptable risk.

We have a generic risk assessment for home visits, reflecting procedures issued by Cumberland Safeguarding Children Partnership (CSCP). Staff have access to a mobile telephone and an emergency contact for use when undertaking home visits.

Staff and other adults in this school are expected to:

- agree the purpose of any home visit with the Head teacher or other senior leader;

- have a clear understanding of the actions to take if it is believed a child or parent is at immediate risk of harm, including when to contact emergency services and/or partner agencies;
- adhere to agreed risk assessments;
- avoid unannounced visits wherever possible;
- understand that they should never enter a home without the parent's consent, except in an emergency;
- ensure there is visual access and/or an open door in one-to-one situations;
- always make detailed records, including time of arrival and departure;
- ensure any behaviour or situation which gives rise to concern is discussed with the Head teacher/DSL;
- ensure the child/children is/are seen in an open and observable space, e.g. a living room;
- comply with data protection regulations in relation to any personal information carried or notes made about the child and/or family.

24. Transporting pupils

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

Staff should never offer lifts to pupils unless agreed by the Head teacher. A designated member of staff plans and provides oversight of all transport arrangements. Consideration is given to driver distraction, passenger supervision, and the number of adults required.

Where private cars are used, the school will seek and retain evidence that the vehicle is safe, the driver is suitable, and there is a valid insurance policy covering the driver and vehicle for the intended use (which may require 'business use' cover).

It is a legal requirement that all passengers wear seatbelts, and the driver is responsible for ensuring that passengers under 14 do so; drivers must adhere to current legislation on car seats for younger children.

Staff and other adults in this school are expected to:

- plan and agree arrangements with all parties in advance;
- respond sensitively and flexibly where any concerns arise;
- take account of 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 medication likely to impair judgement 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 safely passed to a parent;
- report the nature of the journey, route and expected arrival time in accordance with agreed procedures;
- ensure that their behaviour and all arrangements ensure vehicle, passenger and driver safety, including proper insurance;

- ensure that any impromptu or emergency arrangements for lifts are recorded and can be justified;
- refer to School procedures and national guidance for Educational Visits.

25. Educational visits

Staff responsible for organising educational visits are familiar with the School Health and Safety Policy and Educational Visits procedures, and the DfE guidance on health and safety on educational visits.

The Management of Health and Safety at Work Regulations 1999 impose a duty on employers to produce suitable and sufficient risk assessments for educational visits. Staff must take particular care when supervising pupils in the less formal atmosphere of an educational visit, remaining in a position of trust at all times.

Where out-of-school activities include overnight stays, careful consideration will be given to sleeping arrangements, and pupils, adults and parents will be informed of these prior to the trip. A safe staff/child ratio and, wherever possible, a suitable gender mix of staff will be ensured.

Staff and other adults in this school are expected to:

- adhere to the school's educational visits procedures and guidance;
- always have another adult present on visits, unless otherwise agreed with the Head teacher or senior manager;
- undertake risk assessments where significant risks are identified or anticipated;
- have parental consent to the activity;
- ensure that their behaviour remains professional at all times;
- never share a bed with a pupil;
- never share a bedroom unless it involves a dormitory situation previously discussed with the Head teacher, parents and pupils;
- refer to local and national guidance for Educational Visits, including exchange visits.

26. First aid and medication

The School has an adequate number of qualified first-aiders in accordance with our risk assessment and national guidance. We will regularly review and update our first aid procedures, medicines in school policy, Emergency Plan and relevant risk assessments as necessary.

Staff at our school have received sufficient and suitable training to support children with specific medical conditions, including the administering of medicines, where this forms part of their role.

Advice on managing medicines is included in the school's 'Supporting Pupils with Medical Conditions' policy and procedures. Where a pupil needs regular medication, this is usually recorded in their Individual Healthcare Plan (IHP), detailing the level and type of support needed.

A record is kept of all medicines administered to pupils. Adults taking medication which may affect their ability to care for children should seek medical advice regarding their suitability to do so.

Staff and other adults in our school are expected to:

- ensure they have read and understood the school 'Supporting Pupils with Medical Conditions' policy and procedures;
- make other staff aware of the task being undertaken;
- ensure they are familiar with any individual healthcare plan which might impact on the activities being undertaken;
- explain to the pupil what is happening and always act in the pupil's best interest;
- make a record of all medications administered;
- not work with pupils while taking medication unless medical advice confirms this is safe.

27. Use of technology for remote learning

Where remote learning is required in an emergency closure situation, we will consider the impact on children and their families, and consider alternatives such as audio-only or pre-recorded lessons. We will review our online safety and acceptable use agreements to ensure staff are briefed on best practice and expected standards of conduct, including the safe use of any AI tools involved in producing or delivering remote content.

When selecting a platform for remote learning, we will satisfy ourselves that the provider has an appropriate level of security, and staff must use school devices and contact pupils only via the pupil's school email address/log-in where possible.

Staff engaging in remote learning should display the same standards of dress and conduct as they would in person, considering: an appropriate, nondescript background; being in a living/communal area, not a bedroom; appropriate dress; that home filters may differ from school filters; and that resources/videos must be age appropriate.

It is the responsibility of the staff member to act as a moderator, raise any issues of suitability immediately, and end the online interaction if necessary. If a staff member believes a child or parent is recording the interaction inappropriately, the lesson should be ended or the child logged out immediately.

Staff and other adults in our school are expected to:

- adhere to the school's Online Safety Policy and procedures;
- 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 a parent is present, or ask a colleague or member of SLT to join the session;
- only record a lesson or online meeting where this has been agreed with the Head teacher or senior staff, and explicit written consent has been given;
- be able to justify images of pupils in their possession.

Staff and other adults must 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.

28. Photography, videos and other images

Many educational activities involve recording images, undertaken for displays, publicity, celebrating achievement and evidencing activity. Under no circumstances will staff be expected or allowed to use personal equipment to take images of pupils on behalf of the school.

The School has arrangements in place for the taking and use of images, linked to our Child Protection and Online Safety policies. Adults need to be aware of the potential for images to be misused or manipulated – including through generative AI – for pornographic or grooming purposes.

Making and using images of pupils requires age-appropriate consent of the individual and their parent. Images will not be displayed on websites, in publications, or in a public place without such consent.

Staff and other adults in our school are expected to:

- adhere to the school's procedures on the 'Use of Images';
- only publish images of pupils where they and their parent have given explicit written consent;
- 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;
- ensure the Head teacher or senior member of staff is aware that 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.

Staff and other adults must not:

- take images of pupils for their personal use;
- take images of any individual in the school without permission;
- display or distribute images of pupils without parental (and, where appropriate, pupil) consent;
- take images of children using personal equipment unless agreed by a senior manager;
- take images of children in a state of undress or semi-undress;
- take images of a child's injury or bruising, even if requested by children's social care;
- make audio recordings of a child's disclosure;
- take, create or share images of children which could be considered indecent, sexual, or which have been altered using AI to appear so.

29. Exposure to inappropriate images

Staff must take extreme care to ensure that children are not exposed, through any medium, to inappropriate or indecent images, including AI-generated ('deepfake') content.

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

If indecent images of children are discovered at the school or on the school's equipment, an immediate referral will be made to the LADO and the Police contacted if relevant. The images/equipment will be secured, with no attempt to view or delete the images.

Under no circumstances must any adult use school equipment to access pornography. In the event that indecent images or unsuitable material are discovered on a device, the equipment must not be tampered with, but secured, isolated from the network, and the LADO contacted without delay.

Staff and other adults in this school are expected to:

- abide by the school's Acceptable Use Agreement and Online Safety Policy and procedures;
- ensure that children cannot be exposed to indecent or inappropriate images (including AI-generated content) by checking the content of external links prior to access by children;
- ensure that any films or material shown to children are age appropriate.

30. Personal living accommodation

Staff should not invite any pupils into their living accommodation unless the reason to do so has been firmly established and agreed with the Head teacher and the pupil's parent. It is not appropriate for staff to use their private living space for any school-related activity, including discussion of reports, academic reviews or pastoral care.

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

Staff and other adults in this school are expected to:

- be vigilant in maintaining their privacy;
- 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;
- be mindful of the need to maintain appropriate personal and professional boundaries;
- not ask pupils to undertake jobs or errands for their personal benefit.

31. Curriculum

Many areas of the curriculum can include or raise subject matter which is sexually explicit or of a political or sensitive nature. Care will be taken to ensure that resource materials cannot be misinterpreted and clearly relate to the learning outcomes identified by the lesson plan, supported by ground rules developed with pupils.

Care will be taken to comply with the school's guidance on spiritual, moral, social and cultural development, including the promotion of fundamental British values. Staff must also comply at all times with the school's Relationships, Sex and Health Education (RSHE) Policy. Parents have the right to withdraw their child from certain non-statutory elements of sex education, as set out in that policy, but not from the National Curriculum for Science.

Staff and other adults in this school are expected to:

- have clear written lesson plans;

- take care when encouraging pupils' self-expression, not to overstep personal and professional boundaries;
- be able to justify all curriculum materials and relate these to clearly identifiable lesson plans.

Staff and other adults in this school will 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.

32. Duty to report concerns about an individual's suitability to work with children

Staff and other adults have a duty to report (including self-report) any incident in which an adult has or may have behaved in a way inconsistent with this Code of Conduct, including inappropriate behaviours inside, outside or online. Failure to report or respond would constitute a failure in professional responsibilities to safeguard children and promote welfare.

All staff are aware of the school's safeguarding procedures, including for dealing with allegations against staff. Allegations are those where the 'harm threshold' has been met; further detail is set out in the School's Child Protection Policy and procedures.

Not all incidents or concerns will meet the 'harm threshold'. Whistleblowing is the mechanism by which staff can voice concerns, made in good faith, without fear of repercussion; our school has clear and accessible Whistleblowing procedures, and staff who use them will have their employment rights protected.

All staff have an individual responsibility to bring matters of concern to the attention of the Head teacher or, in their absence, a member of the Senior Leadership Team. Where a staff member feels unable to raise an issue with their employer, or feels their genuine concerns are not being addressed, they should use other whistleblowing channels, such as the NSPCC professionals' helpline on 0800 028 0285 and/or email help@nspcc.org.uk.

32.1 What is a low-level concern?

The term 'low-level' concern does not mean it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult working in or on behalf of the school may have acted in a way that is inconsistent with this Code of Conduct (including inappropriate conduct outside of work) and does not meet the allegations threshold, or is otherwise not considered serious enough to consider a referral to the LADO.

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

- being over-friendly with children;
- having favourites;
- taking photographs of children on their mobile phone, contrary to school policy;
- 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;

- humiliating pupils.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless through to that which is ultimately intended to enable abuse.

32.2 Sharing and recording a low-level concern

Low-level concerns may arise in several ways: suspicion, complaint or disclosure made by a child, parent or other adult, or as a result of vetting checks. Staff should recognise their individual responsibility to raise any concerns regarding behaviour or conduct that falls short of the principles outlined in this Code of Conduct.

To safeguard and protect pupils and colleagues, where staff have concerns about someone who works with children, they must report this as soon as reasonably possible and, in any event, within 24 hours of becoming aware of it, to the Head teacher or DSL (Eleanor Dobson) or Deputy DSL (Karen Hodges), unless the concern relates to the Head teacher, in which case reports should be made to the Chair of Governors. It is never too late to share a low-level concern.

All low-level concerns will be recorded in writing. The following will be recorded: details of the concern; the context in which it arose; and details of the action taken. Records will be kept confidential, held securely, and comply with the Data Protection Act 2018 and UK GDPR, and retained at least until the individual leaves our employment.

Records will be regularly reviewed so that potential patterns of inappropriate, problematic or concerning behaviour can be identified. Where a pattern is identified, we will decide on the correct course of action – disciplinary procedures, or, where the behaviour meets the 'harm threshold', a referral to the LADO.

In relation to references for future employment, we will only provide details of substantiated safeguarding allegations. Low-level concerns will not be included in references unless they relate to issues which would normally be included, e.g. misconduct or poor performance.

Staff and other adults in this school are expected to:

- escalate their concerns if they believe a child or children are not being protected;
- report to the Head teacher any behaviour by colleagues or any other adult in school that raises concern;
- take responsibility for recording any incident and passing on information where they have concerns about their own behaviour or the welfare of an individual in the school;
- follow the school's whistleblowing procedures as appropriate;
- report allegations (which meet the harm threshold) against staff and volunteers to the Head teacher, or, where they have concerns about the Head teacher's response, report these directly to the LADO;
- report allegations (which meet the harm threshold) against the Head teacher directly to the Chair of Governors.

Contact details

Cumberland Safeguarding Children Partnership (CSCP):
www.cumberlandsafeguardingchildren.co.uk

LADO (Cumberland): lado@cumberland.gov.uk | 0300 303 3892

NSPCC Whistleblowing Advice Line: 0800 028 0285 | help@nspcc.org.uk