KING EDWARD'S SCHOOL
POLICY DOCUMENT

Title: STAFF CODE OF CONDUCT

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TABLE OF REVISIONS

Policy	Publication	Last Review	Notes	Next Review
ORIGINAL	**Sep 2022**	**June 2025**	Amended to include consistent definition of Bullying (as per ISBA) across all school policies)	**June 2027**
		May 2026	Updates include: • Review of current wording and policy application • Additional wording in the Equal Treatment / scope section • Major new section: Staff who are also parents • New final section on consequences of breach	**June 2027**
		Aug 26	**References to KCSIE for 2026 updates**	**Autumn 2026**

Introduction

This policy applies to all Staff and volunteers in the School regardless of their position, role or responsibility. It sets out clear guidance on the standards of behaviour expected from all Staff (as defined below) at King Edward's School.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

Scope

References to "**Staff**" throughout this policy relate to all the following groups:

- all support and teaching staff, including SMS and LAMDA Teachers and support staff;
- governors;
- volunteers;
- casual workers;
- temporary and supply staff, either from agencies or engaged directly; and
- student placements, including those undertaking initial teacher training, interns and apprentices.

Aims

The principles underlying the guidance aim to encourage Staff to achieve the highest possible standards of conduct and minimise the risk of inappropriate conduct occurring.

Staff are in a unique position of trust and influence as role models for pupils and must adhere to behaviour that sets a good example to all pupils within the School, Staff must also**:**

- *Act, and be seen to act, in the child's or young person's best interest;*
- *Avoid any contact which may lead any reasonable person to question their motivation and intentions;*
- *Take responsibility for their own actions and behaviour;*
- *Understand the responsibilities which are part of their employment or role and be aware that sanctions will be applied if these provisions are breached.*

Staff have an individual responsibility to maintain their reputation and the reputation of the School, both inside and outside working hours and whether they are inside or outside the work setting. This policy therefore applies equally when staff are conducting lessons online or when it is necessary for them to work from home. It can also include behaviour that occurs outside of School that would be easily accessible to pupils, parents and staff.

The School requires that all Staff have read and agree to comply with this policy. Breach or failure to observe this policy may result in action being taken under the School disciplinary procedures including, but not limited to, dismissal.

This Staff Code of Conduct is not an exhaustive list of acceptable and unacceptable standards of behaviour. In situations where guidance does not exist in this policy, Staff are expected to exercise their professional judgement and act in the best interests of the pupils and the School.

Safeguarding

For procedures for dealing with allegations or concerns about a child or disclosures / allegations of abuse, Staff should refer to the School's Safeguarding and Child Protection Policy, Child-on-Child Abuse Policy, Whistleblowing Policy and Low-level Concerns Policy, and other associated policies. Reports & Policies | King Edward's School Bath (kesbath.com)

There is an expectation that all staff will pass on all concerns as a matter of urgency, whether low level or potentially more serious concerns, regarding the behaviour of other staff and/or adults interacting with our pupils. If it became evident that there had been a failure to pass on concerns, this could result in disciplinary action being taken against a member of staff or adult volunteer.

A copy of this guidance is provided to each contracting company as part of the terms and conditions of any agreed contractual work or service provision agreed by the School.

This policy should be read in conjunction with the following related policies and procedures:

- Safeguarding & Child Protection Policy and the list of associated policies within.
- Part One of Keeping Children Safe in Education
- Health and Safety at Work Policy/Manual; and
- Anti-Bribery Policy;
- Low level concerns.

Staff should ensure that they have read and are familiar with these policies and procedures.

Staff and volunteers are in a position of trust at the School and pupils will on occasion share information with a trusted adult which may relate to a child protection matter. It is important that colleagues understand the need to handle such pupil disclosures carefully and appropriately, if they are to support the needs of the child. Appendix A, Section 2 of the Safeguarding & Child Protection Policy contains important advice and guidance on how to deal with a Pupil Disclosure.

All staff, governors and volunteers are reminded of their responsibility to pass on information to one of the School's Designated Safeguarding Leads or the Headmaster if they have cause for concern about any potentially inappropriate or suspicious behaviour which has, or may

have, taken place between a member of staff or volunteer and a pupil. Failure of a member of staff to fulfil this 'whistleblowing' responsibility is likely to result in disciplinary action.

Further advice for staff is available via the NSPCC Whistleblowing Advice Line: https://www.nspcc.org.uk/what-you-can-do/report-abuse/dedicated-helplines/whistleblowing-advice-line/

All (contracted) adults should know the structure of the School's Safeguarding Team – see the Safeguarding & Child Protection Policy.

You should be familiar with the School's child protection arrangements and understand your responsibilities in order to safeguard and protect children and young people.

All staff are required to read and understand Part One of the latest version of the statutory guidance 'Keeping Children Safe in Education'.

Equal Treatment

We are committed to equal treatment for all Staff and pupils regardless of their race or colour, nationality or national or ethnic origins, religion or belief, sex, sexual orientation, pregnancy or maternity, marital or civil partnership status, gender reassignment, age, and disability (together known as "Protected Characteristics").

We aim to create a friendly, caring and perceptive environment in which every individual is valued.

Bullying, harassment, victimisation and/or discrimination will not be tolerated. We treat all our colleagues, pupils and their parents fairly and with consideration which we expect them to reciprocate towards each other, the Staff and the School. Staff should ensure that they are familiar with the School's staff Equal Opportunities Policy and the School's pupil policies on Equal Opportunities and Anti-Bullying (including Child on child Abuse).

Attendance and Timekeeping

Should you need to be absent or expect to be late for any reason, you must inform the School by contacting the designated members of staff in the appropriate section(s) of the School. Teachers should also contact the relevant School Reception, before 8.00am in the case of absence that day.

Permission for a planned leave of absence, either for CPD or personal reasons, must be sought and approved in advance from the Head/Headmaster or the designated senior member of staff. There is also an expectation that you should contact your line managers at the earliest opportunity in the case of absence.

Smoking

To promote a healthy and pleasant working environment and because of the fire risk, smoking (in any form, including the use of e-cigarettes) is not allowed anywhere on the School sites or within any of the School's vehicles. You must not smoke on school premises or outside school gates. Any member of Staff wishing to smoke must leave the school grounds.

You must not smoke whilst working with or supervising pupils offsite.

Alcohol and Illegal Drugs

Consumption of alcohol is not permitted on site, save where at a school function or as otherwise agreed, when modest amounts of alcohol may be consumed. Consumption of illegal drugs is never permitted.

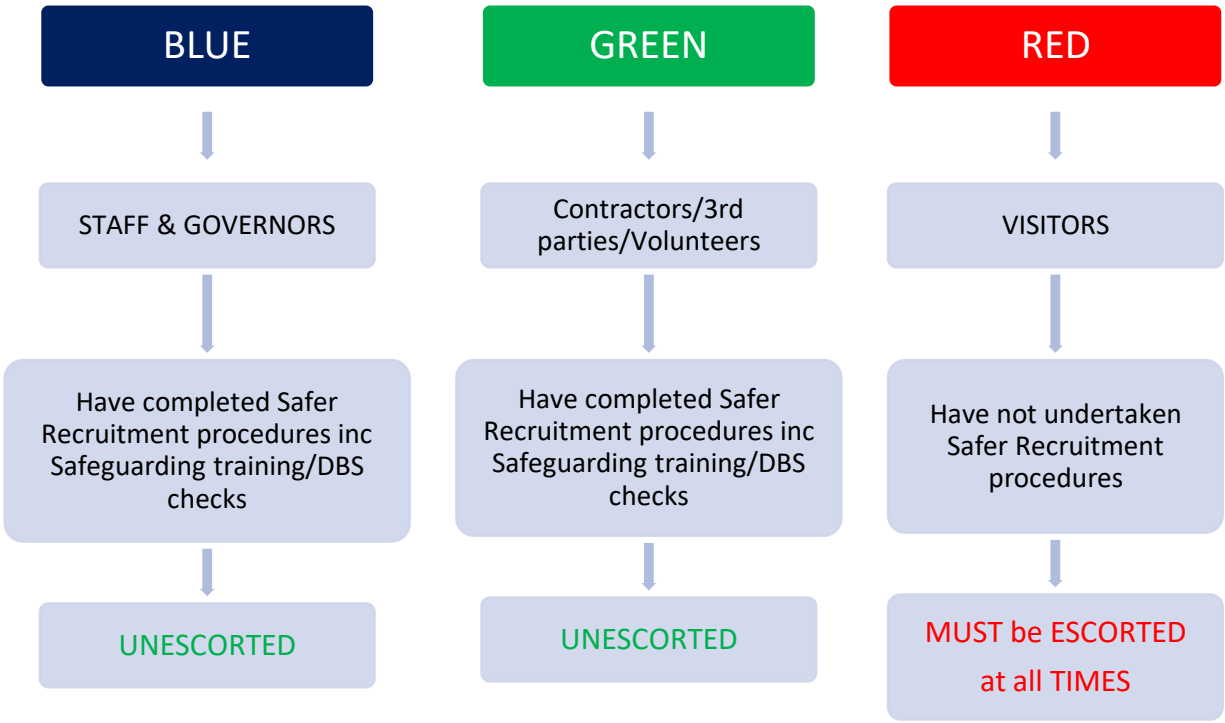
Your conduct and performance must not be adversely impacted by alcohol or drugs when undertaking your duties.

Security and Safeguarding: Staff and Visitors

This guidance aims to safeguard children and young people and reduce the risk of adults being accused of improper or unprofessional conduct.

All staff are in a position of trust and have a duty to keep children and young people safe and to protect them from neglect and physical and emotional harm. This duty is in part exercised through the development of respectful caring and professional relationships between staff, children, and young people.

In the interests of security and safeguarding pupils, employees must wear their identity card, attached to an appropriately coloured lanyard and school branded uniform/kit, whilst in School. Staff may remove their lanyards for the duration of a lesson or activity where this is appropriate for health and safety reasons.



During school hours (8.00-4.00pm), colleagues are expected to ask all visitors to report to Reception, where they will sign in/out and will usually receive a visitor's badge with a red lanyard. Visitors must be always accompanied by a blue or green lanyard holder or two or more pupil guides.

When adults visiting the school are likely to interact with pupils on a one-to-one basis or in small groups, the member of staff organising the visit must complete a risk assessment in advance which is signed off by a senior member of staff. Colleagues should also expect to risk assess visitors where there is any potential risk of radicalisation through their interaction with pupils.

Staff organising an onsite event for parents, governors or other adults from outside school which is due to take place during or immediately before/after the school day are required to risk assess the activity from a safeguarding perspective. In some cases, this will take the form of a generic risk assessment, for example for parents' evenings or sports fixtures.

Staff are expected to politely challenge any adults who are onsite and not wearing a blue or green lanyard and identity card during school hours and who are unaccompanied by a member of staff or pupil tour guides. At times this may involve engaging politely with Junior School parents who are walking across the site to pick up their children or with KES parents, or parents from other schools, who are walking to the viewing platform to watch a sports fixture on the Astro. If following your conversation, you have any suspicions of their reasons for being onsite, please report these concerns to a senior member of staff immediately.

Health and Safety

All Staff have a duty to ensure that a safe working environment exists. Fire and evacuation procedures must be adhered to at all times and Staff are required to familiarise themselves with the procedures and their responsibilities set out in the Health and Safety Policy.

Personal Appearance

We regularly receive visits from parents, prospective parents and others, and naturally wish to convey an impression of professionalism and organisation. Therefore, whilst not wishing to impose unreasonable obligations, Staff are, nonetheless, required to dress smartly and appropriately for their role and in a way that supports the pupil uniform expectations, particularly the published Sixth Form uniform regulations. Colleagues should always look smart in their appearance when engaged in school business.

When working from home or remotely (including the delivery of online lessons, or virtual meetings using a virtual meeting platform such as Microsoft Teams and/or Zoom) staff must ensure they are dressed appropriately in clothing that is smart and of a similar style to what they would wear on a normal school day. They must also check that their backgrounds which are in view on camera are appropriate.

Mobility and Flexibility

Due to the demands and nature of the School, employees should be prepared to transfer upon request to alternative classrooms, offices or work spaces across the school sites, either temporarily or permanently and/or to undertake work of a different nature, providing it is reasonable and safe to do so and the individual is adequately trained. This may include working from home, if appropriate, and in the sole discretion of the School.

Gifts, Rewards and Favours

Staff should take care to ensure that they do not appear to accept a gift that may be construed as a bribe or lead the giver to expect preferential treatment. Staff are required to familiarise themselves with the content of the School's Anti-Corruption and Bribery Policy.

Staff should exercise care when selecting pupils for school teams, productions, trips and/or specific work tasks in order to avoid perceptions of favouritism or injustice. Similar care should be exercised when excluding a child from an activity without prior consultation with the Head or the Deputy Head.

Staff should not give presents/rewards to an individual outside of the School reward system.

Communication

Good communication between all members of the School community is vital. All communication between Staff, pupils and parents should take place within clear, explicit and professional boundaries.

Communication with Parents

Form tutors are often expected to be the first point of contact between parents and the School, although enquiries will also come through the School Office. Staff can contact parents by telephone, email or letter. Microsoft Teams / Zoom can also be used with prior arrangement. Staff should not contact pupils, parents or conduct any school business using personal email addresses or personal social media accounts.

Where a member of Staff receives an email from a parent, a reply should normally be made within three working days in term time. If a full reply cannot be made within that time, the member of Staff should send a brief acknowledgment e-mail and let the parent know when a fuller reply can be expected.

Staff sending emails to parents/carers are advised to send a copy (cc.) to the most appropriate members of staff, for example the Form Tutor, Head of Year/Sector, Head of Department, Head of the Co-curricular activity and/or member of senior leadership/management academic or support staff teams.

Staff must inform the Headmaster, Head, Senior Deputy Head and their Line Manager if they receive an offensive email.

Communication with Pupils

Staff should always carefully consider the manner in which they communicate with pupils to avoid any possible misinterpretation of their motives or behaviours.

Staff should not establish or seek to establish social contact with children or young people for the purpose of securing a friendship. This includes online relationships established through staff use of social networking sites. Staff should on no account engage in inappropriate electronic communication with a pupil.

Staff should not give their personal mobile phone numbers or email addresses to pupils, nor should they communicate with them by social media, text message or personal email. If they need to speak to a pupil by telephone, they should use one of the School's telephones and email using the School system. Any communication on video call platforms, such as Microsoft Teams or Zoom must be for professional reasons only and should accord with the rules of this policy at all times.

If a child or young person seeks to establish contact, the member of staff should politely and professionally decline the invitation and alert the DSL as quickly as possible. In the rare cases where exceptional circumstances might justify contact being established, this must be discussed and agreed with one of the Schools' DSLs beforehand.

Further guidance is available in the school policies: E-Safety Policy and Acceptable use Policy.

The group leader on all trips and visits involving an overnight stay should take a school mobile phone with him/her and may ask the pupils for their mobile numbers before allowing them out in small, unsupervised groups. The School mobile should be used for any contact with pupils that may be necessary. The group leader will delete any record of pupils' mobile phone numbers at the end of the trip or visit and should ensure that pupils delete any Staff numbers that they may have acquired during the trip.

Relationships with Pupils

Staff should understand that they are in a position of trust in relation to pupils, giving them influence and power by virtue of the knowledge they have and/or the authority invested in their role. Staff should ensure that their relationship with pupils clearly takes place within the boundaries of a respectful, professional relationship and avoids any behaviour which may be misinterpreted by others.

Staff are encouraged to self-refer under the School's low-level concerns procedure (as set out within the School's Safeguarding / Child Protection Policy **OR** Low-Level Concerns Policy in the event that they have found themselves in a situation which may be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in a way that may be considered to fall below the expected professional standards. All concerns will be handled sensitively and will be dealt with appropriately and proportionately.

KES Policy on sexual relationships between staff and pupils

It is an offence under the Sexual Offences Act 2003 for a person over 18 to have a sexual relationship with a child under 18 where that person is in a position of trust in respect of that child. This applies where the child is in full-time education and the person works in the same place as the child, even if the person does not teach the child.

The law uses the age of 18 to recognise that many young people, while over the age of consent for sexual activity (16), are still reliant on adults who hold some responsibility for their care and that young people are, therefore, vulnerable to the potential abuse of power by those adults. Young people as pupils cannot be seen as being on an equal footing with their teachers in respect of power and self-determination. The offence acknowledges that a person in a position of trust is expected to respect their position and not abuse it.

A member of staff who strives to keep a relationship secret by putting pressure on a pupil to keep their behaviour a secret is abusing their position of trust.

Sexual relationships are defined as including:

- sexual activity including sexual touching through to intercourse
- causing or inciting sexual activity with a child
- sexual activity in the presence of a child
- causing a child to watch a sexual act

Sexual relationships between any member of staff and any pupil, including those who are aged 18 years or over and are members of the School, will be treated as 'gross misconduct', and will almost certainly result in dismissal. A pupil is considered to be a member of the School until 31 August of their last year at the School, unless they have officially left at an earlier point in the academic year.

The School undertakes to report to the **Disclosure and Barring Service (DBS)**, within one month of leaving the school any person (whether employed, contracted, a volunteer or a student) whose services are no longer used because he or she is considered unsuitable to work with children. Such reports would contain as much evidence as possible. The School recognises that failure to make a report constitutes an offence.

Infatuations

On occasion, pupils may develop an infatuation for a member of Staff. If a member of Staff suspects or becomes aware of an infatuation, the advice of the Headmaster/Head or Senior Deputy Head/Deputy Head must be sought immediately.

Other members of Staff must alert a colleague to the possibility of an infatuation in order that appropriate steps can be taken.

Staff should deal with these situations sensibly and appropriately to maintain the dignity and safety of all concerned.

One to One Situations: Staff working individually with pupils should be aware of the potential vulnerability of pupils and Staff in such situations. Staff should manage these situations and take reasonable and sensible precautions to ensure the safety and security of the pupil and Staff alike.

Individual work with pupils should not be undertaken in secluded areas or behind a closed door **and staff should not see pupils individually outside normal school hours unless this has been approved by a line manager and a risk assessment undertaken and approved.** Where it is necessary to close doors for reasons of confidentiality or noise, for example with an individual music instrumental lesson, a colleague should be made aware of this and asked to remain vigilant.

Where it is necessary to conduct a one-to-one session online (for example, using a platform such as Teams or Zoom) staff must ensure that a senior member of staff is aware of the session and, wherever possible, arrange for a parent to be in the same room, or alternatively, invite a colleague or a senior member of staff to join the session.

Where possible, a gap or barrier should be maintained between teacher and child at all times. Any physical contact should be restricted to the absolute minimum required for appropriate care, instruction or restraint.

A record of any meeting of a disciplinary or counselling nature should always be kept and passed to one of the DSLs in that section of the School.

Physical Contact with Pupils

Staff and volunteers engaged in regulated activity with pupils at the Pre-Prep (including EYFS pupils) and in some cases supervised visitors, must adhere to additional guidance contained within the Pre-Prep School Physical Handling Policy and the Pre-prep Camera and Mobile Phone Policy.

There are occasions when it is entirely appropriate and proper for Staff to have physical contact with pupils, but it is crucial that they only do so in ways appropriate to their professional role. Physical contact may be appropriate in the following circumstances:

- when a pupil needs to get comfort or reassurance e.g., following an accident or personal crisis
    - A member of staff can never take the place of a parent in providing physical comfort and should be cautious of any demonstration of affection.
    - Physical contact should never be secretive, or of the gratification of the adult, or represent a misuse of authority. If a member of staff believes that an action could be misinterpreted, the incident and circumstances should be recorded as soon as possible, the DSL informed and, if appropriate, a copy placed on the pupil's file.

- when a pupil needs encouragement to attempt a new challenge e.g. to climb on to a piece of apparatus; or physical education and other activities requiring physical contact; or where exercises or procedures need to be demonstrated
    - Extreme caution should be used if the demonstration involves contact with pupils and, wherever possible, contact should be avoided. It is acknowledged that some staff, for example, those who teach PE and games, or who offer music tuition, will, on occasions, have to initiate physical contact with pupils in order to support a pupil so they can perform a task safely, to demonstrate the use of a particular piece of equipment/instrument or assist them with an exercise. This should be done with the pupil's agreement.

    - Contact under these circumstances should be for the minimum time necessary to complete the activity and take place in an open environment. Staff should remain sensitive to any discomfort expressed verbally or non-verbally by the child.

- when there is a need to take urgent action to avoid an incident or injury.
    - Any physical restraint is only permissible when a child is in imminent danger of inflicting an injury on himself/herself or on another, and then only as a last resort when all efforts to defuse the situation have failed. Another member of staff should, if possible, be present to act as a witness. All incidents of the use of physical restraint should be recorded in writing and reported immediately to the DSL/head who will decide what to do next. Where this relates to the school's nursery/EYFS setting, parents will be informed of any physical restraint used on their child the same day or as soon as reasonably practicable.

Staff should use their professional judgement at all times. Physical contact must be appropriate for the age, understanding and sex of the child and must never threaten or be sexually inappropriate. Staff must also be sensitive to an individual's cultural background and any special educational needs.

Staff should not have unnecessary physical contact with pupils and should be alert to the fact that minor forms of friendly physical contact can be misconstrued by pupils or onlookers.

Regrettably, even a friendly pat on the shoulder can potentially be misconstrued and staff are advised to exercise considerable caution in providing comfort for pupils in distress save in the presence of the pupil's parents or another adult.

The Education Act 1997 (Section 4) and DfEE circular 10/98 clarified the position about the use of physical force by teachers in order to control or restrain pupils. Corporal punishment is strictly against the law and should not be applied in any circumstances. In addition, any form of physical contact when a child is being rebuked or reprimanded should be avoided as it might be construed as assault.

Nevertheless, there are circumstances when physical intervention by a teacher (or another member of staff authorised by the Head, e.g., a teaching assistant or early years practitioner) is necessary and the use of "reasonable force" is legally permissible:

- in self-defence (where the teacher concerned is subject to an assault)
- where the pupil's actions are causing or likely to cause injury to themselves or others (e.g., self-harm, rough play, reckless misuse of materials or objects, a fight or an assault)
- where the pupil is causing deliberate damage to property (including the pupil's own property)

- where the pupil is engaging in any behaviour prejudicial to the maintenance of good order and discipline e.g., running in a corridor or stairway in a manner likely to cause accidental injury to himself/herself or others

There is no legal definition of "reasonable force", other than that it should be in proportion to the circumstances of the incident and the seriousness of the behaviour or consequences it is intended to prevent. Any force applied should always be the minimum needed to achieve the desired result.

It is essential in all cases that, prior to intervening the teacher should, wherever practicable, tell the pupil misbehaving to stop and warn him/her what will happen if he/she does not. He/she should continue to communicate with the pupil throughout the incident, emphasising that physical contact or restraint will stop as soon as it ceases to be necessary. In the case of a major incident, a teacher would not be wise to intervene without the assistance of another member of staff acting as witness or co-interventionist.

Acceptable forms of intervention include: physically interposing between pupils, blocking a pupil's path, holding, pushing, pulling (but not by ears or hair), leading a pupil by the hand or arm, shepherding a pupil away by placing a hand in the centre of the back or (in extreme cases only) using restrictive holds. Other forms of physical intervention should be avoided in all circumstances as they could lead potentially to a charge of assault.

It is important that a full and detailed written report of any such incident is lodged with the Head as soon as possible afterwards and certainly within 24 hours. Staff should always keep a copy of the report and, should a complaint be lodged subsequently by either the child or a parent, to seek the advice of their professional association. In all cases, the Head or an appointed senior member of staff should immediately inform the parents of the pupil(s) concerned of the nature of the incident in order to minimise the risk of parental complaint.

Transporting Pupils

In certain circumstances it may be appropriate for Staff to transport pupils offsite on approved school business. This must be approved, and risk assessed in liaison with the appropriate senior member of staff in the relevant section of the School, usually one of the designated safeguarding leads. Staff should not transport pupils in their own vehicle without prior authorisation unless exceptional circumstances pertain, for example in the case of an emergency.

Staff should ensure that the driver is not distracted while the vehicle is in motion for any reason other than an emergency and should also ensure all passengers are wearing correctly fastened seatbelts.

Prior to transporting pupils offsite, consent must be obtained from a pupil's parent/guardian and Staff should be aware that the safety and welfare of the pupils is their responsibility until

they are safely passed back to their parent/carer.

Staff should never be alone in a vehicle with a pupil, except in cases of an emergency or justifiable exceptional circumstance.
Staff who are also parents of pupils at the school may transport other pupils, provided that they have the permission of the parents of these children, and this is not on school business.

Contact with Pupils Out of School

Staff should not:

1. arrange meetings with pupils off the School premises (whether in person or online) without the prior approval of the Headmaster/Head or DSL/Deputy DSL;
2. arrange private tuition of any of the School's pupils in school or outside of school whether in term-time or outside of term-time without the prior written approval of the Headmaster/Head; and
3. give pupils their home address or any of their personal contact details.

Staff who are also parents of pupils at the School

Staff who are also parents of children at the School are expected to **maintain a clear distinction between their professional role and their role as a parent**, and to uphold the highest standards of conduct in both capacities.
Such staff must:

- **Act at all times with courtesy, restraint and professionalism** when engaging with colleagues, pupils, parents or governors, whether on site, at school events, or in written or online communication.
- **Avoid using their professional role, status or access** to seek preferential treatment, influence decisions, or gain information relating to their own child or other pupils.
- **Follow the same communication routes as other parents**, including agreed procedures for raising concerns or complaints, and not bypass staff or escalate matters informally through personal or professional relationships.
- **Refrain from challenging or criticising colleagues** (including teaching, pastoral or support staff) in public, on social media, or in front of pupils or other parents. Any concerns must be raised privately and appropriately.
- **Respect professional boundaries**, including recognising that colleagues are entitled to privacy, professional judgement and work–life balance, even where there is a personal relationship.
- **Avoid discussing confidential or sensitive school matters** (including staffing, safeguarding, behaviour, admissions or disciplinary issues) in their capacity as a parent, and must comply fully with confidentiality obligations under their employment.
- **Model positive behaviour and language** in all interactions with the school community, recognising their dual role as both staff member and parent role-model.

- **Accept that breaches of expected conduct as a parent may have professional implications** and may be addressed under the School's disciplinary or safeguarding procedures where relevant.

The School recognises the complexity of dual roles and expects staff-parents to exercise sound judgement at all times. Where uncertainty arises, staff are encouraged to seek guidance from their line manager or a member of the Senior Leadership Team.

Anti-Harassment and Bullying Statement

The School is committed to providing a working environment free from harassment and bullying and ensuring all staff are treated, and treat others, with dignity and respect. You should not engage in any behaviour or conduct which may amount to harassment of another person at work. Harassment of any kind is regarded as a disciplinary offence and in serious instances may lead to instant dismissal.

This policy covers harassment or bullying which occurs at work and out of the workplace, such as on school trips or at work-related events or social functions. It covers bullying and harassment by staff (which may include volunteers, consultants, contractors and agency workers) and by third parties such as parents, suppliers or visitors to our premises.

What is harassment?

Harassment is any unwanted physical, verbal or non-verbal conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. A single incident can amount to harassment.
It also includes treating someone less favourably because they have submitted or refused to submit to such behaviour in the past.

Unlawful harassment may involve conduct of a sexual nature (sexual harassment), or it may be related to age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation. Harassment is unacceptable even if it does not fall within any of these categories. Harassment may include, for example:

- Unwelcome sexual advances or suggestive behaviour (which the harasser may perceive as harmless);
- Racist, sexist, homophobic or ageist jokes, or derogatory or stereotypical remarks about a particular ethnic or religious group or gender;
- Outing or threatening to out someone as LGBTQ+;
- Offensive e-mails, text messages or social media content;
- Mocking, mimicking or belittling a person's disability.

A person may be harassed even if they were not the intended “target”. For example, a person may be harassed by racist jokes about a different ethnic group if the jokes create an offensive environment.

What is bullying?

DEFINITION OF BULLYING

Bullying is behaviour by an individual or group, repeated over time, that intentionally hurts another individual or group either physically or emotionally.

Put another way, bullying is the intentional hurting, harming, or humiliating of another person. It may take many forms, including physical (including any threat of or use of violence of any kind), sexual (including the sharing of nudes/semi-nudes), verbal (including cyberbullying via text messages, email, social media, gaming, or other instant messages, and can include the use of images and video), and/or emotional (including by excluding, being sarcastic, name-calling, tormenting or spreading malicious rumours). It can involve manipulating a third party to tease or torment someone, or actions that fall short of direct participation, where someone encourages others to bully, or joins in with laughing at a victim. Bullying is often hidden and subtle. It can also be overt and intimidating, and often involves an imbalance of power between the perpetrator(s) and the victim(s) whether that be a physical, psychological (knowing what upsets someone), or intellectual imbalance, or by the perpetrator(s) having access to the support of a group, or the capacity to socially isolate the victim(s).

Bullying is often motivated by prejudice against particular groups, and may involve actions or comments regarding a person's race, religion, sex, gender, sexual orientation, special education needs or disabilities (SEND) or certain health conditions, or because of a person’s familial circumstances, such as they are adopted, in care or that they have caring responsibilities. Bullying may be motivated by actual differences between individuals, or perceived differences. For example, bullying can still be homophobic if directed towards an individual that is perceived to be gay, whether or not this is the case.

Bullying can happen anywhere and at any time and can involve anyone - pupils, other young people, staff, and parents.

Legitimate, reasonable and constructive criticism of a worker’s performance or behaviour, or reasonable instructions given to workers in the course of their employment, will not amount to bullying on their own.

If you are being harassed or bullied

If you are being harassed or bullied, consider whether you feel able to raise the problem informally with the person responsible. You should explain clearly to them that their behaviour is not welcome or makes you uncomfortable. If this is not appropriate or has not

been successful, you should speak to your line manager, who can provide confidential advice and assistance in resolving the issue formally or informally.

If you are not certain whether an incident or series of incidents amounts to bullying or harassment, you should initially contact your line manager informally for confidential advice. If informal steps are not appropriate, or have not been successful, you should raise the matter formally under our Grievance Procedure.

If, following conclusion of the grievance process, we consider you have been harassed or bullied by an employee the matter will be dealt with under the Disciplinary Procedure as a case of possible misconduct or gross misconduct. If the harasser or bully is a third party such as a parent or visitor, we will consider what action would be appropriate to deal with the problem. Whether or not your complaint is upheld, we will consider how best to manage any ongoing working relationship between you and the person concerned.

Protection and support for those involved

Staff who make complaints or who participate in good faith in any investigation must not suffer any form of retaliation or victimisation as a result. Anyone found to have retaliated against or victimised someone in this way will be subject to disciplinary action under our Disciplinary Procedure. The school will seek to ensure that you are not in any way penalised whether directly or indirectly for bringing a complaint and the situation will be monitored to ensure that the harassment or bullying stops.

If you believe you have suffered any such treatment you should inform your line manager. If the matter is not remedied, you should raise it formally using out Grievance Procedure.

False or malicious allegations

Making a false allegation deliberately and in bad faith will be treated as misconduct and dealt with under out disciplinary procedure.

Record keeping

Information about a complaint by or about an employee may be placed on the employee's personnel file, along with a record of the outcome and of any notes or other documents complied during the process and in line with the School's retention policy.

Concerns or Complaints

The School aims to create an atmosphere in which a diverse range of people can work together openly in the spirit of mutual respect and trust towards a common purpose. Nevertheless, we recognise that it is possible for misunderstandings and disagreements to arise or for mistakes to occur.

Staff Complaints

Complaints should be dealt with immediately and openly and Staff should try to resolve issues informally in the first instance. If this approach is impractical or unsuccessful, Staff may wish to raise their concerns more formally in accordance with the School's Grievance Procedure or Whistleblowing Procedure, depending upon the nature of the concern.

Parental Complaints

Staff must ensure that parental complaints are dealt with in accordance with the School's Complaints Policy.

Acceptable Use of Technologies

Staff should ensure that they are familiar with and comply with the School's IT Acceptable Use Policy (VLE) / E-Safety Policy at all times. In particular, Staff must:

- not engage in inappropriate use of social network sites which may bring themselves, the School or the School community into disrepute;
- adopt the highest security settings on any personal profiles they have;
- remain mindful of their digital footprint and exercise caution in all their use of social media or any other web-based presence they have. This includes written content, videos or photographs and views expressed either directly or by 'liking' certain pages or posts or following certain individuals or groups;
- exercise care when using dating websites where Staff could encounter students; and
- not contact pupils, their guardians or family members, accept or initiate friend requests or follow pupils' or their guardians' accounts on any social media platform.
- Not follow pupils through their own social media accounts

Personal social media

All staff must take responsibility for their actions online. Staff should ensure they understand the tools they are using, the implications of any privacy and sharing settings, and, on a site-by-site basis, the terms and parameters of any connections or networks made.

There should be no communications between staff and pupils on personal social media. All electronic communication between staff and pupils should be conducted via School channels. If a pupil messages a member of staff privately, the communication should be re directed to a

Staff must not use social media to criticise pupils, parents, colleagues or others within the School community. If staff have concerns about another staff member or pupil's behaviour online, including if they feel they are the victim of cyberbullying or inappropriate comments, photos or posts, or if they believe their own actions may be misinterpreted they should immediately notify The HR Team, the Senior Deputy Head or the Head of Pre Prep and

Junior School. Should staff receive abusive or concerning messages, it is advisable not to delete them but to keep a record to assist with any investigation

Photographs

Many school activities involve recording images as part of the curriculum, extra school activities, publicity or to celebrate an achievement. In accordance with data protection legislation, the image of a pupil is personal data.

Photographs must only be taken of children with the permission of a parent or an individual with parental responsibility. Such consent must have been provided in writing via the School's parental contract/consent form. It is also important to consider the wishes of the pupil, remembering that some pupils do not wish to have their photograph taken or be filmed.

The School follows the guidance contained the 'Guidance for safer working practice for those working with children and young people (March2026)'. The Section 24 states, rather unambiguously, that: ***'Under no circumstances should staff be expected or allowed to take images of pupils at or on behalf of the school on their personal devices'***

This guidance means that colleagues may not use their personal smartphones, or any other personal devices (for example cameras or personal USB storage devices), to take and/or store/transmit images.

In the Pre-Prep School adults must observe the guidelines in the Pre-Prep Camera & Mobile Phone policy.

Where photographs are taken by Staff to evidence a child's progress, such photos should only be taken using School equipment (cameras, mobile phones or other school equipment). They must then be downloaded onto a school computer or cloud-based IT system or uploaded directly to a school social media account. Photos cannot be used or distributed outside the School and must not be uploaded to staff devices or social media accounts. Neither Staff nor children should use their own mobile phones or any other personal device to take or store photographs.

Consequences of breaching the Code of Conduct

It is in your interests to follow this Code to maintain standards of behaviour and your own professional reputation. A breach of this Code may be treated as misconduct and will render you liable to disciplinary action including in serious cases, dismissal.

If the School ceases to use the services of a member of staff or volunteer because they are unsuitable to work with children, a settlement agreement (formerly known as a compromise agreement) will not be used and a referral to the Disclosure and Barring Service will be made promptly if the criteria for a referral are met. Any such incidents will be followed by a review

of the safeguarding procedures within the School, with a report being presented to the Governors without delay. The School may also need to consider a referral to the Disclosure and Barring Service. This will ordinarily be on conclusion of an investigation when an individual is removed from working in regulated activity, which could include being suspended or being redeployed to work that is not regulated activity.

If a member of staff or volunteer tenders their resignation, or ceases to provide their services to the School at a time when child protection concerns exist in relation to that person, those concerns will still be investigated in full by the School and a referral to the Disclosure and Barring Service will be made promptly if the criteria for a referral are met.

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