



FARNBOROUGH HILL

WHOLEHEARTEDLY

FARNBOROUGH HILL STAFF CODE OF CONDUCT

Our Mission

Farnborough Hill welcomes all into our community, where we aim to live Christ's Gospel values joyfully and wholeheartedly, forming each individual to fulfil her potential and face the future with wisdom, strength and dignity.

I. POSITION OF TRUST

As a result of their knowledge, position and/or the authority invested in their role, all adults working with children and young people in education settings are in positions of trust, within and outside the School, in relation to the young people in their care. They are therefore expected to demonstrate consistently high standards of personal and professional conduct at all times.

Staff members should demonstrate proper and professional regard for the ethos, policies and practices of Farnborough Hill and ensure that they always show tolerance of and respect for the rights of others. This includes actively supporting fundamental British values – democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs. In addition, no member of staff should discriminate against pupils because of any protected characteristics – age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

A relationship between a member of staff and a pupil cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable young people and all members of staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification. The relationship between a teacher and a pupil of any age must always be a professional and not a personal one. Wherever possible, staff should avoid behaviour which might be misinterpreted by others, and report and record in writing any incident with this potential to the Designated Safeguarding Lead (DSL) immediately. In relevant cases the *Low-Level Concerns Policy* should be followed.

Whilst it is clearly stated above that the relationship between a teacher and a pupil of any age must always be a professional and not a personal one, staff must be fully aware that any sexual behaviour by a member of staff with or towards a pupil is totally unacceptable, regardless of the pupil's age. This applies to all pupils, including those over 18. 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. This applies even if, in the case of those pupils over 16, the relationship is consensual. Pupils are protected by the same laws as adults in relation to non-consensual sexual behaviour. They are additionally protected by specific legal provisions depending on their age and understanding. This includes the prohibition of sexual activity with children by adults in a position of trust. Sexual activity involves physical contact including penetrative and non-penetrative acts. However, it also includes non-contact activities, such as causing pupils to engage in or watch sexual activity or the production of pornographic material. There are occasions when adults embark on a course of behaviour known as 'grooming' where the purpose is to gain the trust of a child, and manipulate the relationship so sexual abuse can take place. All staff have a responsibility to always report to the Headmistress or DSL any concerns about the behaviour of a colleague which could indicate that a pupil is being groomed. In the case of concerns about the Headmistress, the Chair of Governors should be informed.

This guidance means that staff should not have any form of sexual contact with a pupil from the School and avoid any form of touch or comment which is, or may be considered to be, indecent. They must

avoid any form of communication with a pupil which could be interpreted as sexually suggestive, provocative or give rise to speculation, for example verbal comments, letters, notes, by email or on social media, phone calls, texts or physical contact. They must also not make sexual remarks to or about a pupil and 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.

2. CONFIDENTIALITY

Staff members should never give absolute guarantees of confidentiality to pupils or adults wishing to tell them about something. They should guarantee only that they will pass on information to the minimum number of people who must be told in order to ensure that the proper action is taken to address the problem and that they will not tell anyone who does not have a clear need to know. They will also take whatever steps they can to protect the informing pupil or adult from any retaliation or unnecessary stress that might be feared after a disclosure has been made.

The storing and processing of personal information about pupils is governed by the General Data Protection Regulations 2017 (UK GDPR) and Data Protection Act 2018 (DPA). The DPA contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent, if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent or if to gain consent would place a child at risk.

Staff may have access to special category personal data about pupils and their families which must be kept confidential at all times and only shared when legally permissible to do so and in the interest of the child. Records should only be shared with those who have a legitimate professional need to see them. Staff should never use confidential or personal information about a pupil or her family for their own, or others' advantage (including that of partners, friends, relatives or other organisations). Confidential information should never be used casually in conversation or shared with any person other than on a need-to-know basis. Information must never be used to embarrass, humiliate or intimidate a child. In circumstances where the pupil's identity does not need to be disclosed the information should be used anonymously. 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 or to statutory services. If a child, or their parent/carer, makes a disclosure regarding abuse or neglect, the member of staff should follow the School's safeguarding procedures and report it to the DSL. The adult should 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, he or she should seek guidance from the DSL. Any media or legal enquiries should be passed to the Senior Leadership Team (SLT). They must also ensure that, where personal information is recorded electronically, systems and devices are kept secure.

3. STAFF BEHAVIOUR

At all times staff need to ensure that their conduct not only supports the School's ethos but also protects the well-being of the pupils, and does not inadvertently lay them open to allegations of abuse. At all times their behaviour must be professional and beyond reproach. They need to treat all pupils with respect and always interact and converse with them in a professional way. Language should be used carefully. Sarcasm should be avoided, even as a joke, and staff should remain aware that children can often be affected negatively by scenarios which cause embarrassment. Of course, no child should ever be deliberately embarrassed or humiliated by a member of staff.

Safeguarding

All members of staff have a duty of care to safeguard all pupils, as explained in the School's *Safeguarding and Child Protection Policy*. If at any time they have a concern about a pupil, however minor, they must contact the relevant Head of Year or the DSL. In addition, if they are concerned that there is a risk of immediate serious harm to a pupil they must contact the DSL who will refer the matter to Children's Social Care and/or the police. However, any member of staff may make a direct referral to Children's Social Care or the police, and will be fully supported by the School in the case of this course of action. If they make a direct referral staff should then inform the DSL.

(a) **Communication with pupils**

Staff should keep their personal and professional/school lives separate, and should not put themselves in a position where there is a conflict between the School and their personal interests. Staff should not give their personal mobile phone numbers, email addresses or social media details to pupils, nor should they communicate with them by text message, personal email, any form of social media or private chat/video communication such as a personal Teams account. If a member of staff needs to speak to a pupil by telephone, they should use one of the School's landlines or mobiles. Any email communication should be work-based in nature and sent using the School's IT system. 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.

In the case of social media, staff members should not become 'friends' with, 'follow' or make direct connections on any social media sites with present pupils. This also applies to ex-pupils until they are 18 and have finished secondary education. In addition, they should not seek to view any pupil's social media. The only exception to this rule would be if specifically requested to do so by the DSL or Headmistress, and only then in the course of investigating a discipline or safeguarding matter. Where a social media link exists between school staff and pupils before they become employed or volunteer at Farnborough Hill, for example if they act as a sports coach to a pupil, they would be expected to cease any of these social media links when they join the School. Staff must maintain the securest settings on any personal social media sites so that pupils, parents, former pupils and others cannot see any personal information. They should always consider the reputation of the School in any posts or comments relating to the School.

See the School's *Online Communication Policy – Staff* for further guidance and advice on the use of social media.

Always remember that the relevant Head of Year should be kept informed of any contact or conversations with pupils that may have a bearing on their behaviour or wellbeing, or which might have repercussions in the future. In addition, any communication or request received from children on any personal social media sites must be reported to the Head of Year, with the Designated Safeguarding Lead copied in. This could also include a pupil attempting to simply view a member of staff's personal social media accounts on numerous occasions. Lastly, if any member of staff is aware of any inappropriate communications involving any child via social media, these must immediately be reported to the DSL.

(b) **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 is always in place and reviewed regularly.

Staff should try, as far as possible, not to be alone with a child or young person. Where this is not possible, for example in an instrumental music or performing arts lesson, sports coaching or one-to-one academic tutoring/pastoral support, it is good practice to ensure that others are within earshot and doors are left open if possible, or that there is visual access to the room. The use of 'engaged' or equivalent signs should be avoided where possible, as such signs may create an opportunity for secrecy or the interpretation of secrecy. As mentioned in Section 1 of this guidance, staff should always record in writing and immediately report to the DSL any situation where their actions might be misinterpreted by others, or when a pupil becomes distressed or angry.

Any physical contact should be the minimum required for care, instruction or restraint (see parts c) and d) below).

Arranging to meet with pupils away from the School site is not permitted, apart from in exceptional cases where the necessity for this is clear, for example welfare checks at a pupil's home. In these cases, approval is always obtained from the Headmistress, Deputy Head – Pastoral or Deputy Head – Academic, the pupil and their parents/carers. Where possible, two members of staff will attend the off-site meeting.

(c) **Physical contact with pupils**

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. Staff should, therefore, use their professional judgement at all times. 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. A member of staff can never take the place of a parent in providing physical comfort and should be careful when demonstrating affection.

Physical contact should never be secretive, or for the gratification of the adult, or represent a misuse of authority. If a member of staff believes that an action 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.

Physical education and other activities requiring physical contact:

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 prior verbal 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.

(d) **Physical intervention and restraint**

Physical punishment of any type is, of course, unacceptable. Any physical intervention or restraint is only permissible when a child is in imminent danger of being injured, or inflicting an injury on themselves or on another, and then only as a last resort when all efforts to avert or diffuse the situation have failed. When it is suspected ahead of time that intervention may be needed, another member of staff should, if possible, be present to act as a witness. All incidents of the use of physical intervention or restraint should be recorded in writing and reported immediately to the DSL or Headmistress who will decide what to do next.

(e) **Transporting pupils**

Staff members should not arrange to transport pupils in their own car or give them lifts. If there are exceptional circumstances that make unaccompanied transportation of pupils unavoidable, permission for the journey must be sought from the Headmistress or Deputy Heads and the parents of the pupil(s) beforehand. Parental permission should be sought in writing. In exceptional circumstances, if there is no time to seek written parental permission beforehand and permission is granted verbally, then a record of the phone conversation should always be made and passed on to the DSL. It is also vital that the member of staff ensures that they are covered by the correct level of motor vehicle insurance before making any such journey to transport pupils. If appropriate, details of the circumstances and permissions given should then be recorded on the files of the pupil(s).

(f) **Use of mobile phone cameras and other cameras**

Photographs must only be taken of pupils by staff with their parents' permission (collected at the time of pupil enrolment) and in the course of their professional duties during school activities. Where photographs are taken by staff to give evidence of children's progress, their participation in activities or other events, photos should be taken on school cameras, mobile phones or iPads where the photos can be deleted as soon as they have been downloaded on to the School network. This must be done within 24 hours of the photos being taken and, in the case of a residential trip, within 24 hours of the staff member's return. Photos cannot be used or passed on outside the School or posted on social media networks other than those run by the School. The *Technology Acceptable Use Policy for Staff* should be read in conjunction with this code of conduct.

(g) **Security and safety**

Staff must pay due regard to procedures in place to ensure the security and safety of pupils. This includes adhering to and applying all safety measures (such as those relating to door security, and the admission

and supervision of visitors), keeping accurate electronic attendance registers and maintaining the School as a no smoking site (this includes vape pens and e-cigarettes). Consumption of alcohol (except small quantities at social events, such as the Sixth Form Ball) or illegal drugs is not permitted.

(h) Communication of concerns or changes in circumstances

If any staff members discover that an act of Female Genital Mutilation (FGM) appears to have been carried out on a girl under 18 they have a statutory duty to personally report this directly to the police, as provided for in the Female Genital Mutilation Act (2003) and amended by the Serious Crime Act (2015). Staff should make the DSL aware and then, if possible, contact the police together. In the unlikely event that this is not possible, the teacher should contact the police themselves without delay. Staff must also disclose to the DSL, without delay, any and all suspicions, evidence or disclosure that FGM may be carried out in the near future or over the longer term. The DSL will then report these concerns to Children's Social Care and in some cases the police, following the FGM Mandatory Reporting Guidance (2020). In addition, staff should also report to the DSL any concerns regarding pupils in the Sixth Form over the age of 18. FGM is child abuse, and the School will therefore take all breaches of duty very seriously. If staff do not report such cases they may face disciplinary sanctions.

In addition, staff have a duty to disclose relevant information about any criminal proceedings against them or reasons why they may now be deemed unsuitable to work with children under the Disclosure and Barring Service.

There is also an expectation that all school staff should notify the Headmistress of any relationship or association they have both within and outside of the workplace (including online) which may affect their suitability to work with children, or have behaved or may have behaved in a way that indicates they may not be suitable to work with children. This behaviour, practice or experience may have not involved children, but could have an impact on the member of staff's suitability to work with children because of transferrable risk.

(i) 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 and which may be necessarily different to that adopted in their personal life. Staff should ensure they adhere to the Dress Code as set out in the Staff Handbook and that they are dressed smartly, safely and appropriately for the tasks they undertake. It should also be absent of any political or otherwise contentious slogans, and not considered to be discriminatory. Those who dress or appear in a manner which could be viewed as offensive or inappropriate may render themselves vulnerable to criticism or allegation. This means that staff should be compliant with professional standards and wear clothing which promotes a positive and professional image, is appropriate to their role and is not likely to be viewed as offensive or otherwise inappropriate. It should not distract, cause embarrassment or give rise to misunderstanding.

(j) Giving and receiving gifts, favouritism and exclusion

As set out in the School's *Anti-Bribery and Corruption Policy*, staff need to take care that they do not accept any gift that might be construed as a bribe by others, or lead the giver to expect preferential treatment. There are occasions when pupils or parents will wish to pass small tokens of appreciation to staff, for example at Christmas or as a thank you, and this is usually acceptable. However, it is not acceptable to receive gifts on a regular basis or of any significant value. Similarly, it is inadvisable to give such personal gifts to pupils or their families. This could be interpreted as a gesture either to bribe or groom. It might also be perceived that a 'favour' of some kind is expected in return. Any reward given to a pupil should be in accordance with the School's rewards guidance, consistent with the *Behaviour Policy*, recorded and not based on favouritism.

Staff should therefore be aware of and understand the School's rewards guidance and only give gifts to a pupil as part of the School's reward system. Where giving gifts other than as part of the rewards system, staff must ensure that these are of insignificant value and given to all pupils equally. They should ensure that gifts received or given in situations which may be misconstrued are declared to the Bursar or Headmistress and recorded. Where selection processes of pupils are concerned, these must be fair, and undertaken and agreed by more than one member of staff. Staff should also ensure that they do not

behave in a manner which is either favourable or unfavourable to individual pupils. They should exercise care when selecting children for specific activities, jobs or privileges in order to avoid perceptions of favouritism or injustice. Similar care should be exercised when pupils are excluded from an activity. Methods of selection and exclusion should always be subject to clear, fair, agreed criteria.

(k) **Respectful supervision of changing rooms**

As secondary age children, the pupils do not require any direct supervision whilst in changing rooms at the beginning or end of PE lessons. However, teachers should base themselves within the vicinity of the changing facilities to ensure that pupils' welfare is monitored. If there is an appropriate reason to do so, such as making sure that any late pupils leave in good time, teachers may enter the changing rooms. However, they must knock on the door and clearly announce their intentions *before* going in, giving a few moments between knocking and entering. In the case of an emergency, staff should knock on the door, clearly announce their intention to enter, and then go straight in to the changing room.

4. ALLEGATIONS/CONCERNS ABOUT STAFF AND VOLUNTEERS

Farnborough Hill has its own procedures for dealing with concerns and/or allegations against those working or volunteering at the School. There are two types of allegations, firstly those that may meet the harms threshold, and secondly, 'low-level concerns' (those that do not meet the harms threshold). Allegations that may meet the harms threshold are defined as those that might indicate a person would pose a risk of harm if they continued to work in their present position, or in any capacity with children in a school or college. A low-level concern does not mean that it is insignificant, but that it does not meet the harms threshold. It is any concern, no matter how small, that an adult working with children at the School may have acted in a way that is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside of work, and does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the Local Authority Designated Officer (LADO). Examples of low-level concerns could include, but are not limited to, a staff member being over-friendly with pupils, having favourites, taking photos of children on their own mobile phone, engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or using inappropriate sexualised, intimidating or offensive language.

In the event that an allegation is made or a concern is raised, the School will follow its *Allegations against adults who work with children* procedure (see *Safeguarding and Child Protection Policy*) or its *Low-Level Concerns Policy*.

5. WHISTLEBLOWING

The School has a culture of safety and of raising concerns. It values staff and reflective practice. Where staff members have concerns about poor or unsafe practices and potential failures in the School's safeguarding regimes, or have concerns about the behaviour of another member of staff towards a pupil, they should report it at once to the Headmistress or to the DSL. Where concerns relate to the Headmistress the Chair of Governors must be informed directly. Any concern will be thoroughly investigated under the School's whistle-blowing procedures, which are detailed in the *Whistleblowing Policy*. Where there are allegations of criminal activity, the statutory authorities will always be informed. Wherever possible, and subject to the rights of the pupil, the member of staff will be informed of the outcome of the investigation. No one who reports a genuine concern in good faith needs to worry that they will be judged for this. Under the Public Interest Disclosure Act 1998 the member of staff may be entitled to raise a concern directly with an external body where the circumstances justify it, for example the NSPCC whistleblowing helpline (contact details can be found on the Key Contacts page in the *Safeguarding and Child Protection Policy*).

The *Staff Code of Conduct* is reviewed annually by the Deputy Head – Pastoral.

The next review is due in September 2026.