



SAFER WORKING PRACTICES AND STAFF BEHAVIOUR POLICY

Guidance for safer working practices for the protection of staff and volunteers whose work brings them into contact with children and young people.

(To be applied with related policies for Keeping Children Safe in Education September 2024, Safeguarding Policy, Attendance Policy, SEND Policy, SEN & Disability Information, Intimate Care Policy, Safer Recruitment, e-Safety and Accessible Use Policy, Filtering and Monitoring Policy, Behaviour Policy, Anti-Bullying).

Updated: September 2024

Statement of intent

‘At Eastington Primary School everyone expects high standards of behaviour from adults who work with children and young people. When individuals accept such work, they need to understand and acknowledge the responsibilities and trust inherent in that role.’

Context

‘All adults who come into contact with children and young people in their work have a duty of care to safeguard and promote their welfare’.

The Children Act 2004, through the Stay Safe outcome of the Every Child Matters Change for Children programme, places a duty on organisations to safeguard and promote the well-being of children and young people. This includes the need to ensure that all adults who work with or on behalf of children and young people in these organisations are competent, confident and safe to do so’.

department for
children, schools and families

This document provides a guide for adults working in schools (including staff, governors, volunteers and visitors) about acceptable and desirable conduct to protect both adults and young people.

All adults working in school should know the name of the Designated Safeguarding Lead in the school, be familiar with local child protection arrangements and understand their responsibilities to safeguard and protect children and young people.

Designated Safeguard Lead (DSL)	Mrs C Parsons
Dept DSL	Ms Zoe Avastu (HT) and Mrs Rachel Carrick (SENCO)

Nominated Governors to champion child protection	Nina Foster
Safer recruitment trained	Ms Zoe Avastu (Headteacher),

Underpinning principles

- The welfare of the child is paramount.
- It is the responsibility of all adults to safeguard and promote the welfare of children and young people. This responsibility extends to a duty of care for those adults employed, commissioned, or contracted to work with children and young people.

- Adults who work with children are responsible for their own actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motivation and intentions.
- Adults should work and be seen to work, in an open and transparent way.
- Adults should discuss and/or take advice promptly from the Headteacher/senior member of staff about any incident which could give rise for concern to ensure that such situations can be handled promptly and sensitively.
- A record should be kept of any such incident and of decisions made/further actions agreed.
- Staff should apply the same professional standards regardless of gender, culture, disability, or sexuality.
- Staff should be aware that breaches of the law and other professional guidelines could result in criminal or disciplinary action being taken against them.
- The same professional standards should always be applied regardless of culture, disability etc
- Staff should be aware of and understand their establishment's child protection policy, arrangements for managing allegations against staff, staff behaviour policy, whistle blowing procedure and the procedures of the relevant Multi-agency Partnership (MAP).

All staff, volunteers and visitors to Eastington must:

- Be familiar with and work in accordance with the protocols at Eastington including in particular:
 - Safeguarding Children
 - Behaviour
 - Physical Intervention
 - Confidentiality
 - Online 'e'-Safety
 - Health and Safety
 - Use of Photography, mobile phones and Video recording
 - Whistleblowing
- Provide a good example and a positive role model to pupils.
- Behave in a mature, respectful, safe, fair, and considered manner. For example:
 - Not making remarks to pupil/other adult of a personal, sexual, racist, discriminatory, intimidating or otherwise offensive nature.
 - Not humiliating children
 - Treating all young people equally – never building 'special' relationships or conferring favour on particular individuals.
 - Not giving or receiving gifts (other than tokens given at end of year from families) unless arranged through the school.
- Ensure that relationships with children remain on a professional footing. For example, only touching children for professional reasons when this is necessary and appropriate for the child's

wellbeing or safety. (Also refer to Intimate Care policy). If a younger pupil needs comforting to do this is full view of others.

- Not behaving in a way that could lead a reasonable observer to question conduct, intentions, or suitability to care for other people's children.
- Not making arrangements to contact, communicate or meet with children outside work (this includes use of email, text, internet based social media and other messaging systems)

Guidance for safer working practice for all adults who work with children and young people

Duty of Care

All adults who work with, and on behalf of children are accountable for the way in which they exercise authority; manage risk; use resources; and safeguard children and young people.

All staff have a responsibility to keep pupils safe and to protect them from abuse (sexual, physical, and emotional), neglect and extra-familial harm. Pupils have a right to be safe and to be treated with respect and dignity. It follows that trusted adults are expected to take reasonable steps to ensure their safety and wellbeing. Failure to do so may be regarded as professional misconduct.

The duty of care is in part, exercised through the development of respectful and caring relationships between adults and children and young people. It is also exercised through the behaviour of the adult, which at all times should demonstrate integrity, maturity, and good judgement.

Confidentiality

Adults may have access to confidential information about children and young people in order to undertake their responsibilities. In some circumstances they may have access to or be given highly sensitive or private information. These details must be kept confidential at all times and only shared when it is in the interests of the child to do so. Such information must not be used to intimidate, humiliate, or embarrass the child or young person concerned.

If an adult who works with children is in any doubt about whether to share information or keep it confidential, he or she should seek guidance from the Designated Safeguard Lead (Mrs Catrin Parsons or Ms Zoe Avastu Headteacher or Mrs Rachel Carrick SENCO).

Whilst adults need to be aware of the need to listen to and support children and young people, they must also understand the importance of not promising to keep secrets. Neither should they request this of a child young person.

Making a Professional Judgement

There may be occasions and circumstances in which adults have to make decisions or take action in the best interests of the child or young person which could contravene this guidance or where no guidance exists. Individuals are expected to make judgements about their behaviour in order to secure the best

interests and welfare of the children in their charge. Such judgements, in these circumstances, should always be recorded and shared with the Headteacher. In undertaking these actions individuals will be seen to be acting reasonably.

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

Power and Positions 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 are in positions of trust. Broadly speaking, a relationship of trust can be described as one in which one party is in a position of power or influence over the other by virtue of their work or the nature of their activity. It is vital for all those in positions of trust to understand the power this can give them over those they care for and the responsibility they must exercise as a consequence of this relationship.

A relationship between an adult and a child or young person cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable young people. Adults have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.

Adults should always maintain appropriate professional boundaries and avoid behaviour which might be misinterpreted by others. They should report and record any incident with this potential to the Headteacher or DSL.

Propriety and Behaviour

All adults working with children and young people have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of children and young people. It is therefore expected that they will adopt high standards of personal conduct in order to maintain the confidence and respect of the public in general and all those with whom they work.

There may be times, for example, when an adult's behaviour or actions in their personal life come under scrutiny from local communities, the media or public authorities. This could be because their behaviour is considered to compromise their position in their workplace or indicate an unsuitability to work with children or young people. Misuse of drugs, alcohol or acts of violence would be examples of such behaviour.

Adults in contact with children and young people should therefore understand and be aware, that safe practice also involves using judgement and integrity about behaviours in places other than the work setting.

The behaviour of an adult's partner or other family members may raise similar concerns. We undertake Declaration of Criminal Record ('Disqualification by Association') checks yearly to reduce potential risk to children and young people in our school.

Keeping Children Safe in Education states that schools should make clear their expectation that staff should disclose any relationship or association (in the real world or online) that may impact on the school's ability to safeguard pupils.

Dress and Appearance

Adults should dress in ways which are appropriate to their role - this may need to be different to how they dress when not at work. Adults who work with children are powerful role models in all areas. At Eastington we expect all adults to dress smartly and ensure they are dressed appropriately for the work they undertake. Avoidance of low-cut tops, very short skirts, jeans, impractical footwear, ties/scarves during practical science, tongue piercings and the wearing of appropriate clothing for sport activity is expected.

Gifts, Rewards and Favouritism

Our school gives rewards (table points, certificates, stickers) to children to support positive behaviour and recognise particular achievements. In some situations, the giving of a small gift (pencil, notebook) as a reward may be accepted practice for a group/class of children, whilst in other situations the giving of a small item to an individual child will be part of an agreed plan, recorded and discussed with the Headteacher, parent/ carer.

It is acknowledged that there are rare, specific occasions when adults may wish to give a child a personal gift- such as when a child leaves the school. This is only acceptable practice where the adult has first discussed the giving of the gift and the reason for it, with the Headteacher and/or parent or carer. Any gifts should be given openly and not be based on favouritism. Adults need to be aware however, that the giving of gifts can be misinterpreted by others as a gesture either to bribe or groom a young person.

Care should also be taken to ensure that adults 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 children, young people or parents wish to pass small tokens of appreciation to adults e.g., on special occasions or as a thank-you and this is acceptable. However, it is unacceptable to receive gifts on a regular basis or of any significant value.

Adults should exercise care when selecting children and/or young people for specific activities or privileges to avoid perceptions of favouritism or unfairness. Methods and criteria for selection should always be transparent and subject to scrutiny.

Infatuations

Occasionally, a child may develop an infatuation with an adult who works with them. Adults deal with these situations sensitively and appropriately to maintain the dignity and safety of all concerned. Adults remain aware, however, that such infatuations carry a high risk of words or actions being misinterpreted and therefore make every effort to ensure that their own behaviour is above reproach.

An adult, who becomes aware that a child or young person is developing an infatuation, should discuss this at the earliest opportunity with the Headteacher and parent/carer so appropriate action can be taken to avoid hurt, distress or embarrassment.

Communication with Children (*including the Use of Technology & mobile phones*)

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

The use of mobile phones in class is prohibited for pupils and staff. For adults, they should be on silent, be out of sight and always stored securely. The use of mobile phones by adults should only be outside of teaching hours. If a member of staff does need to use a mobile phone outside of teaching hours, the member of staff should enter the office area or class cupboard away from all pupils or go off site.

Adults should also be circumspect in their communications with children so as to avoid any possible misinterpretation of their motives or any behaviour which could be construed as grooming. Adults should not share or request personal information from a child including e-mail, home or mobile telephone numbers, unless the need to do so is agreed with the Headteacher and parents/carers.

Personal e-mail or text communications between an adult and child is prohibited. Adult staff should not be 'friends' with present or past pupils on social media sites. Adults will refuse requests to be a 'friends' by pupils. If staff are family friends with a family before they join the school, they will inform the HT so ways to communicate with the children can be discussed/agreed– this information will be logged in the staff member's file.

School does communicate one way with parents using the school text service only. School does communicate 2 ways with parents using the school e-mail service.

Social Contact

All adults who work with children and young people at Eastington Primary should not seek to have social contact with them or their families, unless the reason for this contact has been firmly established and agreed with the Headteacher. If a child or parent seeks to establish social contact, or if this occurs coincidentally, the adult should exercise her/his professional judgement in making a response but should always discuss the situation with the Headteacher. Adults should be aware that social contact can be misconstrued as grooming.

No child or young person should be in or invited into, the home of an adult who works with them, unless the reason for this has been firmly established and agreed with parents/ carers and the Headteacher or the home has been designated by a regulatory body as a workplace e.g., childminders, foster carers. If staff are family friends with a family before they join the school, they will inform the HT so social contact with the children can be discussed/agreed– this information will be logged in the staff member's file.

Children or young people should not assist with chores or tasks in the home of an adult who works with them. Neither should they be asked to do so by friends or family of that adult.

Where social contact is an integral part of work duties, e.g., pastoral work with families, PA & teacher events, etc. care should be taken to maintain appropriate personal and professional boundaries. Confidentiality must always be maintained, and parent led conversations around pupils must be postponed so they can be held within the school site during work hours. This also applies to social events around shared interests outside of work, through shared family links or other personal networks.

It is recognised that some adults who work in school may support a parent in particular difficulty. Care needs to be exercised in those situations where the parent comes to depend upon the adult for support outside their professional role. This situation should be discussed with the Headteacher (or in the case of the Headteacher – the Chair of Governors) and where necessary referrals made to the appropriate support agency.

Sexual Contact

All adults should clearly understand the need to maintain appropriate boundaries in their contacts with children and young people. Intimate or sexual relationships between children/young people and the adults who work with them is illegal and will be regarded as a grave breach of trust- it will always be reported to the police and disciplinary action will be taken. (Children and young people are protected by specific legal provisions regardless of whether the child or young person consents or not.) Allowing or encouraging a relationship to develop in a way which might lead to a sexual relationship is also unacceptable.

Physical Contact

Some tasks within school may require physical contact with children as part of their learning or safety. There are also occasions when it is entirely appropriate for other adults to have some physical contact with the child or young person with whom they are working. However, it is crucial that in all circumstances, adults should only touch children in ways which are appropriate to their professional or agreed role and responsibilities.

Not all children and young people feel comfortable about physical contact, and adults should not make the assumption that it is acceptable practice to use touch as a means of communication. Permission should be sought from a child or young person before physical contact is made. Where the child is very young, there should be a discussion with the parent or carer about what physical contact is acceptable and/or necessary.

When physical contact is made with a child this should be in response to their needs at the time, of limited duration and appropriate to their age, stage of development, gender, ethnicity, and background. It is not possible to be specific about the appropriateness of each physical contact, since an action that is appropriate with one child in one set of circumstances may be inappropriate in another, or with a different child. Adults, nevertheless, should use their professional judgement at all times, observe and take note of the child's reaction or feelings and – so far as is possible - use a level of contact and/or form of communication which is acceptable to the child for the minimum time necessary.

Physical contact which occurs regularly with an individual child or young person is likely to raise questions unless there is explicit agreement on the need for, and nature of, that contact. This would then be part of a formally agreed plan within established parameters. Any such arrangements should be understood and agreed by all concerned (pupil – dependent on age/ability, parent, staff member, Headteacher), justified in terms of the child's needs, consistently applied and open to scrutiny.

Physical contact should never be secretive, for the gratification of the adult, or represent a misuse of authority. If an adult believes that their action could be misinterpreted, or if an action is observed by another as being inappropriate/possibly abusive, the incident and circumstances should be reported to the Headteacher as outlined in the procedures for handling allegations (see also safeguarding policy and Whistleblowing policy), and an appropriate record made. Parents/carers will also be informed in such circumstances.

Where a child seeks or initiates inappropriate physical contact with an adult, the adult should inform the Designated Safeguard Lead/Headteacher at the soonest possible time and the incident recorded in writing. The incident should be handled sensitively. Careful consideration will be given to the needs of the child – sexual behavior in young children can (but not always) be a sign of abuse. Parents will be notified. Advice and support will be given to the adult concerned.

It is recognised that some children who have experienced abuse may seek inappropriate physical contact. Adults should be particularly aware of this when it is known that a child has suffered previous abuse or neglect. In the child's view, physical contact might be associated with such experiences and lead to some actions being misinterpreted. In all circumstances where a child or young person initiates inappropriate physical contact, it is the responsibility of the adult to sensitively deter the child and help them understand the importance of personal boundaries. Such circumstances must always be reported and discussed with the Headteacher and the parent/carer.

Other Activities that require Physical Contact: sport, drama, outdoor activities

Adults who work in certain settings, for example sports, drama, or outdoor activities, will have to initiate some physical contact with children, for example to demonstrate technique in the use of a particular piece of equipment, adjust posture, or perhaps to support a child so they can perform an activity safely or prevent injury.

Physical contact should take place only when it is necessary in relation to a particular activity. It should take place in a safe and open environment i.e., one easily observed by others and last for the minimum time necessary. The extent of the contact should be undertaken with the permission of the child/young person. Contact should be relevant to their age or understanding and adults should remain sensitive to any discomfort expressed verbally or non-verbally by the child.

Guidance and protocols around safe and appropriate physical contact are provided by sports governing bodies and should be understood and applied consistently in PE lessons. Any incidents of physical contact that cause concern or fall outside of these protocols and guidance should be reported to the DSL/Headteacher who will record the incident and share with parents/take further action if needed.

Behaviour Management *(please also reference the School's Behaviour and anti-bullying policy)*

All children and young people have a right to be treated with respect even in those circumstances where they display difficult or challenging behaviour.

Adults should not use any form of degrading treatment to punish a child. The use of sarcasm towards children is not acceptable. Sanctions or rewards used should be in line with the school's Behaviour policy.

The use of physical punishment is not acceptable in any circumstances.

Where children display difficult or challenging behaviour, adults must follow the agreed Behaviour policy and use strategies appropriate to the circumstance and situation. The use of physical intervention can only be justified in exceptional circumstances when written into a personal plan for a child in agreement with parents/carers or when a child/another child/adult is a risk of harm/serious harm to property - see section below.

Use of Control and Physical Intervention

There are circumstances in which adults working with children displaying extreme behaviours can legitimately intervene by using either non-restrictive or restrictive physical interventions. This is a complex area and adults at Eastington will have regard to government guidance (Use of Reasonable Force in Schools) and legislation and the agreed policies and practice.

The use of physical intervention is, wherever possible, avoided. It should only be used to manage a child or young person's behaviour if it is necessary to prevent personal injury to the child, other children or an adult, to prevent serious damage to property or in what would reasonably be regarded as exceptional circumstances. When physical intervention is used it should be undertaken in such a way that maintains the safety and dignity of all concerned.

The scale and nature of any physical intervention must be proportionate to both the behaviour of the individual to be controlled and the nature of the harm they may cause. The minimum necessary force should be used.

Under no circumstances should physical force or intervention be used as a form of punishment. The duty of care which applies to all adults and organisations working with children and young people requires that reasonable measures are taken to prevent children being harmed. The use of unwarranted physical force is likely to constitute a criminal offence.

In all cases where physical intervention is employed the incident and subsequent actions will be documented and reported to the Headteacher/DSL. This should include written and signed accounts of all those involved, including the child if able. The parents/carers will be informed the same day.

If a physical restraint was used with a child or a child has specific needs in respect of challenging behaviour, a behaviour plan would be drawn up with the teaching team, SENCo, child – dependent on

age/ability, parent with a focus on de-escalation techniques to support the avoidance of restraint being used in the future. Only in these circumstances should an adult deviate from the behaviour policy.

The Headteacher, one teacher and four TAs have been trained in Team Teach techniques. Staff would receive refresher training/new training as soon as possible if such techniques were likely to be needed with a child.

Children in Distress

For all adults working with children there will be occasions when a distressed child needs comfort and reassurance and this may involve physical contact. Young children, in particular, may need immediate physical comfort, for example after a fall, separation from parent etc. Adults should use their professional judgement to comfort or reassure a child in an age-appropriate way whilst maintaining clear professional boundaries. Being in an observed area, having another adult/child nearby, keeping doors open, informing another adult that you are supporting a child are all parts of safe practice.

Where an adult has a particular concern about the need to provide this type of care and reassurance, or is concerned that an action may be misinterpreted, this should be reported and discussed with the Headteacher and parents/carers.

Intimate Care *(please also reference the Intimate care policy)*

Some job responsibilities necessitate intimate physical contact with children on a regular basis, for example assisting young children with toileting, providing intimate care for children with disabilities or in the provision of medical care. The nature, circumstances and context of such contact should comply with the guidance below and/or be part of a formally agreed plan, which is regularly reviewed. The additional vulnerabilities that may arise from a physical or learning disability should be taken into account and be recorded as part of an agreed care plan.

The views of the child should be actively sought, wherever possible, when drawing up and reviewing formal arrangements. As with all individual arrangements for intimate care needs, agreements between the child, parents/carers and the school must be negotiated and recorded.

All children have a right to safety, privacy and dignity when contact of a physical or intimate nature is required and depending on their abilities, age and maturity should be encouraged to act as independently as possible.

Toileting accidents for very young children are not common but do happen. Children who have had a toilet accident should be reassured by the staff member. The staff member would inform another adult they were helping a child in advance of supporting the child get changed/clean. The staff member could help a child out of outer clothing if needed and offer replacement clothing from the store in the Reception class/child's PE kit. The child would be asked to clean themselves privately while the staff member waited nearby. If an adult was needed in changing/cleaning, two adults would be present. The

child's parent would be informed at the end of the session. The parent would be called if the child needed to be washed to be comfortable.

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

The emotional responses of any child to intimate care should be carefully and sensitively observed, and where necessary, any concerns passed to the Headteacher and/or parents/carers.

First Aid and Administration of Medication

It is expected that adults working with children should be aware of basic first aid techniques. It is not however, a contractual requirement and whilst adults may volunteer to undertake such tasks, they should be suitably trained and qualified before administering first aid and/or any agreed medication. We have three Paediatric First Aid trained staff members on site.

When administering first aid, wherever possible, adults should ensure that another adult is aware of the action being taken. The adult administering the first aid will record any head bumps/more severe injuries in the School Accident File (held in the Admin Office). Parents are always informed why and when first aid was administered through the medical slip being sent home. A parent will be informed by phone if a child has a serious injury.

In circumstances where children need medication regularly a health care plan will be established to ensure the safety and protection of children and the adults who are working with them. Depending upon the age and understanding of the child, they should where appropriate, be encouraged to self-administer medication or treatment including, for example any ointment, use of inhalers.

All medicines to be administered will be given to the Admin Officer by the parent with clear, written instructions of when/how much medication is needed. The admin officer locks all medication in a box, one of these will be kept in the fridge for medicines which need to be held at specific temperatures, so pupils cannot access it until the correct time. Medication will be taken by the child with the Admin Officer present. If the Admin Officer is not available, one of the paediatric First Aiders or Headteacher will undertake this role. A slip is given to parents each day to show that the medication has been administered.

Inhalers are stored in the classroom of the child. They are named and available for use when needed.

Medicines relating to severe allergic reactions (epipens/piriton) will be held in teacher cupboard of the pupil's classroom. They will be clearly labelled so staff can access them easily when needed and stored high out of the reach of other children. The first aid cupboard in the library holds a spare epipen & blue reliever inhaler – this is on a high shelf out of the reach of children.

One to One Situations

At Eastington we fully recognise the potential vulnerability of both the adult and child during one-to-one situations, and these will be minimised. However, it is not realistic to state that one to one situations should never take place. When one to one situations are unavoidable, reasonable and sensible precautions are taken such as keeping door ajar, informing another staff member before the session etc.

Meetings with children 1:1 outside agreed working arrangements should not take place without the agreement of the Headteacher and parents/carers.

Home Visits

Under no circumstances should an adult visit a child in their home outside agreed work arrangements. If in an emergency, such a one-off arrangement is required, the adult must have a prior discussion with the headteacher and the parents/carers and a clear justification for such arrangement is agreed.

Transporting Children and Young People

There will be occasions when adults are asked to transport children as part of their duties. Adults, who use their own vehicles for transporting children should ensure that: the vehicle is roadworthy and carries a MOT certificate and that the maximum capacity for their vehicle is not exceeded. The school will check the vehicle for a live MOT certificate. The school has a travel insurance agreement for all staff and governors who may provide transportation for a child or young person. Children will be picked up and dropped off at school. Children should not be alone with an adult in a car unless in exceptional circumstances. If this is the case, the situation should be reported to the Headteacher.

It is a legal requirement that all passengers should wear seat belts and it is the responsibility of the staff member to ensure that this requirement is met. Staff members should also be aware of current legislation and adhere to the use of car seats/booster seats for younger children.

It is inappropriate for adults to offer lifts to a child or young person outside their normal working duties, unless this has been brought to the attention of the Headteacher and has been agreed with the parents/carers beforehand.

There may be occasions where the child or young person requires transport in an emergency situation or where not to give a lift may place a child at risk. Such circumstances must always be reported to the Headteacher and parents/carers.

Trips and Outings

Risk assessments will always be undertaken before an activity takes place to identify safe adult/ pupil ratios, potential risks and ways to reduce them. These will be given to the HT a week before the trip so they can be approved.

Adults should take particular care when supervising children and young people on trips and outings, where the setting is less formal than the usual workplace. Staff and volunteer adults remain in a position of trust and need to ensure that their behaviour remains professional at all times and stays within clearly defined professional boundaries. This involves:

- Being a positive role model by behaving in a mature, respectful and fair manner:
 - Using words well (not swearing, making remarks to pupil/other adults of a personal, sexual, racist, discriminatory, intimidating or otherwise offensive nature.)
 - Treating children with respect (not using sarcasm/humiliating children)
 - Treating all children equally – never building ‘special’ relationships or conferring favour on particular individuals, including their own child if a parent helper.

- Behaving in a safe manner:
 - Only touching children for professional reasons when necessary and appropriate for the child’s wellbeing or safety.
 - If a younger pupil needs comforting to do this is full view of others.
 - Supervising pupils calmly to ensure their safety
 - Ensuring they are not alone with a child in a toilet area (ensure another adult/pupil/s are with you.)

Where activities include overnight stays such as PGL, careful consideration is given to sleeping arrangements. Children, adults and parents are informed of these prior to the start of the trip. Typically, the girls and boys are in separate dorms with adult staff in separate shared rooms. Health and Safety arrangements require members of staff to keep the Headteacher aware of their whereabouts, especially when involved in activities outside the usual workplace.

Photography and Videos

Working with children may involve the taking or recording of images during work time for learning purposes or to record an event – this will be on ipads, school cameras. (**Mobile phones will not be used for this purpose.**) Any such photography/recording takes place with due regard to the law and the need to safeguard the privacy, dignity, safety and well- being of children.

Images/recordings will be stored on the school server/class computer/cloud storage. They may be temporarily stored on memory pens, camera chips until downloaded/uploaded/used for their intended purpose. Images will not be taken or help on personal devices.

It is not appropriate for any adult to take photographs of children for their personal use.

Written consent from parents/ carers is sought on the use of images when they start school (including pupils who start after Reception). This list is maintained by the admin officer and shared with staff. Every effort is made to respect parental wishes, though we recognise that when on trips/sporting fixtures where the wider public is present this may not always be possible.

The school recognises the desire of some parents to record their child at special occasions and school events. However, this is dependent on the wishes of parents in school at that time. We typically request parents do not record/take photographs during Christmas plays etc to respect the wishes of parents and to ensure all children are safe. In this event, the Headteacher could ask a member of staff to take still shots during a rehearsal/performance, without the pupils who do not have photo permission, and share these with parents. A pupil/s could also be removed from a group after the event so photographs can be taken. The school will intervene if the taking of photographs/or video may inadvertently distress another child or places a child at risk (e.g. disclosure of whereabouts etc.) or goes against parent consent.

Controlling image taking in public events such as district sports, shared trips or parents/pupils taking photos in informal events such as May Queen/Duck race is more difficult. The school cannot guarantee a child will not be recorded/photographed in these situations.

We ask parents not to share images of other children on social media unless they gain permission from other parents.

Access to Inappropriate Images and Internet Usage *(please also reference Acceptable Policy and 'e'-Safety policy, and Filtering and Monitoring Policy)*

There are no circumstances that will justify adults possessing indecent images of children. Adults who access and possess links to such websites will be viewed as a significant and potential threat to children. Accessing, making and storing indecent images of children on the internet is illegal. This will lead to criminal investigation and the individual being barred from working with children and young people if proven.

Adults should ensure that children and young people are not exposed to any inappropriate images or web links. Eastington Primary has clear guidance as to the use of the internet within school-see e-safety policy.

Whistleblowing

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

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

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

Whistleblowing is the mechanism by which adults can voice their concerns, made in good faith, without fear of repercussion. Eastington Primary has an agreed 'Whistleblowing policy' which is readily accessible to all staff and meets the terms of the Public Interest Disclosure Act 1998.

Adults & all staff acknowledge their individual responsibilities to bring matters of concern to the attention of the Headteacher and/or relevant external agencies. Even if concerns are low, these should be shared with the headteacher so they can be addressed. This is particularly important where the welfare of children may be at risk.

Allegations Management *(please also reference the school's Safeguarding Policy and Whistleblowing policy)*

All staff should be aware of the school's policy and procedures for Safeguarding and child protection procedures including procedures for dealing with allegations against adults. All allegations are taken seriously and properly investigated in accordance with local procedures and statutory guidance. Adults who are the subject of allegations are advised to contact their professional association.

If the allegation has been made against a member of staff or volunteer including supply or agency workers, contractors or governors, the County's Allegations Management Procedures are implemented.

ALLEGATIONS MANAGEMENT



Concerns about a member of staff or a volunteer working with children

If a professional receives an allegation or has a concern about the behaviour of a member of staff working or volunteering with children and that concern could amount to:

- a) A member of staff or volunteer has behaved in a way that has harmed a child, or may have harmed a child, or
- b) Possibly committed a criminal offence against or related to a child, or
- c) Behaved towards a child or children in way that indicates s/he may pose a risk of harm to children

Then that professional should:



Report their concerns

Report the concern to the most senior person not implicated in the allegation



Completion of written record

Complete a written record of the nature and circumstances surrounding the concern, including any previous concerns help. Include where the concern came from and brief details only.



Seek advice before proceeding – Initial Discussion

Always contact the Local Authority Designated Officer (LADO) for advice prior to investigation the allegation. This is because it might meet the criminal threshold and so your investigation could interfere with a Police or Social Care investigation.

Local Authority Designated Officer (LADO) – Tel: 01452 426994

The LADO will offer advice on any immediate action required and will assist with employment and safeguarding issues



Allegations Management Process

If, after your initial discussion with the LADO, it is agreed that the allegation meets the criteria, please complete the allegation management referral form via the GSCE website.

<https://ges-online.com/Gloucestershire/eLADO/Live#/Public>

The LADO will review referrals and convene an allegations management meeting. This might result in a criminal investigation, a Social Care investigation and /or an investigation to inform whether disciplinary action is required. If it is agreed that the allegation does not meet the criteria, the LADO will record the initial discussion and send it to you for your records. Any further action will be taken within your setting if necessary.



Further Action

Further meetings might be required and these will be convened by the LADO, with your input at all times. Further information on the Allegations Management process can be found in the Government Document: Working Together to Safeguard Children 2018, Part 4 Keeping Children Safe in Education and the South West Procedures. <https://www.proceduresonline.com/swcpp/gloucestershire/contents.html>

Allegations that may meet the harms threshold

This part of the policy is about managing cases of allegations that might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in school. This guidance should be followed where it is alleged that anyone working in the school, including supply teachers, volunteers and contractors has:

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

The last bullet point above includes behaviour that may have happened outside of school, that might make an individual unsuitable to work with children, this is known as transferable risk. Where appropriate an assessment of transferable risk to children with whom the person works should be undertaken. If in doubt seek advice from the local authority designated officer (LADO).

If staff are concerned an adult (including supply staff and volunteers), within the school has harmed or may have harmed a child, possibly committed a criminal offence against or related to a child or behaved towards a child in a way that indicated 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, they must **immediately contact the Head Teacher**, who in turn contacts the Local Authority Designated Officer for Allegations (LADO) Nigel Hatton on 01452 426994 for an Initial Discussion and reported to OFSTED as appropriate.

We ensure the child is safe.

In the case of the Head Teacher being accused, the Chair of Governors, Mrs Carol Trim and/or the Child Protection Governor (Nina Foster) should be informed, and the compliance policy should be followed including reporting to OFSTED.

Employers and senior staff have a responsibility to ensure that professional behaviour applies to relationships between staff and pupils. Physical contact is a particular issue where thought is required. With younger children touching is inevitable and provides reassurance. With older children, perfectly innocent actions can be misconstrued. In emergencies, physical restraint to prevent harm to the pupil or to others can be required.

The following definitions should be used when determining the outcome of allegation investigations:

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive
- **False:** there is sufficient evidence to disprove the allegation

- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made
- ***“For all other cases, where the allegation concluded to be either, unfounded, false, malicious or unsubstantiated the case manager (and if they have been involved the LADO) should consider the facts and determine whether any lessons can be learned and if improvements can be made.”***

Any member of staff using the Code of Conduct & confidential reporting procedure (Whistleblowing) will receive full support.

Adults should always feel able to discuss with the Headteacher any difficulties or problems that may affect their relationship with children so that appropriate support can be provided, or action can be taken.

Concerns that do not meet the harm threshold – Low-level concerns

The Governing body has policies and processes to deal with concerns (including allegations) which do not meet the harm threshold set out above. Concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent, or other adult within or outside of the organisation; or as a result of vetting checks undertaken. The school has appropriate policies and processes in place to manage and record any such concerns and take appropriate action to safeguard children.

We ensure that we promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school (including supply teachers, volunteers, and contractors) are dealt with promptly and appropriately. Creating a culture in which all concerns about adults (including allegations that do not meet the harms threshold) are shared responsibly and with the headteacher, recorded and dealt with appropriately, is critical. If implemented correctly, this encourages an open and transparent culture; enables the schools to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and 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 the school.

Low-level concerns which are shared about supply staff and contractors should be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified.

What is a low-level concern?

The term ‘low-level’ concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold set out previously. 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 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 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
- 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.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse. It is crucial that any such concerns, including those which do not meet the harm threshold, are shared responsibly and with the right person, and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of the school from potential false allegations or misunderstandings.

Responding to low-level concerns

If the concern is raised via a third party, the headteacher will collect evidence where necessary by speaking:

- › Directly to the person who raised the concern, unless it has been raised anonymously
- › To the individual involved and any witnesses

The headteacher will use the information collected to categorise the type of behaviour and determine any further action. The headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

Record keeping

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- › Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- › Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harm threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- › Retained at least until the individual leaves employment at the school

We also encourage staff to self-refer if they find themselves in a situation that could be misinterpreted. If staff are not sure whether behaviour would be deemed a low-level concern, we encourage staff to report it.

All reports will be handled in a responsive, sensitive and proportionate way.

Unprofessional behaviour will be addressed, and the staff member supported to correct it, at an early stage.

This creates and embeds a culture of openness, trust and transparency in which our values and expected behaviour are constantly lived, monitored and reinforced by all staff, while minimising the risk of abuse.

We can achieve the purpose of our low-level concerns policy by, for example:

- ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- empowering staff to share any low-level safeguarding concerns following the procedure set out in this policy
- addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- providing a responsive, sensitive, and proportionate handling of such concerns when they are raised; and,
- helping identify any weakness in the school's safeguarding system.

This policy is created with reference to:

Guidance for Safe Working Practice for the Protection of Children and Staff in Education Settings
February 2022

'Keeping Children Safe in Education' DFE September 2024

'Working Together to Safeguard Children' DFE December 2023

GSCP live manual (Gloucestershire Safeguarding Children Partnership)



At Eastington we work together for everyone's safety.