

Staff Code of Conduct including safeguarding



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CHAIR OF TRUSTEES:	
CEO:	

Consistent with *Guidance for Safer Working Practice for Adults who Work with Children and Young People in Education Settings*, **Keeping Children Safe in Education 2026** and **Working Together to Safeguard Children (latest version)**.

*This policy will be reviewed and updated at least annually and/or following any updates to national and local guidance and procedures.

Contents

Overview	4
Background	4
Professional Behaviour and Standards	4
What to do if you are Worried a Child is Being Abused	5
Staff Safeguarding Responsibilities.....	5
2.0 Using the Guidance.....	6
Status of Document	6
Purpose of Guidance	6
Underpinning Principles.....	6
Definitions.....	7
How to Use the Document	7
3.0 Guidance for Safer Working Practices.....	8
Context.....	8
“Unsuitability”	8
Duty of Care.....	9
3.4 Criminal Convictions and Legal Issues	10
3.5 Confidentiality	10
Conflicts of Interest and Secondary Employment	11
Making a Professional Judgment.....	11
Professional Curiosity	11
Power and Positions of Trust	12
Professional Boundaries	12
Propriety and Behaviour	13
Dress and Appearance.....	13
Personal Living Space.....	14
Gifts, Rewards and Favouritism.....	14
Infatuation.....	15
Digital Communication, Technology and Social Media	15
Social Contact	16

Sexual Contact	17
Physical Contact	18
Other Activities that Require Physical Contact	19
Behaviour Management	20
Use of Control and Physical Intervention.....	21
Recognising and Challenging Harmful Behaviour.....	22
Children and Young People in Distress	22
Intimate Care	23
Personal Care	23
First Aid and Administration of Medication.....	24
One to One Situations.....	25
Home Visits	25
Transporting Children and Young People	26
Trips and Outings	27
Photography, Video and Digital Images.....	28
Access to Inappropriate Images and Internet Usage	29
Use of School Premises, Equipment & Communication Systems.....	29
Low-Level Concerns	29
Whistle Blowing.....	31
Sharing Concerns and Recording Incidents	32
Teaching Standards	32
APPENDIX 1	34
APPENDIX 2.....	35
Appendix 3 – Summary of Staff Expectations.....	36
Staff SHOULD	36
Staff MUST NOT	37

Overview

Background

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 1989 and 2004, 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.

In schools the requirement for a Code of Conduct for staff became mandatory following new safeguarding guidance "Keeping Children Safe in Education" in April 2014. The vast majority of adults who work with children act professionally and aim to provide a safe and supportive environment which secures the well-being and very best outcomes for children and young people in their care.

However, it is recognised that in this area of work tensions and misunderstandings can occur. It is here that the behaviour of adults can give rise to allegations of abuse being made against them.

Allegations may be malicious or misplaced. They may arise from differing perceptions of the same event, but when they occur, they are inevitably distressing and difficult for all concerned. Equally, it must be recognised that some allegations will be genuine and there are adults who will deliberately seek out, create or exploit opportunities to abuse children. It is therefore essential that all possible steps are taken to safeguard children and young people and ensure that the adults working with them are safe to do so.

This document has been produced by a team of individuals from various backgrounds who are knowledgeable about allegation procedures and the circumstances in which allegations might arise and provides practical guidance for anyone who works with, or on behalf of children and young people regardless of their role, responsibilities or status. It seeks to ensure that the duty to promote and safeguard the wellbeing of children is, in part, achieved by raising awareness of illegal, unsafe and inappropriate behaviours. This document also constitutes a code of conduct and can be used as part of staff induction.

Whilst every attempt has been made to cover a wide range of situations, it is recognised that this guidance cannot cover all eventualities. There may be times when professional judgments are made in situations not covered by this document, or which directly contravene the guidance given by their employer. It is expected that in these circumstances adults will always advise their senior colleagues of the justification for any such action already taken or proposed.

It is also recognised that not all adults who work with children and young people work as paid or contracted employees. The principles and guidance outlined in this document still apply and should be followed by all adults whose work brings them into contact with children and young people, whether volunteers, governors or others in contact with children.

The guidance contained in this document has due regard to current legislation and statutory guidance.

Professional Behaviour and Standards

All employees are expected to give the highest possible standard of service to the public. Employees should demonstrate honesty and integrity and maintain reasonable standards in their own behaviour, both inside and outside the workplace, which enable them to uphold public trust and confidence in the school. Breaches of conduct and personal behaviour will be dealt with under the Staff Discipline, Conduct and Grievance Policy.

- Employees must not misuse or misrepresent their position, qualifications or experience or bring the reputation of the EPA into disrepute.
- Staff should uphold decent standards of dress. Just as students are expected to wear uniform, the same principles of fitness for purpose should be reflected in staff dress.
- Staff should be punctual at all times. This includes the start of the day, the end of break times, meetings and for other agreed duties. Staff should ensure that their line manager is kept informed as to their whereabouts and expected time of return if off-site.
- Within the expectation of maintaining a work/life balance, staff should ensure that they spend the requisite amount of time on the school premises to ensure that their duties can be carried out effectively.
- All leave should be approved prior to it being taken, including parental leave, special leave etc. Failure to notify absence, including absence because of sickness, could lead to disciplinary action, as could a false declaration of sickness.
- Personal property of a sexually explicit nature such as books, magazines, DVDs or such material on any electronic media must not be brought onto or stored on the school premises.

Compliance with the Code of Conduct and Confidentiality

Failure to comply with the Code of Conduct and with the associated policies ("Recommended Reading") may result in disciplinary action being taken and the school reserves the right to take legal action against employees where breaches of the Code warrant such action.

What to do if you are Worried a Child is Being Abused

Everyone working with children and young people should be familiar with local procedures and protocols for safeguarding the welfare of children and young people. Adults have a duty to report any child protection or welfare concerns to a designated member of staff in their organisation and/or report any concerns to the local social care office.

Staff Safeguarding Responsibilities

Safeguarding and promoting the welfare of children is everyone's responsibility. Every adult working on behalf of the EPA Trust has a duty to maintain a child-centred approach, safeguard children, promote their welfare and act in accordance with statutory guidance, including **Keeping Children Safe in Education (KCSIE)**, the Trust's Child Protection and Safeguarding Policy and this Code of Conduct.

All staff are expected to:

- read and understand **Part One** of *Keeping Children Safe in Education* and confirm annually that they have done so;
- know the identity and role of the Designated Safeguarding Lead (DSL) and Deputy DSLs;
- understand that safeguarding is everyone's responsibility and forms part of their day-to-day role;
- maintain professional curiosity and remain alert to indicators of abuse, neglect, exploitation and harm;
- act immediately and report any safeguarding concern, however small, in accordance with Trust procedures;
- maintain appropriate professional boundaries and uphold the highest standards of professional conduct at all times;
- contribute to creating a safe, respectful and inclusive culture where children feel listened to,

- valued and protected;
- work collaboratively with colleagues and other agencies to safeguard children where appropriate;
- participate in safeguarding training and keep their knowledge up to date;
- follow all Trust safeguarding policies and procedures.

Staff should never assume that another person has recognised or reported a safeguarding concern. Where there is any doubt, advice should be sought from the Designated Safeguarding Lead without delay.

2.0 Using the Guidance

Status of Document

This document acts as a code of conduct and to form part of every induction process. It will not replace or take priority over additional codes of conduct produced by organisations.

This is a generic document that should complement existing professional procedures, protocols and guidance which relate to specific roles, responsibilities or professional practices.

Purpose of Guidance

It is important that all adults working with children understand that the nature of their work and the responsibilities related to it, place them in a position of trust. This practice guidance provides clear advice on appropriate and safe behaviours for all adults working with children in paid or unpaid capacities, in all settings and in all contexts. The guidance aims to:

- Keep children safe by clarifying which behaviours constitute safe practice and which behaviours should be avoided;
- Assist adults working with children to work safely and responsibly and to monitor their own standards and practice;
- Support managers and employers in setting clear expectations of behaviour and/or codes of practice relevant to the services being provided;
- Support employers in giving a clear message that unlawful or unsafe behaviour is unacceptable and that, where appropriate, disciplinary or legal action will be taken;
- Support safer recruitment practice;
- Minimise the risk of misplaced or malicious allegations made against adults who work with children and young people;
- Reduce the incidence of positions of trust being abused or misused.
- Fulfil requirements as a code of conduct and act as part of staff induction.

Employers should be familiar with, and know how to access, their Local Safeguarding Children's Partnership's policy and procedures for managing allegations against staff. (See "Keeping Children Safe in Education").

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. The same professional standards should always be applied regardless of culture, disability, gender, language, racial origin, religious belief and/or sexual identity.
- Adults should continually monitor and review their practice and ensure they follow the guidance contained in this document.

Definitions

Children and Young People: Throughout this document references are made to "children and young people". These terms are interchangeable and refer to children who have not yet reached their 18th birthday. This guidance, however also has value for those working with vulnerable adults.

Adults: References to 'adults' or 'volunteers' refer to any adult who is employed, commissioned or contracted to work with or on behalf of, children and young people, in either a paid or unpaid capacity.

Manager: The term 'manager' refers to those adults who have responsibility for managing services including the supervision of employees and/or volunteers at any level.

Employer: The term 'employer' refers to the organisation which employs, or contracts to use the services of individuals in pursuit of the goals of that organisation. In the context of this document, the term 'employer' is also taken to include 'employing' the unpaid services of volunteers.

Safeguarding: Process of protecting children from abuse or neglect, preventing impairment of their health and development, and ensuring they are growing up in circumstances consistent with the provision of safe and effective care that enables children to have optimum life chances and enter adulthood successfully.

Duty of Care: The duty which rests upon an individual or organisation to ensure that all reasonable steps are taken to ensure the safety of a child or young person involved in any activity or interaction for which that individual or organisation is responsible. Any person in charge of, or working with children and young people in any capacity is considered, both legally and morally to owe them a duty of care.

How to Use the Document

This document is relevant to both individuals and organisations working with or on behalf of children and young people. Where an individual works independently and does not work as part of an organisation references made to the 'senior manager' should be taken to refer to parents or those with parenting responsibilities.

Each section provides general guidance about a particular aspect of work undertaken with children and young people with, in the right-hand column, specific guidance about which behaviours should

be avoided and which are recommended. Some organisations may need to adapt or add to the guidance to meet their specific practices or contexts, the document has however, been written for a generic audience and most, if not all of the content, is applicable to all adults who work with children and young people. The diagram in Appendix 1 illustrates how the guidance could be used as a basis for developing specific agency guidance. Appendix 2 provides a visual framework for understanding how the document fits with safer recruitment and selection and procedures and those which relate to disciplinary proceedings. Appendix 3 serves as a visual reminder of expected conduct when working with children and young people.

Organisations and settings who provide services for children and young people should use this guidance to develop and promote safer working practice by ensuring that all employees and volunteers are made aware of its contents and have access to it. Schools must use this or an attendance code of conduct.

Incorporating the use of this document in recruitment and selection processes will help to prevent and deter unsuitable people from working with children and young people. Providing employees and volunteers with clear guidance on appointment and revisiting this through induction, supervision, performance management, training programs etc., will also help to ensure a safer children's workforce. Employers and managers will be better placed to deal with unsuitable or inappropriate behaviour if their expectations have been made clear and reinforced throughout a person's employment and there is evidence that this has been done.

Individuals should follow this guidance in their day-to-day practice. It should also be referred to when taking on new work, different duties or additional responsibilities.

3.0 Guidance for Safer Working Practices

Context

All adults who work with children and young people have a crucial role to play in shaping their lives. They have a unique opportunity to interact with children and young people in ways that are both affirming and inspiring. This guidance has been produced to help adults working in all settings to establish safe and responsive environments which safeguard young people and reduce the risk of adults being unjustly accused of improper or unprofessional conduct.

This means that these guidelines:

- *Apply to **all** adults working in all settings whatever their position, role, or responsibilities.*
- *May provide guidance where an individual's suitability to work with children and young people has been called into question.*

“Unsuitability”

The guidance contained in this document is an attempt to identify what behaviours are expected of adults who work with children and young people. Adults whose practice deviates from this guidance and/or their professional or employment-related code of conduct may bring into question their suitability to work with children and young people.

This means that adults should:

- *Have a clear understanding about the nature and content of this document.*
- *Discuss any uncertainties or confusion with their line manager.*
- *Understand what behaviours may call into question their suitability to continue to 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.

Whether working in a paid or voluntary capacity, these adults have a duty to keep children and young people safe and to protect them from sexual, physical and emotional harm. Children and young people have a right to be treated with respect and dignity. It follows that trusted adults are expected to take reasonable steps to ensure the safety and well-being of children and young people. Failure to do so may be regarded as neglect".

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 judgment.

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.

Employers also have a duty of care towards their employees, both paid and unpaid, under the Health and Safety at Work Act 1974. This requires them to provide a safe working environment for adults and provide guidance about safe working practices. Employers also have a duty of care for the well-being of employees and to ensure that employees are treated fairly and reasonably in all circumstances. The Human Rights Act 1998 sets out important principles regarding protection of individuals from abuse by state organisations or people working for those institutions. Adults who are subject to an allegation should therefore be supported and the principles of natural justice applied.

The Health and Safety Act 1974 also imposes a duty on employees to take care of themselves and anyone else who may be affected by their actions or failings. An employer's duty of care and the adult's duty of care towards children should not conflict. This 'duty' can be demonstrated through the use and implementation of these guidelines.

This means that adults should:

- *Understand the responsibilities, which are part of their employment or role, and be aware that sanctions will be applied if these provisions are breached.*
- *Always act, and be seen to act, in the child's best interests.*
- *Avoid any conduct which would lead any reasonable person to question their motivation and intentions.*
- *Take responsibility for their own actions and behaviour.*
- *Exercise professional curiosity and take timely action where there are concerns about a child's welfare.*

This means that employers should:

- *Ensure that appropriate safeguarding and child protection policies and procedures are adopted, implemented and monitored.*
- *Ensure that codes of conduct/practices are continually monitored and reviewed.*
- *Ensure that where services of activities are provided by another body, the body concerned has appropriate safeguarding policies and procedures.*
- *Foster a culture of openness and support.*
- *Ensure that systems are in place for concerns to be raised.*
- *Ensure that adults are not placed in situations which render them particularly vulnerable.*
- *Ensure all adults have access to and understand this guidance and related policies and procedures.*
- *Ensure that all job descriptions reflect an individual duty of care.*

3.4 Criminal Convictions and Legal Issues

Employees must inform the CEO immediately if they are subject to a criminal conviction, caution, ban, police enquiry, investigation or pending prosecution. The CEO will discuss this with the employee in the context of their role and responsibilities in order to help safeguard children and other employees at the school.

3.5 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 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 a senior member of staff or nominated child protection person. Any actions should be in line with locally agreed information sharing protocols.

The storing and processing of personal information about children and young people is governed by the Data Protection Act 1998. Employers should provide clear advice to adults about their responsibilities under this legislation.

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 under any circumstances.

Additionally, concerns and allegations about adults should be treated as confidential and passed to a senior manager without delay.

This means that adults:

- *Be clear about when information can be shared and in what circumstances it is appropriate to do so.*
- *Are expected to treat information they receive about children and young people in a discreet and confidential manner.*

- *Should seek advice from a senior member of staff if they are in any doubt about sharing information they hold or which has been requested of them.*
- *Need to know to whom any concerns or allegations should be reported.*

Conflicts of Interest and Secondary Employment

An employee is required to declare this where the group or organisation would be considered to be in conflict with the ethos of the school. Membership of a trade union or staff representative group would not need to be declared.

Employees should also consider carefully whether they need to declare to the EPA their relationship with any individual(s) where this might cause a conflict with school activities. Failure to make a relevant declaration of interests is a very serious breach of trust and therefore if employees are in doubt about a declaration, they are advised to take advice from their union. All declarations, including nil returns, should be submitted in writing to the CFO on the school Register of Business Interests.

Employees are permitted to take up secondary employment, as long as the activity does not constitute a conflict of interest, or adversely affect their primary employment.

Employees are required to keep the CEO (Board of Trustees if the employee is the CEO) informed of their employment at other organisations.

Making a Professional Judgment

This guidance cannot provide a complete checklist of what is or is not inappropriate behaviour for adults in all circumstances. There may be occasions and circumstances in which adults have to make decisions or act 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 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 a senior manager or if the adult does not work for an organisation, with the parent or carer. In undertaking these actions individuals will be seen to be acting reasonably.

This means that where no specific guidance exists adults should:

- *Discuss the circumstances that informed their action, or their proposed action, with a senior manager, or with the parent/carer if not working for an organization.*
- *Report any actions which could be misinterpreted to their senior manager.*
- *Always discuss any misunderstanding, accidents or threats with a senior manager.*
- *Always record discussions and reason why actions were taken.*
- *Record any areas of disagreement about course of action taken and if necessary, referred to a higher authority.*

Professional Curiosity

Professional curiosity is an essential part of safeguarding. It means maintaining an open and inquisitive approach to children's welfare, recognising that concerns may not always be immediately obvious and that children may not disclose abuse directly.

All adults working within the EPA Trust are expected to always exercise professional curiosity and act in the best interests of children.

Staff should:

- *remain alert to changes in a child's behaviour, presentation, attendance or wellbeing;*
- *respectfully question unusual, inconsistent or concerning situations where appropriate;*

- *seek advice from the Designated Safeguarding Lead (DSL) if they are unsure about a concern;*
- *share safeguarding concerns promptly in accordance with Trust procedures;*
- *make timely, factual records where required;*
- *never assume that another member of staff or professional has recognised or acted upon a concern.*

Professional curiosity supports the early identification of need and helps ensure that children receive the right support at the right time.

Power and Positions of Trust

As a result of their knowledge, position and/or authority invested in their role, all adults working with children and young people are in positions of trust in relation to the young people in their care. 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.

Where a person aged 18 or over is in a specified position of trust with a child under 18, it is an offence for that person to engage in sexual activity with or in the presence of that child, or to cause or incite that child to engage in or watch sexual activity.

This means that adults should not:

- *Use their position to gain access to information for their own or others' advantage.*
- *Use their position to intimidate, bully, humiliate, threaten, coerce or undermine children or young people.*
- *Use their status and standing to form or promote relationships which are of a sexual nature, or which may become so.*

Professional Boundaries

Adults working within the EPA Trust are expected to establish and maintain clear professional boundaries with all pupils. Professional relationships must always be appropriate, transparent and focused on the welfare and best interests of the child.

Professional boundaries apply at all times, including outside school, during educational visits, extracurricular activities, online and within the local community. Staff should avoid any behaviour that could be misinterpreted, compromise their professional judgement or undermine public confidence in their role.

Staff should:

- *maintain professional relationships with pupils at all times;*
- *ensure interactions are open, appropriate and capable of scrutiny;*
- *seek advice if they are unsure whether a situation may compromise professional boundaries;*
- *report any circumstances that could place themselves or a pupil at risk of misunderstanding or harm.*

Staff must not:

- *seek friendships or develop exclusive relationships with pupils;*
- *communicate with pupils through personal social media or messaging platforms;*
- *provide private tuition to Trust pupils without the prior written approval of the Headteacher;*

- *transport pupils in a private vehicle unless this has been authorised in accordance with Trust procedures;*
- *exchange personal gifts with pupils or show favouritism towards individual children;*
- *share personal information or seek emotional support from pupils;*
- *engage in conduct that could reasonably be perceived as grooming or as blurring professional boundaries.*

Where there is any doubt about the appropriateness of professional boundaries, staff should seek advice from their line manager or the Headteacher before taking action.

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 and require careful consideration by an employer as to whether there may be a potential risk to children and young people in the workplace.

This means that adults should not:

- *Behave in a manner which would lead any reasonable person to question their suitability to work with children or act as a role model.*
- *Make, or encourage others to make, unprofessional personal comments which scapegoat, demean or humiliate, or which might be interpreted as such.*

This means that adults should:

- *Be aware that behaviour in their personal lives may impact upon their work with children and young people.*
- *Follow any codes of conduct deemed appropriate by their organisation.*
- *Understand that the behaviour and actions of their partner (or other family members) may raise questions about their suitability to work with children and young people.*

Dress and Appearance

A person's dress and appearance are matters of personal choice and self-expression. However, adults should dress in ways which are appropriate to their role and this may need to be different to how they dress when not at work.

Adults who work with children and young people should ensure they take care to ensure they are dressed appropriately for the tasks and the work they undertake.

Those who dress in a manner which could be considered as inappropriate could render themselves vulnerable to criticism or allegations.

This means that adults should wear clothing which:

- *Is appropriate to their role.*
- *Is not likely to be viewed as offensive, revealing, or sexually provocative.*
- *Does not distract, cause embarrassment or give rise to misunderstanding.*
- *Is absent of any political or otherwise contentious slogans.*
- *Is not considered to be discriminatory and is culturally sensitive.*

Personal Living Space

No child or young person should be 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 senior managers or the home has been designated by the organisation or regulatory body as a work place e.g. child minders, foster carers.

It is not appropriate for any other organisations to expect or request that private living space be used for work with children and young people.

Under no circumstances should children or young people 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.

This means that adults should:

- *Be vigilant in maintaining their privacy and mindful of the need to avoid placing themselves in vulnerable situations.*
- *Challenge any request for their accommodation to be used as an additional resource for the organization.*
- *Be mindful of the need to maintain professional boundaries.*
- *Refrain from asking children and young people to undertake personal jobs or errands.*

Gifts, Rewards and Favouritism

The giving of gifts or rewards to children or young people should be part of an agreed policy for supporting positive behaviour or recognising particular achievements. In some situations, the giving of gifts as rewards may be accepted practice for a group of children, whilst in other situations the giving of a gift to an individual child or young person will be part of an agreed plan, recorded and discussed with senior manager and the parent or carer.

It is acknowledged that there are specific occasions when adults may wish to give a child or young person a personal gift. This is only acceptable practice where, in line with the agreed policy, the adult has first discussed the giving of the gift and the reason for it, with the senior manager and/or parent or carer and the action is recorded. 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.

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.

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.

This means that adults should:

- *Be aware of their organisation's policy on the giving and receiving of gifts.*
- *Ensure that gifts received or given in situations which may be misconstrued are declared.*
- *Generally, only give gifts to an individual young person as part of an agreed reward system.*
- *Where giving gifts other than as above, ensure that these are of insignificant value.*
- *Ensure that all selection processes which concern children and young people are fair and that wherever practicable these are undertaken and agreed by more than one member of staff.*

Infatuation

Occasionally, a child or young person may develop an infatuation with an adult who works with them. These adults should deal with these situations sensitively and appropriately to maintain the dignity and safety of all concerned. They should remain aware, however, that such infatuations carry a high risk of words or actions being misinterpreted and should 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 a senior manager or parent/carer so appropriate action can be taken to avoid any hurt, distress or embarrassment.

This means that adults should:

- *Report and record any incidents or indications (verbal, written or physical) that suggest a child or young person may have developed an infatuation with an adult in the workplace.*
- *Always acknowledge and maintain professional boundaries.*

Digital Communication, Technology and Social Media

The EPA Trust recognises that technology plays an important role in education and communication. Staff are expected to use all digital technologies responsibly, professionally and in ways that safeguard children, protect confidential information and maintain appropriate professional boundaries.

Communication with pupils should only take place through Trust-approved systems and for legitimate educational purposes. Staff must ensure that all digital communication is appropriate, transparent and capable of scrutiny.

Professional standards apply equally to all forms of digital communication, including email, messaging applications, social media, online learning platforms, gaming platforms and emerging technologies.

Staff should:

- *use only Trust-approved systems when communicating with pupils and families;*
- *maintain professional boundaries in all digital communications;*

- *use Trust-issued devices and accounts wherever possible;*
- *protect confidential information and comply with UK GDPR and Trust data protection procedures;*
- *store photographs, videos and other pupil information securely using Trust-approved systems;*
- *remain alert to safeguarding risks associated with technology, artificial intelligence (AI) and online activity;*
- *report any inappropriate online communication, digital safeguarding concern or data breach immediately.*

Staff must not:

- *communicate with pupils using personal messaging services or personal social media accounts;*
- *exchange personal contact details with pupils;*
- *accept or send friend or follow requests from current pupils;*
- *use personal devices, including mobile phones, tablets or smart watches, to photograph or record pupils unless specifically authorised;*
- *upload confidential Trust information, safeguarding records or identifiable pupil information to public AI platforms or personal cloud storage;*
- *use AI-generated content without appropriate professional review;*
- *attempt to bypass Trust filtering or monitoring systems;*
- *use technology in any way that compromises safeguarding, confidentiality or professional boundaries.*

This expectation applies to all current and future digital platforms, including, but not limited to, email, Microsoft Teams, Google Workspace, WhatsApp, Snapchat, Instagram, TikTok, Signal, Discord, gaming platforms, live-streaming services and any other emerging technologies.

Further guidance is provided within the Trust's ICT Acceptable Use Policy, Online Safety Policy and Data Protection Policy.

Social Contact

Adults who work with children and young people 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 senior managers, or where an adult does not work for an organisation, the parent or carers.

If a child or parent seeks to establish social contact or if this occurs coincidentally, the adult should exercise her/his professional judgment in making a response but should always discuss the situation with their manager or with the parent of the child or young person. Adults should be aware that social contact in certain situations can be misconstrued as grooming.

Where social contact is an integral part of work duties, e.g. pastoral work in the community, care should be taken to maintain appropriate personal and professional boundaries. This also applies to social contacts made through interests outside of work or through the adult's own family or personal networks.

It is recognised that some adults may support a parent who may be 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 senior management and where necessary referrals made to the appropriate support agency.

This means that adults should:

- *Have no secret social contact with children and young people or their parents.*
- *Consider the appropriateness of the social contact according to their role and nature of their work.*
- *Always approve any planned social contact with children or parents with senior colleagues.*

- *Advise senior management of any social contact they have with a child or a parent with whom they work, which may give rise to concern.*
- *Report and record any situation, which may place a child at risk or which may compromise the organisation or their own professional standing.*
- *Be aware that the sending of personal communications such as birthday or faith cards should always be recorded and/or discussed with line manager.*
- *Understand that some communications may be called into question and need to be justified.*

Sexual Contact

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 will be regarded as a grave breach of trust. Allowing or encouraging a relationship to develop in a way which might lead to a sexual relationship is also unacceptable.

Any sexual activity between an adult and the child or young person with whom they work may be regarded as a criminal offence and will always be a matter for disciplinary action.

Children and young people are protected by specific legal provisions regardless of whether the child or young person consents or not. The sexual activity referred to does not just involve physical contact including penetrative and non-penetrative acts.

It may also include non-contact activities, such as causing children to engage in or watch sexual activity or the production of pornographic material. 'Working Together to Safeguard Children' defines sexual abuse as "forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening".

There are occasions when adults embark on a course of behaviour known as 'grooming' where the sole purpose is to gain the trust of a child, and manipulate that relationship so sexual abuse can take place. Adults should be aware that consistently conferring inappropriate special attention and favour upon a child might be construed as being part of a 'grooming' process and as such will give rise to concerns about their behaviour.

This means that adults should not:

- *Have sexual relationships with children and young people.*
- *Have any form of communication with a child or young person which could be interpreted as sexually suggestive or provocative i.e. verbal comments, letters, notes, electronic mail, phone calls, texts, physical contact.*
- *Make sexual remarks to, or about, a child/young person.*
- *Discuss their own sexual relationships with or in the presence of children or young people.*

This means that adults should:

- *Ensure that their relationships with children and young people clearly take place within the boundaries of a respectful professional relationship.*
- *Take care that their language or conduct does not give rise to comment or speculation. Attitudes, demeanour and language all require care and thought, particularly when members of staff are dealing with adolescent boys and girls.*

Online social contact should be regarded in exactly the same way as face-to-face contact. Professional boundaries apply equally to social networking sites, messaging applications, gaming platforms and any future digital communication methods.

Physical Contact

Many jobs within the children's workforce require physical contact with children as part of their role. 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 or within the parameters of established, agreed and legal professional protocols on physical contact e.g. sport activities or medical procedures. Any such arrangements should be understood and agreed by all concerned, justified in terms of the child's needs, consistently applied and open to scrutiny.

Physical contact should never be secretive, or 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 or possibly abusive, the incident and circumstances should be reported to the senior manager outlined in the procedures for handling allegations and an appropriate record made. Parents/carers should also be informed in such circumstances.

Where a child seeks or initiates inappropriate physical contact with an adult, the situation should be handled sensitively and care taken to ensure that contact is not exploited in any way. Careful consideration must be given to the needs of the child and advice and support 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 a senior manager and the parent/carer.

This means that adults should:

- *Be aware that even well-intentioned physical contact may be misconstrued by the child, an observer or by anyone to whom this action is described.*
- *Never touch a child in a way which may be considered indecent.*
- *Always be prepared to report and explain actions and accept that all physical contact be open to scrutiny.*
- *Not indulge in "horseplay".*
- *Always encourage children, where possible, to undertake self-care tasks independently.*
- *Work within Health and Safety regulations.*
- *Be aware of cultural or religious views about touching and always be sensitive to issues of gender.*
- *Understand that physical contact in some circumstances can be easily misinterpreted.*

This means that organisations should:

- *Ensure they have a system in place for recording incidents and the means by which information about incidents and outcomes can be easily accessed by senior management.*
- *Make adults aware of relevant professional organisational guidance in respect of physical contact with children and meeting medical needs of children and young people where appropriate.*
- *Be explicit about what physical contact is appropriate for adults working in their setting.*

Other Activities that Require Physical Contact

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. Such activities should be carried out in accordance with existing codes of conduct, regulations and best practice.

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 made clear to the parent/carer and once agreed, 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 national organisations, for example sports governing bodies or major arts organisations, or the employing organisation and should be understood and applied consistently.

Any incidents of physical contact that cause concern or fall outside of these protocols and guidance should be reported to the senior manager and parent or carer.

It is good practice if all parties clearly understand at the outset, what physical contact is necessary and appropriate in undertaking specific activities. Keeping parents/carers, children and young people informed of the extent and nature of any physical contact may also prevent allegations of misconduct or abuse arising.

This means that adults should:

- *Treat children with dignity and respect and **avoid contact with intimate parts of the body.***
- *Always explain to a child the reason why contact is necessary and what form that contact will take.*
- *Seek consent of parents where a child or young person is unable to do so because of a disability.*
- *Consider alternatives, where it is anticipated that a child might misinterpret any such contact.*
- *Be familiar with and follow recommended guidance and protocols.*
- *Conduct activities where they can be seen by others.*
- *Be aware of gender, cultural or religious issues that may need to be considered prior to initiating physical contact.*
-

This means that organisations should:

- *Have up-to-date guidance and protocols on appropriate physical contact in place that promote safe practice and include clear expectations of behaviour and conduct.*
- *Ensure that staff are made aware of this guidance and that safe practice is continually promoted through supervision and training.*

Behaviour Management

All children and young people have a right to be treated with respect and dignity 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, demeaning or insensitive comments towards children and young people is not acceptable in any situation. Any sanctions or rewards used should be part of a behaviour management policy which is widely publicised and regularly reviewed.

The use of corporal punishment is not acceptable and whilst there may be a legal defence for parents who physically chastise their children, this does not extend, in any circumstances, to those adults who work with or on behalf of children and young people.

Where children display difficult or challenging behaviour, adults must follow the behaviour policy outlined by their place of work and use strategies appropriate to the circumstance and situation. The use of physical intervention can only be justified in exceptional circumstances and must be used as a last resort when other behaviour management strategies have failed. The adult must follow the Trust policy on restrictive interventions.

Where a child has specific needs in respect of particularly challenging behaviour, a positive handling plan may be drawn up and agreed by all parties. Only in these circumstances should an adult deviate from the behaviour management policy of the organisation.

This means that adults should:

- *Not use force as a form of punishment.*
- *Try to defuse situations before they escalate.*

- *Inform parents of any behaviour management techniques used.*
- *Adhere to the organisation's behaviour management policy.*
- *Be mindful of factors which may impact upon a child or young person's be e.g. bullying, abuse and where necessary take appropriate action.*

This means that organisations should:

- *Have in place appropriate behaviour management policies.*
- *Where appropriate, develop positive handling plans in respect of an individual child or young person.*

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 and organisations must have regard to government guidance and legislation and the policies and practice of their specific organisation.

The use of physical intervention should, wherever possible, be 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 and the techniques deployed in line with recommended policy and practice.

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 settings where restrictive physical interventions may need to be employed regularly, i.e. where adults are working with children with extreme behaviours associated with learning disability or autistic spectrum disorders, the employer should have a policy on the use of such intervention, as part of a wider behaviour management policy.

Individual care plans, drawn up in consultation with parents/carers and where appropriate, the child, should set out the strategies and techniques to be used and those which should be avoided. Risk assessments should be carried out where it is foreseeable that restrictive physical intervention may be required.

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

Recognising and Challenging Harmful Behaviour

The EPA Trust is committed to providing a safe, respectful and inclusive environment for all children. Every member of staff has a responsibility to model respectful behaviour and to challenge attitudes or behaviours that may place a child at risk of harm or contribute to an unsafe culture.

Staff should recognise that inappropriate behaviour between children should never be dismissed as "banter", "part of growing up" or "boys will be boys". All concerns should be taken seriously and responded to in accordance with the individual school's Behaviour Policy and Child Protection and Safeguarding Policy.

Staff should:

- promote respectful, inclusive relationships;
- challenge inappropriate language, discriminatory behaviour and harmful attitudes;
- recognise indicators of child-on-child abuse, harmful sexual behaviour and online abuse;
- respond appropriately to incidents of sexual harassment or sexual violence;
- report safeguarding concerns promptly to the Designated Safeguarding Lead (DSL);
- record significant concerns in accordance with Trust procedures;
- support a child-centred and victim-centred approach at all times.

Staff must not:

- ignore or minimise behaviour that may cause harm to another child;
- dismiss concerning behaviour as "banter", "just having a laugh" or "boys will be boys";
- tolerate misogyny, sexual harassment, discriminatory language or prejudice-based behaviour;
- delay reporting safeguarding concerns or assume that another adult has already acted.

This expectation applies to all forms of harmful behaviour, including child-on-child abuse, sexual harassment, sexual violence, harmful sexual behaviour, coercive or controlling behaviour, bullying (including prejudice-based bullying), online abuse and discriminatory behaviour.

Further guidance is provided within school's Behaviour Policy and Child Protection and Safeguarding Policy.

Children and Young People in Distress

There are some settings, where adults are involved in managing significant or regular occurrences of distress and emotional upset in children, for example in mental health services, residential care provision etc. In these circumstances professional guidance should be followed and adults should be aware of what is and what is not acceptable behaviour when comforting a child or diffusing a situation. This is particularly important when working on a one-to-one basis.

For all other 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.

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 a senior manager and parents/carers.

This means the adult should:

- *Consider the way in which they offer comfort and reassurance to a distressed child and do it in an age-appropriate way.*

- *Be circumspect in offering reassurance in one to one situations, but always record such actions in these circumstances.*
- *Follow professional guidance or code of practice where available.*
- *Never touch a child in a way which may be considered indecent.*
- *Record and report situations which may give rise to concern from either party.*
- *Not assume that all children seek physical comfort if they are distressed.*

Intimate Care

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 professional codes of practice or guidance 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 emotional responses of any child to intimate care should be carefully and sensitively observed, and where necessary, any concerns passed to senior managers and/or parents/carers.

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.

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 organisation must be negotiated and recorded.

This means that adults should:

- *adhere to the organisation's intimate care guidelines or code of practice.*
- *make other staff aware of the task being undertaken.*
- *explain to the child what is happening.*
- *consult with senior managers and parents/carers where any variation from agreed procedure/care plan is necessary.*
- *record the justification for any variations to the agreed procedure/ procedure/care plan and share this information with parents.*
- *ensure that any changes to the agreed care plan are discussed, agreed and recorded.*

Personal Care

Young people are entitled to respect and privacy at all times and especially when in a state of undress, changing clothes, or undertaking any form of personal care. There are occasions where there will be a need for an appropriate level of supervision in order to safeguard young people and/or satisfy health and safety considerations. This supervision should be appropriate to the needs and age of the young people concerned and sensitive to the potential for embarrassment.

Adults need to be vigilant about their own behaviour, ensure they follow agreed guidelines and be mindful of the needs of the children and young people with whom they work.

This means that adults should:

- *Avoid any physical contact when children are in a state of undress.*
- *Avoid any visually intrusive behaviour.*
- *Where there are changing rooms announce their intention of entering.*

This means that adults should not:

- *Change in the same place as children.*
- *Shower or bathe with children.*
- *Assist with any personal care task which a child or young person can undertake by themselves.*

First Aid and Administration of Medication

It is expected that adults working with children and young people 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.

When administering first aid, wherever possible, adults should ensure that another adult is aware of the action being taken. Parents should always be informed when first aid has been administered.

In circumstances where children need medication regularly a health care plan should have been 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.

This means that organisations should:

- *Ensure staff understand the extent and limitations of their role in applying basic care and hygiene tasks for minor abrasions and understand where an injury requires more experienced intervention.*
- *Ensure there are trained and named individuals to undertake first aid responsibilities.*
- *Ensure training is regularly monitored and updated.*

This means that adults should:

- *Adhere to the organisation's policy for administering first aid or medication.*
- *Comply with the necessary reporting requirements.*
- *Make other adults aware of the task being undertaken.*
- *Explain to the child what is happening.*
- *Always act and be seen to act in the child's best interests.*
- *Report and record any administration of first aid or medication.*
- *Have regard to any health plan which is in place.*
- *Always ensure that an appropriate health/risk assessment is undertaken prior to undertaking certain activities.*

One to One Situations

All organisations working with or on behalf of children and young people should consider one to one situations when drawing up their policies.

It is not realistic to state that one to one situations should never take place. It is however, appropriate to state that where there is a need, agreed with a senior manager and/or parents/carers, for an adult to be alone with a child or young person, certain procedures and explicit safeguards must be in place. This also applies to those adults who do not work as part of an agency or organisation but owe a duty of care to the child or young person because of the nature of their work.

Adults should be offered training and guidance for the use of any areas of the workplace which may place themselves or children in vulnerable situations. This would include those situations where adults work directly with children and young people in unsupervised settings and/or isolated areas within community settings or in street-based projects for example.

One to one situations have the potential to make child/young person more vulnerable to harm by those who seek to exploit their position of trust. Adults working in one to one settings with children and young people may also be more vulnerable to unjust or unfounded allegations being made against them. Both possibilities should be recognised so that when one to one situations are unavoidable, reasonable and sensible precautions are taken. Every attempt should be made to ensure the safety and security of children and young people and the adults who work with them.

There are occasions where managers will need to undertake a risk assessment in relation to the specific nature and implications of one to one work. These assessments should take into account the individual needs of the child/young person and the individual worker and any arrangements should be reviewed on a regular basis.

Meetings with children and young people outside agreed working arrangements should not take place without the agreement of senior managers and parents or carers.

This means that adults should:

- *Ensure that when lone working is an integral part of their role, full and appropriate risk assessments have been conducted and agreed.*
- *Avoid meetings with a child or young person in remote, secluded areas.*
- *Always inform other colleagues and/or parents/carers about the contact(s) beforehand, assessing the need to have them present or close by.*
- *Avoid use of 'engaged' or equivalent signs wherever possible. Such signs may create an opportunity for secrecy or the interpretation of secrecy.*
- *Always report any situation where a child becomes distressed or angry to a senior colleague.*
- *Carefully consider the needs and circumstances of the child/children when in one to one situations.*

Home Visits

There are workers for whom home visits are an integral part of their work. In these circumstances it is essential that appropriate policies and related risk assessments are in place to safeguard children and young people and the adults who work with them.

A risk assessment should include an evaluation of any known factors regarding the child/young person, parents and others living in the household. Risk factors such as hostility, child protection concerns, complaints or

grievances can make adults more vulnerable to an allegation. Specific consideration should be given to visits outside of 'office hours' or in remote or secluded locations. Following an assessment, appropriate risk management measures should be in place before visits are agreed. Where little or no information is available, visits should not be made alone. There will be occasions where risk assessments are not possible or not available, e.g. when emergency services are used. In these circumstances, a record must always be made of the circumstances and outcome of the home visit. Such records must always be available for scrutiny.

Under no circumstances should an adult visit a child in their home outside agreed work arrangements or invite a child to their own home or that of a family member, colleague or friend. If in an emergency, such a one-off arrangement is required, the adult must have a prior discussion with a senior manager and the parents or carers and a clear justification.

These means that adults should:

- *Agree the purpose for any home visit with senior management, unless this is an acknowledged and integral part of their role e.g. social worker.*
- *Adhere to agreed risk management strategies.*
- *Always make detailed records including times of arrival and departure and work undertaken.*
- *Ensure any behaviour or situation which gives rise to concern is discussed with their manager and, where appropriate action is taken.*

This means that employers should:

- *Ensure that they have home visit and lone-working policies of which all adults are made aware. These should include arrangements for risk assessment and management.*
- *Ensure that all visits are justified and recorded.*
- *Ensure that adults are not exposed to unacceptable risk.*
- *Ensure that adults have access to a mobile telephone and an emergency contact person.*

Transporting Children and Young People

Use of vehicles

For their own protection staff should never give lifts to students. Employees using private vehicles for school business must ensure:

- The vehicle is road worthy and complies with Road traffic/Transport regulations.
- That the vehicle is insured for 'business use'.
- They are licensed to drive the vehicle.
- They do not drive under the influence of drink/drugs or where there is ill health that may impair their ability to drive the vehicle safely.

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 recorded and reported to a senior manager and parents/carers.

This means that all organisations:

- *Should have appropriate policies for transporting children and young people.*

This means that adults should:

- *Ensure they are fit to drive and free from any drugs, alcohol or medicine which is likely to impair judgment and/ or ability to drive.*
- *Be aware that the safety and welfare of the child is their responsibility until they are safely passed over to a parent/carer.*
- *Record details of the journey in accordance with agreed procedures.*
- *Ensure that their behaviour is appropriate at all times.*
- *Ensure that there are proper arrangements in place to ensure vehicle, passenger and driver safety. This includes having proper and appropriate insurance for the type of vehicle being driven.*
- *Ensure that any impromptu or emergency arrangements of lifts are recorded and can be justified if questioned.*

Required reading:

- Health and Safety Policy
- EPA Driving At Work Policy

Trips and Outings

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. 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.

Where activities include overnight stays, careful consideration needs to be given to sleeping arrangements. Children, young people, adults and parents should be informed of these prior to the start of the trip. In all circumstances, those organising trips and outings must pay careful attention to ensuring safe staff/child ratios and to the gender mix of staff especially on overnight stays.

Health and Safety arrangements require members of staff to keep colleagues/employers aware of their whereabouts, especially when involved in activities outside the usual workplace.

If the Trip Leader decides to allow staff to take some 'free time' during residential visits, it **may** be acceptable to consume alcohol in a different, non-visible location to the students. In this situation, care should be taken to ensure that staff regarded as 'on duty' understand that they are **not permitted** to consume alcohol during this time since they have a professional duty of care over the students attending the visit, and may be required to make professional decisions or actions.

It is an essential requirement that a **minimum of two members of staff** (male and female if the trip demands) remain 'on duty' to supervise the students on the trip, and 'staff drinking alcohol' **must** be part of the full Risk Assessment for the visit.

Careful consideration should be given as to how activities involving the taking of images are organised and undertaken. Care should be taken to ensure that all parties understand the implications of the image

being taken especially if it is to be used for any publicity purposes or published in the media, or on the Internet. There also needs to be an agreement as to whether the images will be destroyed or retained for further use, where these will be stored and who will have access to them.

Adults need to remain sensitive to any children who appear uncomfortable, for whatever reason, and should recognise the potential for such activities to raise concerns or lead to misunderstandings. It is not appropriate for adults to take photographs of children for their personal use.

This means that adults should:

- *Always have another adult present in out of workplace activities, unless otherwise agreed with a senior manager.*
- *Undertake risk assessments in line with their organisation's policy where applicable.*
- *Have parental consent to the activity.*
- *Ensure that their behaviour remains professional at all times (see section 3.7).*
- *Never share beds with a child/children or young people.*
- *Not share bedrooms unless it involves a dormitory situation and the arrangements have been previously discussed with senior manager, parents and children and young people.*

Photography, Video and Digital Images

The EPA Trust recognises that photographs, video recordings and digital images are an important part of school life. However, the creation, storage and use of images must always safeguard children's privacy, dignity and welfare.

Photographs, videos and audio recordings of pupils should only be taken for legitimate educational or Trust purposes using Trust-approved equipment and systems. Staff must comply with the Trust's Data Protection, ICT Acceptable Use and Online Safety policies, together with any parental consent arrangements.

Staff should:

- use only Trust-authorised devices to photograph or record pupils;
- check and adhere to parental consent arrangements before taking or using images;
- store photographs, videos and recordings securely using Trust-approved systems;
- ensure images are used only for legitimate educational or Trust purposes;
- report any inappropriate use, loss or unauthorised sharing of images immediately.

Staff must not:

- use personal mobile phones, tablets, smart watches or other personal devices to photograph or record pupils unless specifically authorised;
- upload or store pupil images on personal devices, personal cloud storage or public AI platforms;
- share images of pupils through personal email accounts, messaging applications or social media;
- create, manipulate or generate images of pupils using artificial intelligence (AI) without Trust authorisation;
- retain or use pupil images for personal purposes.

Staff should remain alert to safeguarding risks associated with digital technology, including AI-generated or manipulated images, and report any concerns in accordance with the Trust's safeguarding procedures.

Further guidance is provided in the Trust's ICT Acceptable Use Policy, Data Protection Policy and Online Safety Policy.

Access to Inappropriate Images and Internet Usage

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 not use equipment belonging to their organisation to access adult pornography; neither should personal equipment containing these images or links to them be brought into the workplace. This will raise serious concerns about the suitability of the adult to continue to work with children.

Adults should ensure that children and young people are not exposed to any inappropriate images or web links. Organisations and adults need to ensure that internet equipment used by children have the appropriate controls with regards to access. e.g. personal passwords should be kept confidential.

Where indecent images of children or other unsuitable material are found, the police and Local Authority Designated Officer (LADO) should be immediately informed. Adults should not attempt to investigate the matter or evaluate the material themselves, as this may lead to evidence being contaminated which in itself can lead to a criminal prosecution.

This means that organisations should:

- *Have clear e-safety policies in place about access to and use of the internet.*
- *Make guidance available to both adults and children and young people about appropriate usage.*

This means that adults should:

- *Follow their organisation's guidance on the use of IT equipment.*
- *Ensure that children are not exposed to unsuitable material on the internet.*
- *Ensure that any films or material shown to children and young people are age appropriate.*

Use of School Premises, Equipment & Communication Systems

Equipment and premises are available only for EPA-related activities and should not be used for fulfilment of another job or post or for excessive or regular personal use, unless authorised in writing and in advance by the CFO. This includes photocopy facilities, stationery, telephones, computers and premises. Any EPA equipment that is used outside EPA premises, for example laptops, should be returned to the EPA when the employee leaves employment or upon request by the CEO.

Low-Level Concerns

EPA Trust is committed to creating and maintaining a strong safeguarding culture in which children are protected, staff feel supported, and concerns about adults are identified and addressed at the earliest opportunity.

- A low-level concern is any concern, no matter how small, that an adult working in or on behalf of the Trust may have acted in a way that:
- is inconsistent with the Staff Code of Conduct;
- does not meet the threshold for referral through the allegations management process; or
- may indicate that the adult is becoming less able to maintain appropriate professional boundaries.
- Low-level concerns may arise from a single incident or a pattern of behaviour over time. Whilst such concerns may not meet the harm threshold, they should always be shared appropriately so that they can be considered within the wider context of safeguarding.

Examples of low-level concerns may include, but are not limited to:

- being over-familiar with children;
- showing favouritism towards an individual pupil;
- using inappropriate language or humour;
- failing to maintain professional boundaries;
- communicating with pupils outside agreed Trust procedures;
- using personal devices inappropriately;
- transporting pupils without authorisation;
- failing to follow safeguarding procedures;
- behaviour which could be perceived as grooming, even if unintentional.

The purpose of sharing low-level concerns is not to apportion blame but to enable early support, promote professional reflection, identify patterns of behaviour and maintain a culture of openness and accountability.

Responsibilities of Staff

All staff have a responsibility to report low-level concerns about the behaviour of any adult working in or on behalf of the Trust, including volunteers, supply staff, contractors and leaders.

Staff should also self-report if they believe that their own behaviour may have fallen below the expected professional standards or may have been capable of being misinterpreted.

Reporting concerns demonstrates professionalism and supports the Trust's commitment to safeguarding children.

Reporting Procedure

Low-level concerns should normally be reported promptly to the Headteacher.

Where the concern relates to the Headteacher, it should be reported to the Chief Executive Officer.

Where the concern relates to the Chief Executive Officer, it should be reported to the Chair of Trustees.

Reports should be factual, timely and confidential.

All concerns will be considered sensitively, fairly and proportionately, taking account of the context of the behaviour, any previous concerns and whether further action is required.

Recording

The Trust will maintain confidential records of all reported low-level concerns in accordance with its Low-Level Concerns Policy.

Records will:

- identify any emerging patterns;
- support decision making;
- ensure appropriate follow-up;
- inform future safeguarding decisions where appropriate.

Records will be retained in accordance with Trust retention schedules and relevant data protection legislation.

Relationship with Allegations

Where information received indicates that the harm threshold may have been met, the matter will immediately be managed in accordance with Part Four of Keeping Children Safe in Education and the Trust's Managing Allegations Against Staff procedures.

Creating a Culture of Openness

EPA Trust encourages all staff to raise concerns professionally and without fear of reprisal.

Safeguarding children requires an open and transparent culture in which all adults understand that:

- safeguarding is everyone's responsibility;
- concerns should never be ignored because they appear minor;
- professional curiosity should be exercised where behaviour gives cause for concern;
- children are best protected when adults are willing to speak up.

Whistle Blowing

Whistle blowing is the mechanism by which adults can voice their concerns, made in good faith, without fear of repercussion. Each employer should have a clear and accessible whistle blowing policy that meets the terms of the Public Interest Disclosure Act 1998. Adults who use whistleblowing procedure should be made aware that their employment rights are protected.

Adults should acknowledge their individual responsibilities to bring matters of concern to the attention of senior management and/or relevant external agencies. This is particularly important where the welfare of children may be at risk.

This means that organisations should:

- *Ensure they have appropriate whistle-blowing policies in place.*

- *Ensure that they have clear procedures for dealing with allegations against staff which are in line with their Local Safeguarding Children Board's procedures.*

This means that adults should:

- *Report any behaviour by colleagues that raises concern regardless of source.*

Whilst whistleblowing procedures remain available where there are concerns regarding malpractice, illegal activity or unsafe practice, staff should be aware that concerns regarding professional conduct which do not meet the harm threshold should normally be reported in accordance with the Trust's Low-Level Concerns Policy.

Sharing Concerns and Recording Incidents

Individuals should be aware of their organisation's child protection procedures, including procedures for dealing with allegations against adults. All allegations must be 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.

In the event of any allegation being made, to someone other than a manager, information should be clearly and promptly recorded and reported to a senior manager without delay.

Adults should always feel able to discuss with their line manager any difficulties or problems that may affect their relationship with children and young people so that appropriate support can be provided or action can be taken. It is essential that accurate and comprehensive records are maintained wherever concerns are raised about the conduct or actions of adults working with or on behalf of children and young people.

This means that adults:

- *Should be familiar with their organisation's system for recording concerns.*
- *Should take responsibility for recording any incident, and passing on that information where they have concerns about any matter pertaining to the welfare of an individual in the workplace.*
- *Staff should not delay sharing concerns whilst seeking additional evidence or reassurance. Where there is uncertainty, professional curiosity should prompt discussion with the Designated Safeguarding Lead rather than inaction.*

This means that organisations:

- *Should have an effective, transparent and accessible system for recording and managing concerns raised by any individual in the workplace.*

Teaching Standards

A teacher is expected to demonstrate consistently high standards of personal and professional conduct. The following statements define the behaviour and attitudes which set the required standard for conduct throughout a teacher's career. Schools should expect the same standards of behaviour for all staff who represent the school irrespective of role.

Teachers/staff uphold public trust in the profession and school and maintain high standards of ethics and behaviour, within and outside school, by:

- Treating pupils with dignity, building relationships rooted in mutual respect, and at all
- times observing proper boundaries appropriate to a teacher's professional position.
- Having regard for the need to safeguarding pupil's well-being, in accordance with statutory provisions.
- Showing tolerance of and respect for the rights of others.
- Not undermining fundamental British values, including democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs.
- Ensuring that personal beliefs are not expressed in ways which exploit pupil's vulnerability
- or might lead them to break the law.

Teachers/staff must have proper professional regard for the ethos, policies and practices of the school in which they teach, and maintain high standards in their own attendance and punctuality.

Teachers/staff must have an understanding of, and always act within, the statutory frameworks which set out their professional duties and responsibilities.

This should include expressing radical or extremist views.

This means that organisations should:

- *Ensure that the Induction performance management and recruitment policies reflect the expectation that extremist or radical views will not be tolerated.*

This means that adults should:

- *Be aware that behaviour or communication either electronic or other communication which undermines fundamental British values, whether expressed inside or outside school will be reported and could lead to disciplinary action.*

APPENDIX 1

This generic document can be used as a base upon which other disciplines/agencies develop specific guidance for adults working in specialised areas.



APPENDIX 2

This generic document can be used to support safer recruitment and selection practices, induction and on-going training programmes and where necessary, disciplinary and child protection procedures.



Appendix 3 – Summary of Staff Expectations

Staff SHOULD

Safeguarding

- Put the welfare of the child first.
- Maintain a child-centred approach.
- Read and understand KCSIE Part One.
- Know who the Designated Safeguarding Lead (DSL) and Deputy DSLs are.
- Report safeguarding concerns immediately.
- Exercise professional curiosity.
- Keep accurate, factual records.
- Work collaboratively with other professionals where appropriate.
- Participate in safeguarding training and updates.
- Maintain professional boundaries at all times.

Professional Conduct

- Act with honesty, integrity and professionalism.
- Be a positive role model.
- Act in the best interests of every child.
- Be open and transparent.
- Accept responsibility for your own actions.
- Seek advice whenever unsure.
- Record decisions that depart from normal guidance.
- Declare conflicts of interest and outside employment where required.

Professional Curiosity

- Notice changes in behaviour, attendance or presentation.
- Ask respectful questions.
- Follow up concerns.
- Never assume someone else has acted.
- Escalate concerns promptly.
- Record concerns factually.

Professional Boundaries

- Keep all relationships professional.
- Ensure interactions are appropriate and capable of scrutiny.
- Seek advice if boundaries become unclear.
- Report situations that could lead to misunderstanding.

Digital Communication

- Use Trust-approved communication systems.
- Use Trust devices where possible.
- Protect confidential information.
- Store images securely.
- Report online safety concerns immediately.
- Review AI-generated content before use.
- Follow filtering and monitoring procedures.

Physical Contact

- Use only necessary, proportionate physical contact.
- Explain why contact is necessary.
- Seek consent where appropriate.
- Respect dignity and privacy.
- Report and record incidents where appropriate.
- Follow individual care plans and risk assessments.

Behaviour

- Promote respectful relationships.
- Challenge discriminatory language.
- Challenge misogyny.
- Challenge harmful stereotypes.
- Report child-on-child abuse.
- Support victims.
- Follow the Behaviour Policy.

Confidentiality

- Share information appropriately.
- Protect confidential information.
- Follow GDPR requirements.
- Seek advice if unsure.
- Report concerns about adults immediately.

Staff MUST NOT

Safeguarding

- Ignore safeguarding concerns.
- Delay reporting concerns.
- Assume someone else has reported.
- Promise confidentiality to a child.
- Fail to act where a child may be at risk.

Professional Boundaries

- Form friendships with pupils.
- Develop exclusive relationships.
- Share personal information.
- Seek emotional support from pupils.
- Give preferential treatment.
- Blur professional boundaries.
- Groom or behave in a way that could be perceived as grooming.

Technology

- Use personal messaging with pupils.
- Use personal social media to communicate with pupils.
- Exchange personal contact details.
- Accept friend requests.
- Photograph pupils on personal devices.

- Upload confidential information to AI platforms.
- Upload safeguarding records to public AI tools.
- Circumvent filtering or monitoring systems.

Conduct

- Behave in a way that damages public confidence.
- Bully, intimidate or humiliate pupils.
- Abuse their position of trust.
- Use inappropriate language.
- Use degrading treatment.
- Use force as punishment.
- Behave inappropriately inside or outside work.

Social Contact

- Have secret contact with pupils.
- Build inappropriate relationships with families.
- Send personal communications without appropriate approval.
- Allow personal relationships to compromise professional judgement.

Sexual Conduct

- Enter into a sexual relationship with a pupil.
- Make sexual remarks.
- Send sexually suggestive communications.
- Discuss their own sexual relationships with pupils.
- Engage in grooming behaviour.

Physical Contact

- Touch pupils indecently.
- Engage in horseplay.
- Use unnecessary physical contact.
- Ignore a child's discomfort.
- Keep physical contact secret.

Personal Care

- Change alongside pupils.
- Shower or bathe with pupils.
- Carry out personal care that a child can do independently.
- Compromise a child's dignity or privacy.

Harmful Behaviour

- Ignore harmful behaviour.
- Dismiss concerns as "banter".
- Tolerate misogyny.
- Tolerate discriminatory language.
- Ignore child-on-child abuse.
- Minimise sexual harassment or online abuse.



STAFF SHOULD		STAFF MUST NOT	
	SAFEGUARDING - Put the welfare of the child first. - Maintain a child-centred approach. - Read and understand KCSIE Part One (or Annex A where appropriate). - Know who the Designated Safeguarding Lead (DSL) and Deputy DSLs are. - Report safeguarding concerns immediately. - Exercise professional curiosity. - Keep accurate, factual records. - Work collaboratively with other professionals where appropriate. - Participate in safeguarding training and updates. - Maintain professional boundaries at all times.		STAFFGUARDING - Ignore safeguarding concerns. - Delay reporting concerns. - Assume someone else has reported. - Promise confidentiality to a child. - Fail to act where a child may be at risk.
	PROFESSIONAL CONDUCT - Act with honesty, integrity and professionalism. - Be a positive role model. - Act in the best interests of every child. - Be open and transparent. - Accept responsibility for your own actions. - Seek advice whenever unsure. - Record decisions that depart from normal guidance. - Declare conflicts of interest and outside employment where required.		PROFESSIONAL BOUNDARIES - Form friendships with pupils. - Develop exclusive relationships. - Share personal information. - Seek emotional support from pupils. - Give preferential treatment. - Blur professional boundaries. - Groom or behave in a way that could be perceived as grooming.
	PROFESSIONAL CURIOSITY - Notice changes in behaviour, attendance or presentation. - Ask respectful questions. - Follow up concerns. - Never assume someone else has acted. - Escalate concerns promptly. - Record concerns factually.		TECHNOLOGY - Use personal messaging with pupils. - Use personal social media to communicate with pupils. - Exchange personal contact details. - Accept friend requests. - Photograph pupils on personal devices. - Upload confidential information to AI platforms. - Upload safeguarding records to public AI tools. - Circumvent filtering or monitoring systems.
	PROFESSIONAL BOUNDARIES - Keep all relationships professional. - Ensure interactions are appropriate and capable of scrutiny. - Seek advice if boundaries become unclear. - Report situations that could lead to misunderstanding.		CONDUCT - Behave in a way that damages public confidence. - Bully, intimidate or humiliate pupils. - Abuse their position of trust. - Use inappropriate language. - Use degrading treatment. - Use force as punishment. - Behave inappropriately inside or outside work.
	DIGITAL COMMUNICATION - Use Trust-approved communication systems. - Use Trust devices where possible. - Protect confidential information. - Store images securely. - Report online safety concerns immediately. - Review AI-generated content before use. - Follow filtering and monitoring procedures.		SOCIAL CONTACT - Have secret contact with pupils. - Build inappropriate relationships with families. - Send personal communications without appropriate approval. - Allow personal relationships to compromise professional judgement.
	PHYSICAL CONTACT - Use only necessary, proportionate physical contact. - Explain why contact is necessary. - Seek consent where appropriate. - Respect dignity and privacy. - Report and record incidents where appropriate. - Follow individual care plans and risk assessments.		SEXUAL CONDUCT - Enter into a sexual relationship with a pupil. - Make sexual remarks. - Send sexually suggestive communications. - Discuss their own sexual relationships with pupils. - Engage in grooming behaviour.
	BEHAVIOUR - Promote respectful relationships. - Challenge discriminatory language. - Challenge misogyny. - Challenge harmful stereotypes. - Report child-on-child abuse. - Support victims. - Follow the Behaviour Policy.		PHYSICAL CONTACT - Touch pupils indecently. - Engage in horseplay. - Use unnecessary physical contact. - Ignore a child's discomfort. - Keep physical contact secret.
	CONFIDENTIALITY - Share information appropriately. - Protect confidential information. - Follow GDPR requirements. - Seek advice if unsure. - Report concerns about adults immediately.		PERSONAL CARE - Change alongside pupils. - Shower or bathe with pupils. - Carry out personal care that a child can do independently. - Compromise a child's dignity or privacy.
			HARMFUL BEHAVIOUR - Ignore harmful behaviour. - Dismiss concerns as "banter". - Tolerate misogyny. - Tolerate discriminatory language. - Ignore child-on-child abuse. - Minimise sexual harassment or online abuse.

WELFARE FIRST Put the child's welfare first and keep them safe.	SPEAK OUT Share concerns immediately. It could make all the difference.	BE PROFESSIONAL Maintain boundaries, act with integrity and lead by example.	SAFEGUARDING IS EVERYONE'S RESPONSIBILITY
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IF YOU ARE UNSURE OR HAVE A CONCERN, SPEAK TO YOUR DSL OR DEPUTY DSL IMMEDIATELY