



# Staff Code of Conduct

## Staff Code of Conduct (Including EYFS)

**Policy Review Date:** September 2026

**Reviewed By:** J Callaway, SLT & Board of Governors

**Next Review:** September 2027 (or following incident, legislation or interim guidance)

September 2026 Reviewed & ratified by:

Headteacher: Mrs J Callaway

Chair of Governors: Dr Catherine

Kidd :

## Distribution

This policy is also made available on the school website or by hard copy upon request from the school office.

## Updates and Amendments to Policy

| Date      | Section Heading | Update Details                                                                                                                                        | Page N° |
|-----------|-----------------|-------------------------------------------------------------------------------------------------------------------------------------------------------|---------|
| SEPT 2021 |                 | Updated with due regard to KCSIE 2021                                                                                                                 |         |
| SEPT 2022 |                 | Updated with due regard to KCSIE 2022<br>Highlights in Green                                                                                          |         |
| SEPT 2023 |                 | Updated with due regard to KCSIE 2023<br>Highlights in Blue                                                                                           |         |
| SEPT 2024 |                 | Updated with due regard to KCSIE 2024<br>Highlights in Grey                                                                                           |         |
| SEPT 2025 |                 | Updated with due regard to KCSIE 2025<br>Highlights in green                                                                                          |         |
| SEPT 2026 |                 | Updated with due regard to KCSIE 2026<br>Highlights in yellow                                                                                         |         |
|           |                 |                                                                                                                                                       |         |
|           | APPENDIX 1      | Safer Recruitment Consortium (Feb 2022)<br>Guidance for Safer Working practice for those working with children and young people in education settings |         |



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## **Aims of this Code of Conduct**

Avalon expects all pupils to receive high-quality teaching and learning in a positive and respectful environment.

Staff should understand that their own behaviour, and the manner in which they conduct themselves with their colleagues, pupils, parents and other stakeholders, sets an example.

We recognise that the majority of staff members act appropriately and treat each other with dignity and respect; however, we consider it important to clarify the expected standards.

This policy forms part of a staff member's contract of employment and failure to comply with it, and with the associated school policies, may result in disciplinary action being taken, including legal action where this is warranted.

- This document applies to all staff members who are employed by the school,
- This document does not apply to:

Employees of external contractors. These employees are governed by their employment contracts and any relevant laws pertaining to their activities within the school, for example, the UK GDPR and the Data Protection Act 2018.

In accordance with this Code of Conduct and **KCSIE 2026** staff must pay due regard to the following documents which can be found in Appendix 1 of this Code of Conduct:

- Guidance for safer working practice for those working with children and young people in education settings February 2022

## **Professional behaviour and conduct**

Staff are expected to demonstrate consistently high standards of personal and professional conduct such that public confidence in their integrity is sustained.

Staff will:

- Have proper and professional regard for the ethos, policies and practices of the school.
- Maintain high standards in their attendance and punctuality.
- Take care of themselves and others affected by their activity at school.
- Cooperate with school leaders in meeting their duties under the relevant regulations.
- Treat pupils, parents, colleagues and external contacts with dignity and respect.
- Observe proper boundaries appropriate to their professional position, showing tolerance of and respect for the rights of others.
- Inform the headteacher if they are subject to a criminal conviction, caution, ban, police enquiry, investigation or pending prosecution.
- Be aware that professional behaviour and conduct is expected to be extended to extracurricular trips and visits.
- Be aware that professional behaviour and conduct extends to use of school devices, internet, technology systems and AI, both online and offline.
- Act appropriately in terms of the views they express – in particular, political views – and the use of school resources at all times.

Staff will ensure that they do not:

- Use foul or abusive language.
- Perpetrate discrimination, bullying, harassment, or intimidation, including physical, sexual and verbal abuse.
- Misuse or misrepresent their position, qualifications, or experience.
- Seek to bring the school into disrepute.
- Use school resources for political purposes.

## **Safeguarding pupils**

In accordance with '**Keeping children safe in education 2026**' (KCSIE), staff have a responsibility to safeguard pupils by:

- Providing help and support to meet the needs of pupils as soon as problems emerge.

- Protecting pupils from maltreatment, whether that is within or outside the home, including online.
- Preventing the impairment of pupils' mental and physical health or development.
- Ensuring that pupils grow up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all pupils to have the best outcomes.

To effectively safeguard pupils, staff are required to follow the procedures outlined in this Staff Code of Conduct, the Behaviour Policy, the Child Protection and Safeguarding Policy, and the Children Missing from Education Policy.

All staff must ensure that they do not act in a way that may put pupils at risk of harm, or lead others to question their actions. Staff should also be aware of the role of the DSL and when to contact them.

In accordance with the school's Behaviour Policy and Child Protection and Safeguarding Policy, staff will be prepared to identify pupils who may be subject to, or at risk of, various types of abuse, neglect and exploitation including, but not limited to, the following:

- Physical abuse
- Emotional abuse
- Sexual abuse
- Neglect
- Child-on-child abuse
- Child criminal exploitation (CCE)
- Child sexual exploitation (CSE)
- Domestic abuse
- FGM
- Serious violence

Staff will also be expected to understand that mental health problems can, in some cases, be an indicator that a pupil has suffered or is at risk of suffering abuse, neglect or exploitation

Copies of policies and a copy of **Part one of KCSIE** will be provided to staff at induction and during annual safeguarding training. Staff will have a clear understanding of the school's policies and procedures with regards to safeguarding issues, e.g. abuse, and the important role they play in preventing harm against pupils.

In accordance with the school's Child Protection and Safeguarding Policy, staff will also be aware that the following factors could increase a pupil's risk of being subject to safeguarding issues:

- Pupils who need a social worker (Child in Need and Child Protection Plans).
- Children absent from education, particularly if on repeat occasions and/or long periods of time.

- Elective Home Education (EHE).
- Pupils requiring mental health support.
- LAC, PLAC and care leavers.
- Pupils with SEND or health issues.
- Pupils who identify as or are perceived to be LGBTQ+.

If a staff member identifies a pupil who is subject to, or at risk of, abuse and neglect, they will follow the necessary reporting and referral procedures outlined in the Child Protection and Safeguarding Policy. Staff will be aware of the procedures to follow if a pupil tells them they are experiencing abuse, exploitation, or neglect.

In all cases, if a staff member feels unsure as to whether an incident or pupil would be classed as a safeguarding concern, they will speak directly to the DSL. Staff will not assume a colleague will take action and share information that might be critical in keeping children safe.

Staff will recognise, acknowledge, and understand that even if there are no reports of child-on-child abuse in the school, this does not mean it is not happening. Staff will understand the scale of harassment and abuse and challenge inappropriate behaviours between peers that are abusive in nature and report any concerns regarding any form of abuse to the DSL without undue delay.

Any member of staff member that has concerns about another staff member's actions or intent or believes these actions may lead to a pupil being put at risk of harm, will report this in line with the Whistleblowing Policy immediately so appropriate action can be taken. This includes if the staff member in question is a volunteer, supply staff or an individual using school premises to host extra-curricular activities.

If a staff member feels unable to raise an issue with the school, they will use other whistleblowing channels, including contacting the NSPCC's helpline on 0800 028 0285 (between the hours of 8:00am and 8:00pm Monday to Friday) or email address [help@nspcc.org.uk](mailto:help@nspcc.org.uk). Staff members can also access guidance at [www.gov.uk/whistleblowing](http://www.gov.uk/whistleblowing). Fear about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare of pupils.

Upskirting is not tolerated by the school and any incidents of upskirting must be reported to the DSL who will decide on the next steps to take, which may include involving the police.

If the concern is regarding the headteacher, staff will report this to the chair of the board of governors: Dr C. Kidd.

Staff will undergo safeguarding and child protection training at induction. This will include training around online safety, particularly concerning the understanding of roles and responsibilities in relation to filtering and monitoring, in line with the [filtering and monitoring standards](#). This training will be updated at least annually to continue to provide staff members with relevant skills and knowledge to safeguard children effectively.

Staff will recognise that, when teaching pupils about safeguarding and online safety, a one-size-fits-all approach may not be appropriate for every pupil, and a more personalised or contextualised approach may be needed for pupils who are vulnerable, victims of abuse and/or have SEND.

Staff will be aware of their local early help process, including Family Help and understand their role in it. Staff will also be aware of the process for making referrals to children's social care service (CSCS) and for statutory assessments under the Children Act 1989, along with the role they may be expected to play in such assessments.

Staff will be aware that confidentiality will never be promised to a pupil – staff will understand the procedure for if a pupil discloses a potential safeguarding issue, in accordance with the school's Child Protection and Safeguarding Policy.

Staff will reassure victims that they are being taken seriously and that they will be supported and kept safe by the school. They will never give the impression that pupils are creating a problem by reporting abuse, sexual violence or sexual harassment, nor should a pupil ever be made to feel ashamed for reporting an incident.

Staff will know how to manage the requirement to maintain an appropriate level of confidentiality, involving those who need to be involved, but will never promise a child that they will not tell anyone about a report of any form of abuse, as this may ultimately not be in the best interests of the child.

Staff will be aware of the school's legal duty to make a referral to the DBS where they consider an individual has engaged in contact that has harmed, or is likely to harm, a child.

## **Appearance and dress**

The school expects that staff members will:

- Ensure that their appearance is clean and neat when at work or representing the school.
- Dress in a manner that is appropriate to their role – the school will make reasonable adjustments to uniform expectations to suit disabilities, medical conditions, and religious and cultural beliefs. (Jeans are not permitted, unless for a specific event or themed day)
- Remember that they are role models for pupils, and that their dress and appearance should reflect this.
- Not dress in a way that would cause embarrassment to pupils, parents, colleagues or other stakeholders.
- Ensure that, if visible, tattoos do not cause offence to others; if tattoos are likely to cause offence, they must be covered up whilst in work.
- Ensure that jewellery and piercings are minimal and, in the health and safety interests of both staff and children, avoid anything that could catch or be caught by pupils.
- Ensure personal hygiene and appearance is respectful of being employed in a school setting.

## **Attendance**

The school expects that staff will:

- Attend work in accordance with their contract of employment and associated terms and conditions in relation to hours, days of work and holidays.
- Comply with the school's notification of sickness absence procedures.
- Make routine medical and dental appointments outside of their working hours or during holidays, where possible.
- Refer to the school's Staff Leave of Absence Policy if they need time off for any reason other than personal illness.
- Follow the school's absence reporting procedure when they are absent from work due to illness or injury.

## **Conduct outside of work**

Staff may undertake work outside school, either paid or voluntary, provided that it does not conflict with the interests of the school.

Staff will not engage in outside work which could seriously damage the reputation and standing of the school, the employee's own reputation, or the reputation of other members of the school community. Staff will also not engage in outside work at a level which may contravene The Working Time Regulations 1998 or affect an individual's work performance.

Staff committing offences that involve violence, possession or use of illegal drugs, or sexual misconduct is unacceptable, and will result in disciplinary procedures in line with the school's Disciplinary Policy and Procedure.

Staff will not engage in inappropriate use of social network sites which may bring themselves, the school, school community or employer into disrepute. This is explored further in the Acceptable use of technology section of this policy.

## **Smoking, E-cigarettes, alcohol and other substances**

Staff will not smoke or vape on, directly on or outside the school premises and whenever in the sight of pupils, parents or visitors.

Staff will not smoke or vape whilst working with or supervising pupils off-site, such as when on educational visits and trips.

Staff will report for work and remain in a condition to perform their duties free from the effects of drugs, alcohol or any other substances that may hinder judgement and cause changes in behaviour; this does not include over-the-counter painkillers such as paracetamol.

## **Health and safety**

Staff will:

- Be familiar with, and adhere to, the school's Health and Safety Policy and ensure that they take every action to keep themselves and everyone in the school environment safe and well.
- Comply with health and safety regulations, adhering to any rules, routines and procedures in place, and cooperate with school leaders and colleagues on matters relating to health and safety.
- Use the correct equipment and tools for the job and any protective clothing supplied.
- Inform the headteacher of any paid work which is undertaken elsewhere, for compliance with The Working Time Regulations 1998 (as amended).
- Adhere to their common law duty to act as a prudent parent would when in charge of pupils.

## **Conflicts of interests**

The school is aware that situations may arise where family interests or loyalties conflict with those of the school; however, staff have an obligation to act in the best interests of the school community to avoid situations where there may be a potential conflict of interest.

All staff will be able to demonstrate that they do not have a vested interest in any decision-making or budget spending. All declarations will be submitted in writing to the headteacher for inclusion on the school's Declared Conflicts of Interest Register.

Failure to make a relevant declaration of interests is a serious breach of trust and, therefore, if employees are in doubt about a declaration, they are advised to contact the school.

Any member of staff found to be withholding information about a conflict of interest will be subject to disciplinary action in line with the Disciplinary Policy and Procedure.

Staff and volunteers will be responsible for:

- Declaring any conflicts of interest.
- Acting in accordance with this policy at all times.
- Identifying any conflicts of interest that have not been previously declared.
- Following the school's Whistleblowing Policy where there are concerns that a conflict of interest has not been declared, and an individual might have subsequently benefitted.
- Ensuring that all individuals in a discussion do not have a vested interest in the subject.
- Informing the headteacher of any relatives who may have a declarable interest.
- Consider whether they need to declare their relationship with any individual where this might cause a conflict with school activities.

Membership to a trade union or staff representative group does not need to be declared.

## **Relationships with pupils**

The school expects that staff will:

- Maintain professional boundaries and relationships with pupils at all times, and will consider whether their actions are warranted, proportionate, safe and necessary.
- Act in an open and transparent way that would not lead to others questioning their actions.
- Ensure that they do not establish social contact with pupils for the purpose of securing a friendship, or to pursue or strengthen a relationship.
- Ensure that they do not develop personal or sexual relationships with pupils: this includes sexual remarks and discussing their own sexual relationships with, or in the presence of, pupils.
- Only contact pupils via the school's established mechanisms: personal phone numbers, personal email addresses or social media platforms will not be used to contact pupils.

Staff are aware that they must not:

- Discuss personal information with pupils, such as concerning their lifestyle or marital status, unless it is directly relevant to the topic being taught.
- Correspond in a personal nature through any medium with pupils, e.g. phone calls or text messages, unless it is within the staff member's role and via an approved communication method, e.g. school emails.
- Adopt an ongoing support role beyond the scope of their position.
- Use personal equipment for approved activities, such as a personal camera, unless approved in writing by the SLT, and will not photograph, audio record or film pupils without authorisation from the SLT and consent from the pupil's parent.
- Save images, videos or audio recordings of pupils on personal devices, unless authorised by the SLT or parents.
- Upload images, videos or audio recordings of pupils to any location without consent from parents and the SLT.
- Discuss or share information regarding other pupils or members of staff; staff should be aware of their surroundings when speaking to others, as their conversations may be overheard.
- Ignore instances of sexual harassment and inappropriate behaviour amongst pupils.
- Invite or allow pupils to visit their home.
- Allow pupils to access staff members' personal devices.
- Attend pupils' homes or their social gatherings, unless approved by the SLT.
- Be alone with a pupil outside of teaching responsibilities, unless approved by the SLT.
- Enter changing rooms or toilets occupied by pupils, when supervision is not required or appropriate, use toilet facilities allocated to pupils, or undress in facilities intended for use by pupils.
- Not transport a pupil unless in line with the Driving at Work Policy.
- Carry out one-to-one tutoring, mentoring or coaching of pupils, unless approved by the headteacher or SLT.
- Give personal gifts or special favours, or disproportionately single specific pupils out for special duties or responsibilities.
- Offer overnight, weekend or holiday care as a respite to parents without the approval of the headteacher.

Under the Sexual Offences Act 2003, it is an offence for a person aged 18 or over to have a sexual relationship with a child under 18 where that person is in a position of trust in respect to that child, even if the relationship is consensual.

Where inappropriate contact is made with pupils, this will be raised with the headteacher, and handled in line with the school's Child Protection and Safeguarding Policy and Staff Code of Conduct.

If a pupil is consistently attempting to befriend or contact a member of staff on social media, the member of staff will inform the headteacher as soon as possible.

Staff are strongly discouraged from forming personal relationships with former pupils, including on social media, as well as with the parents of any pupils on social media.

In the event of the school becoming aware of a close relationship between a member of staff and a former pupil which may raise concerns about their suitability to work with children, the headteacher will contact the LA designated officer (LADO) for advice and guidance.

Any inappropriate contact made with former pupils will be handled in line with the Child Protection and Safeguarding Policy and Staff Code of Conduct.

### **Appropriate language**

Staff will be informed that pupils should not be treated as friends. Staff will not:

- Use inappropriate names or terms of endearment.
- Allow inappropriate conversations or enquiries of a sexual nature to occur.
- Comment on a pupil's appearance, including personal flattery or criticism.
- Treat pupils disrespectfully or discriminatorily, based upon their perceived or actual protected characteristics.
- Subject pupils to humiliation, profanity, or vilification.
- Allow or partake in suggestive humour, banter, jokes or innuendos of a sexual nature.
- Use obscene or inappropriate gestures and language.
- Partake in personal conversations, including on the phone, where this may be overheard by pupils.

### **Physical contact with pupils**

All staff members will respect the personal space and privacy of all pupils and will avoid situations which unnecessarily result in close physical contact.

The school understands that there are circumstances in which it is entirely necessary for staff to have physical contact with pupils, e.g. when applying first aid and assisting with intimate care, but staff will only do so in a professional and appropriate manner in line with relevant school policies.

When physical contact is made with pupils, it is imperative that it is conducted in a way which is responsive to the pupil's needs, is of limited duration and is appropriate to their age, stage of development, gender, and background.

Staff will seek the pupil's permission, where possible, before initiating contact.

Staff will always use their professional judgement when determining what physical contact is appropriate, as this may differ between pupils, and ensure that the pupil's feelings and wishes are always taken into account.

Staff will never touch a pupil in a way which is indecent and will be aware that even well-intentioned physical contact may be misconstrued by a pupil, an observer or by anyone to whom this action is described and, therefore, will always be prepared to explain their actions.

Staff will not engage in rough play, tickling or play fights with pupils.

Physical contact will never be secretive; if a member of staff believes an action could be misinterpreted, this will be reported to the headteacher, or the Chair of Governors if the concern is about the headteacher, and appropriate procedures will be followed.

Where it is necessary in PE classes for teachers to demonstrate use of equipment, this will be conducted with another member of staff if possible. If a pupil is required to participate, their consent will be given before doing so.

If a pupil is in distress and in need of comfort as reassurance, staff may use age-appropriate physical contact, such as placing their hand on the pupil's shoulder. Staff will remain self-aware of their actions at all times and ensure that their contact is not threatening, intrusive or subject to misinterpretation.

The school acknowledges that situations may arise in which staff members will be required to use physical intervention, and in some cases reasonable force, in order to manage conflict, disruption and distressed behaviour when other measures have failed to do so. In these cases, staff will ensure that actions such as safe touch and reasonable force are used in a correct and safe manner, in accordance with the relevant legislation and national guidance and in line with the schools **Restrictive Intervention and Use of Reasonable Force Policy**.

In all interactions with pupils staff will always behave and act in a respectful and professional manner and staff will be aware that extra caution and consideration may be needed where it is known that a pupil has previously suffered from abuse or neglect.

## **Changing**

Pupils are entitled to respect and privacy whilst they are changing before/after PE; however, a level of supervision is required to ensure that pupils are safe, and that they are not subjected to bullying.

The supervision will be appropriate to the needs and ages of the pupils, and sensitive to the potential for embarrassment.

Staff will announce their intention of entering the changing room to allow pupils to maintain their privacy and will only remain in the changing room for as long as is necessary.

Staff will never change in the same area as pupils.

## **Transporting pupils**

Staff are aware that the safety and welfare of pupils is the responsibility of the school until pupils are with their parents. The school is committed to taking all possible safety measures to ensure the safety of pupils.

When it is necessary to transport pupils off-site, staff will gain consent from parents before transporting pupils and adhere to the appropriate school policies and risk assessments, such as the Safer Working Practices guidance.

Staff will ensure that they:

- Hold a full valid driving licence for the category of vehicle being driven and providing their licence details to the headteacher where required.
- Drive in accordance with the laws of the road and Highway Code.
- Check before each journey that the vehicle is roadworthy, e.g. tyres are properly inflated and meet legal requirements.
- Ensure that they are fit to drive; where their fitness to drive may be impaired, e.g. due to a medical condition or taking medication, they inform their line manager as soon as possible and notify the DVLA where required.
- Notify the headteacher where there is any change in their circumstance in relation to driving at work, e.g. if they acquire penalty points on their licence for motoring offences outside of work.
- Staff will only use their own vehicle to transport pupils where there is no practical or reasonable alternative, and where agreed upon by the headteacher and parents in advance of the journey. Only members of staff with the appropriate level of DBS check and safeguarding and behaviour management training will be permitted to transport pupils.

Where possible, two staff will be present in the vehicle to avoid any discrepancy regarding safeguarding concerns.

Staff will not offer pupils transport outside of their normal working duties, other than in an emergency or if a pupil is at risk. These circumstances will be recorded and reported to the headteacher and the pupil's parents.

## **Acceptable use of technology**

Staff are aware of the benefits and challenges associated with using technology, including AI, in school. When using technology, staff will always adhere to the various procedures, freedoms and limitations outlined in the relevant school policies, which include but are not limited to:

- Digital Safety Policy
- Safeguarding & Child Protection Policy
- Acceptable Use Policy
- Safe Use of AI Policy

All staff will maintain a professional level of conduct in their personal use of technology, and read, sign, and adhere to the school's Technology Acceptable Use Agreement.

Staff will be aware of how the use of technology can impact safeguarding and wellbeing issues, e.g. online abuse.

Staff will be vigilant to ensure their own behaviour is respectful and that pupils are using technology, including AI, appropriately while under their care.

### **Personal devices**

Personal devices are used in accordance with the provisions outlined in the policies above. Any personal electronic device that is brought into school is the responsibility of the user.

Personal devices are not permitted to be used in areas of school where children are present.

Staff are not permitted to use their personal devices during lesson time, other than in an emergency, and should inform the Headteacher of this circumstance.

Staff are not permitted to use their personal devices to take photos or videos of pupils.

### **Social media**

Staff will be aware that their conduct on social media can have an impact on their role and reputation within the school.

Staff will remain mindful of their use of social media and their web-based presence including written content, videos or photographs, and views expressed directly or indirectly which may bring themselves, the school, or the school community into disrepute.

Staff are required to employ the highest security settings on any personal profiles they may have.

Staff will not engage in inappropriate use of social networking sites including contacting pupils or their family members, accepting or inviting friend requests from pupils or their family members, or following pupils or their family members on social media.

The school understands that some staff are also parents of pupils at the school and, therefore, may wish to contact other parents. When doing so, staff will exercise their professional judgement and will not contact family members on social media if this would lead to a conflict of interest.

### **Premises, equipment and communication**

Staff are responsible for:

- Securing windows and doors when rooms are not in use.
- Ensuring that visitors sign in and out at the school office.
- Challenging any unidentified individuals and notifying the headteacher of any unauthorised person.
- Securing valuable equipment after use.
- Ensuring the security of school equipment if it is taken off the school premises, such as laptops.
- Acting in accordance with the school's Data Protection Policy, ensuring that data and information is secure.
- Reporting any minor security concerns to the headteacher.
- Reporting major security concerns directly to the police or emergency services, where appropriate and the Headteacher.
- Carrying their school ID with them at all times.
- Being responsible for the security of any of their own property that they bring to the school site.

School equipment and systems are available only for school-related activities and will not be used for the fulfilment of another job or for personal use, unless specifically authorised by the headteacher. Illegal, inappropriate, or unacceptable use of school equipment or communication systems may result in disciplinary action and, in serious cases, could lead to an employee's dismissal.

Employees receiving inappropriate communication or material, or who are unsure about whether something they propose to do might breach this policy, should seek advice from the headteacher.

The school reserves the right to monitor emails, phone calls, internet activity, AI use, or document production on school-owned equipment, principally in order to avoid offensive or nuisance material and to protect systems from viruses, but also to ensure proper and effective use of systems.

Communication systems may be accessed when the school suspects that the employee has been misusing systems or facilities, or for the investigation of suspected fraud or other irregularity.

Passwords should not be shared and access to computer systems must be kept confidential except on the express request of the headteacher. Breaches of this confidentiality may be subject to disciplinary action.

School equipment that is used outside the premises, e.g. laptops, will be returned to the school when the employee leaves employment or if requested to do so by the headteacher.

## **Photography, images and videos**

All staff will act in accordance with the school's Code of Conduct Policy, Safeguarding and Child Protection Policy, The Staff Handbook and Digital Safety Policy.

Photographs, images and videos will only be taken using school equipment – using personal mobile phones for this purpose is prohibited and taking images of pupils will not be taken for personal use. Avalon School is essentially a 'mobile phone free' environment by default and

follows the national guidance on mobile phone use as set out in the Children and Wellbeing and Schools Act 2026.

Staff will ensure that imagery and videos will be kept in an appropriate and secure place in school.

No pupil will be photographed in a state of undress or semi-undress, or in a situation which could be considered as indecent or sexual.

Photographs and video footage of pupils, school personnel, or visitors will not be used in the generation of new or composite images via artificial intelligence (AI).

Staff will not take images of a pupil's injury, bruising or similar (e.g. following a disclosure of abuse), even if they have been requested to do so by children's social care and staff members will not make audio recordings of any disclosure made by a pupil.

Consent for taking photographs will be obtained from parents, or the pupil themselves, if they are deemed old enough and able to make the decision for themselves.

The age of consent that is legislated is 13 and above; however, this is only applicable for online services provided directly to children. For everything else, an appropriate age of consent is considered on a case-by-case basis by the Data Protection Officer, headteacher and a pupil's parents (where appropriate).

Pupils who have not provided consent, either personally or via their parents, to have their photograph taken or be filmed will have their wishes respected, in line with the Photography Policy.

The headteacher will be notified of the proposed use of the imagery or video and the equipment and ensure that the use of such is included in lesson plans where this is necessary.

All photographs and videos will be available for scrutiny, and staff will be prepared to explain and justify the images or footage taken.

Careful consideration will always be given to the activities which are being filmed or photographed, to ensure that images or videos are not indecent and cannot be misused.

## **Data protection and confidentiality**

All staff will be aware of their responsibilities as laid out in the schools Data Protection Policy and in line with the core principles of the UK GDPR and the Data Protection Act 2018.

Staff members will not disclose sensitive information about the school, its employees, or the LA to other parties. The only exception to this being when the confidential information gives rise to concerns about the safety or welfare of a pupil.

Staff members have the right to request access to data that is held about them. Such requests will be made to the headteacher in writing in accordance with the school's Data Protection Policy and Records Management Policy.

Staff will ensure that:

- Confidential paper records are kept locked in a filing cabinet, drawer or safe place, with restricted access, and will not be left unattended or in clear view anywhere with general access.
- Implement a 'clear desk policy' to avoid unauthorised access to physical records containing sensitive or personal information.
- Memory sticks are not used to hold personal information unless they are password-protected and fully encrypted.
- They will not use their personal laptops or computers for school purposes. All necessary members of staff are provided with their own secure login and password.
- When sending confidential information staff will always check that the recipient is correct before sending.
- They involve the Data Protection Officer / Headteacher in all data protection matters closely and in a timely manner.
- They only use AI systems that have been tested and approved for use by the school.

Before sharing data, all staff will ensure:

- They are allowed to share it.
- That adequate security is in place to protect it.
- Who will receive the data has been outlined in a privacy notice.

Where personal information that could be considered private or confidential is taken off the premises, either in electronic or paper format, staff will take extra care to follow the same procedures for security, e.g. keeping devices under lock and key. The person taking the information from the school premises accepts full responsibility for the security of the data.

When pupils and staff join the school, the staff member or pupil (or, where appropriate, pupil's parent) will be required to complete a consent form for personal data use. This consent form deals with the taking and use of photographs and videos, amongst other things. Where appropriate, third parties may also be required to complete a consent form.

The school holds the right to take the necessary disciplinary action against a staff member if they believe them to be in breach of the above security measures.

## **Integrity of records**

The deliberate falsification of documents, such as references, academic qualifications, or legal documents, is unacceptable. Where a staff member falsifies records or other documents, including those held electronically, this will be regarded as a serious disciplinary matter and potentially a criminal offence.

## **Low Level Concerns**

KCSIE recognises that sometimes staff can act in a way that creates "nagging doubt" without being clearly unacceptable. The chart below provides a traffic light guide to behaviour that is appropriate (as per this document), that is possibly illegal (an allegation), and behaviour that falls in between (amber).

### **Allegation**

Behaviour which indicates that an adult who works with children has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children.

### **Low-Level Concern**

Any concern – no matter how small, even if no more than a ‘nagging doubt’ – that an adult may have acted in a manner which:

- is not consistent with an organisation’s Code of Conduct, and/or
- relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult’s suitability to work with children.

### **Appropriate Conduct**

Behaviour which is entirely consistent with the organisation’s Code of Conduct, and the law.

The school has policies and procedures in place for dealing with concerns, including allegations, which do not meet the “harm threshold” (as defined above as an allegation). Such concerns may arise from a range of sources, including suspicion or complaint, or a disclosure from a child, a parent, a member of staff or another adult. A concern may also arise from the undertaking of vetting checks. The School will follow its procedures to identify, undertake and record any necessary action. Such procedures include, but are not limited to;

- complaints procedure
- safeguarding policy
- staff disciplinary and grievance procedures

As part of its safeguarding procedures, the school promotes an open and transparent culture in which all concerns about all adults working in or on behalf of the school (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately. The term ‘low level’ does not mean that a concern is insignificant, but defines it as not meeting the ‘harm threshold’ as cited above. Such a concern, however small, may indicate that a member of staff, supply staff or a volunteer may have acted in a way that;

- is inconsistent with the staff code of conduct
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

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

- being over friendly with children;
- having favourites;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating or offensive language

The schools policy for how to handle Low Level Concerns that do not meet the “harm” threshold is detailed in the Safeguarding policy

The basic instruction is that you inform the Headteacher (or DSL) immediately of your concern, this can then be appropriately investigated and action can be taken. If the concern regards the headteacher it is appropriate to inform the Chair of Governors. Further information can be found in the safeguarding policy.

## **Contacts**

Staff members will not use school business contacts for acquiring materials or services at trade/discount prices for non-school activities.

## **Monitoring and review**

This document will be reviewed on an annual basis by the headteacher and any changes made will be communicated to all members of staff.

All members of staff are required to familiarise themselves with this document as part of their induction programme and on an annual basis in regard to any updates.

All staff should also take due regard for the guidance document (see Appendix 1)

Guidance for safer working practice for those working with children and young people in education settings (February 2022)

## **APPENDIX 1**

### **Guidance for safe working practice February 2022**