



# King William's College, The Buchan School & The Buchan Nursery

Staff and School Community Code of Conduct

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## AIMS OF KING WILLIAM'S COLLEGE AND THE BUCHAN ("THE SCHOOL")

Our vision for the next five years of King William's College and The Buchan School is:

A joyful and flourishing learning community in a spectacular natural setting.

The **purpose** of our school is:

To provide first class, distinctive independent education to children from Early Years to Sixth Form, to prepare them for their exciting future lives on and off the Isle of Man. Our pupils, no matter what their ability, will work hard, succeed, and leave school confident in their own identity, proud of their badge, and eager to embark on further study, employment and service around the world.

We are guided by a long-standing set of **values**:

The Buchan School Motto is *Fortior Qui Melior (The braver the better*), while The Buchan Charter states "We are kind. We are honest. We are polite. We always do our best. Love your neighbour (everyone) as much as you love yourself."

The KWC Motto is **Assiduitate Non Desidia (Through industry not sloth).** 

KWC is proud to be an IB World School and espouse the IB Learner Profile. We want our pupils to be: *Inquirers, Knowledgeable, Thinkers, Communicators, Principled, Open-minded, Caring, Risk-takers, Balanced, and Reflective.* 

Strategic Priority 1: Secure excellent academic outcomes which position the school unequivocally as the leading school on the Isle of Man and competitive with UK non-selective independent schools.

Strategic Priority 2: Ensure that the school's pastoral care remains outstanding so that we are always known for our distinctive character education and the caring, kind, healthy and well young people we produce.

Strategic Priority 3: Broaden and deepen the range of co-curricular activities offered to give pupils unforgettable experiences outside the classroom.

Strategic Priority 4: Building on the school's international ethos, inculcate a truly global mindset in all stakeholders.

Strategic Priority 5: Re-position the School at the heart of Manx life – the warm hub of the community with a profound interest in local affairs and a clear measurable benefit to the whole island.

## **Kindness**

#### Model kindness

Lead by example and show everyone else what being kind looks like.

## **Encourage kindness**

Have an expectation that others will be kind - carry out acts of kindness

#### Notice kindness

Recognise and praise others when you notice them being kind.

## Stand up for others

Give support to others and let them know they are not alone.

## Be kind to yourself

Do not expect perfection. Challenge yourself while looking after your wellbeing.

## Wellbeing

## Mind your Head!

Connect with the people around you

Be active. Go for a walk or run, cycle, play a game, garden or dance.

Take notice. Be observant, look for something beautiful or remark on something unusual.

Keep learning.

Give what you can: time, patience, and understanding. Be kind.

## Challenge

## Set yourself goals

Everyone has their own goals. What can you do to challenge yourself?

## Be Realistic

Consider having four realistic goals at a time: academic, mental, social and physical.

### Be Resilient

What do you do when you face a challenge? What do you do when things do not go to plan?

### Be Determined

If at first you do not succeed, try, try again.

#### 1. INTRODUCTION

- 1.1 King William's College ("the School", which for the purposes of this Policy includes the Buchan School and The Buchan Nursery), and its Governing Body is committed to safeguarding and promoting the welfare of children and young people and believes that all pupils, regardless of age, special needs or disability, racial/cultural heritage, religious belief or sexual orientation have the right to be protected from all types of harm and abuse. The School expects all Staff to share this commitment and this Safeguarding and Child Protection Policy forms a fundamental part of our approach to providing excellent pastoral care to *all* pupils, including young people who may be over the age of 18 years.
- 1.2 The School believes that all staff, parents and young people are entitled to a safe and protective environment in which to learn and work.
- 1.3 Although King William's College is not subject to UK law, the School seeks to adopt best practice in the UK in terms of the Independent Schools Inspectorate ("ISI") Regulations and Requirements.
- 1.4 ISI has revised the Regulatory Requirements with effect from April 2014 in the light of the UK Department of Education statutory guidelines for schools and colleges entitled 'Keeping Children Safe in Education, April 2014' ("KCSIE")- updated September 2024.
- 1.5 Paragraph 67 of the revised Regulations requires schools to adopt a Staff Behaviour Policy/Code of Conduct which should provide clear guidelines about behaviour and actions so as not to place pupils or staff at risk of harm or of allegation of harm to a pupil.
- 1.6 This code helps all staff to understand what behaviour is and is not acceptable. Behaviour that will cause harassment, alarm or distress to other members of the community is contrary to the aims of the School.
- 1.7 Staff should be aware that a breach of this code of conduct, the law and/or other professional guidelines could result in formal disciplinary action being taken against them by the school, criminal action and/or other proceedings including barring by the Disclosure and Barring Service from working in regulated activity, or for acts of serious misconduct prohibition from teaching by the Teaching Regulation Agency.
- 1.8 This policy is in addition to the whole staff handbook.

#### 2. PURPOSE, SCOPE AND PRINCIPLES

This Code of Conduct/Behaviour Policy is designed to give clear guidance on the standards of behaviour all School staff are expected to observe, and the School should notify staff of this code and the expectations therein. Children are prone to exaggeration and therefore it is essential that all staff maintain the highest possible standards. The aims of the School are given above, with respect, common courtesy and a sense of community being at the core.

- 2.1 Adults in a school community are role models and are in a unique position of influence. They must adhere to behaviour that sets a good example to all the pupils and other staff within the School, demonstrating the benefits of a positive professional relationship at all times. The rewards of working with such a close knit community are wonderful and little triumphs can brighten entire days.
- As a member of a school community, each member of staff has an individual responsibility to maintain their own reputation and the reputation of the School, whether inside or outside working hours. Whether you like it or not, if you are a Head of Year, House Staff or Tutor, the group of children in your care will take on some of your characteristics. Be careful that your strong qualities do not depress (for example, the non-sporty child in a Tutor group run by a games fanatic) and your weaknesses (poor administration, forgetting to shave, enjoyment of idle gossip etc) do not catch on.
- 2.3 The School community will not accept any kind of abusive behaviour or threats. Physical attacks and threatening behaviour, abusive or insulting language verbal or written, to staff, governors, parents and carers, children and other users of the School premises will not be tolerated. Any reports of this kind of behavior will be considered in lines with the appropriate school policy (e.g. Behaviour Management Policy, Complaints Policy, Grievance Procedure or Staff Disciplinary Procedure). Advice may be sought from the Police in cases of nuisance or disturbance on School premises.

- 2.4 This Code of Conduct applies to all staff who are employed by the School, as well as volunteers, Governors and Trustees, and parents. References to "staff" in this policy includes individuals from all of these groups.
- 2.5 Where reference is made to the Principal, it should be assumed this also refers to the Head at Buchan or the Chief Operating Officer, as applicable.
- 2.6 The safeguarding policies are intended to encourage and sustain an atmosphere of mutual trust and to promote the positive, caring and professional relationships between staff, between pupils, and between staff and pupils that are essential in a school environment.
- 2.7 The following guidance is given to staff to ensure that their behaviour and actions do not place pupils or themselves at risk of harm or of allegations of harm to a pupil. Staff should be punctual; Classes should not be left unattended, except in an emergency; Pupils and children of members of staff must not be given access to keys and key codes or be allowed to enter sensitive or potentially dangerous places.
- 2.8 Whilst every attempt has been made to cover a wide range of situations, it is recognised that any guidance cannot cover all eventualities. There may be times when professional judgments are made or actions taken in the best interests of a child in situations not covered by this document or related policies. It is expected that in such circumstances staff will act reasonably, record what has taken place and the justification for it and always advise the Designated Safeguarding Lead and/or the Principal as soon as possible.
- 2.9 Adults are expected to make judgements about their behaviour in order to secure the best interests and welfare of the pupils in their charge and, in so doing, will be seen to be acting reasonably. Staff should always consider whether their actions are warranted, proportionate, safe and applied equitably.

#### 3. SETTING AN EXAMPLE

- 3.1 All staff who work in schools set examples of behaviour and conduct which can influence pupils and other staff.
- 3.2 All staff must, therefore, demonstrate the highest standards of conduct in order to encourage our pupils and colleagues to do the same.
- 3.3 Staff are responsible for their own actions and behaviour and ensuring that they avoid putting themselves at risk of allegations of abusive or unprofessional conduct. Any conduct that leads any reasonable person to question their motivation and intention must be avoided.
  - Types of behaviour that are considered serious and unacceptable and will not be tolerated towards any member of the School community:

Please note this is not an exhaustive list, but seeks to provide illustrations of such behaviour:

- Shouting, either in person or over the telephone
- Inappropriate posting on Social Networking sites which could bring the School into disrepute or be deemed as bullying
- Speaking in an aggressive/threatening tone
- Threatening, abusive, rude or insulting language verbal or written
- Physically intimidating, e.g. standing very close
- The use of aggressive hand gestures/exaggerated movements
- Physical threats
- Shaking or holding a fist towards another person
- Swearing
- Pushing
- Hitting e.g. slapping, punching or kicking
- Spitting
- Racist or sexist comments

#### 4. SAFEGUARDING PUPILS/STUDENTS

- 4.1 Staff have a duty to safeguard pupils from harm and abuse.
- 4.2 The duties of staff to safeguard pupils are set out in the School's Safeguarding and Child Protection Policy.

#### 5. STAFF, PARENT & PUPIL RELATIONSHIPS

- 5.1 Staff must always think carefully about their own conduct and the way in which they build relationships. Any sexual behaviour by a member of staff with or towards a pupil is unacceptable. Sexual activity involves physical contact and non-contact activities, such as causing pupils to engage in or watch sexual activity.
  - a) All adults working with students in education settings are in a position of trust in relation to the young people in their care.
  - b) Staff should be aware that:

5.1.1	some actions may be misconstrued by pupils as unprofessional conduct. Therefore
	staff should all be alert to situations where they and other staff (including visiting staff
	and volunteers) are potentially vulnerable to false allegations of abuse.

- 5.1.2 inappropriate behaviour with or towards children or pupils of any age is unacceptable and likely to constitute gross misconduct. In particular, 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 of that child, even if the relationship is consensual. A situation where a person is in a position of trust could arise where the child is in full-time education and the person looks after children under 18 in the same establishment as the child, even if s/he does not teach the child.
- 5.1.3 the school is under a duty to consider making a referral to the Teaching Regulation Agency where a teacher has been dismissed (or would have been dismissed had they not resigned) for: unacceptable professional conduct; conduct that may bring the profession into dispute; or a conviction, at any time, for a relevant offence.
- 5.1.4 Staff undertake appropriate training so that they are fully aware of those behaviours that may constitute 'grooming' and they are made aware of their responsibility to always report to the Designated Safeguarding Lead and/or Principal any concerns about the behaviour of a colleague which could indicate that a pupil is being groomed.

  5.1.5 Staff may have genuine friendships and social contact with parents of pupils independent of the professional relationship. They should advise the Senior Leadership Team of any regular social contact they have with a pupil which could give cause for concern. Any requests or arrangements where parents wish to use the services of a member of staff outside the workplace e.g. babysitting or tutoring should be notified.

#### 6. INFATUATIONS & CRUSHES

Any member of staff who receives a report, overhears something, or otherwise notices any sign, however small or seemingly insignificant, that a young person has become, or may be becoming infatuated with either themselves or a colleague, should immediately report this to the Principal or Designated Safeguarding Lead. In this way appropriate early intervention can be taken which can prevent escalation and avoid hurt, embarrassment or distress for those concerned.

#### 7. RESPECT

- 7.1 Staff must show appropriate respect for pupils, parents, carers and colleagues.
- 7.2 Staff must also show appropriate respect for any individual they come into contact with in connection with their employment by the School.
- 7.3 Staff must avoid using inappropriate or offensive language and/or behaviour at all times.
- 7.4 Staff must not demean or undermine pupils, their parents or carers or colleagues.

#### 8. PUPIL DEVELOPMENT

- 8.1 Staff must take reasonable care of pupils under their supervision with the aim of ensuring their safety and welfare.
- 8.2 Staff must comply with School policies and procedures that support the well-being and development of pupils.
- 8.3 Staff must co-operate and collaborate with colleagues and with external agencies where necessary to support the development of pupils.
- 8.4 Staff must follow reasonable instructions that support the development of pupils.

#### 9. HONESTY AND INTEGRITY

- 9.1 Staff must maintain high standards of honesty and integrity in their work. This includes the handling of money, claiming of expenses and the use of school property and facilities.
- 9.2 Gifts from suppliers or associates of the School must be declared to the Principal, with the exception of 'one off' token gifts from pupils or parents. Personal gifts from individual members of staff to individual pupils are inappropriate and could be misinterpreted.

#### 10. CONDUCT OUTSIDE WORK

- 10.1 Staff must not engage in conduct outside work which could seriously damage the reputation and standing of the School or the employee's own reputation or the reputation of other members of the school community.
- 10.2 In particular, criminal offences that involve violence or possession or use of illegal drugs or sexual misconduct are likely to be regarded as unacceptable.
- 10.3 Full time staff may not undertake work outside School, either paid or voluntary, without the permission of the Principal.
- 10.4 Part time staff may undertake work outside school, either paid or voluntary, provided that it does not conflict with the interests of the School nor be to a level which may contravene the working time regulations or affect an individual's work performance.

#### 11. CONFIDENTIALITY

- 11.1 Where staff have access to confidential information about pupils or their parents or carers, or colleagues staff must not reveal such information except to those colleagues who have a professional role in relation to the pupil or colleague.
- 11.2 All staff are likely at some point to witness actions/behaviour which need to be kept confidential. For example, where a pupil is bullied or otherwise harmed, this needs to be reported and dealt with in accordance with the appropriate school procedure. However, this incident must not be discussed outside the school, including with the pupil's parent or carer, nor with colleagues in the School except with a senior member of staff with the appropriate role and authority to deal with the matter.
- 11.3 However, in the context of Safeguarding/Child Protection, staff have an obligation to report concerns in certain circumstances. Staff responsibilities in this area are set out in the School's Safeguarding and Child Protection Policy.
- 11.4 Members of staff should be mindful of their duty of confidentiality and their duty to maintain the reputation of the school when engaged in any communication about the school.

#### 12. MEETINGS

12.1 Meetings should be held during normal school hours. Avoid wherever possible unobserved situations of one-to-one contact with pupils, although it is appreciated that some one-to-one situations are unavoidable and necessary in the course of teaching, eg peripatetic music lessons, sports coaching sessions etc.

- 12.2 Meetings should always be held in an appropriate location. Where there is a need for one to one meetings to take place with pupils, staff should ensure that the meeting room affords sufficient privacy but is still in the view of others. Where possible, talk to the pupil with a desk between you and avoid any physical contact. If a pupil becomes distressed, an additional teacher could be called to provide assistance.
- 12.3 If a member of staff lives on site they must not take a pupil into their accommodation unless another member of staff is present. The exception to this would be in the context of Housemaster/Housemistress or Housemother accommodation when it may be appropriate to have a one to one meeting in private.
- 12.4 Unless with the prior permission of the Principal, Staff should not let individual pupils into their homes and should avoid seeing pupils in their homes even in pairs. The only exception to this would be if a pupil was to visit a member of staff's home for the purpose of meeting with the children of that member of staff.
- 12.5 If a member of staff arranges to see pupils in School during the holidays or out of school hours they should ensure that they hold the sessions in an area that can be overlooked. They should ensure also that another member of staff is aware of the arrangements.
- 12.6 A member of staff should not visit a pupil in the pupil's own home unless at the invitation of the pupil's parents. In such circumstances it would be inadvisable to be alone with the pupil.
- 12.7 A member of staff should not organise a recreational outing or social event for pupils unless with the Principal's permission. An appropriate outing or social event might be a sports dinner, a Choir outing or a meal organized by a tutor for their tutor group. Such events must be appropriately staffed and pupil conduct monitored. Staff attending such an event are expected to demonstrate high standards of conduct.

#### 13. PHYSICAL CONTACT

- 13.1 Be very mindful how you touch pupils, as actions can be misconstrued.
- 13.2 There are circumstances in School where physical contact is either necessary or reasonable action to take for example in games or musical instrument lessons, to prevent a pupil from falling or to administer first aid but staff must be aware that the action may be misconstrued or cause offence. If a child's reaction shows that they are uncomfortable with being touched, the member of staff should adjust his/her behaviour accordingly.
- 13.3 Be cautious when comforting a distressed pupil with physical contact which should never be in private. Whenever a member of staff touches a child she/he should be aware that the action may be misconstrued or cause offence. Bear in mind the pupil's age and ethnicity, the nature of the distress and their needs and the physical environment. Common sense dictates, however, that there are some situations where appropriate physical contact is either necessary or reasonable action to take e.g. to prevent a child from falling; to administer first aid; to give reassurance to or comfort a younger child. Contact may also be required if the child has visual or hearing impairments or mobility difficulties. If a child's reaction shows that they are uncomfortable with being touched, the member of staff should adjust his/her behaviour accordingly.
- 13.4 If any physical contact occurs in a one-to-one situation, or if a child's reaction to physical contact shows that they are uncomfortable with being touched a prompt report should be made to the Principal.
- 13.5 Do not engage in or allow any sexually provocative games whether based on talking or touching or engage in 'horseplay' involving pupils.
- 13.6 When challenging an infringement of the uniform rules, it is not advisable to touch a pupil or an item of their clothing whilst they are wearing it.
- 13.7 The School has a restraint policy which must be adhered to. This can be found on the School Website or a paper copy may be obtained from The Principal's Office.
- **13.8** The Buchan Nursery has an Intimate Care Procedure which must be adhered to. This can be found on the School Website.

#### 14. COMMUNICATION

- 14.1 Do not engage in inappropriate communication with pupils, colleagues or parents. Communication between staff, or staff and pupils should be restricted to the proper discharge of the professional duties of the member of staff. Informal and personal communication must be avoided.
- 14.2 If a member of staff needs to communicate electronically with a pupil, the School's email system must be used, apart from Boarding staff who may, on occasion, text from a mobile.
- A member of staff must not accept current pupils as contacts on social networking sites such as Facebook. 14.3 Further guidance is given in the School Social Media Policy. Social media websites are being used increasingly to fuel campaigns and complaints against schools, Principals, school staff, and in some cases, other parents/pupils. The School considers the use of social media websites being used in this way as unacceptable and not in the best interests of the children or the whole school community. Any concerns you may have must be made through the appropriate channels by speaking to a member of staff, Head of Year, the Principal, member of the Senior Leadership Team or the Chair of Governors, so they can be dealt with fairly, appropriately and effectively for all concerned. In the event that any member of the school community is found to be posting libelous or defamatory comments on Facebook or other social network sites, they will be reported to the appropriate 'report abuse' section of the network site. All social network sites have clear rules about the content which can be posted on the site and they provide robust mechanisms to report contact or activity which breaches this. The School will also expect that the member of the school community removes such comments immediately. In serious cases the School will also consider its legal options to deal with any such misuse of social networking and other sites. Additionally, and perhaps more importantly is the issue of cyber bullying and the use by one person to publicly humiliate another by inappropriate social network entry. We will take and deal with this as a serious incident of bullying. Thankfully such incidents are extremely rare.
- 14.4 Staff private mobile telephone numbers should not generally be given to pupils. The exception to this guidance is, for example, when a member of staff is responsible for pupils on a school trip or tour.
- 14.5 Never use sexual, suggestive, discriminatory or threatening words or language (or words or language which might be interpreted as such) in communicating with a pupil, parent, carer or colleague.
- 14.6 Avoid 'favouritism' and singling out 'troublemakers'. Staff should congratulate pupils on successes and recognize their efforts; however, staff should not make comment to a pupil on disciplinary matters involving a pupil with which they are not directly concerned.
- 14.7 Staff should never discuss students (or their families) in the hearing of other students. Unsolicited personal remarks about another student, even if intended to be positive or jocular, are not appropriate.
- 14.8 Members of staff should exercise professionalism and confidentiality when communicating matters concerning the school within or without the school community.
- 14.9 Staff must not discuss their own relationships or personal life with a student, nor should they instigate a discussion about a student's own personal relationships unless there is a specific welfare concern. Staff should avoid being led into the disclosure of personal information about other members of staff,
- **14.10** Members of staff must not make personal calls on mobile telephones or access other means of e-communication during teaching time.

#### 15. BOARDING ACCOMMODATION

- 15.1 Members of staff visiting boarding houses, particularly those housing members of the opposite sex, must exercise discretion and common sense.
- 15.2 In normal circumstances, no member of staff should enter boarding accommodation without the knowledge of the Housemaster/Housemistress.

- 15.3 Never enter a pupil's room where a pupil may be changing his/her clothes without getting his/her consent to enter. Knock before entering a study/bedroom
- 15.4 If a member of staff visits a boarder who is alone in a room, the door should be kept open.
- 15.5 In the environment of boarding accommodation, the opportunity for mis-interpretation of behavior is perhaps particularly acute. Staff should report promptly to the Housemaster/Housemistress any incident which might be mis-interpreted.
- 15.6 In the boarding houses all staff should avoid entering, except in the case of an emergency, the washing, changing and toilet facilities when they are in use.
- 15.7 In the boarding houses, staff of the opposite sex who are not resident in the House, should not, in general, go into the sleeping areas after 2100. Where this is necessary, such as for the final check of the night, they should be in the company of a senior pupil another member of staff.

#### 16. MEDICATION, SMOKING AND ALCOHOL

- 16.1 Staff should not consume or be under the influence of alcohol or any substance, including prescribed medication, which may affect their ability to care for children.
- 16.2 If staff are taking any medication they must seek medical advice to ensure that it does not affect their ability to care for children.
- 16.3 Staff medication when on school premises must be stored securely and out of the reach of children at all times.
- 16.4 Members of staff must abide by the law of the land in terms of offering alcohol to pupils.
- **16.5** Staff may not drive a school vehicle if they have consumed alcohol.
- **16.6** Staff must not become intoxicated in the presence of children.
- 16.7 Alcohol should not in any circumstances be offered to a pupil who is not yet in the Sixth Form.
- 16.8 At the discretion of the Housemaster/Housemistress it would be acceptable for a Sixth Form boarder to be offered an alcoholic drink on occasion. In these circumstances, the Housemaster/Housemistress should exercise sensible caution to monitor the consumption of alcohol.
- 16.9 Alcohol may be offered to pupils at certain school social events (both onsite and offsite) attended by pupils and members of staff (such as the Epiphany Dinner, the Sixth Form Ball, the Valedictory Dinner, the Serenade Evenings, Sports Dinner, Founders' Ball etc). On these occasions, attending members of staff have a responsibility to monitor and regulate the consumption of alcohol by pupils to avoid harm.
- 16.10 The School is a non-smoking campus and it is against the law to smoke in the premises. Staff should not smoke in front of pupils at school or on school trips. This includes e-cigarettes.

#### 17. SCHOOL TRIPS

- 17.1 This staff code of conduct applies on school trips. Staff have a duty to ensure their behaviour remains professional at all times.
- 17.2 Staff:pupil ratios and gender mix must be carefully considered as part of the early planning and risk assessment for a trip and should be agreed with the Deputy Head Pastoral, Head of Buchan, Head of Buchan Nursery or the Chief Operating Office as appropriate. Normally there will be a minimum of two adults
- 17.3 All arrangements for a residential trip should have full, informed consent of parents.
- 17.4 Careful consideration should be given to sleeping arrangements. Staff accommodation should be suitably separate from that of pupils but enable them to provide adequate supervision. Staff should not share bedrooms with pupils.
- 17.5 Staff should take particular care when supervising pupils in the less formal atmosphere of an educational visit. Staff remain in a position of trust and must ensure that their behaviour cannot be interpreted as seeking to establish an inappropriate relationship or friendship.

#### 18. VISITORS

18.1 Any member of staff inviting a visitor to school must follow the Visitor Policy. Visitors should wear visitor badges and should not be left without appropriate supervision. Resident staff must follow the notification requirements of the Licence to Occupy agreement.

#### 19. PRIVATE TUITION

19.1 No private or **regular one-to-one teaching arrangements** should be made between staff, pupils and their families without the prior knowledge and consent of the Head of Buchan or Deputy Head Academic.

#### 20. TRANSPORTING PUPILS

- 20.1 Staff must ensure they are fit to drive and free from any drug, alcohol or medicine that is unlikely to impair judgement or the ability to drive.
- 20.2 Staff must ensure the vehicle is roadworthy, appropriately insured and should carry out the necessary pre-journey checks.
- 20.3 Staff should never offer to transport pupils outside of their normal working duties, other than in an emergency, or where not doing so would mean that the pupil may be at risk.
- 20.4 It is a legal requirement that all passengers wear seatbelts and the driver should ensure they do so. The driver must also be aware of and follow current legislation regarding use of car seats for younger children.

#### 21. FAVOURITISM

- 21.1 Pupils are acutely sensitive to what they perceive as favouritism. Staff should always guard against showing partiality or treating a particular pupil less favourably.
- 21.2 Staff should exercise care when selecting children for or excluding them from specific activities, jobs or privileges. Methods of selection should always be subject to clear, fair, agreed criteria.
- 21.3 Staff 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 would give rise to concern about their behaviour.

#### 22. GIVING & RECEIVING GIFTS

- 22.1 Staff need to take care that they do not accept any gift that might be construed as a bribe by others, or lead the giver to expect preferential treatment. Similarly, staff should not give personal gifts to pupils or their families, which could be interpreted as a grooming gesture.
- 22.2 There are occasions when pupils or parents may wish to pass small tokens of appreciation to staff, for example at Christmas or as a thank you, which is acceptable. It is unacceptable to receive gifts on a regular basis or of any significant value.
- 22.3 If you are offered a gift which has a value of £100 or more, permission must be sought from the Chief Operating Officer before accepting the gift. A register of substantial gifts both offered and received is kept in the Bursary. Notification and the details of any gifts offered should be sent to the PA to the Chief Operating Officer as they are received for recording.
- 22.4 Members of staff should not give pupils personal gifts but should use the school's reward system to recognise achievement. This should be done openly and without favouritism.
- 22.5 Further guidance can be found in the Whole Staff Handbook.

#### 23. DRESS

23.1 Staff should set high personal standards of dress and appearance, which promotes a positive and professional image. Dress should always be professional and appropriate to the activity which they are undertaking. In general, it must be smart and in good repair. Clothing must be modest, not revealing or sexually provocative, it should be culturally sensitive and free from contentious slogans. It should not distract, cause embarrassment or give rise to misunderstanding.

23.2 Teaching staff and office staff should wear smart business-like clothing. King William's College teachers and office staff are expected to follow a similar dress standard to that of the Sixth Form dress code. For information, these are the requirements for the Sixth Form students:

Girls' Uniform: Single coloured, matching tailored suit, single coloured smart blouse, single coloured, v-neck jumper, black or "nude" tights, dark, smart, sensible shoes.

Boys' Uniform: Single coloured, matching tailored suit, Single coloured shirt with a smart tie, single coloured, v-neck jumper, dark socks, black or brown polished shoes.

In the Buchan School, jackets would be worn on formal occasions, such as Parents' Meetings.

- 23.3 Where practical work is involved teachers may wear suitable practical clothing. Sportswear should be smart and where possible school branded.
- 23.4 Teaching support staff wear clothing appropriate to their role (e.g. lab coat).
- 23.5 If provided, non-teaching support staff should wear the uniform with which they have been provided.
- **23.6** Protective clothing should be worn during any relevant activity.

#### 24. MOBILE TELEPHONES & DEVICES

- **24.1** The Buchan Nursery is a mobile free zone for staff and visitors.
- 24.2 Unless there has been an explicit agreement with the Principal, staff should not give their personal mobile numbers or personal email addresses to pupils, nor should they communicate with them by text or personal email. Where permission has been obtained to communicate in this way, it will be logged by the Deputy Head Pastoral. It can be assumed that boarding house staff have permission to communicate in this way.
- 24.3 In general, members of staff should not contact pupils via the pupil's mobile telephone. The only exception to this may be in an emergency, for example a Group Leader on a school trip or House Staff wishing to contact a pupil in their House.
- 24.4 Any messages or contact from pupils to a member of staff that could be interpreted as of a personal nature should be reported to the Deputy Head Pastoral.
- 24.5 Mobile telephones must be switched off in the Chapel and The Barrovian. They should be set to silent when teaching or coaching or in the Library. They may be used for professional purposes on campus. Personal calls may be taken in breaks and must be taken in private.
- **24.6** It is unlawful to use a handheld mobile telephone whilst driving.

#### 25. PHOTOGRAPHY & MOVING IMAGES

- 25.1 Staff must be able to justify why they are taking images and why they have images in their possession. Separate guidance is in place which must be followed in regard to taking and storing images of children in the EYFS, The Buchan School and The Buchan Nursery.
- 25.2 Photographs or moving images of pupils and children taken at school events should not be used for publicity or be posted onto publicly accessible websites by members of staff without the prior permission of the Senior Leadership Team.
- 25.3 Images should not be taken for personal use. Images should not be made in one-to-one situations.
- 25.4 Staff should be aware that some pupils and colleagues may not wish to have their photograph taken and be sensitive to this. Staff should refer to the list of pupils for whom parental consent has been withheld before publishing any images.
- 25.5 Staff should not take images of children in a state of undress or semi-undress or which could be considered as indecent or sexual.
- 25.6 Photographs or moving images of senior school pupils should be taken wherever possible using school equipment. In The Buchan School and The Buchan Nursery images should only be taken using school equipment.
- 25.7 Careful thought should be given about how images taken of pupils are managed. They should be emailed to the marketing department or uploaded to a relevant folder in an appropriate shared drive on the school's network. As soon as they have been emailed or stored they should be deleted from personal equipment. If you require further guidance, please contact the Systems department.

#### 26. WHISTLEBLOWING

26.1 There is a separate whistleblowing policy/procedure which can be found on the KWC website, the staff section of 'Firefly', or a hard copy is available from the Principal's Office.

#### 27. POTENTIAL BREACHES OF THIS CODE OF CONDUCT

- 27.1 Complaints about the actions of another member of the community in respect of this code of conduct should be made via the School Complaints Procedure.
- 27.2 In cases of staff dispute, the complaint will then follow the School's grievance procedure.

#### 28. SAFEGUARDING CONCERNS AND ALLEGATIONS AGAINST STAFF

- 28.1 The School has procedures for dealing with allegations against Staff, Supply Staff and Volunteers who work with children that aims to strike a balance between the need to protect children from abuse and the need to protect Staff and Volunteers from false or unfounded allegations. Full details can be found in the Safeguarding Policy, Appendix 2.
- 28.2 A low level concern is when an adult working for the school may have behaved in a way that is:
  - Inconsistent with the staff code of conduct
  - 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.
  - Does not meet the Isle of Man Social Care allegations threshold.
- 28.2.1 Such behaviour may be inadvertent or thoughtless, or perhaps look to be inappropriate without knowing the full context of the circumstance, or it may be intended to enable abuse. These concerns will be shared responsibly with the member of staff, recorded and dealt with appropriately. All staff should be familiar with the Staff Code of Conduct which describes acceptable and unacceptable behaviour.
- 28.2.2 Step 1 Low level concerns should be shared with the DSL (who will then inform the Principal). If the concern is about the DSL, it should be shared directly with the Principal. Following the report of a concern, evidence will be gathered from the complainant.
  - This may be a verbal account that will be recorded contemporaneously by the DSL. A written record is always taken as information is shared.
  - Sound professional judgment should be used in determining what information is necessary to record for safeguarding purposes.
  - Record should include brief context, consise details and relevant incidents
  - Record will be signed, dated and timed.

This will help identify the behaviour and determine if any further action needs to be taken.

- 28.2.3 Staff are encouraged to self refer if, for example, they have found themselves in an uncomfortable situation which may be misinterpreted or may appear compromising to others, or, if on reflection they believe that they have behaved in such a way that they consider falls below the expected professional standards.
- 28.2.4 Step 2 The DSL will review the information with the Principal and decide whether the behaviour is:
  - (i) Entirely consistent with the Staff Code of Conduct
  - (ii) Constitutes a low level concern
  - (iii) Is serious enough to consider a referral to Isle of Man Social Care
  - (iv) When considered with any other previous low level concerns about this individual, should be reclassified as an allegation and referred to Isle of Man Social Care
  - Where the DSL is in any doubt, then they should seek advice from Isle of Man Social Care
  - Speak to the individual about whom the concern is raised (unless Isle of Man Social Care or the Police have advised otherwise if within (iii) or (iv) above).

• The Principal is the ultimate decision maker in respect of low level concerns.

#### DSL must make records of:

- All internal conversations;
- All external conversations;
- Their determination;
- The rationale for their decision; and
- Any action taken.

#### 28.2.5 Step 3 – The Next Steps

## When the information shared meets the organisation's expectations and is compliant with Code of Conduct

- DSL to inform the individual concerned what was shared about their behaviour and give them an opportunity to respond;
- Speak to person who shared the low level concern, providing feedback about how and why the behaviour is consistent with the Code of Conduct and the law;
- Consider if a review of the Code of Conduct is necessary is the Code not clear? Has the training been unsatisfactory?
- Consider training if the same individual reports similar low level concerns and it is found to be consistent with Code again.

## When the information shared does not meet the organisation's expectations and is in breach of the Code of Conduct - a low level concern

- A sensitive and proportionate response is essential;
- Maintain confidence that concerns will be handled promptly and effectively, whilst protecting staff from potential false or malicious allegations;
- Any investigation is on a 'need to know' basis;
- Some concerns may not give rise to further action, others may be dealt with by management guidance and/or training;
- In many cases, a positive/supportive conversation with the individual will enable them to meet expectations moving forward.

If during these conversations the level of concern is raised, the DSL will always seek advice from the Principal and/or Isle of Man Social Care.

- 28.2.6 Records of all low-level concerns will be kept on staff files. The record will include:
  - Details of the concern
  - The context in which the concern arose
  - Action taken
  - Name of the individual sharing their concerns (if the individual wishes to remain anonymous, this will be respected as far as reasonably possible).

If a pattern of behaviour becomes concerning, the School may consider using disciplinary procedures and/or a referral to Isle of Man Social Care.

- 28.2.7 Low level concerns will not be reported in references unless they relate to issues that would normally be included in a reference, for example, misconduct or poor performance. However, where a low-level concern (or group of concerns) has met the threshold for referral to Isle of Man Social Care and found to be substantiated, it will be referred to in a reference.
- 28.2.8 Low level concerns which are shared about supply staff and contractors will be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified.

28.2.10 If there are any low-level concerns relating to a boarding pupil, a notification of events form must be completed with the headline information (not identifying the member of staff and identifying the student by iSAMS unique pupil identifier) and submitted to the Department of Social Care Registrations and Inspectorate Department Randl@gov.im.

#### 29. LINKED POLICIES

- Anti-Bullying Policy
- Complaints Procedure
- E-Safety Policy
- Grievance Procedure
- Safeguarding and Child Protection Policy
- Safer Recruitment Policy
- Social Media Policy
- Whistleblowing Procedure