

Staff Code of Conduct

(R.E.A.L Foundation Trust)
(the Trust)

Addendum added to cover Covid Arrangements April 2020: additions can be viewed in
blue text

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I. Definitions

For ease of reading, references will be made to 'setting'. This term encompasses all of the provision delivered by R.E.A.L Foundation Trust, and all of our possible venues, or settings.

References made to 'child' and 'children' refer to children and young people under the age of 18 years. However, the principles of the document apply to professional behaviours towards all young people, including those over the age of 18 years. 'Child' should therefore be read to mean **any young person** within the R.E.A.L settings.

References made to 'adults' and 'staff' refer to all those who work with young people in R.E.A.L settings, in either a paid or unpaid capacity. This would also include, for example, those who are not directly employed by the Trust e.g. Local Authority staff, sports coaches.

The term 'allegation' means where it is alleged that a person 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; or,
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children.

References are made in this document to legislation and statutory guidance which differ dependent on the setting and alter over time. However, the behavioural principles contained within the document remain consistent.

II. Overview and purpose of guidance

This safe working practice document is NOT statutory guidance; it is for all of us working with children and young people to use this as the basis for our codes of conduct and staff behaviour guidelines.

The document seeks to ensure that the responsibilities of charity leaders towards children and staff are discharged by raising awareness of illegal, unsafe, unprofessional and unwise behaviour. This should help to monitor your own standards and practice and reduce the risk of allegations being made against you. It is also recognised that not all people who work with children, work as paid or contracted employees. The principles and guidance outlined in this document still apply and should be followed by any person whose work will bring them into contact with children.

This guidance will also support you to give a clear message that unacceptable behaviour will not be tolerated and that, where appropriate, legal or disciplinary action is likely to follow.

This Code of Conduct may be referred to in any disciplinary proceedings.

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 judgements are made in situations not covered by this document. It is expected that in these circumstances staff will always advise their senior colleagues of justification for any such action already taken or proposed.

All staff have a responsibility to be aware of the systems within their school which support safeguarding and these are explained as part of the staff induction and in regular staff training sessions. This includes the child protection policy and, now, this staff Code of Conduct, which will form part of the safeguarding procedures here at R.E.A.L.

It is recognised that the vast majority of adults who work with children act professionally and aim to provide a safe and supportive environment which secures their wellbeing and very best outcomes for children in their care. Achieving these aims is not always straightforward, as much relies on child and staff interactions where tensions and misunderstandings can occur. This document aims to reduce the risk of these.

It must be recognised that some allegations will be genuine as there are people who seek out, create or exploit opportunities to harm children. However, allegations may also be false or misplaced and may arise from differing perceptions of the same event. When they occur, they are inevitably distressing and difficult for all concerned. It is therefore essential that all possible steps are taken to safeguard children and the adults who work with them.

III. Underpinning principles

The welfare of the child is paramount.

Staff should understand their responsibilities to safeguard and promote the welfare of pupils.

Staff 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.

Staff should work, and be seen to work, in an open and transparent way.

Staff should acknowledge that deliberately invented/malicious allegations are extremely rare and that all concerns should be reported and recorded.

Staff should discuss and/or take advice promptly from their line manager if they have acted in a way which may give rise to concern.

Staff should apply the same professional standards regardless of culture, disability, gender, language, racial origin, religious belief and sexual orientation.

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.

Staff should be aware that breaches of the law and other professional guidelines could result in disciplinary action being taken against them, criminal action and/or other proceedings including barring by the Disclosure & Barring Service (DBS) from working in regulated activity, or for acts of serious misconduct prohibition from teaching by the National College of Teaching & Leadership (NCTL).

Staff and managers should continually monitor and review practice to ensure this guidance is followed.

Staff should be aware of and understand the R.E.A.L Foundation Trust child protection policy, arrangements for managing allegations against staff, this code of conduct, whistleblowing procedure and the Local Safeguarding Children Board (LSCB) procedures.

IV. How to use this document

Each section provides general guidance about a particular aspect of work and, in the right hand column, specific guidance about which behaviours should be avoided and which are recommended.

1. Introduction

Adults have a crucial role to play in the lives of children. This code of conduct has been produced to help you to establish the safest possible learning and working environments which safeguard children and reduce the risk of you being falsely accused of improper or unprofessional conduct.

2. Status of document

This document is endorsed and recommended by the Safer Recruitment Consortium. It should inform and assist the Trust to develop and review guidelines on safer working practices. It may be also used as a reference for managers when responding to allegations made against staff in Trust settings. This is **not** statutory guidance.

3. Responsibilities

Staff are accountable for the way in which they exercise authority, manage risk, use resources and safeguard children.

All staff have a responsibility to keep children safe and to protect them from abuse (sexual, physical and emotional), neglect and safeguarding concerns. Children have a right to be safe and to be treated with respect. All staff should be able to take reasonable steps to ensure the safety and well-being of children. Failure to do so may be regarded as professional misconduct.

The safeguarding culture of R.E.A.L is, in part, exercised through the development of respectful, caring and professional relationships between adults and pupils and behaviour by the adult that demonstrates integrity, maturity and good judgement.

The public, local authorities, employers and parents/carers will have expectations about the nature of professional involvement in the lives of children. When individuals accept a role working in a charitable setting they should understand and acknowledge the responsibilities and trust involved in that role.

Employers have duties towards their employees and others under Health and Safety legislation which requires them to take steps to provide a safe working environment for staff.

Legislation also imposes a duty on you to take care of yourself and anyone else who may be affected by your actions or failings. An employer's Health and Safety duties and the adults' responsibilities towards children should not conflict. Safe practice can be demonstrated through the use and implementation of these guidelines.

4. Making professional judgements

This guidance cannot provide a complete checklist of what is, or is not, appropriate behaviour for all staff. It does highlight, however, behaviour which is illegal, inappropriate or inadvisable. There will be rare occasions and circumstances in which you have to make decisions or take action in the best interest of a child which could contravene this guidance or where no guidance exists.

Individuals are expected to make judgements about their behaviour in order to secure the best interests and welfare of the children in their charge and, in so doing, will be seen to be acting reasonably. These judgements should always be recorded and shared with a manager.

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

5. Power and positions of trust and authority

As a result of their knowledge, position and/or the authority invested in their role, all those working with children in a charitable setting are in a position of trust in relation to all children.

The relationship between a person working with a child/children is one in which the adult has a position of power or influence. It is vital for adults to understand this power; that the relationship cannot be one between equals and the responsibility they must exercise as a consequence

The potential for exploitation and harm of vulnerable children means that adults have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.

Staff should always maintain appropriate professional boundaries, avoid behaviour which could be misinterpreted by others and report and record any such incident. [This is relevant in the online world as it is in the classroom; staff engaging with pupils and/or parents online have a responsibility to model safe practice at all times.](#)

Where a person aged 18 or over is in a 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.

6. Confidentiality

The storing and processing of personal information is governed by the Data Protection Act 1988, and from May 2018 the Data Protection Regulations.

Staff will have access to confidential information about children and their families which must be kept confidential at all times and only shared when legally permissible to do so and in the interest of the child. Records will only be shared and accessed by those who have a legitimate professional need to see them.

Staff should never use confidential or personal information about a child or her/his family for their own, or other's advantage (including that of partner, friends, relatives or other organisations). Information must never be used to intimidate, humiliate, or embarrass the child. Confidential information should never be used casually in conversation or shared with any person on a need-to-know basis. In circumstances where the child's identity does not need to be disclosed

the information should be used anonymously.

There are some circumstances in which a member of staff may be expected to share information about a child, for example when abuse is alleged or suspected. In such cases, individuals have a responsibility to pass information on without delay, but only to those with designated safeguarding responsibilities.

If a child or their parent/carer makes a disclosure regarding abuse or neglect, the member of staff should follow the safeguarding procedures. The adult should not promise confidentiality to a child or parent, but should give reassurance that the information will be treated sensitively.

If a member of staff is in any doubt about whether to share information or keep it confidential he or she should seek guidance from the allocated Kine Manager or a Designated Safeguarding Lead. Any media or legal enquiries should be passed to senior management immediately.

7. Standards of behaviour

All staff have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of children. They should adopt high standards of personal conduct in order to maintain confidence and respect of the general public and those with whom they work.

There may be times where an individual's actions in their personal life come under scrutiny from the community, the media or public authorities, including with regard to their own children, or children and/or adults in the community. Staff should be aware that their behaviour, either in or out the workplace, could compromise their position within the work setting in relation to the protection of children, loss of trust and confidence, or bringing the employer into disrepute. Such behaviour may also result in a bar from engaging in regulated activity, or action by another relevant regulatory body.

The Childcare (Disqualification) Regulations 2009¹ set out grounds for disqualification under the Childcare Act 2006 where the person or a person living in the same household or employed in the same household meets certain criteria set out in the Regulations. For example, an individual will be disqualified where they have committed a relevant offence against a child; been subject to a specified order relating to the care of a child; committed certain serious sexual or physical offences against an adult; been included on the DBS children's barred list; been made subject to a disqualification order by the court; previously been refused registration as a childcare provider or provider or manager of a children's home or had such registration cancelled. A disqualified person is prohibited from providing relevant early or later years childcare as defined in the Childcare Act 2006 or being directly concerned in the management of such childcare. Schools and private childcare settings are also prohibited from employing a disqualified person in respect of relevant early or later years childcare.

8. Dress and appearance

¹ R.E.A.L Education is not currently required to adhere to these regulations due to the age of the young people we work with.

A person's dress and appearance are matters of personal choice and self-expression and some individuals will wish to exercise their own cultural customs. However staff should select a manner of dress and appearance appropriate to their professional role and which may be necessarily different to that adopted in their personal life. Staff should ensure they are dressed decently, safely and appropriately for the tasks they undertake; [this also applies to online or virtual teaching](#). Those who dress or appear in a manner which could be viewed as offensive or inappropriate will render themselves vulnerable to criticism or allegation.

9. Gifts, rewards, favouritism and exclusion

Staff need to take care that they do not accept any gift that might be construed as a bribe by others, or lead the giver to expect preferential treatment.

There are occasions when children or parents wish to pass small tokens of appreciation to staff e.g. at Christmas or as a thank-you and this is usually acceptable. However, it is unacceptable to receive gifts on a regular basis or of any significant value.

Similarly, it is inadvisable to give such personal gifts to children or their families. This could be interpreted as a gesture either to bribe or groom. It might also be perceived that a 'favour' of some kind is expected in return.

Any reward given to a pupil should be in accordance with agreed practice, and consistent with the school behaviour policy, for example, declared and authorised through the relevant Line Manager or designated safeguarding lead.

Adults should exercise care when selecting children for specific activities, jobs or privileges in order to avoid perceptions of favouritism or injustice. Similar care should be exercised when pupils are excluded from an activity. Methods of selection and exclusion should always be subject to clear, fair, agreed criteria.

10. Infatuations and 'crushes'

All staff need to recognise that it is not uncommon for children to be strongly attracted to a member of staff and/or develop a 'crush' or infatuation. They should make every effort to ensure that their own behaviour cannot be brought into question, does not appear to encourage this and be aware that such infatuations may carry a risk of their words or actions being misinterpreted.

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 DSO or most senior manager. In this way appropriate early intervention can be taken which can prevent

escalation and avoid hurt, embarrassment or distress for those concerned.

The DSO (or senior manager) should give careful thought to those circumstances where the staff member, child and their parents/carers should be spoken to and should ensure a plan to manage the situation is put in place. This plan should respond sensitively to the child and staff member and maintain the dignity of all. This plan should involve all parties, be robust and regularly monitored and reviewed.

11. Social contact outside of the workplace

It is acknowledged that staff may have genuine friendships and social contact with parents of children, independent of the professional relationship. Staff should, however, also be aware that professionals who sexually harm children often seek to establish relationships and contact outside of the workplace with both the child and their parents, in order to ‘groom’ the adult and the child and/or create opportunities for sexual abuse.

It is also important to recognise that social contact may provide opportunities for other types of grooming such as for the purpose of sexual exploitation or radicalisation. Staff should recognise that some types of social contact with pupils or their families could be perceived as harmful or exerting inappropriate influence on children, and may bring the setting into disrepute (e.g. attending a political protest, circulating propaganda).

If a child or parent seeks to establish social contact, or if this occurs coincidentally, the member of staff should exercise her/his professional judgement. This also applies to social contacts made through outside interests or the staff member’s own family.

Some staff may, as part of their professional role, be required to support a parent or carer. If that person comes to depend upon the staff member or seeks support outside of their professional role this should be discussed with senior management and where necessary referrals are made to the appropriate support agency.

12. Communication with children (including the use of technology) and online/virtual sessions

In order to make the best use of the many educational and social benefits of new and emerging technologies, pupils need opportunities to use and explore the digital world. E-safety risks are posed more by behaviours and values than the technology itself.

Staff should ensure that they establish safe and responsible online behaviours, working to the Trust’s acceptable use policies which detail how technologies may be used.

Communication with children both in the ‘real’ world and through web based and telecommunication interactions should take place within explicit professional boundaries. This includes the use of computers, tablets, phones, texts, emails, instant messages, social media such as Facebook and Twitter, chat-rooms, forums, blogs, websites, gaming sites, digital

cameras, videos, webcams and other handheld devices. (Given the ever changing world of technology it should be noted that this list gives examples only and is not exhaustive.)

Staff should not request or respond to any personal information from children other than which may be necessary in their professional role. They should ensure that their communications are open and transparent and avoid any communication which could be interpreted as 'grooming behaviour'.

Staff should not give their personal contact details to children for example, a personal email address, home or mobile telephone numbers, or details of any web based identities. If children locate these by other means and attempt to contact or correspond with the staff member, the adult should not respond and must report the matter to their line manager. The child should be firmly and politely informed that this is not acceptable.

Staff should, in any communication with children, also follow the guidance in section 7 'Standards of Behaviour'.

Staff should also adhere to the e-safety policy which outlines the processes to follow when working with learners.

13. Physical contact

There are occasions when it is entirely appropriate and proper for staff to have physical contact with children, however, it is crucial that they only do so in ways appropriate to their professional role and in relation to the child's individual needs and any agreed education, health and care plan.

Not all children feel comfortable with certain types of physical contact. This should be recognised and, wherever possible, adults should seek the pupil's permission before initiating contact and be sensitive to any signs that they may be uncomfortable or embarrassed. Staff should acknowledge that some pupils are more comfortable with touch than others and/or may be more comfortable with touch from some adults than others. Staff should listen, 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 pupil.

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.

Any physical contact should be in response to the child's needs at the time, of limited duration and appropriate to their age, stage of development, gender, ethnicity and background. Adults should therefore use their professional judgement at all times.

Physical contact should never be secretive, or for the gratification of the adult, or represent a misuse of authority. If a member of staff believes that an action by them or a colleague could be misinterpreted, or if an action is observed which is possibly abusive the incident and

circumstances should be immediately reported to the manager and recorded. Where appropriate, the manager should consult with the Local Authority Designated Officer (the LADO).

Extra caution may be required where it is known that a child has suffered previous abuse or neglect. Staff need to be aware that the child may associate physical contact with such experiences. They also should recognise that these children may seek out inappropriate physical contact. In such circumstances staff should deter the child sensitively and help them to understand the importance of personal boundaries.

A general culture of 'safe touch' should be adopted, where appropriate, to the individual requirements of each child. Children with disabilities may require more physical contact to assist their everyday needs. The arrangements should be understood and agreed by all concerned, justified in terms of the child's needs, consistently applied and open to.

14. Other activities that may require physical contact

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 only last for the minimum amount of time necessary. The extent of the contact should be made clear and undertaken with the permission of the child. Contact should be relevant to their age and understanding and adults should remain sensitive to any discomfort expressed verbally or nonverbally by the child.

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

15. Behaviour management

Corporal punishment and smacking is unlawful.

Staff should not use any form of degrading or humiliating treatment to punish a child. The use of sarcasm, demeaning or insensitive comments towards children is completely unacceptable and particularly in relation to those children diagnosed to be on the autistic spectrum.

Where children display difficult or challenging behaviour, adults should follow the behaviour management policy and seek advice from the allocated Learning Manager to use strategies appropriate to the circumstances and situation.

Where a child has specific needs in respect of particularly challenging behaviour, a positive

handling plan, and a clear individual risk assessment, should be drawn up and agreed by all staff involved in the delivery of the child's activity.

16. The use of control and physical intervention

A person will not be taken to have used corporal punishment if the action was taken for reasons that include averting an immediate danger of death of any person including the child.

The law and guidance states that adults may reasonably intervene to prevent a child from:

- committing a criminal offence
- injuring themselves or others
- causing damage to property
- engaging in behaviour prejudicial to good order and to maintain good order and discipline.

17. Sexual conduct

Any sexual behaviour by a member of staff with or towards a child is unacceptable. It is an offence for a member of staff in a position of trust to engage in sexual activity with a pupil under 18 years of age and sexual activity with a child could be a matter for criminal and or disciplinary procedures.

Children are protected by the same laws as adults in relation to non-consensual sexual behaviour. They are additionally protected by specific legal provisions depending on their age and understanding. This includes the prohibition of sexual activity with children by adults in a position of trust.

Sexual activity involves physical contact including penetrative and non-penetrative acts, however it also includes non-contact activities, such as causing children to engage in or watch sexual activity or the production of pornographic material.

There are occasions when adults embark on a course of behaviour known as 'grooming' where the purpose is to gain the trust of a child, and manipulate the relationship so sexual abuse can take place. All staff should undertake appropriate training so they are fully aware of those behaviours that may constitute 'grooming' and of their responsibility to always report to a senior manager any concerns about the behaviour of a colleague which could indicate that a child is being groomed.

18. One to one situations

Staff working in one to one situations with children at the setting, including visiting staff from

external organisations can be more vulnerable to allegations or complaints.

To safeguard both children and adults, an individual pupil risk assessment in relation to the specific nature and implications of one to one work will always be undertaken. The risk assessment will be placed on the child's electronic file. Each assessment should take into account the individual needs of each child and should be reviewed regularly. Where staff are aware of an out of date or missing risk assessment they must inform a senior manager immediately so the information can be provided without delay

Arranging to meet with children in a community venue or setting away from the activity hub should always be authorised by the line manager, and be clearly visible on the weekly timetable. Sometimes venues need to change last minute and therefore authorisation must be obtained and the office informed.

19. Home visits

All work with children and parents should usually be undertaken in an activity hub or agreed other setting as agreed with the line manager setting prior to the session. There are however occasions, in response to an urgent, planned or specific situation or a specific job role (such as a coordinator), where it is necessary to make one-off or regular home visits.

A risk assessment should be available prior to any planned home visit taking place. The assessment should include an evaluation of any known factors regarding the child, parents/carers and any others living in the household. Consideration should be given to any circumstances which might render the staff member becoming more vulnerable to an allegation being made e.g. hostility, child protection concerns, complaints or grievances.

Where a new child has joined a service and an initial visit is to be made, all risk assessment information from the relevant commissioner should be available to the relevant staff member, and information added, and regularly reviewed to build up a clear picture of any risk involved in a home visit.

Before undertaking any home visit ascertain the current situation for all members of the household and if they are displaying any symptoms. Do not continue if symptoms are present or anyone is currently 'shielding'. Doorstep visits can still be undertaken and social distancing adhered to.

20. Transporting pupils

As for any other activity undertaken at work, the Trust has a duty to carry out a risk assessment covering the health and safety of staff and to manage any known risks. The transportation of children and the associated risk are contained within the child's risk assessment. If you have any

other concerns regarding your ability to drive then these should be raised directly with your line manager.

Staff should not provide transport to children unless they have up to date vehicle and business insurance cover. The child's coordinator is appointed to plan and provide oversight of all transport arrangements and respond to any concerns that may arise.

It is a legal requirement that all passengers wear seatbelts and the driver should ensure that they do so. They should also be aware of and adhere to current legislation regarding the use of car seats for younger children.

Staff should ensure that their behaviour is safe and that the transport arrangements and the vehicle meet all legal requirements. They should ensure that the vehicle is roadworthy and appropriately insured and that the maximum carrying capacity is not exceeded.

Staff should never offer to transport children outside of their normal working duties, other than in an emergency or where not doing so would mean the child may be at risk. In these circumstances the matter should be recorded and reported to both their manager and the child's parent(s).

During Covid arrangements transportation of children will be kept to an absolute minimum, with parents and carers being asked to transport to an agreed venue, or sessions taking place within walking distance of the child's home.

21. Overnight visits

Where out of school or setting activities include overnight stays, careful consideration needs to be given to sleeping arrangements. Pupils, adults and parents should be informed of these prior to the start of the trip. In all circumstances, those organising trips and outings should pay careful attention to ensuring there is a safe staff/child ratio and suitable gender mix of staff.

22. First Aid and medication

All settings should have an adequate number of qualified first-aiders. Parents should be informed when first aid has been administered.

Any member of staff may be asked to become a qualified first-aider or to provide support to children with medical conditions, including the administration of medicines, but they cannot be required to do so unless this forms part of their contract of employment.

A policy on Managing Medicines is available, and this is recorded in the child's individual file, on the confidential consent form. This provides details of the level and type of support a child needs to effectively manage their medical condition away from home and includes information about the

medicine to be administered, the correct dosage and any storage requirements. After discussion with parents, children who are competent are encouraged to take responsibility for managing their own medicines and procedures. This includes for example, the application of any ointment or sun cream, or use of inhalers or epipens.

If a member of staff is concerned or uncertain about the amount, or type of medication being given to a child they should discuss this with the designated safeguarding lead without delay.

Adults taking any medication which may affect their ability to care for children should seek medical advice regarding their suitability to do so and ensure that they only work directly with children if that advice confirms that medication is unlikely to impair that ability. The Trust are also responsible for managing the performance of staff and for ensuring all staff are suitable to work with children.

Medication stored on any R.E.A.L premises will be done so securely, using locked cabinets and kept out the reach of children at all times.

In exceptional circumstances, and during these Covid arrangements, *The Management of Health and Safety at Work Regulations* allow for organisations to function without a member of staff being trained in 'first aid at work'. If a site does not have a trained first aider due to Covid 19, it is the responsibility of the designated duty manager to lead on any crisis or serious incident including the provision of first aid. This decision should be supported by a risk assessment at the time taking into account the number of staff, learners and any other professionals/visitors on site, the proximity of emergency services and any other risks presented. All risks should be minimised as much as possible, for example not undertaking high risk or adventurous activities.

Staff whose 'first aid at work' training is about to or has expired since 16th March 2020 should be aware the HSE has agreed an extension of 3 months for renewal.

23. Photography, videos and other images

Many activities involve recording images. These may be undertaken for displays, publicity, to celebrate achievement and to provide records of evidence of the activity. You will not be expected or allowed to use your personal equipment to take images of pupils at or on behalf of the charity or setting.

Children who have been previously abused in a manner that involved images may feel particularly threatened by the use of photography, filming etc. staff should remain sensitive to any child who appears uncomfortable and should recognise the potential for misinterpretation.

Making and using images of children will require the appropriate consent of the individual concerned and their parents/carers. Images should not be displayed on websites, in publications, or in a public place without such consent. Particular care should be taken with the images of children who may be in the care of the local authority, or have been adopted.

For the protection of children, it is recommended that when using images for publicity purposes

check the R.E.A.L guidance regarding the use of images in the e-safety policy.

24. Exposure to inappropriate images

Staff should take extreme care to ensure that children and young people are not exposed, through any medium, to inappropriate or indecent images.

There are no circumstances that will justify adults: making, downloading, possessing or distributing indecent images or pseudo-images of children (child abuse images). Accessing these images, whether using the settings or personal equipment, on or off the premises, or making, storing or disseminating such material is illegal.

If indecent images of children are discovered at the establishment or on the school or setting's equipment an immediate referral should be made to the Designated Safeguarding Lead (DSL) and the police contacted if relevant (this will usually follow an assessment of the situation, and follow specific criteria). The images/equipment should be secured and there should be no attempt to view or delete these images as this could jeopardise necessary criminal action. If the images are of children known to the school, a referral will be made to children's social care in line with local arrangements.

Under no circumstances should any adult use charity setting equipment to access equipment containing pornography or links to it should never be brought into or used in the workplace. This will raise serious concerns about the suitability of the adult to continue working with children and young people.

Staff should keep their passwords confidential and not allow unauthorised access to equipment. In the event of any indecent images of children or unsuitable material being discovered on a device the equipment should not be tampered with in any way. It should be secured and isolated from the network, and the DSL contacted without delay. Adults should not attempt to investigate the matter or evaluate the material themselves as this may lead to a contamination of evidence and a possibility they will be personally at risk of prosecution.

25. Whistleblowing

Whistleblowing is the mechanism by which staff can voice their concerns, made in good faith, without fear of repercussion. R.E.A.L Education has a clear and accessible whistleblowing policy that meets the terms of the Public Interest Disclosure Act 1998. Staff who use whistleblowing procedures will have their employment rights protected.

Staff should recognise their individual responsibilities to bring matters of concern to the attention of senior management and/or relevant external agencies and that to not do so may result in charges of serious neglect on their part where the welfare of children may be at risk.

Staff should be aware of the routes for raising concerns during school partial closure including how to escalate their concern if the normal routes for whistleblowing are impeded by the

absence, or illness, of senior managers.



26. Sharing concerns and recording incidents

All staff should be aware of our safeguarding procedures and details for dealing with allegations against staff and volunteers.

In the event of an allegation being made, by any person, or an incident being witnessed, the relevant information should be immediately recorded and reported to the senior manager or Designated Safeguarding Lead as appropriate.

Members of staff should feel able to discuss with their line manager any difficulties or problems that may affect their relationship with or behaviour towards children, so that appropriate support can be provided and/or action can be taken.

In order to safeguard and protect children and colleagues, where staff have any concerns about someone working with children they should immediately report this to a Designated Safeguarding Lead in line with R.E.A.L's safeguarding practice, processes and policies.