

Local Tutor

Staff Behaviour Policy/

**Code of Conduct and Safer
Working Practice**

Local Tutor Limited

Next Review Date: Sep 2025

This document seeks to ensure that the responsibilities of senior leaders of educational settings towards children and staff are discharged by raising awareness of illegal, unsafe, unprofessional and unwise behavior. It should assist staff to monitor their own standards and practice and reduce the risk of allegations being made against them. This document applies to volunteers and contacted staff as well as paid employees.

Underlying Principles

- The welfare of the child is paramount - all staff have the responsibility to keep pupils safe and to protect them from abuse and neglect. Failure to do so may be regarded as professional misconduct.
- Staff should understand their responsibilities to safeguard and promote the welfare of pupils • Staff are responsible for actions and behavior and should avoid any conduct which would lead to any reasonable person to question their motivation and intention
- 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, racial origin, religious belief or sexual orientation
- Staff should not consume or be under the influence of alcohol or any substance, including prescribed medications, 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 Disclosure & Barring Service (DBS) from working in regulated activity, or for acts of serious misconduct, prohibition from teaching by the Teaching Regulation Agency (RTA)
- Staff and managers should continually monitor and review practice to ensure this guidance is followed
- Staff should be aware of and understand their establishment's child protection policy, arrangements for managing allegations against staff, whistle blowing policy and procedures for referring a child to Children's Services - see Safeguarding Policy

1.0 Introduction

- 1.1 This policy sets out clear guidance on the standards of behavior expected from all staff at Bright Futures Learning Trust. The principles underlying the guidance aim to encourage staff to achieve the highest possible standards of conduct and minimize the risk of inappropriate conduct occurring.
- 1.2 tuition centre staff are in a unique position of trust and influence as role models for pupils/students. Therefore, staff must adhere to behavior that sets a good example to all pupils/students within the tuition centre.
- 1.3 Staff also have an individual responsibility to maintain their reputation and the reputation of the tuition centre, both inside and outside working hours and work setting.
- 1.4 This policy applies to all staff and volunteers in the tuition centre regardless of their position, role or responsibility. References to 'staff' throughout the policy relate to all of the following groups:

- 1.4.1 All members of staff including teaching and support staff
- 1.4.2 Volunteers, including governors
- 1.4.3 Casual workers
- 1.4.4 Temporary and supply staff, either from agencies or engaged directly
- 1.4.5 Student placements, including those undertaking initial teacher training and apprentices.
- 1.5 Bright Futures Learning Trust requires that all staff have read and agree to comply with this policy.
- 1.6 Breach or failure to observe this policy will result in action being taken under the tuition centre disciplinary procedures including, but not limited to, dismissal.
- 1.7 This code of conduct is not an exhaustive list of acceptable and unacceptable standards of behavior. In situations where guidance does not exist in this policy staff are expected to exercise their professional judgement and act in the best interests of the pupils/students and the tuition centre.

2.0 Professional Behaviour and Conduct

Staff should be aware that their behavior, either in or out of 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 behavior may also result in prohibition from teaching by the Teaching Regulation Agency (TRA) a bar from engaging in regulated activity, or action by another regulatory agency. The Childcare (Disqualification) Regulations 2018 set out grounds for disqualification under the Childcare Act 2006 where a person meets certain criteria set out in the regulations.

Staff should inform the Headteacher of any cautions, convictions, or relevant orders accrued during their employment and/or if they are charged with a criminal offense. Staff should be aware that behavior of themselves, those with whom they have a relationship or association, or others in their personal lives, may impact on their work with children. Staff should disclose any relationships or associations (in the real world or online) that may impact on the tuition centre's ability to safeguard pupils.

- 2.1 Staff are expected to demonstrate the highest possible standards of personal and professional conduct and behavior and consistently act with honesty and integrity. Bright Futures Learning Trust expects staff to treat each other, pupils/students, parents and the wider community with dignity and respect at all times.
- 2.2 Staff must act in accordance with their duty of care to pupils and ensure that the safety and welfare of pupils are accorded the highest priority.
- 2.3 Staff should show fairness in their treatment of children and avoid behaviors such as embarrassing or humiliating pupils/students, making jokes at the expense of pupils/students, discriminating against or favouring pupils/students and sarcasm.
- 2.4 Staff must show tolerance of and respect the rights of others and should uphold the fundamental British values including democracy, the rule of law, individual liberty, mutual respect, and tolerance of those with different faiths and beliefs.
- 2.5 Staff must have regard for the ethos and values of the tuition centre and must not do or say anything which may bring the tuition centre or governing body into disrepute. Care should be taken by staff to avoid any conflict of interest between activities undertaken outside the tuition centre and responsibilities within the tuition centre. Staff should act in accordance with the tuition centre's policies and procedures at all times.

3.0 Dress and Appearance

- 3.1 Bright Futures Learning Trust recognises that dress and appearance are matters of personal choice and self-expression and some individuals will wish to exercise their own cultural customs. However, all staff must dress in a manner that is appropriate to a professional role and that promotes a professional image.
- 3.2 Staff should dress in a manner that is not offensive, revealing or sexually provocative and in a manner that is absent from political or contentious slogans.
- 3.3 Staff should dress safely and appropriately for the tasks they undertake.
- 3.4 Inappropriate tattoos and body art should be covered while staff are in the tuition centre. Discreet earrings are acceptable but all other body piercings should be removed while on tuition centre premises.

4.0 Smoking, alcohol, e-cigarettes and other substances

- 4.1 All academies in Bright Futures Learning Trust are non-smoking sites. Staff must not smoke or use e-cigarettes on tuition centre premises or outside tuition centre gates. Any member of staff wishing to smoke or use an e-cigarette must leave the tuition centre grounds.
- 4.2 Staff must not smoke or use an e-cigarette whilst working with or supervising pupils offsite.
- 4.3 Staff must not consume or be under the influence of alcohol, illicit drugs or other illegal substances on or near tuition centre premises.
- 4.4 Staff must refrain from the consumption of alcohol and other substances at tuition centre/student events (i.e. Leaving Proms, residential visits) both within the tuition centre premises and outside the tuition centre setting.
- 4.5 At the discretion of the Headteacher, staff may consume alcohol at social events outside teaching hours.

5.0 Relationships with Pupils/Parents

It is acknowledged that staff may have genuine friendships and social contact with parents of pupils, 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. Staff should be aware of behaviors which may constitute 'grooming' and of their responsibility to always report to the Headteacher any concerns about the behavior of a colleague which could indicate that a pupil is being groomed.

- 5.1 Staff must maintain professional boundaries with pupils/parents appropriate to their position and must always consider whether their actions are warranted, proportionate, safe and applied equitably. Staff should act in an open and transparent way that would not lead any reasonable person to question their actions or intent. Staff should think carefully about their conduct so that misinterpretations are minimized, avoiding any communication which could be interpreted as 'grooming behavior'.
- 5.2 Staff must not establish or seek to establish social contact with pupils for the purpose of securing a friendship or to pursue or strengthen a relationship. If a young person seeks to establish social contact, you should exercise your professional judgement in making a response and be aware that such social contact could be misconstrued.
- 5.3 Staff must not develop personal or sexual relationships with pupils/students and should not

engage in any sexual activity with a pupil/student. Sexual activity does not just involve physical contact including penetrative and non-penetrative acts.

- 5.4 Working Together to Safeguard Children¹ defines sexual abuse as ... ‘forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet).
- 5.5 Staff should be mindful of section 16 of The Sexual Offences Act 2003².
- 5.6 Staff must not make sexual remarks to a pupil/student, discuss their own sexual relationships with, or in the presence of, pupils/students or discuss a pupil’s sexual relationships in an inappropriate setting or context.
- 5.7 Contact with pupils/students must be through the tuition centre’s authorized mechanisms e.g. tuition centre email / Scholarpack comms. Personal phone numbers, email addresses or communication routes via all social media platforms must not be used and staff must not share their home address with pupils/students. If contacted via an inappropriate route the member of staff must inform the Headteacher immediately.
- 5.8 Bright Futures Learning Trust staff must not accept friend invitations or become friends with any pupil/student of Bright Futures Learning Trust on any social media platform. Staff should also refrain from following the Twitter or other similar social media accounts of pupils/students or their parents. Staff must read the tuition centre’s e-safety policy carefully and follow all advice and guidance contained within it.
- 5.9 Staff should not invite any pupils into their homes unless the reason to do so has been firmly established and agreed with the Headteacher and the pupil’s parents/carers. It is not appropriate for staff to be expected or requested to use their private living space for any activity, play or learning.

¹https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419595/Working_Together_to_Safeguard_Children.pdf

² Section 16 of The Sexual Offences Act 2003 provides that it is an offence for a person aged 18 or over (e.g. teacher, youth worker) 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.

6.0 Infatuations

- 6.1 It is not unusual for pupils or, sometimes, their parents to develop infatuations towards members of staff. Staff should make every effort to ensure that their behavior cannot be brought into question and does not appear to encourage this. All such situations must be responded to sensitively to maintain the dignity of those concerned.
- 6.2 Staff should also be aware that such circumstances carry a high risk of words or actions being misinterpreted and for allegations to be made against staff. Any indications of an infatuation towards yourself or another member of staff must be reported to the Headteacher so appropriate early action can be taken which can prevent escalation and avoid hurt, embarrassment or distress for those concerned.
- 6.3 The Headteacher should give careful thought to the circumstances and ensure a plan responds sensitively to the child and staff member and maintain dignity for all.

7.0 Gifts/Hospitality

- 7.1 Staff need to take care that they do not accept any gift/offer of hospitality that might be construed as a bribe by others, or lead the giver to expect preferential treatment. However, there may be occasions where pupils/students or parents wish to give a small token of appreciation to staff, for example at religious festivities or at the end of the year.
- 7.2 It is unacceptable to receive gifts on a regular basis or to suggest to pupils/students that gifts are appropriate or desired. Money must not be accepted as a gift. If you are unsure whether to accept a gift you should consult your line manager.
- 7.3 Staff must not accept significant gifts or hospitality from pupils, parents, carers, actual or potential contractors or outside suppliers. All such gifts/offers of hospitality should be reported to your line manager and recorded.
- 7.4 Personal gifts must not be given by staff to pupils/students and any reward to pupils/students should be in accordance with the tuition centre's behavior policy, recorded and not based on favoritism.
- 7.5 Adults should exercise caution when selecting children for specific activities, jobs or privileges in order to avoid perceptions of favoritism 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.

8.0 Physical Contact with Pupils

- 8.1 There are occasions when it is entirely appropriate and proper for staff to have physical contact with pupils, but it is crucial that they only do so in ways appropriate to their professional role. A 'no touch' approach is impractical for most staff and may in some circumstances be inappropriate. When physical contact is made with pupils it should be in response to their needs at that time, of limited duration and appropriate to their age, stage of development, gender, ethnicity and background.
- 8.2 Where feasible, staff should seek the child's permission before initiating contact. 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 which is acceptable to the child for the minimum time necessary.
- 8.3 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. Staff should therefore, use their professional judgement at all times.
- 8.4 Staff should be aware that even well intentioned physical contact may be misconstrued by the child, an observer or by anyone to whom this action is described. Staff should never touch a child in a way which may be considered indecent. Always be prepared to explain actions and accept that all physical contact be open to scrutiny. Staff must not engage in rough play, tickling or fun fights with pupils/students.
- 8.5 Extra caution should be exercised where a child is known to have suffered previous abuse or neglect. Staff need to be aware that the child may associate physical contact with such experiences. Such experiences may sometimes make a child exceptionally needy and demanding of physical contact and staff should respond sensitively by deterring the child through helping them to understand the importance of personal boundaries.
- 8.6 Staff supervising PE and games or providing musical tuition should demonstrate the use of a particular piece of equipment/instrument on another member of staff if possible. However,

they may be required to initiate physical contact with pupils/students to support a child to perform a task safely, to demonstrate the use of a particular piece of equipment/instrument or to assist them with an exercise. Contact under these circumstances should be done with the pupil/student's agreement, for the minimum time necessary, in an open environment, and appropriate to their age/understanding. Staff should remain sensitive to any discomfort expressed verbally or non-verbally by the pupil/student.

8.7 Physical contact must never be secretive, for the gratification of the adult or represent a misuse of authority.

8.8 If a member of staff believes that an action could be misinterpreted, the incident and circumstances should be reported to your line manager, recorded and, if appropriate, a copy placed on the child's file. Where appropriate, the manager should consult with the Local Authority Designated Officer (LADO).

8.9 Pupils with special educational needs or disabilities may require more physical contact to assist their daily living. The arrangements should be understood and agreed by all concerned, justified in terms of the child's needs, consistently applied and open to scrutiny. The views of parents, carers and the pupil, regardless of their age and understanding, should be actively sought in formulating the plan and reviews.

8.10 Pupils should be encouraged to act as independently as possible and to undertake as much of their own personal care as is possible and practical. There may be times when intimate physical contact with a child is required e.g. assisting with toileting, provision of medical care. The nature, circumstances and context of such contact should comply with professional codes of practice and policies, and should be undertaken by one member of staff although they should try to ensure another appropriate adult is in the vicinity. Arrangements for intimate and personal care should be open and transparent and accompanied by recording systems. All children have a right to safety, privacy and dignity where contact of a physical or intimate nature is required.

8.11 Corporal punishment and smacking are unlawful in all tuition centres and education settings. Staff should never 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. In cases of difficult or challenging behavior, adults must follow the Behaviour Policy. Where a child has specific needs in respect of particularly challenging behavior, staff will be trained in Restrictive Physical Intervention and a Behaviour Plan drawn up and agreed. The use of physical intervention should, wherever possible be avoided and should never be used as a form of punishment. It should only be used to manage a child's behavior if it is necessary to prevent a child from:

- committing a criminal offence,
 - injuring themselves or others,
 - causing damage to property
 - engaging in behavior prejudicial to good order and to maintain good order and discipline.
- When physical intervention is used it should be undertaken in such a way that maintains the safety and dignity of all concerned, and never used as a form of punishment.

In all cases where physical intervention is employed the incident and subsequent actions should be documented and reported. This should include written and signed accounts of all those involved, including the child if appropriate. The parent / carers should be informed the same day. The use of unwarranted or disproportionate physical force is likely to constitute a criminal offence.

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. Staff should receive sufficient and suitable training and achieve the necessary level of competency before they take on responsibility to support children with a medical condition. Some children will have an Individual Health Care Plan.

Advice on managing medicines is sent out each year and included in Induction mid-year.

Adults taking medication which may affect their ability to care for children should seek medical advice

regarding their suitability to do so and providers should ensure that they only work with children if that advice confirms that the medication is unlikely to impair their ability to look after children. Staff medication on the premises must be stored securely and out of reach of children at all times.

9.0 Child in distress

9.1 There may be occasions when a pupil/student is in distress and in need of comfort as a reassurance. This may include age appropriate physical contact. Staff should remain self aware at all times in order that their contact is not threatening, intrusive or subject to misinterpretation.

9.2 Such incidents should always be recorded and shared with your line manager. If you have a particular concern about the need to provide this type of care and reassurance you should seek further advice from your line manager.

10.0 Showers and changing

10.1 Pupils/students are entitled to respect and privacy whilst they are changing or showering after PE/games or swimming. However, there needs to be an appropriate level of supervision in order to safeguard young people, meet health and safety requirements and to ensure that bullying does not take place. The supervision should be appropriate to the needs and age of the pupils/students and sensitive to the potential for embarrassment.

10.2 Staff should be vigilant about their own behaviour and announce their intention of entering a changing room. Personal and tuition centre devices with a camera or video function should not be taken into areas where children are showering or changing. Staff must not change or shower in the same place as children.

11.0 One to one situations

11.1 Staff working individually with pupils/students should be aware of the potential vulnerability of pupils/students and staff in such situations. Staff should manage these situations with regard to the safety of the pupil/student and to themselves.

11.2 Individual work with pupils should not be undertaken in isolated areas or rooms where there is no external viewing panel. Where it is necessary to close doors for reasons of confidentiality a colleague should be made aware of this and asked to remain vigilant.

11.3 To safeguard both pupils and adults, a risk assessment in relation to the specific nature and implications of one-to-one work should always be undertaken.

11.4. Arranging to meet with pupils from the tuition centre away from the work premises should not be permitted unless the necessity for this is clear and approval is gained from the Delegated staff member, the pupil and their parents/carers. If this is considered necessary, then a Risk Assessment must be in place to include an evaluation of any known factors regarding the pupil, 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.

12.0 Transporting pupils

Staff should not offer lifts to pupils unless the need for this has been agreed by the Headteacher. Staff should never offer to transport pupils outside of their 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 the Headteacher and the child's parents/carers.

12.1 In certain circumstances it may be appropriate for staff to transport pupils/students offsite, for example sports fixtures, swimming lessons or other out of tuition centre activities. A designated member of staff should be appointed to plan and provide oversight of all

transport arrangements and to respond to any difficulties that may arise. A risk assessment should be undertaken to cover health and safety of staff and manage any known risks. If a pupil may require close supervision then another adult should travel in the vehicle so that the driver is not distracted or compromised.

- 12.2 Staff should ensure that the transport arrangements and the vehicle meet all legal requirements. Staff should ensure that the driver has the appropriate license for the vehicle, that the vehicle is roadworthy, has a valid MOT certificate and is appropriately insured and that the maximum capacity is not exceeded.
- 12.3 Staff should ensure that the driver is not distracted while the vehicle is in motion for any reason other than an emergency and should also ensure all passengers are wearing correctly fastened seat belts. Staff should also be aware of and adhere to the current legislation regarding the use of car seats/ booster seats for younger children. Staff should never transport pupils/students while under the influence of alcohol or drugs.
- 12.4 Prior to transporting pupils off site consent must be obtained from pupil/students' parent/guardian and staff should be aware that the safety and welfare of the pupils/students are their responsibility until this is safely passed back to their parent/carer.

13.0 Online Safety

- 13.1 Staff should follow Bright Futures Learning Trust's Online Safety policy for staff and the Acceptable Use Policy at all times and have regard for Bright Futures Learning Trust's Online Safety policy for pupils.
- 13.2 Staff must not engage in inappropriate use of social network sites which may bring themselves, the tuition centre or the tuition centre community into disrepute. Staff should adopt the highest security settings on any personal profiles they have.
- 13.3 Staff should remain mindful of their digital footprint and exercise caution in all their use of social media or any other web based presence they have. This includes written content, videos or photographs and views expressed either directly or by 'liking' certain pages or posts or following certain individuals or groups. Staff should exercise care when using dating websites where staff could encounter students.
- 13.4 Staff must not make contact with pupils or ex pupils, must not accept or initiate friend requests nor follow pupil/student or ex pupil accounts on any social media platform. Staff must not communicate with pupils/students or ex pupils via social media, websites, instant messenger accounts or text message. The only acceptable method of contact is via the use of tuition centre email accounts or telephone equipment.
- 13.5 Staff should not make contact with pupils' family members, accept or initiate friend requests or follow pupils' family member's accounts on any social media platform.
- 13.6 However, Bright Futures Learning Trust acknowledges that staff who are also parents may wish to make contact with other parents, who are friends, over social media. Staff must exercise caution and professional judgement in these circumstances and should not have any contact with pupils' family members via social media if that contact is likely to constitute a conflict of interest or call into question their objectivity.
- 13.7 Mobile phones and personally-owned devices such as tablets may not be used during lessons or formal tuition centre time. They should be switched off (or silent) at all times. The Bluetooth functionality of a mobile phone or tablet should be switched off at all times and may not be used to send images or files to other mobile phones. Mobile phones and personal devices, cameras and video equipment are not permitted in certain areas within the tuition centre site such as changing rooms and toilets.
- 13.8 Any photos or videos of children will be deleted from personal devices before they are taken off the tuition centre premises.

13.9 Mobile phones and personally-owned mobile devices brought into the tuition centre are the responsibility of the device owner. Bright Futures Learning Trust accepts no responsibility for the loss, theft or damage of personally-owned mobile phones or mobile devices.

14.0 Photography, video and images of children

- 14.1 Many tuition centre activities involve recording images as part of the curriculum, extra tuition centre activities, publicity or to celebrate an achievement. In accordance with The Data Protection Act 1998 the image of a pupil/student is personal data. Therefore, it is a requirement under the Act for consent to be obtained from the parent/guardian of a pupil/student for any images made. It is also important to take into account the wishes of the pupil/student, remembering that some pupils/students do not wish to have their photograph taken or be filmed.
- 14.2 Using images for publicity purposes will require the age-appropriate consent of the individual concerned and their parent/guardian. Images should not be displayed on websites, in publications or in a public place without their consent. Staff should also be clear about the purpose of the activity and what will happen to the photographs/images/video footage when the lesson or activity is concluded.
- 14.3 Photographs/stills or video footage of pupils/students should only be taken using tuition centre equipment for purposes authorised by the tuition centre and should be stored securely and only on tuition centre equipment.
- 14.4 Staff should ensure that a member of the Senior Leadership Team is aware of the proposed use of photographic/video equipment and that this is recorded in lesson plans. All photographs/stills and video footage should be available for scrutiny and staff should be able to justify all images/video footage made.
- 14.5 Staff should remain aware of the potential for images of pupils/students to be misused to create indecent images of children and/or for grooming purposes. Therefore, careful consideration should be given to how activities which are being filmed or photographed are organised and undertaken. Particular care should be given when filming or photographing young or vulnerable pupils/students who may be unable to question how or why the activities are taking place. Staff should also be mindful that pupils/students who have been abused through the use of video or photography may feel threatened by its use in a teaching environment.
- 14.6 Staff should take extreme care to ensure that pupils 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 tuition centre's or personal equipment, on or off the premises, or making, storing or disseminating such material is illegal. If indecent images of children are discovered an immediate referral should be made to the LADO. If the images are of children known to the tuition centres, a referral should also be made to children's social care.
- 14.7 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 found 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/Headteacher told immediately.

15.0 Confidentiality

- 15.1 Members of staff may have access to confidential information about pupils/students, their parents/carers or their siblings. Staff must not reveal such information except to those colleagues who have a professional role in relation to the pupil/student on a need to know basis. Confidential information should never be used casually in conversation.
- 15.2 Staff should never use confidential or personal information about a pupil/student or her/his

family for their own, or others' advantage (including that of partners, friends, relatives or other organisations). Information must never be used to intimidate, humiliate, or embarrass the pupil/student.

15.3 All staff are likely at some point to witness actions which need to be confidential. For example, where a pupil/student is bullied by another pupil/student, this needs to be reported and dealt with in accordance with the appropriate tuition centre procedure. It must not be discussed outside the tuition centre, including with the pupil/student's parent or carer, nor with colleagues in the tuition centre except by a senior member of staff with the appropriate authority to deal with the matter.

15.4 Staff have a statutory obligation to share with the tuition centre's Designated Safeguarding Lead or Deputy Designated Safeguarding Lead any information which gives rise to concern about the welfare or safety of a pupil/student or that might suggest a pupil/student is in need or at risk of significant harm. Staff should pass on information without delay in accordance with Bright Futures Learning Trust's safeguarding policy and procedures and this should be recorded. Staff must never promise a pupil/student that they will not act on or pass on any information that they are told by the pupil/student.

15.5 Staff should refer to the Department of Education's document Information sharing: advice for practitioners providing safeguarding services³ for further guidance on information sharing. If you are in any doubt about whether to share you should seek guidance from a member of the senior leadership team.

15.6 Any media or legal enquiries should be passed to the senior leadership team and only approved staff and Governors should communicate to the media about the tuition centre.

³https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419628/Information_sharing_advice_safeguarding_practitioners.pdf

16.0 Parents as employees

16.1 It is acknowledged that some staff also have children who attend the tuition centre. It is recognised that in these cases the staff fulfil a dual role of parent and employee.

16.2 Parents as employees should ensure that they uphold boundaries between the two roles and that their behaviour does not constitute a conflict of interest. For example, they must maintain the same level of confidentiality despite social expectations. Parent-staff should discuss any inter-role conflict with their line manager.

17.0 Whistleblowing

17.1 Whistleblowing is the mechanism by which staff can voice their concerns, made in good faith, without fear of repercussion. Education settings must have a clear and accessible whistle blowing policy. Staff who use whistle blowing procedures should have their employment rights protected.

17.2 Staff should recognise their individual responsibilities to bring matters of concern to the attention of the Headteacher 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.

17.3 All staff should be aware of the tuition centre's safeguarding procedures, including the procedures for dealing with allegations against staff and volunteers. In the event of an allegation being made, by any person, or incident being witnessed, the relevant information should be immediately recorded and reported to the Headteacher.

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

17.5 In order to safeguard and protect pupils and colleagues, where staff have concerns about someone who works with children they should immediately report this to the Headteacher.

18.0 Curriculum

Some areas of the curriculum may include or raise subject matter which is sexually explicit, or of an otherwise sensitive nature. Care should be taken to ensure that resource materials cannot be misinterpreted and clearly relate to the learning outcomes identified by the lesson plan. This can be supported by developing ground rules with pupils to ensure sensitive topics can be discussed in a safe learning environment. The curriculum can sometimes include or lead to unplanned discussion about a subject matter of a sexually explicit, political or otherwise sensitive nature. Responding to pupils' questions can require careful judgement.

Care should be taken to comply with the tuition centre's policy on social, moral, social, cultural (SMSC) which should promote British values. Staff should also comply with the policy for relationships and sex education (RSE). It should be noted that parents have the right to withdraw their children from all or part of any sex education provided but not from the national Curriculum for Science.

19.0 Educational Visits - After tuition centre Activities

For regular local activities, the risks should be considered under the tuition centre's general arrangements and a check made that the precautions remain suitable is all that is required. For infrequent e.g. annual activities, a review of the existing risk assessment may be all that is required. For new higher-risk activities or trips, specific assessment should be carried out.

19.1 Staff responsible for organising educational visits should be familiar with the Department of Education's advice on Health and safety available at <https://www.gov.uk/government/publications/health-and-safety-on-educational-visits> All tuition centres must have a Health and Safety policy which should include policy and procedures for off-site visits, including residential visits and any tuition centre-led adventure activities. There must be a suitable and sufficient risk assessment to include any risks to employees, children or others during an educational visit, and the measures taken to minimize these risks.

19.2 Staff should take particular care when supervising pupils in the less formal atmosphere of an educational visit where a more relaxed discipline or informal dress and language cadet may be acceptable. Staff remain in a position of trust and need to ensure that their behaviour cannot be interpreted as seeking to establish an inappropriate relationship or friendship.

19.3 Where out of tuition centre activities include overnight stays, careful consideration needs to be given to sleeping arrangements and to the staff/child ratio and suitable gender mix of staff. Pupils, adults and parents should be informed of sleeping arrangements prior to the trip.

19.0 Compliance

All staff must sign to confirm they have read, understood and agree to comply with this policy.