

# PORT·REGIS

## STAFF CODE OF CONDUCT

For all staff, including from Early Years upwards

POLICY NAME	Staff Code of Conduct	POLICY OWNER	C Beaty-Pownall, Director of People
APPROVED BY	Governance Committee	DATE APPROVED	June 2025
DATE OF LAST REVIEW	June 2025	DATE OF NEXT REVIEW	June 2026
SOURCE DOCUMENT	ISBA template – Staff Handbook, October 2024		

### Introduction

This policy applies to all Staff and volunteers at Port Regis regardless of their position, role or responsibility. It sets out clear guidance on the standards of behaviour expected from all Staff (as defined below) at the School.

References to “Staff” throughout this policy relate to all of the following groups:

- all members of staff including teaching and support staff;
- governors;
- regular volunteers;
- casual workers;
- temporary and supply staff, either from agencies or engaged directly; and
- student placements, including those undertaking initial teacher training and apprentices.

The principles underlying the guidance aim to encourage Staff to achieve the highest possible standards of conduct and minimise the risk of inappropriate conduct occurring.

Staff are in a unique position of trust and influence as role models for pupils and must adhere to behaviour that sets a good example to all pupils within the School.

Staff also have an individual responsibility to maintain their reputation and the reputation of the School, both inside and outside working hours and whether they are inside or outside the work setting. This policy therefore applies equally when staff are conducting lessons online or when it is necessary for them to work from home.

The School requires that all Staff have read and agree to comply with this policy. Breach or failure to observe this policy may result in action being taken under the School disciplinary procedures including, but not limited to, dismissal.

This Staff Code of Conduct is not an exhaustive list of acceptable and unacceptable standards of behaviour. 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 and the School.

This policy should be read in conjunction with the following related policies and procedures:

- Child Protection & Safeguarding Policy;
- Low-level Concerns Policy;
- Equity, Diversion & Inclusion;
- Anti-harassment and Bullying Policy;
- Preventing Sexual Harassment Policy;
- ICT – Staff Usage Agreement;
- Mobile Phone, Mobile Device and Social Media Policy;
- Health and Safety at Work Policy;
- Anti-corruption and Bribery Policy; and
- Whistleblowing Policy.

Staff should ensure that they have read and are familiar with these policies and procedures.

All staff are required to read and understand Part One of the statutory guidance 'Keeping Children Safe in Education'. School leaders and staff working directly with children must also read Annex B.

### **Attendance and Timekeeping**

Should you need to be absent from school, for example CPD or for personal reasons, you will need to ask the Headmaster, in advance, for permission, whether or not cover is required. If you are going to be late for school or absent for ill-health, childcare or other unplanned/unexpected reasons you should contact Barbara Lonergan – [barbara.lonergan@portregis.com](mailto:barbara.lonergan@portregis.com) and copy in Clair Beaty-Pownall [clair.beaty-pownall@portregis.com](mailto:clair.beaty-pownall@portregis.com) and the School Office so that cover can be arranged.

### **Eating and Drinking**

Staff benefit from meals at school while undertaking their duties at Port Regis. However, it is expected that all staff (except support staff) will sit with the children in the dining room and help to monitor table manners and general behaviour. While this is not a formal duty, it is an expectation that staff will carry out this informal role during any and all meals in term time. Teaching and boarding staff are permitted to sit together in small groups of no more than four and should spread themselves out around the dining room.

### **Smoking**

To promote a healthy and pleasant working environment and because of the fire risk, smoking (in any form, including the use of e-cigarettes) is only permitted in designated areas as set out in the School's Smoke Free Policy and prohibited within any of the School's vehicles.

You must not smoke whilst working with or supervising pupils on or offsite.

## **Alcohol and Illegal Drugs**

Consumption of alcohol is not permitted on site, unless an agreement has been made in advance that modest amounts of alcohol may be consumed for a specific function. Staff that reside on site may consume modest quantities of alcohol in private accommodation when they are not on duty. Consumption of illegal drugs is never permitted.

Your conduct and performance must not be adversely impacted by alcohol or drugs when undertaking your duties.

## **Security**

In the interests of security, employees must visibly wear their lanyards whilst in School. You must not remove any School documents from the site or take any photographs without due permission. The School reserves the right to search the outer clothing, bags, lockers and vehicles etc. of employees whilst on site. Staff may have a colleague in attendance on such occasions.

## **Health and Safety**

All Staff have a duty to ensure that a safe working environment exists. Fire and evacuation procedures must be adhered to at all times and Staff are required to familiarise themselves with the procedures and their responsibilities set out in the Health and Safety at Work Policy.

## **Personal Appearance**

We regularly receive visits from parents, potential parents and others, and naturally wish to convey an impression of professionalism and organisation. Therefore, whilst not wishing to impose unreasonable obligations, Staff are, nonetheless, required to look smart in appearance at all times.

When working from home or remotely (including the delivery of online lessons, or virtual meetings using a virtual meeting platform such as Zoom and/or Teams) staff must ensure they are dressed appropriately in clothing that is smart and of a similar style to what they would wear on a normal school day.

## **Mobility and Flexibility**

Due to the demands and nature of the School, employees should be prepared to transfer upon request within departments either temporarily or permanently and/or to undertake work of a different nature, providing it is reasonable and safe to do so and the individual is adequately trained. This may include working from home, if appropriate, and in the sole discretion of the School.

## **Gifts, Rewards and Favours**

Staff should take care to ensure that they do not appear to accept a gift that may be construed as a bribe or lead the giver to expect preferential treatment. Staff are required to familiarise themselves with the content of the School's Anti-corruption and Bribery Policy and to record any gifts received over the value of £100 in the School's gifts and hospitality register

Staff should exercise care when selecting pupils for school teams, productions, trips and/or specific work tasks in order to avoid perceptions of favouritism or injustice. Similar care should be exercised when excluding a child from an activity without prior consultation with the Headmaster or the Deputy Heads.

## **Communication**

Good communication between all members of the School community is vital. All communication between Staff, pupils and parents should take place within clear, explicit and professional boundaries.

### **Communication with Parents**

Form tutors in the Prep school and teachers/key workers in the Pre-Prep and Nursery are expected to be the first point of contact between parents and the School, although enquiries will also come through the School Office. Staff can contact parents by telephone, email or letter. Microsoft Teams or Zoom can also be used with prior arrangement.

Staff should not contact pupils, parents or conduct any school business using personal email addresses, or on platforms such as What'sApp. This does not prevent members of staff who have children at the school from having the usual contact with other parents and pupils to arrange play dates etc. Members of staff who are parents of children at the school must always be mindful of their employment/role at the school and exercise caution and high standards with regard to confidentiality, safeguarding and professional conduct.

Where a member of Staff receives an email from a parent, regarding an urgent pastoral matter, a reply should normally be made as soon as practicable. If a full reply cannot be made within that time, or in circumstances where the query is less urgent, the member of Staff should try to send a brief acknowledgment e-mail and let the parent know when a fuller reply can be expected.

Staff sending emails to parents/carers discussing sensitive or contentious issues are advised to speak to their Head of Department or the Deputy Head Pastoral/Academic before sending. The email should be sent through iSams, not Outlook, so that a central record of all communication is kept on file for future reference. Staff must inform the Deputy Head, Pastoral if they receive an offensive email.

### **Communication with Pupils**

Staff should carefully consider the manner in which they communicate with pupils at all times so as to avoid any possible misinterpretation of their motives or behaviours.

Staff should not give their personal mobile phone numbers or email addresses to pupils, nor should they communicate with them by social media, text message or personal email. If they need to speak to a pupil by telephone, they should use one of the School's telephones and email using the School system. Any communication on video call platforms, such as Microsoft Teams or Zoom must be for professional reasons only and should accord with the rules of this policy at all times.

The group leader on all trips and visits involving an overnight stay should take a school mobile phone with them r. which should be used to contact parents and for all school business related to the trip.

Pupils should be encouraged to discuss with their parents or guardians any issues that are troubling them. It may be appropriate to suggest that a pupil sees the School counsellor or a member of the pastoral team.

### **Relationships with Pupils**

Staff should understand that they are in a position of trust in relation to pupils, giving them influence and power by virtue of the knowledge they have and/or the authority invested in their role. Staff should ensure that their relationship with pupils clearly takes place within the boundaries of a respectful, professional relationship and avoid behaviour which may be misinterpreted by others.

Staff are encouraged to self-refer under the School's Low-Level Concerns Policy in the event that they have found themselves in a situation which may be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in a way that may be considered to fall below the expected professional standard. All concerns will be handled sensitively and will be dealt with appropriately and proportionately.

Staff are reminded that it is a criminal 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 power, even if the child is over 16 and the relationship is consensual.

### **Infatuations**

On occasion, pupils may develop an infatuation for a member of Staff. If a member of Staff suspects or becomes aware of an infatuation, the advice of the Headmaster or Iain Hepburn (Deputy Head, Pastoral) must be sought immediately.

Other members of Staff must alert a colleague to the possibility of an infatuation in order that appropriate steps can be taken.

Staff should deal with these situations sensibly and appropriately to maintain the dignity and safety of all concerned.

### **One to One Situations**

Staff working individually with pupils should be aware of the potential vulnerability of pupils

and Staff in such situations. Staff should manage these situations and take reasonable and sensible precautions to ensure the safety and security of the pupil and Staff alike.

Individual work with pupils should not be undertaken in secluded areas or behind a closed door, with the exception of individual music lessons and other pre-agreed one-to-one tuition. Where it is necessary to close doors for reasons of confidentiality a colleague should be made aware of this and asked to remain vigilant. Wherever possible one-to-one work should only be undertaken with the knowledge and consent of a senior member of staff to minimise risk to those involved.

Where it is necessary to conduct a one-to-one session online (for example, using a platform such as Zoom or Teams) staff must ensure that a senior member of staff is aware of the session and, wherever possible, arrange for a parent to be in the same room, or alternatively, ask a colleague or a member of SLT to join the session.

Where possible, a gap or barrier should be maintained between teacher and child at all times. Any physical contact should be the minimum required for care, instruction or restraint.

### **Physical Contact with Pupils**

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. Physical contact may be appropriate in the following circumstances:

- when a pupil needs to get comfort or reassurance e.g. following an accident or personal crisis;
- when a pupil needs encouragement to attempt a new challenge e.g. to climb on to a piece of apparatus; or
- when there is a need to take urgent action to avoid an incident or injury.

Staff should use their professional judgement at all times. Physical contact must be appropriate for the age, understanding and sex of the child and must never threaten or be sexually inappropriate. Staff must also be sensitive to an individual's cultural background and any special educational needs.

Staff should not have unnecessary physical contact with pupils and should be alert to the fact that minor forms of friendly physical contact can be misconstrued by pupils or onlookers.

Staff are referred to the School's Restraints Policy for guidance on the use of reasonable force in relation to pupils.

## **Prevent Duty**

All Staff should understand that the School has a legal duty under section 26 of the Counter-Terrorism and Security Act 2015 to have 'due regard to the need to prevent people from being drawn into terrorism'. This is known as the Prevent duty. Schools are required to assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. Consequently, Staff should be aware of:

- what extremism and radicalisation means and why people - including pupils and fellow Staff members - may be vulnerable to being drawn into terrorism as a consequence of it;
- what measures are available to prevent people from becoming drawn into terrorism and how to challenge the extremist ideology that can be associated with it; and
- how to obtain support for people who may be being exploited by radicalising influences.

More guidance for schools from the DfE on this can be found at:

[Prevent duty guidance: England and Wales \(2023\) - GOV.UK](#)

## **Transporting Pupils**

In certain circumstances it may be appropriate for Staff to transport pupils offsite on approved school business. The Deputy Head, Pastoral must oversee the plan and provide oversight of all transport arrangements. Staff should not transport pupils without prior authorisation except in the case of an emergency.

Staff should ensure that (i) the driver is not distracted while the vehicle is in motion for any reason other than an emergency; s(i) all passengers are wearing correctly fastened seatbelts; and (iii) the pupil(s) sit in the rear of the vehicle.

Wherever possible and practicable, vehicles other than private ones should be used to transport pupils to and from games fixtures and other activities. However, there will be occasions when staff may need to use their own cars to transport pupils, in which case the driver must:

- comply with the provisions in this section 'Transporting Pupils';
- comply with Port Regis' risk assessment in relation to these journeys (available on iAMCompliant 'transport management - use of personal vehicles to transport children').

Situations do arise when the decision to transport a pupil in a privately owned vehicle has to be taken quickly and without consultation — in cases of emergency, for example, and where not to give a lift would place a pupil at risk. Such circumstances must always be recorded and reported to the Deputy Head, Pastoral and Bursar without delay. In all such situations, it is the driver's responsibility to ensure

that the vehicle used is roadworthy and appropriately insured, that the maximum capacity is not exceeded, and that all passengers wear seat belts.

It is inappropriate for staff to offer lifts to pupils outside their normal working duties, unless any arrangement has been agreed beforehand with parents and the Deputy Head, Pastoral.

Prior to transporting pupils offsite, consent must be obtained from a pupil's parent/guardian and Staff should be aware that the safety and welfare of the pupils is their responsibility until they are safely returned to school or passed back to their parent/carer.

### **Contact with Pupils Out of School**

Staff should not:

- arrange meetings with pupils off the School premises (whether in person or online) without the prior approval of the Headmaster;
- arrange private tuition of any of the School's pupils in school or outside of school whether in term-time or outside of term-time without the prior written approval of the Headmaster; and
- give pupils their home address or any of their personal contact details.

The above provisions will not prevent members of staff who are also parents at the school acting in that capacity e.g. hosting or attending play dates or birthday parties. Please see the 'Communication with Parents' section above for further details.

### **Conduct Out of School**

Staff are expected to be loyal to our stated aims and objectives and may not engage in any outside activity which, in the reasonable view of the Headmaster, might interfere with the efficient discharge of their duties or is in conflict with our School's interests.

You should at all times, both in and out of School, uphold our ethos and conduct yourself in a manner consistent with your position.

You must notify us of any outside conduct, activity or circumstances that are likely to either bring the School into disrepute or put into question a staff member's suitability for their role at the School.

### **School Events**

You are expected to behave appropriately at School events, including School organised social occasions. A School event, which may or may not take place outside of working hours or on School premises, is sufficiently connected to the School such that the standards of behaviour expected will be in line with the requirements in this policy.

### **Acceptable Use of Technologies**

Staff should ensure that they are familiar with and comply with the School's Staff ICT Usage Agreement and Mobile Phone, Mobile Device and Social Media policies at all times. In particular, Staff must:

- not engage in inappropriate use of social network sites which may bring themselves, the School or the School community into disrepute;
- adopt the highest security settings on any personal profiles they have;



- 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;
- exercise care when using dating websites where Staff could encounter students; and
- not contact pupils, their guardians or family members, accept or initiate friend requests or follow pupils' or their guardians' accounts on any social media platform. This will not prevent members of staff who are also parents at the school acting in that capacity e.g. contacting other parents to arrange play dates or birthday parties. Please see the 'Communication with Parents' section above for further details.

## **Equal Treatment**

We are committed to equal treatment for all Staff and pupils regardless of their race or colour, nationality or national or ethnic origins, religion or belief, sex, sexual orientation, pregnancy or maternity, marital or civil partnership status, gender reassignment, age, and disability (together known as "Protected Characteristics").

We aim to create a friendly, caring and perceptive environment in which every individual is valued. We endeavour to contribute positively towards the growing autonomy, self-esteem and safety of each pupil. Staff will be required to undertake regular consultation activities with pupils e.g. through safety questionnaires, participation in anti-bullying week and speaking to children about their experiences at lunchtime and playtimes.

Bullying, harassment, victimisation and/or discrimination will not be tolerated. We treat all our pupils and their parents fairly and with consideration which we expect them to reciprocate towards each other, the Staff and the School. Staff should ensure that they are familiar with the School's staff Diversity, Equity and Inclusion Policy, Anti-harassment and Bullying Policy and Preventing Sexual Harassment Policy and the School's pupil policies on Equal Opportunities and Anti-Bullying Policy.

## **Photographs**

Many school activities involve recording images as part of the curriculum, extra school activities, publicity or to celebrate an achievement. In accordance with data protection legislation, the image of a pupil is personal data.

Photographs must only be taken of children with the permission of a parent or an individual with parental responsibility. Such consent must have been provided in writing via the School's consent form. It is also important to consider the wishes of the pupil, remembering that some pupils do not wish to have their photograph taken or be filmed.

Where photographs are taken by Staff to evidence a child's progress, such photos should only be taken on School cameras. They must then be downloaded onto a School computer. Photos cannot be used or passed on outside the School. Neither Staff nor children should use their own mobile phones or any other personal device to take or store photographs unless specifically required for the purposes of a lesson (for example, a child using their laptop in A and B Form). If you have any questions or concerns about this, you should speak to Iain Hepburn (Deputy Head, Pastoral and DSL).

## **Continuing Professional Development**

All staff are expected to attend training sessions relevant to them during each termly INSET and to promptly complete any online training sent to them for completion.



## Concerns or Complaints

The School aims to create an atmosphere in which a diverse range of people can work together openly in the spirit of mutual respect and trust towards a common purpose. Nevertheless, we recognise that it is possible for misunderstandings and disagreements to arise or for mistakes to occur.

### Staff Complaints

Complaints should be dealt with immediately and openly and Staff should try to resolve issues informally in the first instance. If this approach is impractical or unsuccessful, Staff may wish to raise their concerns more formally in accordance with the School's Grievance Procedure or Whistleblowing Procedure, depending upon the nature of the concern.

### Parental Complaints

Staff must ensure that parental complaints are dealt with in accordance with the School's Complaints Policy.

### Safeguarding

For procedures for dealing with concerns or allegations about a child or disclosures / allegations of abuse, Staff should refer to the School's Safeguarding and Child Protection Policy.

### Low-level Concerns

As part of our whole school approach to safeguarding, we promote an open and transparent culture in which all concerns about adults working in or on behalf of the School are dealt with promptly and appropriately. This includes any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the School may have acted in a way that:

- is inconsistent with this Staff Code of Conduct, including inappropriate conduct outside of work; and
- does not meet the harm threshold set out in Part 4 of the statutory guidance, Keeping Children Safe in Education (KCSIE), or is otherwise not serious enough to consider a referral to the LADO.

Such allegations or concerns are referred to as "low-level concerns" within KCSIE. The term "low-level" does not mean that it is insignificant. Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

In order to create and embed a culture of openness, trust and transparency in which the School's values and expected behaviour set out in this Staff Code of Conduct are lived, monitored and reinforced constantly by all staff, it is vital that any such low-level concerns are shared in accordance with the School's Low-Level Concerns Policy which can be found on iAM Compliant. You can report a Low-Level Concern here: [Low-Level Concern Form](#)

Any questions regarding low-level concerns and/or the procedure for reporting them should be raised with Iain Hepburn (Deputy Head, Pastoral and DSL).