



Staff Conduct Policy

Created by:	Dean Frances-Hawksley	Date: 01-10-2024
Last reviewed on:	[Date]	
Next review due by:	[Date]	

Introduction

- 1.1. All adults have a duty to keep learners safe, promote their welfare and, to protect them from radicalisation (the Prevent duty), abuse (sexual, physical and emotional), neglect and safeguarding concerns. This duty is, in part, exercised through the development of respectful, caring and professional relationships between adults and learners and behaviour by adults that demonstrates moral integrity, maturity and good judgement. Following this Code will help to safeguard adults from being maliciously, falsely or mistakenly suspected or accused of misconduct in relation to learners.
- 1.2. This Code takes account of the most recent versions of the following guidance (statutory and non-statutory); ‘Keeping Children Safe in Education’ Department of Education (‘DfE’) (statutory), Working together to safeguard children’ HM Government (statutory) and ‘Guidance for safer working practice for those working with children and young people in education settings’ (non-statutory). This Code cannot provide an exhaustive list of what is, or is not, appropriate behaviour for adults. However, it does highlight behaviour that is illegal, inappropriate or inadvisable in relation to the required professional standards. There will be occasions and circumstances in which adults have to make decisions or take action in the best interests of the learner where no specific guidance has been given. Adults are expected to make responsible and informed judgements about their own behaviour in order to secure the best interests and welfare of the learners.
- 1.3. Any behaviour in breach of this Code by employees may result in action under our Disciplinary Procedure. Such behaviour may constitute gross misconduct and, as such, may result in summary dismissal. The governing body will take a strict approach to serious breaches of this Code.
- 1.4. Adults have a duty to act in accordance with The Quay Safeguarding Policy and report any safeguarding, child protection, welfare or radicalisation concerns about a learner to the Designated Safeguarding Lead.
- 1.5. Whistleblowing. Adults must raise concerns they have about the safeguarding or child protection practices by following the All Things SEN Whistleblowing Policy. An Adult who “whistle blows” or makes a public interest disclosure will have the protection of the relevant legislation.

Expected Professional Standards

- 2.1. All adults as appropriate to the role and/or job description of the individual, must:

All Things SEN Staff Code of Conduct

- place the well-being and learning of learners at the centre of their professional practice.
 - have high expectations for all learners, be committed to addressing behavioural issues in a supportive manner, and work to help learners progress regardless of their background and personal circumstances.
 - treat learners fairly and with respect, take their knowledge, views, opinions and feelings seriously, and value diversity and individuality.
 - model the characteristics they are trying to inspire in learners, including enthusiasm for learning, a spirit of enquiry, honesty, tolerance, social responsibility, patience, and a genuine concern for other people.
 - respond sensitively to the differences in the home backgrounds and circumstances of learners, recognising the key role that parents and carers play in education.
 - seek to work in partnership with parents and carers, respecting their views and promoting understanding and co-operation to support the young person's learning and well-being in and out of school.
 - reflect on their own practice, develop their skills, knowledge and expertise, and adapt appropriately to learn with and from colleagues.
 - ensure that the same professional standards are always applied regardless of culture, disability, gender, language, racial origin, religious belief and/or sexual identity.
- 2.2. All adults must be familiar with and act in accordance with the most recent versions of the following documents; Part 1 of Keeping Children Safe in Education DfE (statutory), Working Together to Safeguard Children HM Government (statutory), Prevent Duty Guidance HM Government (statutory), 'The Prevent duty departmental advice for schools and childcare providers' DfE and 'Guidance for safer working practice for those working with children and young people in education settings' (non-statutory).
- 2.3. An employee who fails to bring a matter of concern to the attention of senior management and/or the relevant agencies is likely to be subject to disciplinary action.

Confidentiality

- 3.1. The Quay is subject to the Data Protection Act 2018. In addition, all staff owe a common law duty of care to safeguard the welfare of their learners.
- 3.2. Adults may have access to confidential information about learners in order to undertake their responsibilities. In some circumstances the information may be sensitive data and/or confidential. Confidential or personal information about a learner or her/his family must never be disclosed to anyone other than on a need to know basis and advice should be sought prior to disclosure to ensure such disclosure is in accordance with the Data Protection Act 2018, the ICO 'Guide to Data Protection' and the ICO guide on 'How to Disclose Information Safely'. In circumstances where the learner's identity does not need to be disclosed the information should be used anonymously. Information must never be used to intimidate, humiliate, or embarrass the learner. Information must never be used by anyone for their own or others advantage (including that of partners, friends relatives or other organisations).
- 3.3. There are some circumstances in which an adult may be expected to share information about a learner, for example when abuse is alleged or suspected. In such cases, adults have a duty to pass information on without delay to those with designated safeguarding responsibilities. See paragraph 19 below.
- 3.4. Confidential information about learners must be held securely. Confidential information about learners must not be held off the Quay site other than on security protected Quay equipment. Information must only be stored for the length of time necessary to discharge the task for which it is required.
- 3.5. If a learner or parent/carer makes a disclosure regarding abuse or neglect, the adult must follow the Quay's procedures and the guidance as set out in Keeping Children Safe in Education DfE. Confidentiality must not be promised to the learner or parent/carer however reassurance should be given that the information will be treated sensitively.
- 3.6. If an adult is in any doubt about the storage or sharing of information s/he must seek guidance from the Designated Safeguarding Lead. Any media or legal enquiries must be passed to senior management.

Propriety, Behaviour and Appearance

- 4.1. All adults working with children have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of learners. They should

All Things SEN Staff Code of Conduct

adopt high standards of personal conduct in order to maintain the confidence and respect of their colleagues, learners and the public in general. An adult's behaviour or actions, either in or out of the workplace, must not compromise her/his position within the work setting, or bring The Quay into disrepute.

- 4.2. Adults are required to notify the DSL or Joint Directors immediately of any allegation/s of misconduct that are of a safeguarding nature made against them (or implicating them), by a child or adult in relation to any outside work or interest (whether paid or unpaid) and, of any arrest or criminal charge whether child related or not. Where employees fail to do so, this will be treated as a serious breach of this Code and dealt with under our Disciplinary Procedure.
- 4.3. Individuals should not behave in a manner which would lead any reasonable person to question their suitability to work with children or to act as an appropriate role model; make, or encourage others to make sexual remarks to, or about, a learner; use inappropriate language to or in the presence of learners; discuss their personal or sexual relationships with or in the presence of learners; make, or encourage others to make, unprofessional personal comments which scapegoat, demean or humiliate, or might be interpreted as such. Behaving in an unsuitable way towards children may result in disqualification from childcare under the Childcare Act 2006, prohibition from teaching by the TRA, a bar from engaging in regulated activity, or action by another relevant regulatory body.
- 4.4. A person's dress and appearance are matters of personal choice, self-expression, religious and cultural customs. However Adults must maintain an appropriate standard of dress and personal appearance at work which promotes a positive and professional image. Clothing and footwear must be safe and clean and take account of health and safety considerations. Adults must ensure they are dressed in ways which are appropriate to their role and not likely to be viewed as offensive, revealing or sexually provocative and specifically should not distract, cause embarrassment or give rise to misunderstanding, should be religious and culturally sensitive and free of any political or otherwise contentious slogans, and not considered to be discriminatory. Adults who dress or appear in a manner which may be considered as inappropriate could render themselves vulnerable to criticism or, where the adult is an employee, allegations of misconduct that may lead to action under our Disciplinary Procedure.
- 4.5. Personal property of a sexually explicit nature or property which might be regarded as promoting radicalisation or otherwise inappropriate such as books, magazines, CDs, DVDs or such material on any electronic media including links to such material must not be brought onto or stored on Quay premises or on any Quay equipment.

Sexual Contact with Children and Young People and Abuse of Trust

- 5.1. A relationship between an adult and a child or young person is not a relationship between equals; the adult has a position of power or influence. There is potential for exploitation and harm of children or vulnerable young people and all adults have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification. Adults must not use their status or position to form or promote relationships with children (whether current learners or not), that are of a sexual nature, or which may become so. Adults should maintain appropriate professional boundaries and avoid behaviour which might be misinterpreted by others. They should report any incident with this potential.
- 5.2. Any sexual behaviour or activity, whether homosexual or heterosexual, by an adult with or towards a child/learner or young person is illegal. Children and young people are protected by the same laws as adults in relation to non-consensual sexual behaviour. They are additionally protected by specific legal provisions regardless of whether there is consent or not. Where a person aged 18 or over is in a specified position of trust with a child or young person under 18 years, the Sexual Offences Act 2003 makes it 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.
- 5.3. Sexual behaviour includes non-contact activities, such as causing a child or young person to engage in or watch sexual activity or the production of indecent images of children. 'Working Together to Safeguard Children' *Appendix A* 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..."
- 5.4. Adults must not have sexual relationships with learners or have any form of communication with a child, which could be interpreted as sexually suggestive or provocative i.e. verbal comments, letters, notes, texts, electronic mail, phone calls, social networking contact or physical contact. The adult should not make sexual remarks to, or about, a child or discuss their own sexual relationships with or in the presence of learners. Adults should take care that their language or conduct does not give rise to comment or speculations. Attitudes, demeanour and language all require care and thought.
- 5.5. There are occasions when adults embark on a course of behaviour known as 'grooming' where the sole purpose is to gain the trust of a child or young person,

and manipulate that relationship so that sexual abuse can take place. Adults should be aware that conferring special attention without good reason or favouring a learner has the potential to be construed as being part of a 'grooming' process, which is a criminal offence.

Infatuations and Crushes

6.1. A child or young person may develop an infatuation with an adult who works with them. An adult, who becomes aware (may receive a report, overhear something, or otherwise notice any sign no matter how small or seemingly insignificant) that a learner has become or may be becoming infatuated with him/herself or a colleague, must report this without delay to the Joint Directors or DSL, so that appropriate action can be taken to avoid any hurt, distress or embarrassment. The situation will be taken seriously and the adult should be careful to ensure that no encouragement of any kind is given to the learner. It should also be recognised that careless and insensitive reactions may provoke false accusations.

6.2. Examples of situations which must be reported are given below:

- Where an adult is concerned that he or she might be developing a relationship with a learner which could have the potential to represent an abuse of trust.
- Where an adult is concerned that a learner is becoming attracted to him or her or that there is a developing attachment or dependency.
- Where an adult is concerned that actions or words have been misunderstood or misconstrued by a learner such that an abuse of trust might be wrongly suspected by others.
- Where an adult is concerned about the apparent development of a relationship by another adult, or receives information about such a relationship.

Gifts, Rewards, Favouritism and Exclusion

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

7.2. Personal gifts must not be given to learners or their families/carers. This could be misinterpreted as a gesture either to bribe or groom. It might be perceived that a 'favour' of some kind is expected in return.

- 7.3. Care should be taken when selecting children for specific activities, jobs, privileges and when learners are excluded from an activity in order to avoid perceptions of favouritism or injustice. Methods of selection and exclusion should be subject to clear, fair and agreed criteria.

Social Contact and Social Networking

- 8.1. Communication between learners and adults, by whatever method, should take place within clear and explicit professional boundaries. This includes the wider use of technology such as mobile phones, tablets, text messages, emails, instant messages, websites, social media such as Facebook, Twitter, Instagram, chat-rooms, forums, blogs, apps such as Whatsapp, gaming sites, digital cameras, videos, web-cams and other hand held devices. Adults should not share any personal information with learners and they should not request, or respond to, any personal information from the child/young person, other than that which might be appropriate as part of their professional role. They should ensure that all communications are transparent and avoid any communication that could be interpreted as 'grooming behaviour'.
- 8.2. Adults must not give their personal contact details such as home/mobile phone number; home or personal e-mail address or social networking details to learners unless the need to do so is agreed in writing with senior management. If, for example, a learner attempts to locate an adult's personal contact details and attempts to contact or correspond with him/her, the adult should not respond and must report the matter to his/her manager.
- 8.3. It is recommended that adults ensure that all possible privacy settings are activated to prevent learners from making contact on personal profiles and to prevent learners from accessing photo albums or other personal information which may appear on social networking sites.
- 8.4. Adults are personally responsible for what they communicate in social media and must bear in mind that what is published might be read by us, learners, parents and carers, the general public, future employers and friends and family for a long time. Adults must ensure that their on-line profiles are consistent with the professional image expected by us and must not post material which damages the reputation of The Quay or which causes concern about their suitability to work with children and young people. Those who post material which may be considered as inappropriate could render themselves vulnerable to criticism or, in the case of an employee, allegations of misconduct which may be dealt with under the Disciplinary Procedure. Even where it is made clear that the writer's views on such topics do not represent those of The Quay, such comments are inappropriate.

- 8.5. It is acknowledged that Adults may have genuine friendships and social contact with parents or carers of learners, independent of the professional relationship. Adults should, however, inform senior management of any relationship with a parent/carer where this extends beyond the usual parent/carer/professional relationship; advise senior management of any regular social contact they have with a learner or parent/carer, which could give rise to concern; inform senior management of any requests or arrangements where parents/carers wish to use their services outside of the workplace e.g. babysitting, tutoring; and adults should always approve any planned social contact with learners or parents/carers with senior colleagues. If a parent/carer seeks to establish social contact, or if this occurs coincidentally, the adult should exercise his or her professional judgment and should ensure that all communications are transparent and open to scrutiny.
- 8.6. Some employees may, as part of their professional role, be required to support a parent or carer. If that person comes to depend upon the employee or seeks support outside of their professional role this should be discussed with senior management and where necessary referrals made to the appropriate support agency.

Physical Contact, Personal Privacy and Personal Care

- 9.1. There are occasions when it is entirely appropriate and proper for employees to have physical contact with learners, but it is crucial that they only do so in ways appropriate to their professional role and in relation to the learner's individual needs and any agreed care plan. When physical contact is made with learners this should be in response to their needs at the time, of limited duration and appropriate given their age, stage of development, gender, ethnicity, culture and background. Employees must use their professional judgement at all times. It is not possible to be specific about the appropriateness of each physical contact, since an action that is appropriate with one learner in one set of circumstances may be inappropriate in another, or with a different learner.
- 9.2. Physical contact should never be secretive or casual, or for the gratification of the adult, or represent a misuse of authority. Adults should never touch a learner in a way which may be considered indecent. If an adult believes that an action could be misinterpreted, the incident and circumstances should be reported as soon as possible to the manager and recorded in the Quay's incident book, and, if appropriate, a copy placed on the learner's file.

All Things SEN Staff Code of Conduct

- 9.3. Physical contact, which occurs regularly with a learner or learners, is likely to raise questions unless the justification for this is part of a formally agreed plan (for example in relation to learners with SEN or physical disabilities). Any such contact should be the subject of an agreed and open school policy and subject to review. Where feasible, staff should seek the learner's permission before initiating contact. Adults should listen, observe and take note of the learner's reaction or feelings and – so far as is possible - use a level of contact which is acceptable to the learner for the minimum time necessary.
- 9.4. There may be occasions when a distressed learner needs comfort and reassurance. This may include age-appropriate physical contact. Adults should remain self-aware at all times in order that their contact is not threatening, intrusive or subject to misinterpretation. Adults should always tell a colleague when and how they offered comfort to a distressed learner.
- 9.5. Where an adult has a particular concern about the need to provide this type of care and reassurance s/he should seek further advice from a senior manager.
- 9.6. All parties should clearly understand from the outset what physical contact is necessary and appropriate in undertaking specific activities. Keeping parents/carers informed of the extent and nature of any physical contact may also prevent allegations of misconduct arising. Any incidents of physical contact that cause concern or fall outside of these protocols and guidance should be reported to the senior manager and parent/carer.
- 9.7. Learners are entitled to respect and privacy when changing clothes, toileting or taking a shower. However, given the needs of certain learners, there may need to be physical support or supervision. This supervision should be appropriate to the needs and age of the learners concerned, sensitive to the potential for embarrassment, and kept to a minimum based on needs. Adults who are required as part of their role to attend changing rooms or toilets should announce their intention of entering and only remain in the room only as is necessitated by learner needs.
- 9.8. Intimate care duties will have appropriate training and be in keeping with agreed guidance and The Quay's Intimate Care Policy. Employees should not assist with personal or intimate care tasks which the learner is able to undertake independently.

Behaviour Management and Physical Intervention

- 10.1. All learners have a right to be treated with respect and dignity. The use of sarcasm, demeaning or insensitive comments towards learners is not acceptable in any situation. Deliberately intimidating learners by shouting aggressively, hectoring or overbearing physical presence is not acceptable in any situation.
- 10.2. Physical intervention is always a last resort and is only acceptable to ensure the safety of learners and preventing damage to property. All staff are trained in Team Teach and all physical intervention must fall within the Team Teach guidelines.
- 10.3. All learners have a Positive Behaviour Support Plan and Risk Assessment, updated termly, in which all known behaviours and risks are assessed. All staff must be familiar with the PBSRAs of all learners. All incidents (including near misses) and subsequent actions must be recorded according to The Quay's reporting protocol and reported to a Joint Director. All physical interventions are recorded and reported to parents on the day of the incident. Parental consent does not permit the use of unlawful physical intervention or deprive a learner of their liberty. Refer to The Quay's Behaviour Management Policy and Anti-Bullying Policy for further information.

First Aid and Medication

- 11.1. The Quay has a separate Medication Policy on supporting learners with a medical condition. Employees should have regard to the statutory guidance 'Supporting learners at school with medical conditions' DfE December 2015, which includes advice on managing medicines. All settings must have an adequate number of qualified first aiders/appointed persons. Employees must have had the appropriate training and achieved the necessary level of competency before administering first aid or medication, or taking on responsibility to support learners with medical conditions. If an adult is concerned or uncertain about the amount or type of medication being given to a learner this should be discussed with the Designated Safeguarding Lead.
- 11.2. Adults taking medication that may affect their ability to care for children should seek medical advice regarding their suitability to do so and should not work with learners whilst taking medication unless medical advice confirms that they are able to do so. Adult medication on the premises must be securely stored out of the reach of children.

One to One Situations and Meetings with Learners

- 12.1. One to one situations have the potential to make children/young persons more vulnerable to harm by those who seek to exploit their position of trust. Adults working in one to one settings with learners may also be more vulnerable to unjust or unfounded allegations being made against them. See The Quay's Lone Working Policy for further guidance.
- 12.2. No learner should be in or invited into, the home of an adult who works with them, unless they are family members or close family friends, in which case adults are advised to notify their line manager. Learners must not be asked to assist adults

Transporting Learners

- 13.1. Some learners may require transport from The Quay. Adults should ensure that their behaviour is safe and that the transport arrangements and the vehicle meet all legal requirements. They must ensure that the vehicle is roadworthy and appropriately insured and that the maximum capacity is not exceeded. It is a legal requirement that all passengers wear seatbelts and the driver should ensure that they do so. The driver should be aware of the current legislation concerning the use of car seats for younger children where applicable. It is illegal to drive using hand-held phones or similar devices and the driver must ensure that they adhere to all driving regulations.
- 13.2. It is inappropriate for Adults to offer lifts to a learner, unless the need has been agreed with a manager and, if this falls outside their normal working duties, has been agreed with parents/carers.
- 13.3. There may be occasions where a learner requires transport in an emergency situation or where not to give a lift may place a learner at risk. Such circumstances must always be recorded and reported to a senior manager and parents/carers.

Curriculum

- 15.1. Some areas of the curriculum can include or raise subject matter which is sexually explicit, of a political, cultural, religious or 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 plan should highlight particular areas of risk and sensitivity.
- 15.2. The curriculum can sometimes include or lead to unplanned discussion about subject matter of a sexually explicit, political, cultural, religious or otherwise

sensitive nature. Responding to learners' questions can require careful judgement and adults must take guidance in these circumstances from the Designated Safeguarding Lead. Adults must not enter into or encourage inappropriate discussion about sexual, political or religious activity or behaviour or, discussions which may offend or harm others. Adults should take care to protect children from the risk of radicalisation and should act in accordance with advice given under Part 1 of Keeping Children Safe in Education DfE and accordingly must not express any prejudicial views or, attempt to influence or impose their personal values, attitudes or beliefs on learners.

Photography, Videos and other Creative Arts

- 16.1. Many activities in The Quay involve the taking or recording of images. This may be undertaken as part of the curriculum, for displays, publicity, to celebrate achievement or, to provide evidence of the activity. The Data Protection Act 2018 affects the use of photography. An image of a child is personal data and it is, therefore, a requirement under the Act that consent is obtained from the parent/carer of a child before any images are made such as those used for school web sites, notice boards, productions or other purposes. All parents are asked to give consent to have their child's image used in the Learner Information Document they complete when a learner joins The Quay – staff should always check the permissions before using an image.
- 16.2. Adults need to be aware of the potential for such images to be taken and/or misused to create indecent images of children and/or for 'grooming' purposes. Careful consideration should be given as to how these activities are organised and undertaken. There should be an agreement as to whether the images will be destroyed or retained for further use, where these will be stored and who will have access to them.
- 16.3. Adults should remain sensitive to any learner who appears uncomfortable and should recognise the potential for misinterpretation. It is also important to take into account the wishes of the child, remembering that some children do not wish to have their photograph taken.
- 16.4. Adults should only use equipment provided or authorised by The Quay to make/take images and should not use personal equipment, mobile telephones or any other similar devices to make/take images.
- 16.5. The following guidance should be followed:
 - if a photograph is used, avoid using the full name of the learner

All Things SEN Staff Code of Conduct

- if the learner's full name is used, avoid using the photograph
- photographs/images must be securely stored and used only by those authorised to do so
- be clear about the purpose of the activity and about what will happen to the photographs/images when the lesson/activity is concluded
- only retain images when there is a clear and agreed purpose for doing so
- ensure that all photographs/images are available for scrutiny in order to screen for acceptability
- be able to justify the photographs/images made
- do not take images of learners for personal use
- do not display or distribute photographs/images of learners unless there is consent to do so from the parent/carer
- only publish images of learners where they and their parent/carer have given explicit written consent to do so
- do not take images of learners in a state of undress or semi-undress
- do not take images of learners which could be considered as indecent or sexual.

Unacceptable Use of ICT Facilities and Monitoring

17.1. Posting, creating, accessing, transmitting, downloading, uploading or storing any of the following material (unless it is part of an authorised investigation) is likely to amount to gross misconduct and result (where the adult is employed) in summary dismissal (this list is not exhaustive):

- pseudo-images of children (child abuse images), pornographic or sexually suggestive material or images of children or adults which may be construed as such in the circumstances (that is, writing, texting, pictures, films and video clips of a sexually explicit or arousing nature),
- any other type of offensive, obscene or discriminatory material, criminal material or material which is liable to cause distress or embarrassment to The Quay or others.

- 17.2. If indecent images of children are discovered at the premises, an immediate referral should be made to the School's designated Safeguarding Lead/Head Teacher (unless he or she is implicated) and, if relevant, the police contacted. The images/equipment should be secured, should not be used by others and should be isolated from the network. There should be no attempt to view, tamper with or delete the images as this could jeopardise any necessary criminal investigation. If the images are of children are known to the School, a referral should also be made to children's social care in accordance with local arrangements.
- 17.3. The contents of our ICT resources and communications systems are the property of The Quay. Therefore, staff should have no expectation of privacy in any message, files, data, document, facsimile, telephone conversation, social media post, conversation or message, or any other kind of information or communications transmitted to, received or printed from, or stored or recorded on our electronic information and communications systems.
- 17.4. We reserve the right to monitor, intercept and review, without prior notification or authorisation from staff. Usage of our IT resources and communications systems, including but not limited to telephone, e-mail, messaging, voicemail, CCTV, internet and social media postings and activities is monitored to ensure that our rules are being complied with and for the following purposes:
- to monitor whether the use of the e-mail system or the internet is legitimate and in accordance with this policy;
 - to assist in the investigation of alleged wrongful acts; or
 - to comply with any legal obligation.
- 17.5. Adults consent to monitoring by acknowledgement of this policy and the use of our resources and systems. We may store copies of data or communications for a period of time after they are created, and may delete such copies from time to time without notice. If necessary information may be handed to the police in connection with a criminal investigation.
- 17.6. Cyber-bullying can be experienced by adults as well as learners. Adults should notify their manager/Joint Director if they are subject to cyber-bullying. The Quay will endeavour to protect adults and stop any inappropriate conduct.

Reporting Concerns and Recording Incidents

- 18.1. In the event of an allegation being made, or incident being witnessed, the relevant information should be immediately recorded and reported according to the

protocol of The Quay. An employee who fails to bring a matter of concern to the attention of senior management and/or the relevant agencies will be subject to disciplinary action.

18.2. In addition to behaviours outlined elsewhere in this policy, and the types of abuse and neglect set out in Keeping Children Safe in Education DfE, the following is a non-exhaustive list of some further behaviours which would be a cause for concern:

An adult who:

- Allows a learner/young person to be treated badly; pretends not to know it is happening
- Gossips/shares information inappropriately
- Demonstrates inappropriate discriminatory behaviour and/or uses inappropriate language
- Dresses in a way which is inappropriate for the job role
- Does not treat learners fairly - demonstrates favouritism
- Demonstrates a lack of understanding about personal and professional boundaries
- Uses his/her position of trust to intimidate, threaten, coerce or undermine
- Appears to have an inappropriate social relationship with a learner or learners
- Appears to have special or different relationships with a learner or learners
- Seems to seek out unnecessary opportunities to be alone with a learner

Monitoring and Review

19.1. The Joint Directors are responsible for monitoring the implementation, use and effectiveness of this policy. The policy will be reviewed annually.