



# SPRATTON HALL

## **Staff Code of Conduct / Behaviour Policy**

September 2023

## STAFF CODE OF CONDUCT / BEHAVIOUR POLICY

Title: Staff Code of Conduct / Behaviour Policy	Responsible: SJSC / CJB
Date implemented: September 2014	Last Review: September 2023
	Next Review: September 2024

### INTRODUCTION

Spratton Hall takes the safeguarding and protection of children very seriously and, as such, we expect all members of staff to adhere to the Code of Conduct and always to act within the spirit of these guidelines, as set out below. The guidance is in accordance with 'Keeping Children Safe in Education 2023'.

### GENERAL

1. Members of staff are placed in a position of both power and trust and must always ensure this position is not abused or jeopardised in any way.
2. Members of staff must not have an inappropriate relationship with a pupil.
3. Allegations of unprofessional conduct or improper contact or words can arise at any time. All members of staff are reminded that professionalism and vigilance are required, so as to ensure the safety of children in our care and to reduce the risk of an allegation of impropriety against a member of staff.
4. Any school information/records including details of pupils, parents and employees whether actual, potential or past, other than those contained in authorised and publicly available documents, must be kept confidential unless the school's prior written consent has been obtained. This requirement exists both during and after a member of staff's employment. In particular, members of staff must not use such information for the benefit of any future employer.
5. Members of staff need to take particular care when dealing with a pupil who:–
  - i) appears to be emotionally distressed, or generally vulnerable and/or who is seeking expressions of affection from a member of staff;
  - ii) appears to hold a grudge against a member of staff;
  - iii) acts in a sexually provocative way, or who is inclined to make exaggerated claims about himself/herself and others, or to fantasise, or one whose manner with adults is over-familiar;
  - iv) may have reason to make up a story to cover the fact that he or she has not worked hard enough for public examinations.

**Note:** Some of these behaviours may be indications that a child has been, or is currently being, abused and should therefore be reported to the Designated Safeguarding Lead under the school's safeguarding procedures.

6. Members of staff should follow the dress code, as described in the Staff Handbook.
7. Members of staff should adhere to the following at all times, when with pupils:
  - i) Avoid all unnecessary physical contact and apologise straight away if there is accidental physical contact.
  - ii) Avoid any conduct that could be taken as a sexual advance.
  - iii) Avoid words or expressions that have any unnecessary sexual innuendo, avoid displays of affection either personally or in writing (e.g. messages in birthday cards, text messages, emails etc).
  - iv) Avoid any form of aggressive contact such as holding, pushing, pulling or hitting, which could amount to a criminal assault, or threatening words.
  - v) Avoid any words or actions that are over-familiar.
  - vi) Do not swear, blaspheme or use any sort of offensive language in front of pupils.
8. Staff are expected to uphold fundamental British values – see more information about this in our PSHCE Policy and British Values documentation. Staff are also aware that they are prohibited in inviting in extremist speakers.
9. Staff have a duty to report suspected female genital mutilation. Further information concerning this is in our Safeguarding Policy.
10. With regard to the receipt of gifts, staff are asked to refer to our Anti-Corruption and Bribery Policy.
11. With regard to the use of drugs and alcohol, staff are expected to set a good example at all times. We have a no-smoking policy throughout the school and within its grounds.
12. Staff are also expected to set a good example to both the school and the profession in matters of disrepute including incidents outside of school.
13. Staff are expected to adhere to our 'Intimate Care Policy' and our 'EYFS Toileting and Intimate Care Policy'.
14. Although the Covid pandemic has subsided, staff are expected to adhere to the school's guidelines as set out in the various documents and risk assessments, all located in the shared Coronavirus folder. Should there be a need, staff will again be required to adhere to the school's Covid guidelines.

Report any incident that causes you concern to the DSL or Head Master and make a written record (dated and signed) or follow the Low Level Concerns / Whistleblowing Policy procedures.

## ONE TO ONE CONTACT WITH PUPILS

In addition to the points described in No 7 above, members of staff teaching one pupil, or conducting a one-to-one meeting or teaching session with a pupil should take particular care in the following ways:-

- i) Use a room that has sufficient windows onto a corridor so that the occupants can be seen, or keep the door open, or inform a colleague that the lesson/meeting is taking place.
- ii) Arrange the meeting during normal school hours when there are plenty of other people about.
- iii) Do not continue the meeting for any longer than is necessary to achieve its purposes.
- iv) Avoid sitting or standing in close proximity to the pupil, except as necessary to check work.
- v) Avoid idle discussion.

## PHYSICAL INTERVENTION

**This policy is for the whole school, including the Early Years Foundation Stage and the Pre-Prep Department.**

The law permits a member of the staff of a school to use such force as is reasonably necessary in the circumstances for the purpose of preventing a pupil from committing any offence, causing personal injury or damage to property, or engaging in any behaviour prejudicial to the maintenance of good order and discipline at the School among any of its pupils, whether that behaviour occurs during a teaching session or otherwise.

If physical intervention becomes necessary in these circumstances, it should be used only as a last resort, after a calm and measured approach has failed to resolve the difficulty, or in an emergency. Immediately after the incident, the member of staff should make an oral report to the Head or a senior member of staff and should prepare a written report (dated and signed) – see appendix below.

This Policy is in line with Government guidelines. For further advice and clarification, please refer to:

- ‘Use of Reasonable Force’ (July 2013) by the Department for Education
- Keeping Children Safe in Education (KCSiE) 2023.
- Statutory Framework for the Early Years Foundation Stage – March 2021

**Note:** There is no legal definition of ‘reasonable force’. It will always depend on the circumstances.

- Physical force could not be justified to prevent a pupil from committing a trivial misdemeanour

- Any force used should always be the minimum needed to achieve the desired results
- Whether it is reasonable to use force and the degree of force that could be reasonably employed might also depend on the age, understanding and sex of the pupil, and also whether they have any additional learning need, disability or medical condition

### **Knowing When to Take Action**

All staff undertake a full induction at the start of their employment when employed by Spratton Hall School. This includes expectations regarding behaviour and the supervision of children. Although it is the right of pupils in School not to be touched, it is not illegal to touch a child. There are occasions when physical contact, other than reasonable force is appropriate and necessary e.g. comforting a distressed child, demonstrating a musical instrument or coaching technique, or congratulating a child.

The staff have a duty to safeguard the welfare of all children and a member of staff might be deemed negligent if they were not to take any action e.g. not intervening when a child runs out onto the road. Therefore, a member of staff must use their judgement, depending on individual circumstances when deciding whether restraint is appropriate.

### **Reasonable Restraint**

‘Reasonable’ means ‘using no more force than is needed’ and that the use of force may involve passive physical contact or active physical contact. KCSIE 2023 states that ‘no contact’ policies leave staff unable to protect pupils and encourages schools to adopt sensible policies that allow and support staff to make appropriate physical contact.

When using reasonable force in response to risks presented by incidents involving children with special educational needs or disabilities (SEND), mental health or with medical conditions, staff should consider the risks carefully and recognise the additional vulnerability of these groups. They should also consider their duties under the Equality Act 2010 in relation to making reasonable adjustments, non-discrimination and their Public Sector Equality Duty. Individual behaviour plans and other forms of proactive behaviour support can reduce the need for reasonable force.

When Reasonable Force will be used:

- In self-defence, where risk of injury is imminent.
- Where there is a developing risk of injury to the pupil or others.
- To prevent pupils from seriously damaging property or causing disorder that is likely to lead to an increased risk of injury to persons present.

### **When Using Physical Intervention**

Where physical restraint is used, staff must exercise the utmost care; prevention of physical harm should be the primary consideration.

At the point that a member of staff believes physical restraint may be required, a second member of staff should be called for immediately. If no one is in the vicinity, or cannot be contacted, it will be at the member of staff's discretion to use physical restraint if necessary. The pupil must be told the action being taken is for their own good; in trying to keep them safe.

The pupil must be assured that the restraint is not a punishment.

The scale and nature of any physical intervention must be proportionate to both the risk present or behaviour of the pupil and the nature of the harm they might cause or suffer.

Other children must never be used in the restraint.

Restraint should only be maintained for the minimum time necessary to calm the situation.

**Staff should not act in a way that could be expected to cause injury\*, for example:**

- Holding a pupil around the neck, or by the collar, or in any other way that might restrict the pupil's ability to breathe
- Slapping, punching or kicking a pupil
- Twisting or forcing limbs against a joint
- Tripping up a pupil
- Holding or pulling a pupil by the hair or ear
- Holding a pupil face down on the ground
- Touching or holding a pupil in a way that might be considered indecent/inappropriate.

\*This is particularly relevant to the Early Years and Pre-Prep setting where the children are physically less well developed and more prone to injury from any act of restraint.

### **After the incident**

The member of staff who made the restraint must inform the Head Master/Head of Pre-Prep immediately. The incident should be followed up with time for the adult and child to talk about the situation.

### **The circumstances must be recorded as soon as possible**

Statutory Framework for the Early Years Foundation Stage (March 2021) 3.54 states that *'providers must keep a record of any occasion where physical intervention is used, and parents and/or carers must be informed on the same day, or as soon as reasonably practicable.'*

In addition to informing the Head, the incident where restraint was used must be recorded on Engage, our School information system, as well as in the Physical Intervention Log. Details must include:

- The time and date,

- The duration of the restraint used
- Details of hold used,
- Injuries present
- Witnesses
- Any further actions or events.

A formal report will be kept on the child's file. Parents will be informed of any incident where it has been necessary to restrain their child as soon as it is practicably possible and, ideally, before the child is returned to the parent.

In addition to this Policy, children with specific behavioural or education needs will be assessed on a case-by-case basis, with agreement from parents, as their unique requirements may necessitate an individual approach.



## SPRATTON HALL

### Appendix

#### Physical Intervention Record

<b>Pupil's Name</b>		<b>Date</b>	
<b>Date of Incident</b>		<b>Time of Incident</b>	
<b>Details of Incident:</b>			
<b>Incident managed by:</b>			
<b>Witnesses/other staff involved:</b>			
<b>Methods of restraint (if used):</b>			
<b>Debriefing session/evaluation:</b>			
<b>Parent/Carer informed/response:</b>			
<b>Time form completed:</b>			
<b>Signed:</b>			
<b>Signature of witness:</b>			



## **PHYSICAL CONTACT IN OTHER CIRCUMSTANCES**

Physical contact between a member of staff and a pupil may be necessary and beneficial in order to demonstrate a required action, or a correct technique in, for example, singing and other music lessons, or during Drama, PE, sports and games.

Members of staff should observe the following guidelines (where applicable):-

- i) Explain the intended action to the pupil;
- ii) Do not proceed with the action if the pupil appears apprehensive or reluctant, or if you have other concerns about the pupil's likely reaction;
- iii) Ensure that the door is open and if you are in any doubt, ask a colleague or another pupil to be present during the demonstration.

If you are at all concerned about anything which has occurred during the demonstration, inform the Head Master or the Deputy Head without delay and make a written record.

Touching may also be appropriate where a pupil is in distress and needs comforting. Staff should use their own professional judgement when they feel a pupil needs this kind of support and should be aware of any special circumstances related to the pupil. For example, a child who has been abused may find physical contact particularly difficult.

## **PUPIL VISITS TO YOUR HOME**

1. Avoid inviting pupils (groups or individuals) to your home if there will be no other adult present.
2. Ensure that pupils do not see anything in your home that may cause embarrassment to them or to you or your family, or that might become the subject of inappropriate gossip or rumour.
3. Apply the same guidelines to school trips and especially trips that involve an overnight stay away from the school (there are separate, more detailed guidelines for school trips).
4. In addition to being gross misconduct, it is a criminal offence under the Sexual Offences Act 2003 for a person aged 18 or over who is in a position of trust in relation to another person under that age to engage in sexual activity with that person. The offence is punishable by up to six months imprisonment and/or an unlimited fine.
5. The Sexual Offences Act 2003 also introduced the offence of 'meeting a child following sexual grooming'. This applies where an adult arranges to meet a child aged under 16 in any part of the world, if he has met or communicated with that child on at least two earlier occasions and intends to commit a sexual offence against that child. The law is clearly intended to apply where adults contact children through the Internet. However, the prior meetings or communication need not have been an explicitly sexual content.

6. Most sexual activity involving a person under the age of 16 (male or female) is an indecent assault which is both a criminal offence and a matter for which damages can be awarded. This is so, even when the younger person is alleged to have provoked or encouraged the activity.
7. The Education (Prohibition from Teaching or Working with Children) Regulations 2003 require that an employee is dismissed for misconduct or as being unsuitable to work with children, (or resigns to avoid such dismissal) must be reported to the Secretary of State and may be barred or restricted from teaching or working with children.
8. Every complaint by a pupil must be taken seriously and investigated. It may be necessary to involve Social Services who may themselves involve the police if there are grounds for thinking that a criminal offence has been committed.

## **WHISTLEBLOWING POLICY**

[Please see the full [Whistleblowing Policy](#) for more information.]

The School has adopted this policy and the accompanying procedure on whistleblowing to enable members of staff to raise concerns internally and in a confidential fashion about fraud, malpractice, health and safety, criminal offences, miscarriages of justice, and failure to comply with legal obligations, inappropriate behaviour or unethical conduct. The policy also provides if necessary, for such concerns to be raised outside the organisation.

### **ELEMENTS OF THE POLICY**

In accordance with Lord Nolan's Second Report of the Committee on Standards in Public Life, the School's policy on whistleblowing is intended to demonstrate that the School :

- Will not tolerate malpractice;
- Respects the confidentiality of staff raising concerns and will provide procedures to maintain confidentiality so far as is consistent with progressing the issues effectively;
- Will provide the opportunity to raise concerns outside of the normal line management structure where this is appropriate;
- Will invoke the School's disciplinary policy and procedure in the case of false, malicious, vexatious or frivolous allegations;
- Will provide a clear and simple procedure for raising concerns, which is accessible to all members of staff.

### **PROCEDURE**

This procedure is separate from the School's adopted procedures regarding grievances. Individuals should not use the whistleblowing procedure to raise grievances about their personal employment situation.

This procedure is to enable members of staff to express a legitimate concern regarding suspected malpractice within the School.

Malpractice is not easily defined; however, it includes allegations of fraud, financial irregularities, corruption, bribery, dishonesty, acting contrary to the staff code of ethics, criminal activities, or failing to comply with a legal obligation, a miscarriage of justice, or creating or ignoring a serious risk to health, safety or the environment.

### **CONFIDENTIALITY**

Individuals who wish to raise a concern under this procedure are entitled to have the matter treated confidentially and their name will not be disclosed to the alleged perpetrator of malpractice without their prior approval. It may be appropriate to preserve confidentiality that concerns are raised orally rather than in writing, although members of staff are encouraged to express their concern in writing wherever possible. If there is evidence of criminal activity then the Police will in all cases be informed.

### **THE INVESTIGATION**

A member of staff will be at liberty to express their concern to the Head or Deputy or the Bursar.

Any concern raised will be investigated thoroughly and in a timely manner, and appropriate corrective action will be pursued. The member of staff making the allegation will be kept informed of progress and, whenever possible and subject to third party rights, will be informed of the Resolution.

A member of staff who is not satisfied that their concern is being properly dealt with will have a right to raise it in confidence with the Trustees.

### **EXTERNAL PROCEDURES**

Where all internal procedures have been exhausted, a member of staff shall have a right of access to an external person/body. This may include (depending on the subject matter of the disclosure) HMRC, the Audit Commission, the Health and Safety Executive and/or the Local Authority Designated Officer (where the disclosure relates to a child protection issue).

It should be noted that under the Public Interest Disclosure Act 1998, there are circumstances where a member of staff may be entitled to raise a concern directly with an external body where the individual reasonably believes :-

- That exceptionally serious circumstances justify it;
- That the School would conceal or destroy the relevant evidence;
- Where they believe they would be victimised by the School;
- Where the Secretary of State has ordered it.

### **MALICIOUS ACCUSATIONS**

False, malicious, vexatious or frivolous accusations will be dealt with under the School's Disciplinary Procedure.

## **PROTECTION FROM REPRISAL OR VICTIMISATION**

No member of staff will suffer a detriment or be disciplined for raising a genuine and legitimate concern, providing that they do so in good faith and following the Whistleblower procedures.

## **TRIPS AND VISITS**

Please see the school's full [Educational Visits Policy](#).

## **LOW LEVEL CONCERNS**

Safeguarding is central to the School's operation and its rigorous implementation embedded in the School's culture. This includes sharing low level concerns. This policy enables all staff to share any concerns with the Headmaster or the Designated Safeguarding Lead – no matter how seemingly insignificant – about their own or another member of staff's behaviour.

It is important that low-level concerns are shared with the Safeguarding Lead, or Headmaster, as soon as reasonably possible and, in any event, within 24 hours of becoming aware of the concern (where the concern relates to a particular incident) – although it should also be emphasised that it is never too late to share a low-level concern. If the Headmaster and DSL are absent for any reason, low-level concerns should be shared with the Deputy Headmaster or the Deputy Designated Safeguarding Lead who should ensure that they inform the Safeguarding Lead and Headmaster immediately on their return. If any low-level concern relates to the behaviour of the Safeguarding Lead, it should be shared with the Headmaster or school Governor in charge of safeguarding.

Please see the school's full Low [Level Concerns Policy](#) for full details.

## **CONFIDENTIALITY**

Any School information/records including details of pupils, parents and employees whether actual, potential or past, other than those contained in authorised and publicly available documents, must be kept confidential unless the School's prior written consent has been obtained. This requirement exists both during and after your employment. In particular, you must not use such information for the benefit of any future employer.

You must keep confidential all aspects of every pupil's care, social care, life events and personal details; i.e. you must not divulge anything you know about pupils or families to persons outside the Spratton Hall community.

Members of the Common Room should consider very carefully when asked the question "Is this confidential?" It is not acceptable to give an unqualified "Yes". It is better to reply "Yes, unless what you are going to tell me is so serious that I am bound to pass it on, or if not passing it on I endanger somebody". Information about, for example, child abuse – you must pass on. Almost without exception it is better to say to a senior colleague "X has asked me not to say anything but I think you ought to know." than to keep information to yourself. Often what you have to say will be part of a larger jigsaw.

On no occasion must you give anyone not connected directly with the School information about pupils or staff, particularly the private address or telephone number of a member of staff. Colleagues must be circumspect when referring to other members of Common Room. Professional criticisms of others can backfire later, and in today's litigious society, often do. When speaking to pupils never refer to colleagues by their Christian names and always demonstrate professional deference to the structural hierarchy of responsibility. Colleagues must not articulate disdain for decisions made by a Head of Department, or other Senior Colleagues.

Staff must realise that failure to observe these rules on confidentiality could result in disciplinary action.

## **COMMUNICATIONS AND ACCEPTABLE USE**

### **BRING YOUR OWN DEVICE POLICY**

We are, as a school, very happy to allow members of staff to bring in their own personal computer devices such as smartphones, tablets and laptops to school, either to connect to the school network or to use for work purposes.

Under the General Data Protection Regulation 2018 (GDPR), we will take appropriate steps to keep the school data safe and secure. The school remains legally responsible for ensuring that this data is processed in accordance with the GDPR, regardless of the fact that the school does not legally own the devices used to carry out that processing.

In order to minimise the risk of security breaches, the following policy is in place:

- Members of staff who use their personal phone or tablet to receive school emails must ensure they have the security code operational to access the device.
- If a device belonging to a member of staff is lost or stolen, the member of staff will inform the school immediately so that a remote wipe of the staff member's email account on the device can be put in place.
- If a member of staff has a faulty device that needs to go for repair, they should also inform the school, so that while it is under repair, school data cannot be accessed.
- When members of staff leave the school, all school data should be deleted from the personal device.
- Members of staff should not use their own device for taking photographs or filming children. Their school-provided tablets and school camera equipment may be used in this regard. If, however, on a school trip or a sports tournament, a member of staff needs to take a photograph and, due to connectivity difficulties, their school tablet or school camera is not workable, then the member of staff can seek permission from a member of the SMT to use their own personal device to take a photograph of a pupil. This image should then be removed from their device within 24 hours.
- Members of staff should not use our MIS 'Engage' on their own devices. This can be accessed from their school-provided tablet.

## **USE OF PERSONAL ELECTRONIC DEVICES, WEARABLE TECHNOLOGY, MOBILE PHONES AND CAMERAS WITHIN THE EYFS AND PRE-PREP**

All Pre-Prep and EYFS staff mobiles must be turned off or placed on silent and kept in their bags. Phones may only be checked at break times and never in a room when children are present, or in the toilets or cloakroom areas.

Staff are responsible for ensuring that mobile phones and personal electronic devices brought into school do not hold inappropriate or illegal content.

Staff are not permitted to use their own personal phones or devices, including wearable technology, for taking, sharing or storing pictures or recording images of children at school. Only designated school cameras may be used.

For ease of contact and in case of an emergency, personal mobile phones can be taken on all school trips, including to the Forest School and around the wider school site. This aligns with the Statutory framework for the Early Years Foundation Stage, which states that providers should take contact telephone numbers and a mobile phone on outings. In these events, staff mobiles are kept tucked away at all times and numbers must be given to the school office, and put on the risk assessment.

## **PHOTOGRAPHY AND RECORDING**

Members of staff must not use their own device for taking photographs or filming children. Their school-provided tablets and school cameras only, may be used in this regard.

Members of staff are reminded of the school's 'Data Protection Policy' and 'Electronic Technologies Acceptable Use Policy'.

## **USE OF TELEPHONE, EMAIL SYSTEMS AND INTERNET**

### **TELEPHONES**

Spratton Hall's telephone system should not normally be used to make or receive personal calls. If personal calls are made then they should be noted and details handed in to the Office. Excessive personal use of the telephone may be deemed to be a disciplinary offence.

Spratton Hall reserves the right to monitor call traffic in order to detect misuse of Spratton Hall's telephones.

### **EMAIL SYSTEMS AND INTERNET**

The below should be read in conjunction with our 'Electronic Technologies Acceptable Use Policy'. Computers are an integral part of our lives, both working and personal. Use of the Internet, sending and receiving emails are very simple operations and their ease of use can be their biggest drawback. Please make sure that you are familiar with and adhere to the following policy.

This Policy applies to the use of:

- all internet and electronic mail facilities, any services the school uses, tablets, computers, laptops, phones and any networks connecting them provided by the School;
- all hardware owned, leased, rented or otherwise provided by a member of staff and connected to or otherwise accessing School networks or other facilities;

Hardware owned, leased, rented or otherwise provided by staff may be directly connected to the Spratton network.

Although the system is used primarily in connection with your duties for which the School employs you the use of email and internet facilities for personal purposes is permitted. Therefore the School acknowledges that personal use may occur from time to time. Any such use must be in accordance with this Policy and must not disrupt staff duties. Abuse or inappropriate use of the email and/or Internet will be dealt with through the disciplinary procedure leading to disciplinary action up to and including dismissal. If necessary, the school will advise appropriate legal officials of any illegal abuse of the internet / email.

To clarify: staff are not permitted to interfere with the work of others or the system itself. The facilities must be used in a responsible manner and staff must not:

- create, transmit or cause to be transmitted material which is designed or likely to cause annoyance, inconvenience, needless anxiety or offence, and you must not create, transmit or cause to be transmitted offensive, malicious, obscene or indecent material;
- create, transmit or cause to be transmitted defamatory material;
- create, transmit or cause to be transmitted material such that the copyright of another person is infringed;
- knowingly download a virus;
- gain deliberate unauthorised access to facilities or services accessible via local or national networks;
- transmit by email any confidential information of the School otherwise than in the normal course of your duties;
- send any message internally or externally which is abusive, humiliating, hostile or intimidating;
- engage/communicate with pupils or parents using non-school approved social networks;
- engage/communicate with pupils or parents using non-school email account;
- you must not gain unauthorised access to or violate the privacy of other people's files, corrupt or destroy other people's data or disrupt the work of other people;
- disclose passwords to third parties without the consent of the School

It is expected that staff will:

- observe this policy at all times and note the disciplinary consequences of non-compliance which in the case of a gross breach or repeated breach of the Policy, may lead to dismissal;

- produce and write email with the care normally given to any form of written communication;
- appreciate that electronic mail is relatively insecure and consider security needs and confidentiality before transmission

The School reserves the right to monitor staff communications and equipment in order to

- establish the existence of facts
- ascertain compliance with regulatory or self-regulatory procedures
- monitor standards which are achieved by persons using the system in the course of their duties and for staff training purposes
- to prevent or detect crime
- to investigate or detect unauthorised use of the School's telecommunication system
- ensuring the effective operation of the system such as protecting against viruses, backing up and making routine interceptions such as forwarding emails to correct destinations
- to gain access to routine business communications for instance checking voice mail and email when staff are on holiday or on sick leave

#### **RECEIVING EMAILS**

Should you receive an email message which has been wrongly delivered to your email address you should notify the sender of the message by redirecting the message to that person. Further, if the email message contains confidential information you must not disclose or use that confidential information. In cases of doubt, the email should be brought to the attention of the Head Master or Deputy Head Master.

#### **LEGAL ACTION AGAINST SPRATTON HALL**

Messages sent over the email system, both internally and externally, can give rise to legal action against Spratton Hall. It is therefore vital for email messages to be treated like any other form of correspondence and where if necessary hard copies are to be retained. You are also reminded that messages are disclosable in any legal action commenced against Spratton Hall relevant to the issues set out in the email.

#### **CORRESPONDENCE**

All correspondence to parents, except emails, must be on school letter-headed paper. A copy of that letter, particularly if containing sensitive information, should be shown to either the Deputy Head Master or the Head Master before it is sent. If the matter is of a routine nature then approval should be sought from Heads of Department or direct line management before sending. The same applies to emails, again, if reporting on a child or confidential information is involved.

**Any meetings, particularly with parents, must be dated and minuted and a copy recorded on Engage in the relevant pupil's section.**



## **SOCIAL MEDIA POLICY**

A social networking site is any website which enables its users to create profiles, form relationships and share information with other users. It also includes sites which have online discussion forums, chat-rooms, media posting sites, blogs and any other social space online. It includes but is not limited to, sites such as Facebook, Snapchat, Instagram, Twitter and Wikipedia. It is not intended to affect your ability to use LinkedIn for purely professional purposes.

This policy applies to the use of social media for both business and personal purposes, whether during school hours or otherwise. The policy applies regardless of whether the social media is accessed using our IT facilities and equipment or equipment belonging to members of staff or any other IT equipment.

Breach of this policy may result in disciplinary action up to and including dismissal. Disciplinary action may be taken regardless of whether the breach is committed during working hours, and regardless of whether our equipment or facilities are used for the purpose of committing the breach. Any member of staff suspected of committing a breach of this policy will be required to co-operate with our investigation, which may involve handing over relevant passwords and login details so far as this is consistent with the right of an individual to private and family life.

Staff may be required to remove internet postings which are deemed to constitute a breach of this policy. Failure to comply with such a request may in itself result in disciplinary action.

### **IMPLEMENTATION OF THE POLICY**

The Head Master has overall responsibility for the effective operation of this policy. Responsibility for monitoring and reviewing the operation of this policy and making recommendations for change to minimise risk also lies with the Head of the IT Department. All staff are responsible for the success of this policy and should ensure that they take the time to read and understand it. Any misuse of social media should be reported to the Head Master. Questions regarding the content or application of this policy should be directed to the Head Master.

### **RELATIONSHIP WITH OTHER SCHOOL POLICIES**

If an internet post would breach any of our policies in another forum it will also breach them in an online forum. For example, staff are prohibited from using social media to:

- breach our obligations with respect to the rules of relevant regulatory bodies;
- breach any obligations they may have relating to confidentiality;
- breach our Disciplinary Rules;
- defame or disparage the School or our affiliates, parents, staff, pupils, competitor schools, suppliers, vendors or other stakeholders;
- harass or bully other staff in any way or breach our Anti-harassment and bullying policy;

- unlawfully discriminate against other staff or third parties or breach our Equal Opportunities policy;
- breach our Data Protection policy (for example, never disclose personal information about a colleague, pupil or parent online);
- breach any other laws or ethical standards (for example, never use social media in a false or misleading way, such as by claiming to be someone other than yourself or by making misleading statements).

Behaviour online can be permanent and so staff must be extra cautious about what they say as it can be harder to retract.

Staff must also be aware of the particular risks to internet security that social media presents and so to comply with the existing School policy on IT must take any extra measures necessary not to allow any of their actions on social media sites to create vulnerability to any School systems.

Staff who breach any of the above policies will be subject to disciplinary action up to and including termination of employment.

#### **RESPONSIBLE USE OF SOCIAL MEDIA**

Staff must be aware that their role comes with particular responsibilities and they must adhere to the School's strict approach to social media.

Staff must:

- ensure that wherever possible their privacy settings on social media sites are set so that pupils cannot access information relating to their personal lives;
- obtain the prior written approval of the Head Master, to the wording of any personal profile which you intend to create where the School is named or mentioned on a social networking site;
- seek approval from the Head before they speak about or make any comments on behalf of the School on the internet or through any social networking site;
- report to their Head Master immediately if they see any information on the internet or on social networking sites that disparages or reflects poorly on the School;
- immediately remove any internet postings which are deemed by the School to constitute a breach of this or any other School policy;
- consider whether a particular posting puts their effectiveness as a teacher at risk;
- post only what they want the world to see.

Staff must not:

- provide references for other individuals, on social or professional networking sites, as such references whether positive or negative can be attributed to the school and create legal liability for both the author of the reference and the school;
- post or publish on the internet or on any social networking site, any reference to the School which may bring it into disrepute;

- use commentary deemed to be defamatory, obscene, proprietary, or libellous. Staff must exercise caution with regards to exaggeration, colourful language, guesswork, obscenity, copyrighted materials, legal conclusions, and derogatory remarks or characterisations;
- discuss pupils or colleagues or publicly criticise the School or staff;
- post images or messages that include or references pupils or parents;
- initiate friendships with pupils on any personal social network sites;
- accept pupils as friends on any such sites; staff must decline any pupil-initiated friend requests;
- accept former pupils as friends on any such sites until the former pupil has reached the age of 21;
- use social networking sites as part of the educational process e.g. as a way of reminding pupils about essay titles and deadlines.

### **PERSONAL USE OF SOCIAL MEDIA**

We recognise that staff may work long hours and occasionally may desire to use social media for personal activities in their office or by means of our computers, networks and other IT resources and communications systems. We authorise such occasional use so long as it does not involve unprofessional or inappropriate content and does not interfere with your employment responsibilities or productivity. While using social media at work, circulating chain letters or other spam is never permitted. Circulating or posting commercial, personal, religious or political solicitations, or promotion of outside organisations unrelated to the organisation's business are also prohibited. Staff must ensure that their use of social media does not create any breaches of internet security and therefore must be careful to avoid any applications that might interrupt our IT systems. Excessive use of social media that interrupts staff productivity will be subject to a disciplinary procedure, consistent with this policy.

### **THE MONITORING OF SOCIAL MEDIA**

The contents of our IT resources and communications systems are our property. 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.

We reserve the right to monitor, intercept and review, without further notice, staff activities using our IT resources and communications systems, including but not limited to social media postings and activities, to ensure that our rules are being complied with and for legitimate business purposes and you consent to such monitoring by your use of such resources and systems. This might include, without limitation, the monitoring, interception, accessing, recording, disclosing, inspecting, reviewing, retrieving and printing of transactions, messages, communications, postings, log-ins, recordings and other uses of the systems as well as keystroke capturing and other network monitoring technologies.

We may store copies of such data or communications for a period of time after they are created, and may delete such copies from time to time without notice.

Do not use our IT resources and communications systems for any matter that you wish to be kept private or confidential from the organisation.

### **SOCIAL MEDIA AND THE END OF EMPLOYMENT**

If a member of staff's employment with our School should end, for whatever reason, any personal profiles on social networking sites should be immediately amended to reflect the fact that you are no longer employed or associated with our School.

All professional contacts that a member of staff has made through their course of employment with us belong to our School, regardless of whether or not the member of staff has made social media connections with them.

All members of staff agree that on the termination of employment they will provide to the Head Master any relevant passwords and other information to allow access to any social media site, page or account which has been used or set up for the purpose of furthering the School's business or facilitating the provision of its curriculum and will relinquish any authority they may have to manage or administer any such site, page or account.

### **THE USE OF SOCIAL MEDIA FOR SCHOOL PURPOSES**

The School has Facebook, Instagram and Twitter pages which it uses solely for purposes relating to the School's business, including publicity and news. Members of staff must not create any other social media pages in the school's name without the written permission of the Head Master.

These social media pages shall remain the property of the School. Only the Head Master, Marketing Manager and Media Officer have access to them and are the only persons authorised to edit the content of the pages.

### **COMMUNICATIONS WITH THE MEDIA**

You must not speak to or communicate with the media on matters concerning the School's affairs or regarding your position in the School without the prior written permission of the Head or Bursar. This includes postings on social media, e-petitions etc where you may be identified as an employee of the school.