



ARTS EDUCATIONAL SCHOOLS
Staff Behaviour and Code of Conduct Policy

Document Title	Staff Behaviour and Code of Conduct Policy
Maintained by	ArtsEd Exec
Owned by	People and Culture Transformation Specialist
Institutional/Directorate Policy	Institutional
Approved by	Main Board
Last Reviewed	September 2026
Next Review	September 2027

ArtsEd

Staff Behaviour and Code of Conduct Policy

1. Scope

This policy applies to all staff and volunteers at ArtsEd regardless of their position, role or responsibility. It sets out clear guidance on the standards of behaviour expected from all staff at ArtsEd and relates to all of the following groups:

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

2. Introduction

The principles underlying the guidance aim to encourage you to achieve the highest possible standards of conduct and minimise the risk of inappropriate conduct occurring. We require that you have read and agree to comply with this policy. Breach or failure to observe this policy may result in action being taken under our disciplinary procedures including, but not limited to, dismissal.

ArtsEd is a unique institution where Higher Education (HE) students, who are aged 18 and over, study onsite with Day School and Sixth Form (DSSF) pupils (aged 11-19 years); it also provides short courses through ArtsEd Extra (aged 5 – 18+). It is therefore important that all adults within the institution are fully aware of their safeguarding and welfare responsibilities and how its responses must be tailored to the needs of its users and how their own conduct relates to this.

Within this document ‘students’ will refer to those involved in the HE provision and ‘pupils’ to those in the DSSF and ArtsEd Extra. Those measures and principles that are identified for DSSF will pertain, where appropriate, to ArtsEd Extra.

Safeguarding is a responsibility of everyone at ArtsEd and all adults detailed in the groups above are expected to adhere to the principles and detail of the safeguarding policy. You are also required to read and understand the statutory guidance ‘Keeping Children Safe in Education’.

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

You also have an individual responsibility to maintain your reputation and our reputation, both inside and outside working hours and whether you are inside or outside the work setting. This policy therefore applies equally when you are conducting lessons or meetings online, or when it is necessary for you to work from home.

This Staff Behaviour and Code of Conduct Policy is not an exhaustive list of acceptable and unacceptable standards of behaviour. In situations where guidance does not exist in this policy, you are expected to exercise your professional judgement and act in the best interests of the students/pupils and ArtsEd.

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

- Institutional Safeguarding Policy (which includes Low-level Concerns)
- Diversity, Equity and Inclusion Policy;
- Anti-Harassment and Bullying Policy;
- Prevention of Sexual Harassment Policy;
- Use of Email, Internet and Communication Systems Policy;
- Social Media Policy;
- Health and Safety at Work Policy/Manual;
- Anti-Bribery Policy; and
- Whistleblowing Policy.
- Visual Identification Policy

You should ensure that you have read and are familiar with these policies and procedures.

3. General Personal Behaviour and Conduct

Unacceptable behaviour such as discrimination against protected characteristics (which are listed in *section 27*), bullying, harassment or intimidation will not be tolerated. This includes physical and verbal abuse and use of inappropriate language or unprofessional behaviour (including abusive emails) with colleagues, students/pupils and parents.

All staff are expected to demonstrate respect for diversity and take steps to promote equality having due regard to the applicable policies. Everyone engaged with ArtsEd is expected to set an example to students/pupils. In particular, you will:

- Treat all staff, students/pupils and others with dignity and respect;
- Show tolerance and respect for the rights of others within the ArtsEd community;
- Maintain the highest professional standards set out within teachers' standards by the DfE and the standards of the OfS and TEF;
- Not undermine fundamental British values, including democracy, the rule of law, individual liberty and mutual respect, and the tolerance and acceptance of those with different faiths and beliefs;
- Not express personal beliefs e.g. political views, religious views, in a way that will overly influence students/pupils and potentially exploit their vulnerability, or lead them to break the law;
- Maintain high standards in attendance and punctuality;
- Not use inappropriate or offensive language.

4. Security, Health and Safety

Security, Health and Safety are the responsibility of all adults at ArtsEd.

Whilst in the ArtsEd buildings you must wear your identity card with the appropriate lanyard.

You must not remove any ArtsEd documents from the site or take any photographs without due permission. We reserve the right to search the outer clothing, bags, lockers and vehicles etc. of you whilst you are on site. You may have a colleague in attendance on such occasions.

You have a duty to ensure that a safe working environment exists. Fire and evacuation procedures must be adhered to at all times and you are required to familiarise yourself with the procedures and your responsibilities set out in our Health and Safety at Work documents.

If you have any concerns regarding the safety of the building then you should report it immediately to the Head of Facilities and your Line Manager.

5. 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/vaping) is not allowed anywhere on site or within any of our vehicles. You must not smoke on ArtsEd premises or outside the entrances. If you wish to smoke, you must leave the premises. In addition, you must not smoke whilst working with or supervising students/pupils offsite.

6. Alcohol and Illegal Drugs

Consumption of alcohol is not permitted on site, save where at an ArtsEd function or as otherwise agreed when modest amounts of alcohol may be consumed.

Members of staff must never consume alcohol or be under the influence while actively responsible for students/pupils. Members of staff should not consume alcohol in the presence of students/pupils unless this has been specifically agreed by the Principal, Dean of Higher Education, or Headteacher; in these circumstances staff must never purchase alcohol for students/pupils or drink casually with them in an unstructured manner. Staff are required to uphold their professional reputation and must ensure their behaviour does not compromise their authority or bring ArtsEd into disrepute.

Consumption of illegal drugs is never permitted.

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

7. Personal Appearance

We wish to convey an impression of professionalism and organisation to all those associated with ArtsEd – particularly with our students and pupils. In addition, we regularly receive visitors – these might be, for example, industry professionals, parents, potential parents, potential students and others. Therefore, whilst not wishing to impose unreasonable obligations, you 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) you must ensure you are dressed appropriately in clothing that is smart and of a similar style to what you would wear on a normal working day at ArtsEd.

8. Mobility and Flexibility

Due to the demands and nature of ArtsEd, you 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 at our sole discretion.]

9. Staff relationships

Personal relationships between colleagues who work together can give rise to conflicts of interest. Therefore, staff who have entered into a close personal or romantic relationship with a colleague are required to disclose this fact to the Principal, Dean of Higher Education, Headteacher or Head of People and Culture.

Any information declared or disclosed will be recorded on both staff personnel files, stored confidentially and securely. The disclosure of personal or romantic relationships between colleagues is considered to ensure the existence of the relationship does not negatively impact on the operation and functioning of ArtsEd, and ensure that appropriate line management processes are put in place as necessary.

10. Gifts, Rewards and Favours

You should take care to ensure that you do not appear to accept a gift that may be construed as a bribe or lead the giver to expect preferential treatment. You are required to familiarise yourself with the content of our Anti-Corruption and Bribery Policy.

You should exercise care when selecting students/pupils for productions, trips and/or specific work tasks in order to avoid perceptions of favouritism or injustice. Similar care should be exercised when excluding a student or pupil from an activity without prior consultation with senior leadership.

You should not give presents/rewards to an individual outside of the reward systems in place.

11. Communication

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

11.1. Communication with Parents

Communication between members of staff and the parents of students and pupils will always need to be handled carefully and in accordance with the framework below. These guidelines for communicating with parents are strictly shaped by data protection laws and student confidentiality; therefore there are clear and important differences in how parent communications should be handled with parents of HE students and those of DSSF pupils.

11.1.1. Parents of DSSF Pupils

Communication with parents is a routine matter for DSSF staff. Tutors are usually expected to be the first point of contact between parents and the DSSF, although enquiries will also come through the DSSF Office. You can contact parents by telephone, email or letter for professional

matters. [Microsoft Teams can also be used with prior arrangement.] You should not contact pupils, parents or conduct any school business using personal email addresses.

If you receive an email from a parent, a reply should normally be made within one working day. If a full reply cannot be made within that time, you should send a brief acknowledgment e-mail and let the parent know when a fuller reply can be expected.

If you send emails to parents/carers, you are advised to send a copy (cc or bcc) to the pastoral/line manager or the class teacher/tutor.

You must inform the Headteacher, Deputy Head and your Line Manager if you receive an offensive email.

11.1.2. Parents of HE Students

Under UK law, ArtsEd contracts directly with the student, meaning staff cannot disclose personal information to parents without the student's explicit, written consent. This strict standard is governed by the Data Protection Act 2018 and UK GDPR, which treat students as independent adults with an absolute right to privacy.

If a parent of an HE student calls or emails, then staff are instructed to only discuss non-specific information, for example:

- Public policies and standard ArtsEd procedures;
- General advice on how any student can suspend studies or request extensions;
- Support links, such as student wellbeing teams, counselling services, or funding bodies;
- Passive messaging, where a staff member takes a message from a parent and agrees to reach out to the student directly to prompt them to call home.

11.2. Communication with Students/Pupils

You should carefully consider the manner in which you communicate with students/pupils at all times so as to avoid any possible misinterpretation of your motives or behaviours.

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

Within the DSSF context, the group leader on all trips and visits involving an overnight stay should take a DSSF mobile phone with him/her and may ask the pupils for their mobile numbers before allowing them out in small, unsupervised groups. The ArtsEd mobile should be used for any contact with pupils that may be necessary. The group leader will delete any record of pupil's mobile phone numbers at the end of the trip or visit and should ensure that pupils delete any Staff numbers that they may have acquired during the trip.

DSSF 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 a member of the pastoral team.

12. Relationships with Students/Pupils

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

You are encouraged to self-refer under our Low-Level Concerns Policy in the event that you have found yourself in a situation which may be misinterpreted, might appear compromising to others, and/or on reflection you believe you 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.

You 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.

Whilst it is not a criminal offence, it is a breach of this policy and considered to be gross misconduct to have a sexual relationship with any student/pupil at ArtsEd, even if the student/pupil is aged 18 or over.

Any close personal relationship (this is a relationship where the nature, content, involvement and/or frequency of interactions and/or communications between a staff member and a student/pupil transgress the boundaries of professional conduct or may be reasonably perceived to do so) or sexual contact with a student/pupil within three years of the student/pupil leaving ArtsEd would also be considered inappropriate and a breach of this policy as detailed above.

13. Infatuations

On occasion, students/pupils may develop an infatuation for a member of Staff. If you suspect or become aware of an infatuation, the advice of the Principal, Dean of Higher Education, Headteacher or Institutional Designated Safeguarding Lead 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.

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

14. One to One Situations

If working individually with students/pupils, you should be aware of the potential vulnerability of students/pupils and Staff in such situations. You should manage these situations and take reasonable and sensible precautions to ensure the safety and security of the student/pupil and yourself alike.

Individual work with students/pupils should not be undertaken in secluded areas or behind a closed door. 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. Vision panels in doors should always remain fully open and must never be covered or obscured either partially or fully.

Where it is necessary to conduct a one-to-one session online (for example, using a platform such as Teams) you 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 student/pupil at all times. Any physical contact should be the minimum required for care, instruction or restraint.

15. Physical Contact with Students/Pupils

There are occasions when it is entirely appropriate and proper for Staff to have physical contact with students/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 student/pupil needs to get comfort or reassurance e.g. following an accident or personal crisis;
- when a student/pupil needs encouragement to attempt a new challenge; or
- when there is a need to take urgent action to avoid an incident or injury.

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

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

You are referred to HE policies and protocols on appropriate physical contact within HE.

You are referred to our DSSF Behaviour Rewards and Sanctions Policy on the use of Restrictive interventions, including the use of reasonable force, in schools

16. Pastoral support

You should ensure that students/pupils with support needs are referred to a relevant support service within ArtsEd, and not provide personal support to a student/pupil where this is not part of your official employment duties.

17. Contact with Students/Pupils Out of Hours

You should not:

- Arrange meetings with students/pupils off ArtsEd premises (whether in person or online) without the prior approval of the Principal, Dean of Higher Education, or Headteacher;
- Arrange private tuition of any of our students/pupils whether in term-time or outside of term-time without the prior written approval of the Principal, Dean of Higher Education, or Headteacher; and
- Give students/pupils your home address or any of your personal contact details.

You should not visit students/pupils in their private home, room, or vehicle, especially if others are not present; the same applies to students/pupils and parents visiting the private home or room of staff.

18. Prevent Duty

You should understand that we have 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.

We are required, in recognition that students/pupils may be susceptible to being drawn into terrorism or other forms of extremism, to carry out appropriate risk assessments which assess how students/pupils or staff may be at risk of being radicalised into terrorism, including online. Consequently, you should:

- Understand the factors that lead people to support terrorist ideologies or engage in terrorist related activity;
- Be able to recognise susceptibility to terrorism and be aware of what action to take in response;
- Be aware of what action to take in response, including our internal Prevent referral arrangements.

We protect students/pupils from being drawn into terrorism by having robust safeguarding policies in place to ensure that those at risk of radicalisation are identified and appropriate support is provided. Our procedure for dealing with concerns that a student/pupil may be susceptible to being drawn into to extremist ideology and radicalisation is set out in our Institutional Safeguarding Policy.

There is no single way of identifying whether a student/pupil is likely to be susceptible to an extremist ideology, there are possible indicators that should be taken into consideration alongside other factors and contexts. As with other safeguarding risks, you should be alert to changes in a student’s/pupil’s behaviour, which could indicate that they may be in need of help or protection. You should use your judgement in identifying students/pupils who might be susceptible and act proportionately, which may include making a Prevent referral. More guidance can be found from the DfE at:

https://assets.publishing.service.gov.uk/media/64f8498efdc5d10014fce6d1/14.258_HO_Prevent_Duty_Guidance_v5c.pdf

<https://www.gov.uk/government/publications/the-prevent-duty-safeguarding-learners-vulnerable-to-radicalisation>

This guidance should be read in conjunction with other relevant guidance including

- Working Together to Safeguard Children 2023
- Keeping Children Safe in Education, and;
- Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers.’

19. Protect Duty

The Terrorism (Protection of Premises) Act 2025, also known as Martyn's Law, imposes legal obligations on those responsible for publicly accessible venues to take steps to reduce the threat to the public from terrorist attacks and enhance public security. You should understand the requirements under the Protect Duty and familiarise yourself with ArtsEd's evacuation and lockdown procedures. We will provide the appropriate risk assessments and training required by Martyn's Law. Further information is available from the head of Facilities.

20. Transporting Students/Pupils

In certain circumstances it may be appropriate for you to transport students/pupils offsite on approved ArtsEd business. The Principal, Dean of Higher Education or Headteacher must oversee the plan and provide oversight of all transport arrangements. You should not transport students/pupils without prior authorisation or in the case of an emergency.

You should ensure that the driver is not distracted while the vehicle is in motion for any reason other than an emergency and should also ensure all passengers are wearing correctly fastened seatbelts.

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

You should never be alone in a vehicle with a student/pupil, except in cases of an emergency.

21. ArtsEd Events

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

22. Conduct Outside Work

For the avoidance of doubt 'Conduct Outside Work' is defined as staff outside of contractual working hours off site, or outside of contractual working hours on site. Staff must not bring ArtsEd into disrepute, and you should at all times, both in and out of ArtsEd, uphold our ethos and conduct yourself in a manner consistent with your position.

As a general rule, what you do after working hours and away from the premises is a personal matter. ArtsEd does not concern itself with the private lives of its staff unless they affect its effective operation or its reputation. However, you 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 Principal, Dean of Higher Education, or Headteacher, might interfere with the efficient discharge of their duties or is in conflict with our interests.

ArtsEd will become involved in the following circumstances (where all of ArtsEd's policies will continue to apply):

- At work parties, events and other work-related social occasions;
- At third-party (that is suppliers, parents) occasions where the staff member has been invited in their capacity as an employee and representative of ArtsEd;
- At work-related conferences and training courses;
- Where the staff member is away on business on behalf of ArtsEd;
- Behaviour online which brings ArtsEd into disrepute;

Improper behaviour will lead to investigation and possible disciplinary action, including dismissal.

Statutory Guidance outlined in Keeping Children Safe in Education (KCSIE) makes clear that there are types of behaviour which may indicate a person poses, or might pose, a risk of harm if they continue to work in regular or close contact with children. This is more commonly known as the 'harm test': a person has 'behaved or may have behaved in a way that indicates they may not be suitable to work with children'. This may be indicated when an incident occurs outside of work, did not involve children but could have an impact on a staff member's suitability to work with children, for example, being involved in a

safeguarding issue or perhaps a domestic violence incident at home, where violent behaviour could pose a risk to children at ArtsEd. This is known as transferable risk.

Where concerns of this nature are known or raised, the Safeguarding Procedures will be followed in relation to Allegations about Staff or Volunteers. For further information, staff should refer to the Disciplinary and Grievance Policies.

There may be times where an individual's conduct or actions in their public life come under scrutiny from the community, the media, or public authorities (including with regard to their own children, or children or adults in the community). Staff should be aware that their behaviour either in or out of the workplace could compromise their position with ArtsEd in relation to the protection of children, loss of trust and confidence or bringing ArtsEd into disrepute. Such behaviour may also result in prohibition from teaching by the Teaching Regulations Agency, a bar from engaging in regulated activity, or action by another relevant regulatory body. Staff should therefore always refrain from behaving in a manner which would lead any reasonable person to question their suitability to work with children or act as an appropriate role model.

You must notify the Principal, Dean of Higher Education, Headteacher or the Head of People and Culture of any outside conduct, activity or circumstances that are likely to either bring ArtsEd into disrepute or put into question a staff members suitability for their role at ArtsEd.

23. Acceptable Use of Technologies

You should ensure that you are familiar with and comply with our Use of, Email, Internet and Communication Systems Policy and the Social Media Policy at all times. In particular, you must:

- Not engage in inappropriate use of social network sites which may bring yourself, ArtsEd or the ArtsEd community into disrepute;
- Adopt the highest security settings on any personal profiles you have;
- Remain mindful of your digital footprint and exercise caution in all your use of social media or any other web-based presence you 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 you could encounter students; and
- Not contact students/pupils, their guardians or family members, accept or initiate friend requests or follow students/pupils, or their parents/guardians on any social media platform.

ArtsEd equipment, premises, and systems (phone, email and computers) are available only for ArtsEd related activities and should not be used for the fulfilment of another job or for personal use unless authorised by the Principal, Dean of Higher Education, or Headteacher. This includes photocopying facilities, stationery and premises. It also applies to access provided for remote use (e.g. hand-held portable devices) and to staff working outside of ArtsEd premises and using their own IT equipment.

Illegal, inappropriate or unacceptable use of ArtsEd equipment or communication systems may result in disciplinary action and in serious cases could lead to a staff member's dismissal. This list is not exhaustive and includes:

- Creating, sending or forwarding any message that would reasonably be considered inappropriate or unacceptable;
- Access, publication or circulation of illegal, offensive, unacceptable, inappropriate or non-work related material;
- Any illegal activities;
- Posting confidential information about ArtsEd and/or other staff, students, pupils or parents;
- Unauthorised use of ArtsEd facilities (or staff member's personal IT equipment) for personal use should be minimal, during working time.

Staff receiving inappropriate communication or material or who are unsure about whether something they propose to do might breach this policy should seek advice from the Head of People and Culture.

ArtsEd reserves the right to monitor e-mails, telephone calls, internet activity or document production, principally in order to avoid offensive or nuisance material and to protect systems from viruses, but also to ensure proper and effective use of systems.

Communication systems may be accessed when ArtsEd suspects that a staff member has been misusing systems or facilities, or for the investigation of suspected fraud or other irregularity.

Passwords should not be shared and access to computer systems must be kept confidential. Breach of this confidentiality may be subject to disciplinary action.

Accessing child sexual abuse imagery or indecent images of children on the internet, and making (including with AI technology), storing or sharing such material is illegal, and, if proven, will invariably lead to the individual being barred from working with children and young people.

24. Social Networking Sites

This section is in addition to the ICT Acceptable Use Policy for Staff, Visitors and Trustees. Staff must not access social networking websites for personal use during work time. Access to some journals, blogs and social networking sites is permitted during work time for the purposes of undertaking job related duties only.

Staff must act in the best interests of ArtsEd and not disclose personal information or data about any individual including staff, students, pupils or parents; this includes images. Access may be withdrawn and disciplinary action taken if there is a breach of confidentiality or defamatory remarks are made about ArtsEd, staff, students, pupils or parents.

ArtsEd respects people's private life, however, it must also ensure that confidentiality and its reputation are protected. Staff using networking websites in their private life must:

- Refrain from identifying themselves as working for ArtsEd, in a way which has, or may have, the effect of bringing ArtsEd into disrepute;
- Not identify other ArtsEd staff, students, pupils, parents or anyone associated with ArtsEd without their consent;
- Not make any defamatory remarks about ArtsEd, its staff, students, pupils, parents or anyone associated with ArtsEd, or conduct themselves in a way that is detrimental to ArtsEd, nor disclose personal data or information about ArtsEd, its staff, students, pupils, parents or anyone associated with ArtsEd that could breach the Data Protection Act 2018, for example, by posting photographs or images of children or young people;
- Not allow students, pupils, or parents, to access their personal social networking accounts (including LinkedIn for a period of two years post Year 13) and where they are contacted by a student, pupil, they should bring it to the attention of the DSL;
- On graduation from HE degree courses, students (and staff) may access their respective professional networking sites;
- Ensure that privacy settings are set up on their accounts.

25. Mobile Phones

Mobile phones should be switched off or set to a mode which will not disturb the member of staff whilst teaching. Mobile phones should not be used in front of students/pupils; however, the exception applies if the phone is required for ArtsEd business or in other exceptional circumstances.

Personal calls on a mobile phone may be made when students/pupils are not present.

26. Photographs and Videos

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

The ArtsEd rules on using images of pupils and students are contained within its detailed policies for DSSF and HE, and these must be complied with by all staff at all times.

Photographs must only be taken of pupils within DSSF, or those at ArtsEd Extra, with the permission of a parent or an individual with parental responsibility. Such consent must have been provided in writing via our 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 you to evidence a pupil's progress, such photos should only be taken on DSSF cameras. They must then be downloaded

onto an ArtsEd computer. Photos cannot be used or passed on outside ArtsEd. Neither you nor children should use your own mobile phones or any other personal device to take or store photographs. If there are extenuating circumstances which require you to use your own personal equipment, you should seek permission beforehand from the Principal, Dean of Higher Education, Headteacher or DSL.

When taking photos or videos on any equipment the following should be considered:

- Ensure you have consent from parents or the student/pupil;
- The purpose of the activity must be clear;
- All images should be open to scrutiny to ensure that they are appropriate;
- Images should not be made during one-to-one situations;
- Ensure that the student(s)/pupil(s) are appropriately dressed and consideration is given to the dignity of those in the picture;
- Ensure that the students/pupils understand why the picture is being taken;

Images must not be taken secretly.

27. Equal Treatment

We are committed to equal treatment for all Staff and students/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 student/pupil. You will be required to undertake regular consultation activities with students/pupils.

Bullying, harassment, victimisation and/or discrimination will not be tolerated. We treat all our students/pupils and their parents fairly and with consideration which we expect them to reciprocate towards each other, the Staff and ArtsEd. You should ensure that you are familiar with our Diversity, Equity and Inclusion Policy; Anti-Harassment and Bullying Policy; Prevention of Sexual Harassment Policy; and our policies on Equal Opportunities and Anti-Bullying.

28. Concerns or Complaints

We aim 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.

28.1. Staff Complaints

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

28.2. DSSF Parental Complaints

You must ensure that parental complaints are dealt with in accordance with our Complaints Policy.

28.3. HE Complaints

You must ensure that student complaints are dealt with in accordance with the Complaints Policy.

29. Safeguarding

For procedures for dealing with concerns or allegations about a child or disclosures / allegations of abuse, you should refer to our [Safeguarding / Child Protection Policy]

30. Teaching Regulation Authority (TRA)

Separate consideration will be given to making a referral to the TRA where a teacher, employee, has been dismissed (or would have been dismissed had they not resigned) because of unacceptable professional

conduct, conduct that could bring the profession into disrepute, or a conviction for a relevant offence. An interim referral to the TRA may also be considered and made if appropriate.

31. Low-level Concerns

As part of our institutional approach to safeguarding, we promote an open and transparent culture in which all concerns about adults working in or on behalf of ArtsEd 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 ArtsEd may have acted in a way that:

- is inconsistent with this Staff Behaviour Policy, 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 our values and expected behaviour set out in this Staff Behaviour Policy are lived, monitored and reinforced constantly by all staff, it is vital that any such low-level concerns are shared in accordance with our Low-Level Concerns Policy.

Any questions regarding low-level concerns and/or the procedure for reporting them should be raised with the [DSL and/or Principal, Dean of Higher Education, or Headteacher].

31.1. Allegations

Allegations against staff are defined in KCSIE and should be reported to the Principal/ Dean of Higher Education/ Headteacher (or the Chair of Trustees in the case of allegations against the Principal/ Dean of Higher Education/ Headteacher) in line with the Safeguarding Policy. These include allegations that someone who works with children has:

- Behaved in a way that has harmed a child, or may have harmed a child; and/or
- Possibly committed a criminal offence against or related to a child; and/or
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children; and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

31.2. Reporting a Low-level Concern

Where staff have a low-level concern, as outlined below, they do not need to determine how serious the concern is, but should immediately refer these concerns to the Principal, Dean of Higher Education, Headteacher or the DSL.

The purpose of ‘Low-level Concerns Reporting’ is to keep students/pupils safe and to create and embed a culture of openness, trust and transparency in which ArtsEd’s values and expected behaviour are constantly lived, monitored and reinforced by all staff.

A low-level concern is 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 ArtsEd (staff/ trustee / agency worker / volunteer / contractor) may have acted in a way that is inconsistent with the professional code of conduct, including inappropriate contact outside of work, and does not meet the threshold of the harms test (an action which may cause harm or pose a risk of harm to a child) or is otherwise not considered serious enough to consider a referral to the LADO.

These behaviours can exist on a wide spectrum, from inadvertent to that which is ultimately intended to enable abuse. They include, for example:

- Being over friendly with children;
- Having favourites;

- Taking photographs of children on their mobile phone;
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door;
- Using inappropriate sexualised, intimidating or offensive language;
- Not knocking on a door of a changing room or toilet area and using a verbal command before entry.

Please note that these examples could still lead to a referral to LADO after initial investigations.

These low-level concerns may form part of a wider pattern and need to be reported to the Headteacher and DSL.

When a low-level concern has been raised by a third party, the DSL will collect as much evidence as possible by speaking where possible with the person who raised the concern, to the individual involved and to any witnesses. They will record in writing reports of low-level concerns, including details of the concern, the context in which it arose, and action taken.

The name of the person reporting will be noted and wishes to remain anonymous will be respected as far as is reasonably possible.

Records of low-level concerns will be reviewed on an ongoing basis so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and responded to. Where a pattern of behaviour is identified ArtsEd will decide on a course of action. This might be internal disciplinary procedures, or referral to the LADO if the harms threshold is met.

The Principal, Dean of Higher Education, Headteacher, IDSL/DSL and Head of People and Culture will consider if any wider cultural issues have enabled the behaviour to occur and if appropriate policies could be revised or extra training delivered to minimise the risk of recurrence.

The rationale for all decisions and actions taken will be recorded.

32. Personal Information

You should not seek personal information from a student/pupil unless required for a formal ArtsEd process, such as admissions, counselling referral, medical information required for special consideration, or personal circumstances information as part of an academic progress process. Any information obtained this way must be stored and retained in accordance with local/institutional data protection requirements.

33. Confidentiality

Everyone engaged with ArtsEd comes into contact with a significant volume of data and information in relation to students, pupils, staff, activities and many other matters. There is an obligation to observe the requirements of the Data Protection Act 2018.

Under the Data Protection Act, you are required to collect, maintain and dispose of sensitive or personal data in a responsible manner i.e. via confidential waste bags or a shredding machine.

34. Disclosure of Data

You should not disclose sensitive information about the school or its staff to other parties, for example parents or colleagues. There are particular exceptions to this; for example, disclosure of suspected or alleged abuse of a student/pupil to DSL; discussion with a person accompanying or representing a member of staff in a formal meeting or disclosure under the Whistleblowing Policy.

No communication should be had with the media. If you have any concerns regarding the media that could, in any way, impact upon ArtsEd then you should contact the Principal, Dean of Higher Education or Headteacher as soon as you are able.