

# COGNITA

## Code of Conduct

### for

## REGION & SCHOOL

## ASIA

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## Code of conduct

### PURPOSE

The Code of Conduct Policy is an essential element of a school's Culture of Care and is designed to ensure that all adults are aligned in their professional conduct, responses, and actions.

### RATIONALE AND CONTEXT

The welfare of the child is paramount

Staff should understand their responsibilities to safeguard and promote the welfare of students within the Culture of Care

Staff are responsible for their own actions and behaviours and should avoid any conduct which would lead any reasonable person to question their motivation and intentions

Staff should work, and be seen to work, in an open and transparent way

Staff should discuss and/or take advice promptly from the Designated Safeguarding Lead (DSL) or Head of School if they have acted in a way which may give rise to concern

Staff should be aware that breaches of the law and company or professional guidelines could result in disciplinary action being taken against them including criminal action and / or other proceedings including reporting to the country in which their teaching qualification was gained.

Staff and managers should continually monitor and review practice to ensure this guidance is followed.

*It is acknowledged that international school staff and adults may face additional factors which require professional consideration. A close community can present opportunities to build on positive relationships and support the positive reputation of the school. However, it can also present safeguarding challenges/concerns which should be raised and address through the school's policy and procedures.*

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### 1 INTRODUCTION

1.1. This Code of Conduct should be read and understood in the context of:

- your agreed job description
- appropriate professional standards
- school policies and procedures
- Cognita policies and procedures and
- Country statutory requirements and regulations that apply to schools.

***This means that these guidelines:***

*Apply to ALL adults working in or for Education and Early Years settings whatever their position, role, or responsibilities.*

1.2. Adults have a crucial role to play in the lives of children. Our code of conduct gives clear guidance on the minimum standards of behaviour all school staff and adults are expected to observe. Staff are required to read and sign the policy as part of the annual declaration process. School staff are in a unique position of influence and must adhere to behaviour that maintains public trust in the teaching profession, sets a good example to other staff and to all the students within the school. This document is intended to help ensure that Cognita schools are safe places for students, provide clarity as regards expectations of staff and avoid potential misunderstandings.

### 2 CONDUCT OUTSIDE WORK

2.1. Staff must not engage in conduct (including other employment) outside work or associate with others who could reasonably be expected to damage the reputation and standing of the school, Cognita or other members of the school community.

***This means that staff should:***

*Be aware that their behaviour and that of those with whom they have a relationship or association, or others in their personal lives may impact on their work with children.*

2.2. Criminal offences, and being investigated for such, especially those which involve violence, possession or use of illegal drugs or sexual misconduct are likely to be regarded as unacceptable and incompatible with continued employment with Cognita. Staff must exercise caution when using information technology, including social networking sites, and be aware of the risks to themselves and others.

*Social networking sites and apps, including dating apps, may also be used by students. Such sites must be used with an understanding of the risks to self and others.*

***This means that school leaders should:***

*Have a clear expectation that staff will discuss with managers any relationship/association (in or out of school or online) that may have implications for safeguarding of child in school*

2.3. Staff may undertake work outside school, either paid or voluntary, subject to their employment contract. If there is any doubt as the appropriateness or suitability of their role, they should seek clarification from the Head of School.

*Create a culture where staff feel able to raise these issues.*

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- 2.4. Staff must seek written permission to tutor students from the Head of School in advance of any agreement with any student. Staff must adhere to the private tutoring policy for Cognita employees 2020.

### 3 SETTING AN EXAMPLE

- 3.1. All staff who work in schools set examples of behaviour and conduct which may be used as a model by others. All staff have a responsibility to maintain public confidence in their ability to safeguarding the welfare and best interests of children. They must demonstrate the highest standards of conduct. Avoid behaving in a way that risks giving rise to allegations of abusive or unprofessional conduct.

***This means that staff 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.*

- 3.2. This code is intended to help all staff to understand what behaviour is and is not acceptable.

### 4 EXERCISE OF PROFESSIONAL JUDGEMENT

- 4.1. This policy cannot provide a complete checklist of what is, or is not, appropriate behaviour for staff. It does highlight, however, some examples of behaviour that are unlawful, inappropriate, or inadvisable. There will be occasions and circumstances in which staff must make decisions or act in the best interests of the student which are not dealt with in this policy. Individuals are expected to make professional judgements to secure the best interests and welfare of the students under their charge. Such judgements should always be shared with a senior member of staff, who may inform the child's parent/caregiver, and a low-level concern / self-report should be raised.

**This means that where no specific guidance exists staff should:**

Discuss the circumstances that informed their action, or their proposed action, with their line manager or, where appropriate, the school's designated safeguarding lead. This will help to ensure that the safest practices are employed and reduce the risk of actions being misinterpreted

Always discuss any misunderstanding, accidents or threats with the Head of School or DSL

Always record discussions and actions taken with their justifications

Record any areas of disagreement

- 4.2. Although this code of conduct gives advice and instruction on how to deal with specific situations, it should not replace professional common sense and good judgement. In all matters relating to student /staff relationships, teachers must bear in mind how an action might reasonably be regarded by a third party.
- 4.3. Adults should always consider whether their actions are warranted, proportionate, safe, and applied equitably.

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### 5 DUTY OF CARE

5.1. Teachers and other staff are accountable for the way in which they exercise authority, manage risk, use resources, and protect students from discrimination and avoidable harm. All staff, whether paid or voluntary, have a duty to keep children safe and to protect them from sexual, physical, and emotional harm. Children have a right to be safe and to be treated with respect and dignity. It follows that trusted adults are expected to take reasonable steps to ensure the safety and well-being (both physical and mental wellbeing), of students. Failure to do so may be regarded as professional neglect, bullying or misconduct.

#### **This means that staff should:**

Understand their responsibilities and be aware that sanctions will be applied if these provisions are breached.

Always act, and be seen to act, in the child's best interests

Avoid any contact which would lead any reasonable person to question their motivation and intentions

Take responsibility for their own actions and behaviour

#### **This means that employers should:**

Ensure that appropriate safeguarding and children protection policies and procedures are distributed, adopted, implemented, and monitored.

5.2. A duty of care is, in part, exercised through the development of respectful, caring, and professional relationships between staff and students and behaviour by staff that demonstrates integrity, maturity and good judgement.

5.3. Employers have duties towards their employees and others under Health and Safety legislation which requires them to take steps to provide a safe working environment for staff.

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### 6 POSITION OF TRUST

- 6.1. As a result of their knowledge, position and/or the authority invested in their role, all those working with children in a school setting are in a position of trust in relation to all students on the roll. It is vital for adults to understand this power; that the relationship cannot be one between equals and the responsibility they must exercise as consequence.
- This means that staff should not:*
- Use their position to gain access to information for their own advantage and/or a student's or family's detriment*
- Use their power to intimidate, threaten, coerce, or undermine students*
- 6.2. The potential for exploitation and harm of vulnerable students means that adults have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.
- Use their status and standing to form or promote a relationship with a student of a sexual nature or which may become so.*
- Enter into any form of sexual contact with a student from the school and avoid any form of communication which could be interpreted as sexually suggestive, provocative or give rise to speculation*
- 6.3. Staff should always maintain appropriate professional boundaries, avoid behaviour which could be misinterpreted by others and report and record any such incident.
- Make sexual remarks to or about a student*
- 6.4. Where a person aged 18 or over is in a position of trust with a child under 18 it is not permitted (it is also an offence in some countries) 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. Any such behaviour will lead to disciplinary action and probable dismissal. Cognita does not permit a person in a position of trust to be engaged in sexual activity with any former student who is under the age of 25 as the unequal balance of power would remain – as explained in 6.1.
- Discuss sexual matters with or in the presence of students other than within agreed curriculum content or as part of their recognized job role.*
- 6.5. Relationships between staff and students should be supportive, friendly, and mutually respectful whilst remaining professional.
- 6.6. 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 and manipulate that relationship so abuse can take place. Adults should be aware that consistently conferring special attention and favour upon a child might be construed as being part of a grooming process and as such will give rise to concerns about their behaviour.

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### 7 STAFF/ STUDENT (INCLUDING FORMER STUDENT) CONTACT

7.1. As a rule, staff should avoid unnecessary and unauthorised contact with students outside school.<sup>1</sup>

- they should not give students their home address, mobile or home phone number or non-school e-mail address without compelling cause and without informing their line manager. Thank you letters to students or parents should not contain these personal details.
- they should not arrange to meet students, individually or in groups, outside school other than on school trips authorised by a senior member of staff, and any unplanned meetings should be the subject of a low-level concern/self-report.
- Staff are permitted to undertake agreed home contact, in line with the school's communication and learning strategies, however, they should avoid informal contact with students at home. They should keep a record of any contact which sits outside of the norm, alert the DSL, and submit a low-level concern/ self- report; and
- they should not attend private student gatherings or parties and should be aware of their professional standing and responsibilities when attending parties arranged by parents or others at which students are also present.

*This means that staff:*

*Should always maintain professional boundaries with students and former students including on social media and alert the DSL if anything outside of the norm occurs.*

7.2. Some students may be reluctant to end the close working relationship they have enjoyed with members of staff. When a student leaves school, the professional duty of care ends. However, it is necessary to continue to maintain professional standards of behaviour. Although current and former students may request meetings with staff for education related queries, such as help with university applications, gap year advice or references for future careers, these meetings and any associated correspondence should be conducted at school within office hours and in a professional manner. Staff should inform their line manager of the agreed purpose, time, and place of the meeting.

7.3. If you are in any doubt regarding appropriate contact with a current or former student, you should seek advice from member of the school's leadership team.

7.4. Members of staff who are parents of students, friends with parents of students or who, for example, are voluntary workers in youth organisations attended by students, will of course have contact with students outside school. However, they should still use their professional judgement to respect the spirit of this code.

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<sup>1</sup> *It is acknowledged that international school staff and adults may face additional factors which require professional consideration. A close community can present opportunities to build on positive relationships and support the positive reputation of the school. However, it can also present safeguarding challenges/concerns which should be raised and address through the school's policy and procedures.*



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- 7.5. It is accepted that the effective use of technology brings benefits to learning. Adults must ensure that they establish and adhere to safe and responsible practices. All adults must adhere to Cognita's acceptable use of technology and social media policies. Communication between students and adults, by whatever method, should take place within clear and explicit boundaries. This includes the wider use of technology and social networking. Adults should ensure that all communications are transparent and open to scrutiny. Adults should be circumspect in their communications with students to avoid any misinterpretation or their motives or any behaviour which could be construed as grooming.
- 7.6. Staff should not be 'friends' with current or recent students on any social networking sites. Any invitation to become a 'friend' or similar should be politely declined. If staff have links with former students (25 years old and beyond) on social networking sites, they should ensure that their privacy settings are such as to prevent friends' friends (who may be current students) from accessing their profile or other data.
- 7.7. Email, chat rooms or forum, messaging platforms or social media sites between adults and students outside agreed protocols may lead to disciplinary and/or criminal investigations.

## 8 LANGUAGE AND DISCUSSIONS WITH STUDENTS

- 8.1. Staff should not swear, blaspheme, or use any offensive or inappropriate language in front of students. They should not use language which is discriminatory or demeaning in relation to gender (including gender reassignment), religion, race, nationality, ethnicity, sexual orientation, disability, marriage, or age. Staff should not make sexual innuendos.

*This means that staff should:*  
Behave as a role model in their use of language.
- 8.2. Discussion of issues of a sexual nature (other than in the context of the curriculum as specified in schemes of learning) should be kept to a minimum and only conducted where necessary from a pastoral perspective. Staff must use their professional judgement to ensure that they are not drawn into areas inappropriate to their duties or their relationship with the students concerned. Any concerns arising from such discussions should be reported to the DSL or Head of School and a low-level concern report should also be raised.
- 8.3. Staff must respect the rights of others and respect those with different beliefs. Staff must not express extreme views. The use of sarcastic, demeaning, or insensitive comments must be avoided.

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### 9 PHYSICAL CONTACT

- 9.1. Physical contact with students, will, for most staff, be inappropriate. There are occasions when it is appropriate and proper for staff to have physical contact with children, particularly within Early Years.
- This means that staff should:*
- Be aware that even well-intentioned physical contact may be misconstrued by the student, an observer, or any person to whom this action is described*
- 9.2. However, it is crucial that staff only do so in ways appropriate to their professional role and in relation to the student's individual needs at the time, appropriate to their age, stage of development and any agreed care plan.
- Never touch a student in a way which may be considered indecent*
- Always be prepared to explain actions and accept that all physical contact be open to scrutiny*
- 9.3. When students initiate physical contact e.g., as a greeting or a celebration, then staff must use their professional judgement in how to respond. Staff should not initiate any form of physical contact except in an emergency or specified in this section.
- Never indulge in horseplay or fun fights*
- Always allow/encourage students, where able, to undertake self-care tasks independently*
- Ensure the way they offer comfort to a distressed student is age appropriate.*
- 9.4. Physical contact should never be secretive, or for the gratification of the adult, or represent a misuse of authority. If a member of staff believes that an action by them or a colleague could be misinterpreted, or if an action is observed which is possibly abuse, the incident and circumstances should be immediately reported using a low-level concern form, a self-report, or an allegation form.
- Always make a self-report to explain when and how they comforted an older than early years distressed student*
- Consider alternatives where it is anticipated that a student might misinterpret or be uncomfortable with physical contact*
- Always explain to the student the reason why contact is necessary and what form that contact will take*
- 9.5. Extra caution may be required where it is known that a child has suffered previous abuse or neglect. Staff need to be aware that the child may associate physical contact with such experiences. They also should recognise that these students may seek out inappropriate physical contact. In such circumstances staff should deter the child sensitively and help them to understand the importance of personal boundaries.
- Report using a low-level concern form, any situation which may give rise to concern*
- Be aware of cultural or religious views about touching and be sensitive to issues of gender.*
- 9.6. Students with additional/special needs or disabilities may require more physical contact to assist their everyday learning. The arrangements should be understood and agreed by all concerned, justified in terms of the student's needs, and stated in a care/support plan.
- 9.7. Acceptable comforting in Early Years is part of our Culture of Care and may include:
- A short cuddle/hug at the child's request.
  - Occasionally, when separating a child from a parent /carer it is necessary to physically remove/transfer the child to a member of staff, with adult's consent.

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- Sitting a child on an adult's knee can be a way of giving comfort or calming a child, this will be done on the child's request or with their consent. Staff should not allow children to sit on their knee when alone with a child in a room.
- Occasionally there is no alternative to picking a child up, but for health and safety reasons this is a 'last resort.' Early year's providers should establish clear guidelines for child contact, in line with acceptable practice. This guidance should always take due regard for the safeguarding of children and of staff.
- Other activities, often instigated by the children themselves, are not appropriate. This includes any form of kissing on cheek, forehead, or lips.

## 10 ACTIVITIES THAT REQUIRE PHYSICAL CONTACT

10.1. There are certain curriculum areas where physical contact may be proper or necessary. Some physical contact may, for example, be necessary to demonstrate exercises or techniques during PE (Physical Education), drama, music, or sports coaching.

### *This means that staff should:*

*Treat students with dignity and respect and avoid contact with intimate parts of the body*

*Always explain to a student the reason why contact is necessary and what form that contact will take*

*Seek consent of parents where a student is unable to give this e.g., because of age or disability*

*Conduct activities where they can be seen by others*

*Be aware of gender, culture and religious issues that may need to be considered prior to initiating physical contact.*

10.2. All staff must be alert to the possibilities of any contact being misinterpreted. To avoid such misunderstanding, all planned contact must be demonstrably proper or necessary. It may be that alternative methods involving demonstrations of techniques by the teacher, or a particularly competent student may be more appropriate than modifying a student's technique by physical contact.

10.3. If staff still feel it proper or necessary for physical contact to occur, then the following guidelines must be observed:

- \* Explain the intended action to the student.
- \* Do not proceed with the action if the student is apprehensive or reluctant, or if you have other concerns about the student's reaction; and
- \* Ensure that other students or colleagues are present during the demonstration. Where this is not possible, due to one-to-one teaching, have a conversation with the Head of School or DSL in advance.

10.4. If you are at all concerned about anything which has occurred during the demonstration, inform the Head of School or DSL without delay, and make a low-level concern report.

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### 11 THE USE OF CONTROL AND PHYSICAL INTERVENTION

11.1. The Positive Handling and Search policy states that teaching staff may use positive handling or physical contact, as is reasonable in the circumstances, to prevent a student from doing, or continuing to do any of the following:

- committing a criminal offence.
- injuring themselves or others; and/or
- causing considerable damage to property, including their own
- engaging in behaviour prejudicial to good order
- and to maintain good order and discipline.

***This means that school leaders should:***

*Ensure that their Positive Handling and Search policy is up to date and known to staff.*

*Have an agreed policy for when and how physical interventions should be recorded and reported.*

***This means that staff should:***

*Adhere to the school's positive handling policy*

*Always seek to defuse situations and avoid the use of physical intervention wherever possible*

*Where physical intervention is necessary, only use minimum force and for the shortest time needed.*

11.2. This applies when a teacher is on school premises and when he or she is in control or charge of the student elsewhere, for example on an outdoor activity, field trip or other authorised out-of-school activity.

11.3. Positive handling is only appropriate where no other form of control is available and where it is necessary to intervene. Any force used must always be the minimum needed to achieve the desired result and must be appropriate for the age, sex and understanding of the student.

11.4. Before intervening physically, a teacher must, wherever practicable, tell the student to stop and what will happen if he or she does not. The member of staff must continue attempting to communicate with the student throughout the incident and must make it clear that physical contact or restraint will stop as soon as it ceases to be necessary.

11.5. Staff must always avoid touching or holding a student in a way that might be considered indecent.

11.6. Any member of staff who is involved with or witnesses use of force on a student must inform the Head of School immediately following the incident. This is to help prevent any misunderstanding or misrepresentation of the incident, and it will be helpful in the event of a complaint. The member of staff involved must always provide a written Low-Level concern/self-report as soon as possible afterwards. Often a Serious Incident or Near Miss report will be deemed necessary by the Head of School

### 12 INTIMATE AND PERSONAL CARE

12.1. Schools should have a clear nappy/diaper changing and intimate care policy which ensures that the health, safety, independence, and welfare of children is promoted, and their dignity and privacy are respected. Arrangements for intimate and personal care should be open and transparent.

***This means that staff should:***

*Adhere to their school's intimate care policy*

*Make other staff aware of the task being undertaken*

*Always explain to a child/student what is happening before a care procedure begins*

*Consult with colleagues where any variation from agreed procedure/care plan is necessary*

*Record the justification for any variations to the agreed procedure/care plan and share this information with the child/student and their parents/carers*

*Avoid any visually intrusive behaviour*

*Where there are changing rooms announce their intention of entering*

*Always consider the supervision needs of the students and only remain in the room where the needs require this.*

***This means that adults should not:***

*Change or toilet in the presence or sight of students*

*Shower with students*

*Assist with intimate or personal care tasks which the student can undertake independently*

12.2. Students should be encouraged to act as independently as possible and to undertake as much of their own personal care as is possible and practicable. When assistance is required, this should normally be undertaken by one member of staff, however, they should try to ensure that another appropriate adult is in the vicinity who is aware of the task to be undertaken and that, wherever possible, they are visible and / or audible. Intimate or personal care procedures should not involve more than one member of staff unless the student's care plan specifies the reason for this.

12.3. Students are always entitled to respect and privacy and especially when in a state of undress, including, for example, when changing, toileting and showering. However, there needs to be an appropriate level of supervision to safeguard students, satisfy health and safety considerations and ensure that bullying or teasing does not occur. This supervision should be appropriate to the needs and age of the children concerned and sensitive to the potential for embarrassment.

### 13 ISOLATION AND ONE-TO-ONE WORKING

13.1. Staff working in one-to-one situations with children and young people may be more vulnerable to allegations. All staff should recognise this possibility and plan and conduct such meetings accordingly. Every attempt should be made to ensure that the safety and security needs of both staff and students are met. Head of Schools,' supported by the DSL, should undertake a risk assessment in relation to the nature and implications of one-to-one working. Any arrangements should be reviewed on a regular basis. It may be necessary to amend these to take account of student

***This means that staff should:***

*Ensure that wherever possible there is visual access and/or an open door in one-to-one situations*

*Avoid use of 'engaged' or equivalent signs wherever possible. Such signs may create an opportunity for secrecy or the interpretation of secrecy*

*Always report any situation where a student becomes distressed or angry*

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needs. This does not mean that working one-to-one is unacceptable - it just requires a proportionate risk assessment:

- one-to-one meetings or lessons should, wherever possible, take place in public or semi-public places such as classrooms or offices. If in classrooms, ensure you are seated so that you and the child can be seen through the visibility panel in the door, or the door left open.
- when in a private meeting or lesson with a child or a one-to-one session as occurs with therapists or counsellors, ensure that furniture is positioned to allow easy access into or out of the room and that the visibility panel in the door is not obscured; and
- no member of staff must ever be behind a locked door with a student.

13.2. Arranging to meet with students from the school away from the premises should not be permitted unless the necessity for this is clear and approval is obtained from the Head of School, the student, and their parents/carers.

## 14 PUNISHMENTS

14.1. All staff must follow the agreed school behaviour policy and anti-bullying strategy.

14.2. Corporal punishment is not acceptable in any circumstances. Staff may not strike or otherwise physically punish a student, deprive a student of food or drink, enforce food or drink, prevent contact by telephone to parents or any independent listener or helpline, require students to wear distinctive clothing, lock them in a room, withhold any aids or equipment needed by the student or impose any punishment which is intended to distress or humiliate a student.

14.3. Where students display difficult or challenging behaviour, adults should follow the school's behaviour policy using strategies appropriate to the circumstance and situation. When necessary, a behaviour support plan and positive handling plan should be drawn up and agreed by all parties.

### ***This means that staff should:***

*Not use force as a form of punishment*

*Try to defuse situations before they escalate e.g., by distraction or verbal de-escalation*

*Keep parents informed of any sanctions or behaviour management techniques used*

*Be mindful of factors both inside and outside school which may impact a student's behaviour*

*Follow the behaviour policy*

*Behave as a role model*

*Avoid shouting at children/students other than as a warning in an emergency/safety situation*

*Comply with legislation and guidance in relation to human rights and restriction of liberty.*

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### 15 DATA PROTECTION AND CONFIDENTIALITY

- 15.1. Your school should provide clear advice about your responsibilities so that you know what and how you may share confidential information.
- This means that school leaders should:*
- Ensure that all staff are aware of their responsibilities for data protection and confidentiality.*
- 15.2. Staff may have access to personal data about students and their families which must be always kept confidential and only shared when permissible to do so and in the interest of the child. Records should only be shared with those who have a legitimate professional need to see them.
- This means that staff:*
- Need to know the name of the DSL and child protection procedures*
- Are expected to treat information in a discreet and confidential manner*
- Seek advice from the Head of School or DSL if in doubt about sharing information which has been requested of them*
- 15.3. Confidential information should never be used casually in conversation or shared with any person other than on a need-to-know basis.
- 15.4. In cases of alleged abuse, all staff have a duty to pass on information to the DSL without delay.
- 15.5. In a child, parent or carer makes a disclosure regarding abuse or neglect the member of staff must always take this concern seriously and pass this information to the DSL. The adult should not promise confidentiality to a child or parent but should give reassurance that the information will be treated sensitively.

### 16 INFATUATIONS AND CRUSHES

- 16.1. All staff need to recognise that it is not uncommon for students to be strongly attracted to a member of staff and / or develop a 'crush' or infatuation. They should make every effort to ensure that their own behaviour cannot be brought into question, does not appear to encourage this and be aware that such infatuations may carry a risk of their words or actions being misinterpreted. Any member of staff who receives a report, overhears something, or otherwise notices any sign, however small or seemingly insignificant, that a young person has become or may be becoming infatuated with either themselves or a colleague, should immediately report this to the Head of School or DSL using a low-level concern/self-report. In this way appropriate early intervention can be taken which can prevent escalation and avoid hurt, embarrassment or distress for those concerned.
- This means that staff should:*
- Report any indications (verbal/written or physical) that suggest a student may be infatuated with a member of staff*
- Always maintain professional boundaries*
- This means that the Head of School and/or DSL should:*
- Put action plans in place where concerns are brought to their attention*



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### 17 HOME VISITS

17.1. All work with students and parents should usually be in the school. There are occasions, in response to an urgent, planned, or specific situation, where it is necessary to make one-off or regular home visit e.g., to undertake a welfare check on a school refuser.

***This means that staff should:***

*Agree the purpose for any home visit with their line manager*

*Complete a risk assessment and adhere to all risk management measures*

*Avoid unannounced visits*

*Never enter a house without parental consent or when a parent is absent except in an emergency*

*Make detailed records of arrival, meeting, and departure*

*Ensure that children are seen in open and observable spaces, e.g., living rooms*

17.2. It is essential that staff follow Health and Safety guidance. A risk assessment should take place prior to any planned home visit taking place. The assessment should include an evaluation of known factors regarded the family and circumstances that might render the staff member becoming more vulnerable to an allegation e.g., hostility, child protection concerns, complaints, and grievances.

*Ensure staff have access to a mobile phone and an emergency contact*

17.3. Following the assessment appropriate risk management measures should be in place before the visit. Two members of staff must be present for the visit.

### 18 EDUCATIONAL VISITS AND AFTER SCHOOL/OUT OF SCHOOL ACTIVITIES

18.1. Staff must take particular care when supervising students in the less formal atmosphere of a residential setting or after-school activity where a more relaxed discipline or informal dress and language code may be acceptable. However, staff remain in a position of trust and need to ensure that their behaviour cannot be interpreted as seeking to establish an inappropriate relationship or friendship. It is important to emphasise that the standards of professional conduct and behaviour expected of staff outside and after school are no different from those which apply within school.

***This means that staff should:***

*Adhere to all relevant Cognita policy and procedure for educational visits and after-school activities*

*Ensure that their behaviour always remains professional*

*Never share a bedroom with a student or enter a student's bedroom so that they are alone with a student.*

*Follow all local and national guidelines for educational visits*

*Ensure they are fully trained for the role they are fulfilling.*

18.2. Staff responsible for or supporting educational visits and after-school activities must adhere to all relevant Cognita policy and procedures. Staff are responsible for ensuring they are fully competent and confident to fulfil their role when leading or supporting an educational visit or after-school activity.



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### 19 TRANSPORTING CHILDREN

19.1. In certain situations (e.g., out of school activities), staff or volunteers may be required to transport students. As for any other activity, the school has a duty to carry out a risk assessment covering the health and safety of their staff/volunteers and to manage any known risk.

*This means that staff should:*

*Plan and agree arrangements with all parties in advance*

*Consider the needs of the student*

*Have appropriate licence, insurance, and certificate of roadworthiness*

*Ensure they are fit to drive*

*Be aware that the safety and welfare of the student is their responsibility until this is safely passed over to a parent/carer*

*Ensure that any impromptu or emergency arrangements of lifts are reported, recorded, and can be justified*

19.2. Consideration must be given to the potential distraction of the driver and the supervision of the passengers. A judgement should be made about the likely behaviour and individual needs of the child/ren. If any of them may require close supervision, then another adult should travel in the vehicle so that the driver is not distracted.

19.3. Staff should ensure that their behaviour is safe and that the transport arrangements and the vehicle

meet all legal requirements. Students must only be transported in vehicles with seatbelts and appropriate car seats/booster seats, if required. They should ensure that the vehicle is roadworthy and appropriately insured for business purposes and that the maximum capacity is not exceeded. All adults, whether staff or volunteers, should have satisfactory background screening checks in place.

19.4. Wherever possible and practicable it is advisable that transport is undertaken other than in private vehicles and with at least one adult additional to the driver acting as an escort.

19.5. Staff should never offer to transport students outside of their normal working duties, other than in an emergency or where not doing so would mean the child may be at risk. In these circumstances the matter should be recorded and reported to the DSL and the student's parents/carers.

### 20 CURRICULUM TEACHING MATERIALS

20.1. Many areas of the curriculum can include or raise subject matter which is sexually explicit or of a political or sensitive nature. Care should be taken to ensure that resource materials cannot be misinterpreted and clearly relate to the learning outcomes identified by the lesson plan. This can be supported by developing ground rules with students to ensure sensitive topics can be discussed in a safe learning environment. This plan should highlight areas of risk and sensitivity and care should especially be taken in those areas of the curriculum where usual boundaries or rules are less rigorously applied e.g., drama.

***This means that staff should:***

*Have clear written lesson plans, ensure that content is age and developmentally appropriate and justifiable*

*Take care when encouraging students to use self-expression, not to overstep personal and professional boundaries*

***This means that staff should not:***

*Enter or encourage inappropriate discussions which may offend or harm others*

*Express any prejudicial or extreme views*

*Attempt to influence or impose their personal values, attitudes, or beliefs on students.*

20.2. The curriculum can sometimes include or lead to unplanned discussions about subject matter of a sexually explicit, political, or otherwise sensitive nature. Responding to student's questions requires careful judgement and staff should take guidance in these circumstances from the DSL.

### 21 GIFTS, REWARDS, FAVOURITISM, AND EXCLUSION

21.1. Schools should have policies in place regarding the giving of gifts or rewards to students and the receiving gifts from their or their parents/carers and staff should be made aware of understand what is expected of them.

***This means that staff should:***

*Be aware of the school policy for rewarding positive behaviour*

*Ensure that gifts given or received, which may be misconstrued, are declared, and recorded.*

21.2. Staff need to take care that they do not accept any gift that might be construed as a bribe by others or lead the giver to expect preferential treatment.

*When giving gifts of insignificant value they are given to all students equally.*

*Ensure that you do not behave in a manner which is either favourable or unfavourable to individual students.*

21.3. There are occasions the students or parents wish to pass small tokens of appreciation to staff e.g., for a festival or as a thank-you and this is usually acceptable. However, it is unacceptable to receive gifts on a regular basis or of any significant value.

21.4. Similarly, it is inadvisable to give personal gifts to students – this could be interpreted as a gesture either to bribe or groom. It might also be perceived that a 'favour' of some kind is expected in return. Giving a small gift to a whole class is acceptable, if allowed within your school policy.

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- 21.5. Any reward given to a student should be in accordance with agreed practice, consistent with the school's behaviour policy, recorded and not based on favouritism.
- 21.6. Adults should exercise care when selecting students for specific activities, jobs, or privileges to avoid perceptions of favouritism or injustice. Similar care should be exercised when students are excluded from an activity. Methods of selection and exclusion should always be subject to clear, fair, agreed criteria.

## 22 SOCIAL CONTACT

- 22.1. It is acknowledged that staff may have genuine friendships and social contact with parents of students, independent of the professional relationship. Staff should, however, also be aware that professionals who sexually harm children often seek to establish relationships and contact outside of the workplace with both the child and their parents, to 'groom' the adult and child and/ or create opportunities for sexual abuse.
- This means that staff should:*
- Always approve any planned social contact with students and parents with senior colleagues.*
  - Advise the DSL of any regular social contact they have with a student which could give rise to concern*
  - Refrain from sending personal communication to students or parents unless agreed with senior managers*
  - Seek permission from the Head of School where parents wish to use your services outside of the workplace, e.g., babysitting.*
- 22.2. It is also important to recognise that social contact may provide opportunities for other types of grooming such as for the purpose of sexual exploitation or radicalisation.
- 22.3. Staff should recognise that some types of social contact with students or their families could be perceived as harmful or exerting inappropriate influence on children, and may bring your school into disrepute (e.g., attending a political protest, circulating propaganda).
- 22.4. If a student or parent seeks to establish social contact, or if this occurs coincidentally, the member of staff should exercise their professional judgement in that moment and then inform the DSL as soon as possible. This also applies to social contacts made through outside interests or the staff member's own family.
- 22.5. Staff must maintain the highest professional standards at school social events. They must not continue to socialise with students or parents after the official finishing time or at alternative locations. Staff must not drink alcohol on school premises unless at an approved school function.
- 22.6. In the international school community, staff may live close to their students and socialise in the same locations. Staff must maintain the highest professional standards and not put themselves at risk to an allegation. Staff should bear in mind that students and parents have mobile recording and photographic technology to hand, and the potential this has for comments or actions to be recorded out of context.

## **23 COMMUNICATION WITH STUDENTS INCLUDING VIA TECHNOLOGY**

23.1. To make best use of the many educational and social benefits of new and emerging technologies students need opportunities to use and explore the digital world. Online risks are posed more by behaviours and values than the technology itself.

***This means that adults should:***

*Not seek to communicate/ make contact or respond to contact with students outside of the purposes of their work*

*Not give out their personal details*

23.2. Staff should ensure that they establish safe and responsible online behaviours, working to acceptable use policies which detail how new and emerging technologies may be used.

*Use only the equipment and internet services provided by the school, unless policy states otherwise*

*Follow their school acceptable use of technology and social media policy*

23.3. Communication with students both in the 'real' world and through web based and telecommunication interactions, such as when virtual or remote teaching, should take place within explicit professional boundaries. This includes the use of computers, tablets, phones, texts, e-mails, instant message, social media such as Facebook and Twitter, chat rooms, forums, blogs, website, gaming sites, digital cameras, videos, webcams, and other hand-held devices. (Given the ever-changing world of technology it should be noted that this list gives examples only and is not exhaustive.)

*Ensure that their use of technologies could not bring their employer into disrepute*

*Not discuss or share data relating to students/parents/ carers in staff social media groups*

***This means that schools should:***

*Wherever possible provide school devices such as cameras and mobile phones rather than expecting staff to use their own (e.g., on school trips, remote teaching, etc.*

23.4. Staff should not request or respond to any personal information from students other than which may be necessary in their professional role. They should ensure that their communications are open and transparent and avoid any communication which could be interpreted as 'grooming behaviour'.

23.5. Staff should not give their personal contact details to students, for example, e-mail address, home or mobile telephone numbers, details of web-based identities. If students locate these by any other means and attempt to contact or correspond with the staff member, the adult should not respond and must report on a self-report to the DSL. The student should be firmly and politely informed this is not acceptable.

23.6. Staff should adhere to their school's policies including those regarding communication with parents and carers and the information they share when using the internet.

### 24 LOW LEVEL CONCERNS AND SELF REPORTING

24.1. A low-level concern is any concern, no matter how small and even if no more than a 'nagging doubt,' that an adult may have acted in a manner inconsistent with the school's code of conduct. It is important that any concerns or incidents which might give rise to concerns about the conduct of staff, are reported to the DSL or, in their absence, the head of school however minor. In most cases, there will be a perfectly innocent explanation for what has occurred, and staff should not feel that making a report about themselves, or being the subject of a report, will cause them to suffer any detriment or stigma where this is the case. The DSL, in agreement with the head of school will on receipt of a report, determine how to best approach the issue.

*This means that school should:*

*Ensure all staff are aware of the low-level concern and self-reporting procedure and report any concerns about the behaviour of colleagues*

*Promote an open and transparent culture where staff feel valued and are confident to report any concerns*

*Ensure all concerns about adult conduct are listened to, received in a sensitive manner, taken seriously, action, recorded with clear outcomes*

*Ensure that any concern that meets the harm threshold for an allegation are reported to the Head of School within 24 hours.*

24.2. The process for reporting a concern of this nature is called low level concern reporting. This is a procedure for self-reporting or reporting about the behaviour and action of others. Low level concern reports must be used by staff to record all events and/or situations which have the potential to be misconstrued or misinterpreted by others or where they are at all concerned about the behaviour of an adult and not just where a role or professional boundary has been broken. The purpose of reporting is to protect both students and the staff working with them and allows a system for a simple record to be kept in case events are later referred to or any patterns emerge.

24.3. The circumstances in which staff **must** make a low-level concern report are as follows:

- any incident where s/he feels that his/her actions or behaviour towards a student may have been misinterpreted or may have given rise to a risk of misinterpretation.
- any incident where s/he feels that another adult's actions or behaviour towards a student may have been misinterpreted or may have given rise to a risk of misinterpretation.
- any use by an adult of sexually inappropriate language, references, or jokes to a student.
- email, messaging, use of chat forums, social media sites or other communication between adults and students outside agreed protocols.
- any unsupervised access to a student other than in the context of a planned one-to-one lessons or counselling sessions (this would include all one-to-one meetings or discussions, whether related to schoolwork, pastoral issues, or other matters).
- any incident of physical contact with a student when no one else is present, including when a teacher must administer first aid or medical treatment (health centre staff excluded) and including physical demonstrations in one-to-one sports coaching, music lessons etc.
- any incident where a member of staff has been alone with a student or students in a vehicle where this has not been authorised in advance.
- any contact with students outside school (other than trivial incidents, e.g., passing a student in the street or the supermarket or noticing that they are sitting, separately, in the same restaurant or cinema).

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- if a student becomes aware of a staff member's home address, mobile or home phone number, or non-school e-mail address.
- if a staff member becomes involved in a close or sexual relationship with a former student, regardless of the age of the student.
- the fact of, and explanation for, unsupervised access to a student on school trips.
- non-trivial illnesses or accidents of students on school trips; and
- any incident where, for whatever reason, a member of staff has not complied with this Code of Conduct.

24.4. The list in paragraph 21.3 is not intended to be exhaustive. Anything which causes staff to have a 'nagging doubt' about the way in which other adults behave or interact with students must be notified, to protect both students and the members of staff involved.

24.5. The low-level concern reporting system is intended to enable staff to self-report, as well as to make notifications about other staff members. It is accepted that there are occasions when school staff, as professionals, must make decisions to act in a particular way to protect the health, safety, and welfare of their students. This may, in some cases, put the adult in a vulnerable position and cause the adult, on hindsight, to consider that they might not act in the same way in a comparable situation. In this scenario, staff must raise a self-report. Low level concerns may be made in person or on a low-Level Concern report to the DSL or Head of School, in their absence. If the notification is made in person in the first instance, staff are required to complete a low-level concern report later. The DSL will record all low-level concern reports centrally as part of a single record and obtain the advice of the Safeguarding Manager – Asia, as necessary.

24.6. Any staff member who makes a low-level concern report, or a more serious allegation, in good faith will suffer no detriment as a result and will benefit from the protection set out in the whistleblowing policy. Failure to make a low-level concern report may, however, constitute misconduct and require the implementation of the disciplinary procedure.

## 25 ALLEGATIONS

25.1. An allegation represents situations that might indicate a person will pose a risk of harm to children if they continue to work in regular or close contact with children in their present position, or in any capacity.

*This means that staff should:*

*Report an allegation to the Head of School or CEO immediately.*

*Know they can escalate their concerns (whistle blow) if they believe that anyone on school site is not being*

25.2. This policy applies to all adults in the school if it is alleged that they have:

- Behaved in a way that has harmed a child or may have harmed a child.
- Possibly committed a criminal offence against or related to a child.
- Behaved towards a child in a way that indicates she/he may pose a risk of harm against children or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children (potential transfer of risk)

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- 25.3. Allegations should be reported to the head of school immediately. An allegation about the head of school must be referred to the Cognita CEO immediately.
- 25.4. See the Allegation guidance document for further information.
- 25.5. It is important to emphasise that any member of staff, parent or student can refer their concerns to Cognita's CEO Asia directly.

## **26 WHISTLEBLOWING**

- 26.1. Whistleblowing is the term used when an adult reports any concerns (possibly anonymously) about poor or unsafe practice, including in relation to the care and protection of a student.
- 26.2. Whistleblowing concerns should be reported directly to the Head of School, or in the case of a concern involving the Head of School, directly to Cognita Asia CEO. More detail is found in the Whistleblowing policy.

## **27 RELATED DOCUMENTATION**

- Safeguarding and Child Protection Policy and Procedure
- Acceptable Use of Information Technology / Social Media Policy
- Safeguarding: Allegations of Abuse against Staff
- Employee Handbook / Contract Handbook
- Whistleblowing policy
- Staff or Company Contract document

### **Acknowledgement**

Safer Recruitment Consortium "Guidance for safer working practice for those working with children and young people in education settings" February 2022

APPENDIX

Appendix A

Confidential

|          |
|----------|
| Sheet... |
| Of...    |

**Adult Low-Level Concern or Self-report**

|  |                       |
|--|-----------------------|
| <b>School name</b>   |                       |
|  |                       |
| <b>Name of adult making the report and signature</b>   | <b>Role in school</b> |
|  |                       |
| <b>Person referred to and their role</b>   | <b>Date</b>           |
|  |                       |
| <ul style="list-style-type: none"><li>• See Safeguarding Policy for detail about low level concerns and self-reporting</li><li>• Use this form to record any concerns</li><li>• The form should be handed directly to the DSL or Head of School as soon as possible</li><li>• Be as precise and accurate as possible.</li><li>• Continue a separate A4 sheet if necessary. Each page should be numbered (page x of x), dated and signed.</li></ul> |                       |

|   |
|---|
| <b>Nature of low-level concern or self-report</b> |
|   |

|                                  |
|----------------------------------|
| <b>Action taken and by whom?</b> |
|                                  |