# GDST School Staff Code of Conduct

## September 2026

**Applies to staff working at the Senior and Prep School, including EYFS.**

The GDST School Staff Code of Conduct operates in conjunction with other GDST and school policies and applicable specific occupational standards, including:

- Safeguarding and Child Protection Policy
- Equal Opportunities Policy
- Behaviour / Discipline Policies
- Anti-Bullying Policy
- Online Safety Policy
- Policies relating to Physical Intervention
- Disciplinary Procedure
- ICT Acceptable Use Agreement
- Communications including Social Media Policy
- Administration of Medicines Protocol
- Other codes of conduct including, where relevant, boarding house handbooks

The Code of Conduct incorporates guidance produced by the Safer Recruitment Consortium in *Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings*. Schools are recommended to refer to this guidance for more detailed advice on a range of issues including:

- Infatuations
- One to One Situations
- Transporting Pupils
- Educational Visits and After School Activities

Teachers are also expected to be aware of the standards of personal and professional conduct that form part of the UK Teacher Standards. These are used by the TRA when assessing cases of serious misconduct relating to teachers in independent schools.

## Basic Principles

The GDST expects all staff and volunteers to:

- Treat pupils with respect, dignity, sensitivity and fairness
- Value and respect all pupils as individuals
- Demonstrate that they are willing to listen to pupils' views and opinions
- Provide suitable opportunities for pupils to be involved in decision making processes
- Actively promote the fundamental British values and principles in their work
- Provide positive encouragement and praise to all pupils
- Provide an example of good conduct for pupils
- Ensure that relationships with pupils remain on a professional footing
- Avoid behaviour that could lead a reasonable observer to question their conduct, intentions or suitability to care for children
- If they have concerns about other members of staff or volunteers, to report these as directed in the *Safeguarding Policy* section 6, or, if they have concerns about the management of safeguarding in the school, to report these as directed in the *Safeguarding Policy* section 9

- Consider whether their own behaviour, or relationships or associations with others outside of the workplace (including online) may have implications for the safeguarding of children in the school, and be aware that they should disclose any potential transferrable risk in order to help schools assess the situation and make any necessary arrangements to support them and ensure children's safety
- Alert the school as appropriate to any changes to their own personal circumstances which may affect their suitability to work with children. This includes informing the Head of any medical condition, disability or medication that may affect their ability to do their job, and of any charge or summons to appear in court in relation to a criminal offence (other than minor road traffic violations). Staff and others who work with children in the early years or directly manage the setting are expected to disclose any arrests, charges, convictions, cautions, court orders, reprimands and warnings they have received which may affect their suitability to work with children (whether received before or during their employment at the setting).

## Guidelines on Acceptable Behaviour of Staff and Volunteers

**In the way you speak:**

- Do not address a pupil by any name other than his/her first or preferred name
- Do not encourage or engage in inappropriate humour or chat or gestures (e.g. swearing, sexual connotation or innuendo)
- Do not allow pupils to use inappropriate language unchallenged. Positively challenge inappropriate chat e.g. racist/ sexist comments, swearing or sexual jokes
- Avoid excessive personal comments about a pupil's appearance
- Do not dictate orders by shouting but request or provide direction to staff or pupils
- Do not enter into arguments or heated debates with, or in front of, pupils or parents

**In your conduct:**

- If you need to talk to a pupil privately, make sure that this does not put you at risk, i.e., the room should afford privacy but still be in the view of others. If any physical contact occurs in a one-to-one situation, a prompt report should be made to the DSL
- Maintain appropriate boundaries in changing, showering, boarding and residential settings. Male staff and volunteers should avoid entering girls' toilets, changing rooms or showers except in an absolute emergency and ideally accompanied by a female member of staff/volunteer. Situations where male staff have had to enter these areas should be openly discussed with the staff member's line manager as soon as practical and if necessary recorded
- Do not offer car journeys to pupils unless in an *emergency* and ideally with parental permission. Any transport should be undertaken with at least one adult additional to the driver acting as an escort. Always inform your line manager and log details and reason for the journey ASAP. Staff must ensure they have appropriate insurance in accordance with the information on school trips on the GDST staff intranet
- Take particular care when supervising pupils in a less formal setting, for instance during extra-curricular activities or on school trips
- Do not socialise with pupils online, or in person other than at school events approved by the Head (e.g., end of term celebrations, school concerts etc.). In situations where social contact arises:
    - If a pupil or parent seeks to establish contact, or if this occurs coincidentally, exercise your professional judgement and if deemed appropriate inform the Head or DSL as soon as possible.
    - Inform the Head of any existing friendship with parents of pupils which could involve social contact with a pupil which might give rise to concern
- The guidelines on social contact above also apply to former pupils until they reach the age of 21. This does not preclude contact with former pupils for school purposes via school email or social media accounts. Students due to leave the school who might wish to make contact with staff (e.g. for a reference) should be made aware of the appropriate channels for communication

- Do not make visits to pupils in their homes or receive pupils at your home unless in an *emergency*, or in response to a specific situation (e.g. where a child is not attending school and has not been seen). Any visit should have parental permission other than in exceptional circumstances
- If a home visit is considered to be necessary for any reason which is not an emergency, schools should follow the guidance in *Safer Working Practice*, including undertaking a risk assessment which must be approved in advance by the Head
- Do not single out individual pupils for special gifts or favours or unnecessary individual attention
- Do not allow any allegations made by a pupil or third party to go unchallenged, unrecorded or not acted upon.

**In your use of electronic communications/IT:**

- Do not give pupils personal contact details (e.g. e-mail, telephone numbers or address), or take personal contact details from pupils except in an emergency, (in which case a member of SLT must always be informed)
- It should not be necessary for staff to have pupils' personal contact details on a routine basis. Where staff might require such details e.g., for the organisation of school activities such as school trips, it is essential that the school provides a contact number for the pupils and it is made clear that whenever personal contact numbers are taken from pupils, the lists are destroyed after the trip and are never stored in any device belonging to a member of staff
- Exercise caution in use of social media, and ensure you are working within the confines of the GDST Communications including Social Media Policy, ICT Acceptable Use Agreement and any other GDST guidance on the use of social media
- Do not engage with pupils using personal social media channels. For example, staff must not become Facebook friends with current pupils (or former pupils below the age of 21) on personal accounts, and must not follow them, or communicate with them, on X, WhatsApp, Snapchat, Instagram or other social media platforms.
- For their own personal wellbeing as well as a matter of good safeguarding practice, staff should not engage in communication with pupils out of normal school hours, other than in an emergency, even if using school email accounts/phone numbers etc. This does not preclude students submitting work outside school hours through the usual school channels, or staff marking, commenting on and returning it if they choose to do so. Necessary organisational communications about trips, fixtures and similar are also exempt. Real-time exchanges, however (i.e. something that could be considered the digital equivalent of a phone call), even if about set work, can potentially blur professional boundaries and should be avoided.

The guidelines above do not apply in relation to the behaviour of staff when they are acting in their capacity as parents of their own children if these children are GDST pupils. Staff should refer to and observe the GDST *Guidance for Staff and Staff Parents of GDST Pupils* for further advice on appropriate behaviour and boundaries.

## Misuse of Alcohol and Drugs

GDST staff and volunteers are not permitted to misuse, or be under the influence of, alcohol or illegal drugs, on GDST premises or whilst in charge of pupils at any other venue in the UK or abroad as they are expected to act as role models in their behaviour, and the impaired judgement poses a risk to pupils' safety. Staff and volunteers must ensure their conduct is professional at all times. For the avoidance of doubt, this means:

- Staff must not drink alcohol during the normal school working day as pupils are present and under their care and supervision.
- Staff must not drink alcohol under any circumstances if they are undertaking driving duties
- Drinking alcohol - in moderation - is acceptable **only** in the following circumstances:
    - When attending school productions and events, awards evenings, and staff social events – where the alcohol is served by the school as part of the function.

- During formal, supervised and approved occasions such as a House or 6th form dinner or other similar social events where pupils aged 16 or above are sitting eating a meal and where alcohol consumption is monitored and controlled by members of staff with designated responsibility at that meal.
- On trips whilst not actively 'on duty' supervising pupils, although at *least one (possibly more, depending on the number of pupils on the trip)* member of staff must not drink any alcohol in case of emergency, and arrangements must be included in the risk assessment and signed off by the Head.

- Serving alcohol to students: any function during which alcohol is served to pupils should be risk assessed and staff must strictly follow the agreed protocols in order to supervise and limit students' alcohol consumption

*Disciplinary Action may follow if these guidelines are not upheld.*

Separate guidelines relating to pupils' alcohol consumption can be found in the GDST and individual school Drugs and Alcohol Policies.

## Physical Contact between Staff and Pupils

Safeguarding pupils requires both pupils and staff to be clear about safe and acceptable physical contact. However, it is just as important for all staff and volunteers to feel comfortable in contributing to providing a safe and caring environment for all pupils, especially for very young children and in responding to pupils' practical and emotional needs.

It is important to avoid making assumptions about whether or not a pupil wants physical contact, even with very young children, or to assume that one response fits all circumstances. Members of staff should use their professional judgement in specific situations, taking into account the situation and the pupil's needs at the time, their age, stage of development, gender, ethnicity and background. If a pupil's reaction shows that she is uncomfortable with being touched, the teacher should adjust his/her behaviour accordingly.

Whenever an adult touches a child, she/he should be aware that the action may be misconstrued or cause offence. If a member of staff believes that an incident could be misinterpreted, they should inform the Designated Safeguarding Lead immediately.

**When is Physical Contact with Pupils Acceptable?**

The paramount consideration is the need of the child. Staff should use their professional judgement to comfort or reassure children while maintaining appropriate distance and ensuring that this does not take place in private. Never do anything of a personal nature for children that they can do for themselves (e.g. help with toileting, putting on sun cream, drying after swimming or getting dressed).

There are times when it is appropriate for a member of staff/ volunteer to touch a pupil, for example:

- Young children in particular quite often need immediate physical comfort after a fall/ injury
- Helping very young children with personal care tasks (dressing/ drying after swimming)
- Strapping seat belts for young children
- Some pupils with particular disabilities
- Providing first aid treatment
- Pupil recovering from an accident (e.g., pupils using crutches or in plaster)
- Pupils who are extremely emotionally upset
- To avoid accident or injury in an emergency
- Some contact sports
- Some music, drama, dance or arts activities
- Holding the hand of a child at the front/back of the line when going to assembly or when walking together around the school

If a child needs to sit on your lap, sit the child on your lap in a quiet area, in view of other staff or pupils and ask the child to sit 'side saddle', i.e., with her legs together, folded across your lap. Do not carry a child unless absolutely necessary and try not to handle a child below the shoulder unless there is a justifiable reason for doing so.

**Responding to Pupils Making Physical Contact with You**

Should a pupil of any age seek you out for physical contact or seem to want to establish an overly familiar relationship with you *always* discuss this with your line manager. It may be that other staff have experienced similar issues with the same pupil or group of pupils.

For example, a young child needs to be encouraged to demonstrate their affection in different ways in different situations. An older pupil may have developed a "crush" on you and this needs to be sensitively and openly managed with your line manager, to avoid leaving you open to allegations of misconduct or abuse.

In **all situations** where a pupil **initiates inappropriate physical contact**, it is the responsibility of the adult to distance themselves and help the pupil understand the importance of personal boundaries. It is important that **the incident and the circumstances should be reported to the Designated Safeguarding Lead** and recorded as soon as possible, and, if appropriate, a copy placed on the confidential file relating to that pupil.

## Mandatory Reporting Duty

Under the Crime and Policing Act 2026, there is a statutory duty for anyone taking part in regulated activity with children in England to report sexual abuse when they are made aware of it. The duty requires those taking part in regulated activity to make a report if they:

- Are told about child sexual abuse, either by a child or an adult involved
- Witness sexual abuse in person
- See or hear of it in the form of images, videos or audio recordings

If an individual does not carry out the duty, they may be referred to the Disclosure and Barring Service, who will assess their suitability to work or volunteer with children in the future. Anyone who prevents or attempts to deter someone else from reporting will face criminal charges.

## Abuse of Trust

Under the Sexual Offences Act 2003, it is a criminal offence for any person over 18 in a position of trust to engage in a sexual relationship with a pupil under 18; this constitutes 'Abuse of Trust'. This is to prevent adults abusing their position of trust, for example by persuading, encouraging or intimidating pupils into certain behaviours or activities.

The law applies to anyone working in schools in a paid or voluntary capacity, including sixth formers and gap-year students, even if they do not teach the child and even if *pupils are of an age to consent to sexual activity* and applies *even if both parties consent* to the sexual relationship.

A sexual or intimate relationship between a member of staff or volunteer and a sixth former over the age of 18 is also unacceptable, even though not a criminal offence, will be dealt with under the provisions of the GDST disciplinary procedure and is likely to be considered as gross misconduct.

Schools must ensure that all staff, volunteers and gap-year students are informed about the requirements and implications of "Abuse of Trust" and that the GDST extends the requirements of staff behaviour and the consequences of non-compliance with these procedures to include inappropriate relationships with 6th formers who are 18 or over 18 years old.

## Confidentiality

Members of staff have access to confidential, personal information in order to undertake their everyday responsibilities. This information must be handled responsibly and sensitively.

It is important to:

- Avoid sharing information casually in conversation or other than on a need-to-know basis
- Avoid holding sensitive discussions about pupils in public areas, such as corridors, dining areas or playgrounds
- Keep notes and records about pupils suitably secure
- Be careful about the kinds of personal information about pupils which are on view in staff rooms, work areas and offices, especially if these areas are used or visited by parents, visitors or contractors

In areas where confidentiality may be an issue, it is important to remember that it is the welfare and safety of the pupil which is the key focus.

Children need to be educated that other members of staff may have to pass information on to others in order to help them and keep them safe. In certain circumstances, it may also be the case that pupils themselves receive a disclosure and should understand the importance of passing such information on, and who to speak to. It is important to reassure pupils, including very young children, that if their personal information is shared it will only be passed on to those who need to know and will not become common knowledge amongst other staff/pupils.

It also is essential that staff avoid being pressured into promising that they will keep information 'secret' when pupils give them information about changes in their family, their concerns, worries or other possible indications of abuse. The dangers of keeping secrets are that this approach:

- helps perpetuate the cycle of secrecy and concealment which characterises much abusive behaviour
- leads to the child feeling a greater sense of betrayal when material has to be disclosed, again reinforcing a sense that adults cannot be trusted
- will put you into an impossible situation, for example, if the child then discloses evidence of extensive abuse or a situation in which a vulnerable sibling is clearly at risk of significant harm.

## Information Sharing and Consent

In order to effectively safeguard children and enable intervention, secure and appropriate information sharing between agencies is essential. Schools have clear powers to share, hold and use information to protect children and promote their welfare, and **fears about sharing information must not be allowed to stand in the way of safeguarding.** Often, it is only when information from different sources is put together that risks can be properly identified. All staff should be proactive in sharing information as early as possible and should not assume that someone else will pass on information that they think may be critical to keeping a child safe.

Where you have reason to believe that a child may be suffering or may be at risk of suffering significant harm, you should always report your concerns to the Designated Safeguarding Lead, or, in exceptional circumstances, follow the procedures set out in Section 9 of the *Safeguarding and Child Protection Policy* ('Duty to report concerns about the management of safeguarding').

### The Information Sharing Duty

Where schools hold information relevant to safeguarding or promoting a child's welfare, and sharing it may help another agency covered by the duty to take action, they must share it. There is no threshold that has to be met first. The only exception to sharing is where sharing would be more detrimental to the child than not sharing.

**Data Protection**

A child's safety and welfare are of paramount concern, and information should not usually need to be withheld for data protection purposes. If in doubt refer to the sources of advice below.

Staff should be confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information which is sensitive and personal, and should be treated as 'special category data'. 'Safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data.

**Consent**

Consent is not required to share information under data protection law. It is just one of seven lawful bases to process information – organisations are only required to identify one applicable lawful basis to share, and it is likely that public task, legal obligation or recognised legitimate interests will be more appropriate for safeguarding and welfare purposes.

The information sharing duty reinforces this message, by making clear that the law enables and requires the sharing of information relevant to safeguarding and promoting the welfare of a child, including where consent to share and/or make a referral has not been sought or obtained.

**Transparency with children and families**

Effective engagement of children and families is critically important, particularly where accessing support will be consent based, though consent is not required to share information under the information sharing duty. All practitioners have a role in supporting this engagement, and where safe to do so, should be open and transparent about why information is shared, what might be shared and how it will be used. Building understanding and trust supports better outcomes and helps families to participate meaningfully in support and intervention.

Practitioners should exercise professional judgement in deciding when and how to inform families, taking account of any risks that transparency itself may pose. Decisions should be proportionate, clearly recorded, and focused on the best interests of the child.

**Sources of Advice**

**Seek advice promptly if you are uncertain or do not fully understand how the legal frameworks support information sharing in a particular case.** Do not leave a child at risk of harm because you have concerns about sharing information. Sources of guidance and advice include the Designated Safeguarding Lead and Legal Department at Trust Office.

Further sources of advice:

- The local authority children's social care (which can be on a no names basis)
- *Information Sharing Duty: Statutory guidance for safeguarding organisations and their practitioners* September 2026
- *What to do if you are worried a child is being abused* 2015
- *Working Together to Safeguard Children* December 2023 (there is a guide to information sharing on p.18)
- The Information Commissioner's Office (ICO), which includes ICO GDPR FAQs, sector-specific guidance on sharing information to safeguard children and young people and a lawful basis interactive guidance tool
- *Data protection in schools* February 2023