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The British School of Gran Canaria

Safe Working Practice

Policy Document



THE BRITISH SCHOOL OF GRAN CANARIA

SAFE WORKING PRACTICE POLICY

1. Scope

This policy applies to all adults who work or are in contact with students of the school whether that be in school or off-site, both during and outside of normal school hours.

2. Definitions

Throughout this document the following words, terms and phrases have the following meanings:

The school – specifically refers to The British School of Gran Canaria and includes both Tafira and South sites. Sometimes also referred to as BSGC.

Pupils, students – terms that specifically refer to the children who attend The British School of Gran Canaria.

Staff – adults who are employed and work within The British School of Gran Canaria.

Adults – refers to all adults who work, visit or come into contact with pupils of the school.

Normal school hours – refers to the school day which runs from 8.45am to 3.35pm, but also includes Enrichment time after the end of the school day from 3:50-4:50pm.

Line Manager – managers of discrete sectors of the school; includes education and support services.

Senior Manager – the heads of sector that include the Heads of each primary sector, two Assistant Heads in secondary and the Head.

Head – the head teacher of the school.

Safeguarding Team – team of staff, identified in the Safeguarding and Child Protection Policy, with responsibility for implementing the policy.

Designated Safeguarding Lead – an identified member of staff who leads the school's Safeguarding Team and its work within the school.

Comité de Empresa – are an elected staff body that represent the employees in discussions with the school and in protecting workers' rights. The Comité are an obligatory organ within all companies over a certain size in Spain and act in a similar way as unions in the UK.

3. Rationale

To clarify school expectations on working practice and assist staff in monitoring their own standards and practice, in order to reduce the risk of allegations being made against them by providing guidance on illegal, unsafe, unprofessional and unwise behaviour when working alongside children. The policy seeks to reinforce the trust placed in the BSGC staff by the school community.

The policy is based on the following documentation.

- *'Keeping children safe in education Statutory guidance for schools and colleges'*, DfE (UK) September 2018;
- *'Safer Recruitment Consortium Guidance for safer working practice for those working with children and young people in education settings'*, May 2019;
- *Ley de Protección de Menores*, Ley 26/2015, de 28 de julio.

4. Professional Conduct for All Adults

A number of key principles guide the conduct for all adults within the school setting:

- The welfare of the child is paramount.
- Staff must understand their responsibilities for safeguarding and the promotion of student welfare.
- Staff should be aware of school policies and clearly understand the expectations and procedures laid down in the Safeguarding and Child Protection Policy, the Whistleblowing Policy and this Safe Working Practice Policy.
- Staff are responsible for their own actions and behaviour and must avoid any conduct that might cause a reasonable person to question their intentions or motivation.
- Staff should work, and be seen to work, transparently.
- Staff should report promptly to their line or senior manager and seek advice if they believe they have acted in a way that may cause concern. In all such cases, the line and senior managers must inform the Head. (See Appendix 1 for process and recording forms for such concerns.)
- If staff have concerns about another adult's working practice they should inform their line manager, a senior manager or the Head. In all such cases, the line and senior managers must inform the Head.
If there are concerns about the Head, the Chair of Governor's should be contacted.
(See Appendix 1 for process and recording forms for such concerns.)
- Breaches of the law or professional guidelines could result in criminal action, including being barred from working with children.

Therefore, all staff are accountable for the way they exercise authority, manage risk, use resources, and safeguard children. All have a responsibility for keeping children safe, and protecting them from abuse, neglect and contextual safeguarding concerns. The school also has a responsibility to its employees and others to provide a safe working environment.

The guidance below cannot provide a complete checklist of what is appropriate or inappropriate behaviour. It does, however, outline what is illegal, inappropriate and inadvisable. There will be rare occasions and circumstances where staff have to make decisions or take action in the best interests of a pupil where no guidance exists. Individuals are expected to make judgements in the best interests for the welfare of the pupil and, in so doing, will be seen as acting reasonably. These incidents must be recorded and shared with their line manager.

5. BSGC Expectations and Guidelines

a. Position of Trust

Adults working with pupils are in a position of authority and trust. It is essential that the power that this position gives is understood, and that the teacher/pupil relationship is not seen as existing between equals. Whilst recognising this unequal balance of power, adults in the school must ensure that it is not used for personal advantage or gratification.

Professional boundaries must always be maintained and behaviour that could be misinterpreted should be avoided.

Any intimate or sexual activity between an adult and a pupil is a grave breach of trust, will result in disciplinary action, and will be reported to the police as a criminal offence.

b. Confidentiality

The General Data Protection Regulations (GDPR) that came into force in May 2018, governs the storage, processing and use of personal information. Staff must follow related school GDPR guidelines when considering sharing confidential and or personal information.

Staff should never use personal or confidential information for their own or another's advantage. Such information must never be referred to in casual conversation.

If a safeguarding disclosure is made, the school's policy procedures must be followed. Confidentiality must never be promised, although reassurances that the information will be treated sensitively should be given.

Any media or legal enquiries should be passed to the Head.

c. Standards of Behaviour

Staff must uphold high personal standards of conduct in order to maintain the confidence and respect of colleagues and the school community. They should not make, or encourage others to make, remarks of a sexual nature or unprofessional personal comments. Staff must not use inappropriate language or discuss personal or sexual relationships with students, other than in the appropriate setting of a whole-class PSHE lesson that forms part of the school curriculum.

Staff have a responsibility to declare any reason why they should not work, or are barred from working, with children.

d. Dress and Appearance

The school has a staff dress code, identified within the Uniform and Appearance Policy, although in areas where the roles and regulations are less well-defined, adults should wear clothing that is appropriate to the work expected. No attire should be worn that could be considered offensive, revealing or provocative.

e. Gifts, Rewards, Favouritism and Sanctions

Staff must take care to ensure that others do not construe any gift received as a bribe, nor must they lead the giver to expect preferential treatment. Small tokens of appreciation or thank-you gifts are acceptable but should not be given on a regular basis or be of significant value. Similarly, it is inadvisable for personal gifts to be given by staff to pupils or families, as this could be interpreted as grooming or as expecting a favour of some kind.

School rewards should be given in accordance with school practice, guidelines and criteria. Adults should exercise care when selecting pupils for specific activities, jobs or privileges in order to avoid perceptions of favouritism. Similar care is required with sanctions and exclusions. All methods should always be clear, fair and with agreed criteria (see Discipline and Behaviour policies).

f. Infatuations and ‘Crushes’

It is recognised that occasionally a pupil may develop an infatuation with a member of staff. In such cases, the staff member concerned should deal with the situation sensitively and firmly, and inform their line manager at the earliest opportunity.

g. Social Contact Outside School

It is recognised that staff may have genuine friendships and social contacts with parents and families of the school. Staff should be aware that professionals who seek to harm or exploit children often seek to groom them by establishing relationships and contact outside school with both the child and parents. Staff social contact should never be perceived as harmful or as exerting inappropriate influence i.e. attending a political rally or attempting to radicalise a student.

h. Communication with Children

Staff should establish safe and responsible online behaviour, following UK and Spanish advice and the school’s Acceptable Use of Technologies Policy. As with ‘real world’ interactions, communication through web-based networks and telecommunications should only be within explicit professional boundaries. Staff should not request, or respond to, any personal contact from pupils, other than that necessary in their professional role. All communications should be transparent and avoid as being interpreted as grooming behaviour. Personal contact details should never be given by staff to pupils.

If a member of staff, or any other adult who has authorised access to pupils through the school such as after-school activity supervisors or parents who help with reading, is contacted by a student this must immediately be reported to the line manager or Head. The child should be firmly and politely informed that this is not acceptable.

BSGC staff should not contact or interact on personal social networking sites with former students of the school, for at least three years after the student has left the school, and only after they have turned 18 years of age. If the school receives information to suggest a former member of staff has made such contact then the school will inform the person’s current employer and/or relevant professional controlling authorities as a matter of course.

i. Physical Contact

In a professional capacity, there are specific occasions when physical contact with a pupil is appropriate and proper. It may be required by individual needs or care plans previously agreed with the school in writing. Some students are not comfortable with physical contact; this should be recognised, and adults must seek permission in order to avoid uncomfortable or embarrassing situations.

Any physical contact should be appropriate to the pupil’s needs, limited in duration and appropriate to age, gender, ethnicity and background. Contact should never be secretive, for gratification or a misuse of authority. Any physical contact that might be misinterpreted in such a way should be reported to the line manager by the adult involved, or if observed in another.

It is recognised that some pupils may seek inappropriate physical contact; in such cases, the member of staff should sensitively deter contact and help the pupil understand the importance of personal boundaries. The incident should be reported to a senior manager at the earliest opportunity.

j. Activities Requiring Physical Contact

Curricular areas such as PE, drama and music may require physical contact to support performance or prevent accident or injury. When required, contact should only take place when necessary, be of limited duration and within a safe and open environment that is easily observed. Guidance and protocols from advisory bodies should be adhered to and any incidents that fall outside of these parameters should be reported to the line manager. Sharing clear and up-to-date guidelines with all parties concerned will help to prevent allegations of misconduct from arising.

k. Intimate and Personal Care

Nappy changing and intimate care procedures that ensure the health, safety and independence of pupils, as well as their dignity and privacy, should be established. These procedures must be open and transparent, include recording systems, and should be carried out with privacy, but in the proximity of another adult.

Changing, toileting and showering supervision must ensure health and safety procedures are followed and guarantee appropriate pupil behaviour; at the same time, supervision must allow privacy and respect, taking into account the age of the pupils.

l. Behaviour Management

Corporal punishment, degrading or humiliating punishment and demeaning or insensitive comments are unacceptable in any circumstances. Challenging behaviour should be dealt with in line with the school's behaviour strategies.

m. Use of Control and Physical Intervention

Spanish and UK law states that adults may use physical intervention to prevent a child from:

- committing a criminal offence;
- causing injury to themselves or another/others;
- damaging property;
- and to maintain good order and discipline.

Physical force should never be used as a form of punishment and should only be used where the adult judges that a child's behaviour presents a serious risk to themselves or others. Where physical intervention has taken place a record of the incident and subsequent actions should be made and communicated to the line manager.

If physical intervention is anticipated, a plan should be established which the pupil and parents are aware of, and agree to.

n. Sexual Conduct

Any sexual behaviour by a member of staff with or towards a pupil is unacceptable. It is an offense for an adult in a position of trust to engage in sexual activity with a pupil under 18 years of age and could be a matter of criminal and/or disciplinary action.

Sexual activity can involve physical contact but also includes non-contact activities such as watching or producing pornographic material.

o. One-to-One Situations

One-to-one situations can be open to allegation or complaint. To safeguard the pupil and staff, risk assessments should be completed and the interactions should be conducted in open, easily visible environments, with every effort taken to ensure that the interactions could not be interpreted as secretive.

Staff who give private classes to children should ensure that this is authorised by the parents/carers and that they take place in the presence of parents/carers. Staff must not give private classes where the parents/carers are not present, and they should never use their own accommodation for such purposes.

p. Transporting Pupils.

Staff must not offer lifts to pupils unless previously agreed with line manager. In exceptional circumstances, it may be necessary for a member of staff to transport a pupil in their private vehicle. In such cases, the member of staff must be in agreement and the line or senior manager must be informed. Wherever possible and practical, transport should be undertaken other than in private vehicles and with at least one adult additional to the driver acting as an escort.

All standard safety measures must be applied, such as seat belts, and car or booster seats for younger children.

q. Educational Visits

The school's Trips and Visits Policy outlines BSGC expectations for the organisation and running of such activities. Particular emphasis should be placed on thorough and rigorous risk assessments.

Staff must also take care that a visit's less formal discipline and informal dress and language codes are not used, or misinterpreted, as seeking inappropriate relationships or friendships.

When trips include an overnight stay, careful consideration must be given to sleeping arrangements and these arrangements communicated to parents, pupils and staff beforehand. If any change to these arrangements occurs once the trip is underway, it must be communicated at the earliest opportunity to the line manager.

r. First Aid and Medication

Expectations and procedures are set out in the school's First Aid Policy, including managing and administering of medicines. Becoming a First Aider or administering medicines can be requested of any member of staff but is not an obligation, unless it is a specific part of an employment contract. Children with ongoing medical conditions should be encouraged to take responsibility for their own medication.

s. Photography, Videos and Other Images

The school uses the recording and sharing of student images for displays, celebration, publicity and evidence of progress. Under no circumstance should staff be expected or allowed to use personal equipment to take such images. The school will provide suitable devices for staff to use in the recording these images.

Making and using images requires consent, which the school requests from parents on an annual basis. Lists of students not authorised for having their image used are available and must be consulted. Further details and guidelines are available in the school's GDPR Policy.

t. Exposure to Inappropriate Images

Extreme care must be taken to ensure that children and young people are not exposed to inappropriate or indecent images. If such images are discovered on the school's equipment, they must be referred immediately to the school's Designated Safeguarding Lead and no attempt made to view and evaluate the images.

Staff must keep their passwords confidential and not allow unauthorised access to equipment.

u. Curriculum

The curriculum for older pupils may include content that is sexually explicit or of a political or sensitive nature. Care and consideration when planning the delivery of such material is important, as is developing clear ground rules to ensure a safe learning environment for discussions and explanations. In addition, unplanned discussions and subject matter can arise unexpectedly and dealing with this requires careful consideration; advice should be sought beforehand if uncertain, and any incidents that might be interpreted as having contravened this policy, reported immediately.

v. Whistleblowing

The school has a Whistleblowing Policy, developed so that staff can bring matters of concern to the attention of senior managers, without prejudice. Concerns about the Head should be reported to the Chair of Governors. Staff must recognise their responsibility for bringing all matters of Child Protection to the attention of the appropriate authorities within, or outside the school.

All staff have the obligation to be fully aware of the school's Safeguarding a procedures and should feel able to share issues that affect their relationships with students or staff, and express concerns about a member of staff. (Appendix 12 of Child Protection and Safeguarding Policy)

Appendix 1 – Process for Recording Information and Follow-up Action on a Working Practice Concern

When a working practice concern is shared, recording the information and actions taken is important. Therefore, the steps and forms below are important in ensuring a rigorous and clear procedure.

1. When a concern is shared by a staff member, a meeting shall be held between the staff member and her manager during which information and details must be recorded on the *Initial Concern Sharing Form*, with the two parties agreeing and signing off the record. (See *Safe Working Practice – Initial Concern Sharing Form* below.)
2. If the information is initially shared with a line manager, the concern must be reported in a meeting with the Head (or Chair of Governors in the case of concerns being about the Head). The information on the first section of the *Initial Concern Sharing Form* should be used as the basis for this meeting, with the outcomes and agreed actions of the Line Manager and Head being recorded in the final section of the *Initial Concern Sharing Form*.
3. After receiving information of a concern, the Head will usually meet with the person sharing the concern to seek clarification and further details. A record of this, and any subsequent meetings, will be recorded on the form - *Concern Follow-up Meeting Record*.
4. At this point, especially for cases where the alleged infraction is serious, the Head (or Chair) and a witness from the Governors should meet with the person being accused of improprieties: to air the issue, to allow that person to defend or explain herself, and/or for the Head to communicate the corrective action if any. The defender should be granted the right to invite a member of the *Comité de Empresa* if so desired. The meeting shall be recorded on the *Corrective Action Meeting Record* form and, if possible, signed by all three parties indicating that they agree on the facts of the incident(s) and current and possible future consequences. Failing that, the person being accused should be asked to sign that they attended the meeting and heard and understood the charges.

The purposes of this meeting are two: to give the staff member the greatest possible chance to correct their professional behaviour and be a successful member of the BSGC community, or if necessary, to help to build a paper trail that could document an eventual dismissal for cause.

5. The Head will record all concerns from each academic year on the *Safe Working Practice Annual Record Sheet* – see below.

Safe Working Practice - Initial Concern Sharing Form

Line Manager	Date
Person Sharing Concern	
Brief Outline of Concern	
Signed by person sharing concern	
Signed by Line Manager	
Concern Shared with Head or Chair of Governors	Date
Action	
Signed by Line Manager	Date
Signed by Head/Chair of Governors	Date

Safe Working Practice – Concern Follow-up Meeting Record

Meeting Participants	Date
Summary of Meeting	
Agreed Actions	
Signed by person sharing concern	Date
Signed by Head/Chair of Governors	Date

Safe Working Practice –
Corrective Action Meeting Record

Meeting Participants	Date
Summary of Meeting	
Agreed Actions	
Signed by staff member	Date
Signed by Governor	Date
Signed by Head/Chair of Governors	Date

