

The American School in London

Standards for Safe Working Practices

The current version of any policy, procedure, protocol or guideline is the version held on the ASL website. It is the responsibility of all employees to ensure that they are following the most up-to-date version.

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| Responsible person | Director of Safeguarding and Compliance |
| Approved by | Board of Trustees |
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Guiding principles

The welfare of ASL students is of paramount importance. All adults working in the ASL community have a unique opportunity to interact with children and young people in ways that are both affirming and inspiring. While it is not possible to describe every possible situation that may arise, this guidance is principles based and provides examples of behaviors that constitute safe working practices and those that should be avoided.

This guidance is to be read alongside the standards listed under the heading “PGC, appraisals and probationary period” for faculty, assistant teachers, associates and support staff, as well as the handbooks and codes of conduct published on the [ASL policies, forms and documents page](#).

For faculty members, particular attention is drawn to the definition of professionalism included with Teaching Standard 2 under the ASL Teaching Standards and Professional Code of Conduct that states “The teacher maintains high standards of ethics and behavior, models ASL core values, adheres to statutory frameworks

which outline professional duties and responsibilities, and demonstrates adherence to fundamental British values. The teacher maintains a positive and professional demeanor with students, colleagues and families, participates in ongoing professional development opportunities that enhance practice, and develops effective professional and collaborative relationships with colleagues, sharing knowledge and skills with the ASL community”.

In all interactions with students, adults are expected to demonstrate consistently high standards of personal and professional conduct, treating students with dignity, building relationships rooted in mutual respect, and at all times observing proper boundaries appropriate to a teacher’s professional position.

ASL is committed to the statutory guidance in Keeping Children Safe in Education (KCSiE), and our safe working practices draw directly from that guidance.

The guidance aims to:

- safeguard and promote the welfare of students;
- help adults establish the safest possible learning and working environment for students;
- assist all adults at ASL to carry out their duties safely and responsibly, and to monitor their own standards and practice;
- set clear expectations of behavior;
- offer a supportive framework within which adults may perform their duties;
- minimize the risk of misplaced or malicious allegations against those within the ASL community;
- prevent the misuse or abuse of positions of trust;
- provide guidance where an individual’s suitability to work with students has been called into question and, where misconduct may have occurred, inform disciplinary decisions;
- support the ASL community in giving a clear message that unlawful or unsafe behavior is unacceptable.

Definitions

For the purpose of this document an “adult” is any person who undertakes duties on behalf of the School; a “student” refers to those enrolled at ASL, former students below the age of 18, and children visiting from other schools or institutions; an “administrator” is a member of the senior leadership team or an assistant principal, and “guardians” are the legal parents/guardians of students.

Responsibilities of the individual

Adults have the responsibility to safeguard and promote the welfare of students.

Adults should:

- have a clear understanding of the nature and content of this document, and use it to inform, monitor and review their practice continually;
- discuss any uncertainties or confusion with an administrator;
- always act, and be seen to act, in students' best interests;
- work, and be seen to work, in an open and transparent way;
- apply the same professional standards, regardless of a student's culture, disability, gender, language, racial origin, religious belief, sexual orientation or identity;
- report any circumstance in which a student's safety may be compromised, whether heard or observed;
- understand that this guidance is not exhaustive and that they are responsible for their actions and behavior and should avoid any conduct that may lead any reasonable person to question the adult's suitability to continue to work with students.

Responsibilities of the School

The school administration will:

- safeguard and promote the welfare of students;
- foster a culture of openness and support;
- ensure that systems are in place for concerns regarding students and/or adults to be raised;
- ensure to the best of its ability that adults are not placed in situations that render them vulnerable;
- provide a safe working environment for adults and guidance about safe working practices;
- ensure fair and proper procedure is followed should allegations be made;
- ensure that all adults are aware of expectations, policies and procedures;
- review this document regularly in order to ensure that it is fit for purpose and clearly and effectively communicate any necessary amendments.

Standards for Safe Working Practices

1. Privacy

Adults should:

- treat information they receive about students in a discreet and sensitive manner;
- be clear about the circumstances when information should be shared, bearing in mind that any indication that a child may be in danger, including from self-harm, must be reported;
- seek advice from their administrator if they are unclear about information that may be shared;

- report any concerns or allegations promptly to a member of the designated safeguarding team (see the ASL Safeguarding and Child Protection Policy) (ideally, within two hours);
- ensure any media or legal inquiries are passed to their administrator;
- be aware that the storing and processing of personal information about students is governed by the UK General Data Protection Regulations (UK-GDPR). Any queries relating to this should be addressed to the school's data protection officer at dpo@asl.org.

2. Professional judgment

Adults should:

- take responsibility to understand and act in accordance with guidance, policies and protocols that are intended to help support their professional practice; these include the Safeguarding and Child Protection Policy, ICT and Internet Responsible Use Agreement, Social Media Guidelines, ASL Teaching Standards along with this document and other documents that may be specific to their role;
- ensure that their interactions with students take place well within the boundaries of a respectful professional relationship;
- take care that their demeanor, language or conduct does not give rise to comment or speculation;
- consider whether their actions are warranted, proportionate and safe, and applied equitably;
- discuss proposed actions with their administrator when the necessary professional judgment is unclear and/or specific guidance is not available (either in this document, the Teaching and Learning Handbook, or other departmental protocols or procedures);
- report immediately to the DSL any misunderstandings, accidents, threats or actions that may be misinterpreted involving the individual, other adults and/or students;
- be aware that inappropriate behavior in their personal lives may affect their professional reputation and/or their suitability to work with children.

Adults should not:

- behave in a manner that would lead any reasonable person to question the adult's suitability to work with children;
- make, or encourage others to make, unprofessional comments that scapegoat, demean or humiliate or that might be interpreted as such.

3. Power and positions of trust

Adults should:

- report information that may indicate a child protection concern, and refrain from making promises of absolute confidentiality if a student confides such

information;

- reassure children that their concerns are taken seriously and handled appropriately;
- maintain appropriate professional boundaries and record and report to their administrator any incident that might be misinterpreted by others;
- be aware that it is a criminal offense for a person aged 18 or over in a specified position of trust to engage in sexual activity with a child under the age of 18, or with any student at ASL even if over the age of 18.

Adults should not:

- use their position to gain access to information for their own or others' advantage;
- use their position to intimidate, bully, humiliate, threaten, coerce or undermine students;
- use their status and standing to form or promote relationships that are of a sexual nature or that may become so.

4. Dress and appearance

Adults should:

- wear professional clothing that is appropriate to their role and for the tasks and the work they undertake.

5. Gifts, rewards and favoritism

Adults should:

- use a clear and open process when selecting students for or excluding students from school activities in order to avoid perceptions of favoritism or injustice. Wherever practicable, these processes should be undertaken and agreed upon by more than one adult;
- be aware that if a student is selected for paid work that the nature and hours of the work must be clear and transparent, the pay must be at the approved published rate and the work must be authorized in accordance with school procedures;
- be aware that giving gifts can be misinterpreted as gestures either to bribe, groom or show preferential treatment to a student or parent;
- be aware that the receipt of significant gifts from students and/or guardians may confuse professional boundaries. Adults should use their judgment as to whether the nature and intent of the gift is appropriate and inform their administrator if the adults are concerned that this may be open to misinterpretation.

Adults should not:

- give gifts in a manner that may be construed as favoritism, secretive or in a manner that may be regarded as inappropriate;
- give valuable gifts to a student without the prior approval of their

administrator.

6. Communication with students

Adults should:

- observe the school's [ICT Responsible Use Agreement \(Personnel\)](#) and other guidelines;
- ensure that they promote safe and responsible online behavior;
- ensure that communications are clear and transparent and open to scrutiny;
- ensure that personal social networking sites and blogs follow our [Social Media Guidelines](#);
- avoid communications where behavior may be construed as grooming;
- aim to utilize school-supplied phones for school purposes wherever possible. Text messaging should be used only as part of an agreed communication protocol with their administrator, to whom the texts should be made available upon request.

Adults should not:

- use personal email addresses when communicating with students or provide students with personal contact details (such as personal phone numbers, home addresses, email addresses or social media personal details) unless approved by an administrator.

7. Infatuations

Adults should:

- report to their administrator and record any incidents or indications (verbal, written, physical or electronic) that suggest a student may have developed an infatuation with an adult;
- ensure that interactions between students and adults, whether in person or via technology, take place within clear and transparent professional boundaries, are open to scrutiny and are never secretive;
- always seek support immediately from their administrator if a student's behavior makes the adult uncomfortable.

8. Social contact

Adults should:

- feel able to participate socially in an inclusive parent community, while maintaining appropriate boundaries during any social contact with students and/or their families;
- ensure that pre-existing relationships or any natural and understandable relationships that develop over time between adults and ASL students and/or guardians, are open and transparent and do not conflict with the individuals' professional responsibilities or lead to accusations of favoritism or bias;

- inform their administrator or a member of the safeguarding team of any relationship or social contact an adult has with a student or a parent that may give rise to concern.

9. Alcohol and drugs

Adults should:

- be mindful of their professional standing when consuming alcohol at social events attended by students or their families;
- seek support from an administrator (including Human Resources or the DSL) if the adult believes prescribed medication or substance misuse may affect the adult's ability to perform particular duties safely.

Adults should not:

- use or be under the influence of illegal drugs or alcohol when responsible for students;
- buy students alcoholic drinks or permit the consumption of alcohol during school activities;
- give students any medication or drugs of any kind outside of the approved school protocols.

10. Physical contact

Adults should:

- be aware that even well-intentioned physical contact with any individual may be misconstrued by students, observers or by anyone to whom this action is described;
- be prepared to report and explain actions, and accept that all physical contact is open to scrutiny;
- ask for and receive permission before making necessary physical contact with students in order to correct positioning while coaching sports or teaching classes, such as drama, music or PE;
- conduct activities that may necessitate physical contact, such as drama or sports coaching, where they can be seen by others;
- take particular care if conducting an activity that may necessitate physical contact in a one-to-one setting, such as an individual music lesson. Such activities must be undertaken always in a place with public visibility, for example in a room where there is a glass panel in the door through which both the adult and the student are visible;
- treat students with dignity and respect, and avoid contact with intimate parts of the body;
- use minimum force for the shortest period necessary where physical intervention is required, and record and report the incident to their administrator as soon as possible after the event;

- be aware of gender, gender identity, cultural, developmental, medical or religious issues that may need to be considered prior to initiating any physical contact regardless of context.

Adults should not:

- use physical force as a form of punishment; such actions are inappropriate and unlawful.

11. Self care

Adults should:

- avoid visually intrusive behavior;
- announce their intention to enter before accessing changing rooms;
- avoid physical contact when students are in a state of undress unless children need help;
- ensure that any assistance undertaking personal care tasks is appropriate to the student's age and developmental needs, avoiding intervention when the child is able to complete the task unaided.

Adults should not:

- use the lower school bathrooms designated for students;
- change in the same place as students, unless an adult is required to monitor a public changing area;
- shower with students;
- be with students in changing cubicles.

12. Sexual contact

Adults should not:

- have sexual relationships with students, as this will always be inappropriate and will generally constitute a criminal offense (see below);
- have any form of communication with or about a student that may be interpreted as sexually suggestive or provocative, i.e., verbal comments, letters, notes, emails, phone calls, texts, images, physical contact;
- discuss their own sexual relationships with or in the presence of students.

Adults should:

- ensure that their relationships with students take place clearly within the boundaries of a respectful professional relationship;
- be aware that it is a criminal offense for any adult to:
 - engage in sexual activity with or in the presence of a child under the age of 16;
 - cause or incite a child under the age of 16 to engage in or watch sexual activity;
- be aware that it is a criminal offense for an adult in a specified position of trust to engage in sexual activity with a child under the age of 18.

13. Students in distress

Adults should:

- consider the way in which they offer comfort and reassurance to a distressed student, and do so in a way that is age appropriate for the student. Not all students seek or need physical comfort when distressed;
- explain their actions to the student;
- take care when offering reassurance in one-to-one situations, and always record and report to their administrator such actions.

14. One-to-one situations

Adults should:

- consider carefully the needs and circumstances of the student before arranging a one-to-one situation;
- avoid meeting with a student in a private setting;
- keep doors open during one-to-one situations, whenever possible, and especially when there is no public visibility.

Adults should not:

- use signs, such as “engaged” or “do not disturb” or engage in any behavior that may imply secrecy when meeting alone with students;
- mask or obscure vision into rooms.

15. School-approved tutoring and enrichment lessons

Adults should:

- follow the policies and procedures as outlined in the Tutoring Guidelines and Enrichment Lessons Guidelines, only provide tutoring and enrichment lessons to approved students;
- ensure that guardians have given their consent before the tutoring or enrichment lessons take place.

Adults should not:

- undertake tutoring assignments or enrichment classes on campus unless approved by the DSL, who should be notified of where the class is to take place (whether occurring on or off campus);
- offer tutoring or enrichment lessons on campus during school hours, 7:55 am-3:30 pm, after 7 pm on weekdays, outside of designated times on weekends, or during school holidays. Tutoring or enrichment lessons may take place between 3:30 and 7 pm on weekdays (4-7 pm on Wednesdays); and on weekends, 10 am-4 pm.

16. Other work outside of ASL

Adults should:

- consider the appropriateness any such additional work according to the nature of their position at ASL, especially if this involves or is likely to involve

- contact with students and/or their families;
- discuss with their administrator immediately any potential issues that may arise;
- be aware that complaints or concerns that come to the school's attention when engaged in work for another employer may have an impact on their role at ASL if the individual's suitability to work with children comes into question;
- avoid additional work that involves meeting ASL students in the adult's own home;
- avoid additional work that involves contact with ASL students whom they teach; when unavoidable, prior agreement must be sought from the adult's administrator and the student's guardians.

17. Meeting students off campus (see "School trips" section, below)

Adults should:

- whenever possible, work with students within the school building; where this is not possible, be prepared to explain the circumstances that necessitated working off campus;
- avoid meeting students off campus without other members of the ASL community present (such as colleagues, other students or the student's guardians);
- seek permission from their administrator should a home visit become necessary, and provide detailed records following the visit, including times of arrival and departure and the work undertaken;
- request permission from guardians in the rare situations where one-to-one contact with students off campus is necessary before the meeting takes place;
- avoid meeting with a student in remote or secluded areas and whenever possible have the student's parent or a colleague close by;
- inform their administrator if regular meetings with a student off campus are necessary and be prepared to provide a full explanation of the circumstances including meeting times, travel arrangements, etc. Such arrangements must be approved by the DSL;
- report to their administrator any behavior or situation that gives rise to concern.

18. Transporting students

Adults should not:

- offer a lift to a student, unless this has been brought to the attention of the adult's administrator and has been agreed with the student's guardians.

Adults should:

- record and report to their administrator any emergency situation where it was not possible to make the agreement above and where not having given a lift might have placed the student at risk.

19. School trips

Adults should:

- have parental consent for any off-campus school trips;
- undertake risk assessments in line with the school's School Trips Policies and Procedures Manual;
- have more than one adult present in off-campus activities, unless otherwise agreed with their administrator;
- ensure that appropriate student-chaperone ratios are observed for the age group;
- ensure that at least two adults are present when checking student rooms during overnight trips;
- ensure that, when parent volunteers or other chaperones who are not employees accompany school trips, the required vetting checks have been discussed with the personnel manager and that these have been completed before individuals are allowed to participate.

Adults should not:

- share bedrooms with students unless a dormitory or camping situation is involved and the arrangements have been previously discussed with guardians, students and the adult's administrator;
- use illegal drugs or consume alcohol on school-related trips with students or when responsible for students.

20. Photography and video

Adults should:

- be clear about the purpose of the activity when videos/photographs are to be taken and about what will happen to the images when the activity is concluded;
- be able to explain and justify images of students in their possession;
- report to the DSL any concerns about inappropriate or intrusive photographs found.

Adults should not:

- take covert images or take images in situations that may be construed as being secretive or suggestive.

21. Access to inappropriate materials and the internet

Adults should:

- follow the school's [ICT Responsible Use Agreement \(Personnel\)](#) on the use of IT/communication equipment;
- do their utmost to ensure that students are not exposed to unsuitable material on the Internet;

- use pin codes and passwords on personal devices, such as mobile phones and tablets, to prevent students from accessing emails, links or personal data should they attempt to do so;
- ensure that any films, images or other materials shown to students are not only age-appropriate, but also sensitive to students' emotional and developmental needs, consulting with colleagues, and, where necessary, guardians where there is ambiguity;
- report to their administrator and record if a student is discovered accessing inappropriate material;
- report to the DSL any inappropriate or intrusive images found.

Adults should not:

- access pornography and/or other inappropriate material in the workplace, or on ASL equipment;
- bring personal equipment (including mobile phones, USB, or external hard drives, tablets, etc.) containing inappropriate images or links into the workplace.

22. Curriculum

Adults should:

- follow divisional guidelines with regards to resource materials and do their utmost to ensure that materials that are sexually explicit or of a sensitive nature are not misinterpreted, but clearly relate to the learning outcomes identified in the unit plan;
- ensure that resource materials are not only age-appropriate but also sensitive to the emotional and developmental needs of students;
- collaborate and consult with their administrator and colleagues, and, where necessary, guardians if there is any doubt regarding the suitability of resource materials.

23. Recording and reporting concerns

Adults should:

- understand that the Whistleblowing Policy aims to provide guidance to employees who wish to disclose information about malpractice in the workplace;
- attend Safeguarding and Child Protection training, and read the Safeguarding and Child Protection Policy to ensure that they understand their responsibilities in this area;
- take responsibility for recording and reporting to a member of the safeguarding team any incident where the adult has concerns about any matter pertaining to the welfare of an individual in the workplace in line with the statutory guidance outlined in *Keeping Children Safe in Education (71-73)*;

- Understand their responsibility to voice low level concerns appropriately and in line with the statutory guidance outlined in *Keeping Children Safe in Education* (424-429).

Recording and reporting actions, decisions and concerns relating to the safeguarding of students may require using established formal procedures (such as the reporting procedure described in the Safeguarding and Child Protection Policy); however, where there is no formal procedure or procedures for dealing with a particular situation, a common-sense approach should prevail. If in doubt, it is best to discuss the situation with the DSL or another member of the safeguarding team. In other situations, making other individuals (such as guardians or colleagues) aware of your actions or intended actions will promote a culture of openness and transparency that will minimize the risk of misunderstanding and misinterpretation. At all times, ensuring the welfare of students must be, and be seen to be the School's first priority.