



Staff Code of Conduct Policy

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This Policy will be reviewed by the Trust Annually. Next review date:	August 2027 (annual review)

Updates since last edition

5 & 5.3 Safeguarding and Child Protection	Updated safeguarding provisions and low-level concern examples to reflect emerging online, AI-related and technology-enabled safeguarding risks.
7 & 8 Confidentiality and Use of Technology	Strengthened expectations around confidentiality, use of AI tools, and unauthorised recording, monitoring, and information capture.
4 Reporting Breaches of Standards of Good Conduct	Added reference to the early and constructive resolution of workplace concerns.

Appendix 1 ICT Acceptable Use Policy	Updated provisions covering AI technologies, wearable devices, smart glasses and unauthorised recording and storage of information.
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1. Introduction

The overriding expectation is that employees, volunteers and those engaged to work in the Trust will adopt the highest standards of personal integrity and conduct both in and outside work. As role models, they must behave, through their words and actions, at all times in a manner which demonstrates their suitability to work with children and which upholds the standards and reputation of the Trust.

This code of conduct provides an overall framework of the behaviours expected of individuals who work in the Trust. The code is not intended to be exhaustive, and individuals should use sound professional, ethical and moral judgements to act in the best interests of the Trust, its pupils and its community.

This code should be read in conjunction with:

- other Trust policies and procedures
- the terms of any employment or service contracts and agreements
- relevant professional standards

2. Scope

This Code applies to all individuals employed by the Trust or those engaged by the Trust, including:

- Relief/casual staff
- Supply staff
- Third parties providing services to the Trust (including the self-employed)
- Voluntary workers

For the purpose of elements of this code applying to all individuals set out above, they are collectively referred to as “workers”.

3. Roles and responsibilities

3(i) Governing Committee/trustees

It is the responsibility of the Governing Committee/Trustees to establish and monitor standards of conduct and behaviour within the Trust schools, including the establishment of relevant policies and procedures.

Governors and Trustees are subject to their own Code of Conduct.

3(ii) Headteacher, Central Trust Senior leaders and line managers

It is the responsibility of the headteacher and line managers to address promptly any breaches of acceptable conduct and behaviour, using informal procedures where possible but implementing formal procedures where necessary.

* Note 1: The term ‘Headteacher’ is used to identify the person with the responsibilities of headship within each Academy, who may be referred to locally as Head of School, Headteacher, Executive Headteacher or, in the case of the Central Trust Team, the Executive leader.

3(iii) Employees

It is the responsibility of all employees to familiarise themselves with, and comply with this Code.

Any breaches of this Code of Conduct will be regarded as a serious matter which could result in disciplinary action, and in certain circumstances could potentially lead to dismissal.

3(vi) Engaged Workers/Volunteers

Engaged workers and volunteers are required to familiarise themselves with, and comply with this Code insofar as it is relevant to their role. Any breaches of this Code may result in the engagement of the worker/volunteer being terminated, in accordance with any applicable terms of engagement.

4. Reporting Breaches of Standards of Good Conduct

4(i) Open Culture and Early Resolution

The Trust promotes an open environment where individuals feel confident raising issues constructively without fear of recrimination. Concerns should be raised and resolved at the earliest opportunity. Workers are expected to engage constructively in informal conversations, mediation, or facilitated resolution processes where appropriate before matters escalate to formal procedures.

4(ii) General Duty to Report Breaches

All employees, engaged workers, and volunteers must bring to the attention of an appropriate manager, Governing Committee member, or Trustee any impropriety, deficiency in service provision, or breach of Trust policy or this Code.

4(iii) Protected Disclosures Regarding Sexual Harassment

Disclosures made by a worker regarding actual, alleged, or suspected sexual harassment automatically qualify as **protected disclosures** under statutory whistleblowing provisions. Any worker who reports sexual harassment in good faith is legally protected from dismissal, victimisation, or any other workplace detriment. Concerns should be raised directly through the process set out in the Trust Whistleblowing Policy

4(iv) Formal Escalation and Policy Access

Where informal resolution is unsuitable or where formal reporting pathways are necessary, individuals should refer to the Trust Whistleblowing Policy, which is available from the school office and the Trust website.

5. Safeguarding and Child Protection

It is essential that all adults working with children understand that the nature of their work and the responsibilities related to it place them in a position of trust. Adults must be clear about appropriate and safe behaviours for working with children in paid or unpaid capacities, in all settings and in all contexts, including outside work.

The relevant requirements specific to safeguarding and child protection are set out in:

- the school's Child Protection and Behaviour Management Policies and Procedures
- the Department for Education Statutory Guidance "Keeping Children Safe in Education" (as amended from time to time).

This is the key statutory guidance which all employees must follow, and all employees and volunteers must, as a minimum, read Part 1 of that Document. *Staff working in central services who do not have any contact with pupils may read the abridged version at Appendix A*

"Guidance for Safer Working Practice for those working with Children and Young People in Education Settings" issued by the Safer Recruitment Consortium sets out key expectations for adult interactions with children and young people – the full guidance is available [here](#).

In addition, individuals should be aware that it is a criminal offence (s 16. Sexual Offences Act 2003) for a person aged 18 or over to have a sexual relationship with a child under 18 where that person is in a position of trust in respect of that child, even if the relationship is consensual.

Individuals should familiarise themselves with these documents, in conjunction with the body of the Code of Conduct and other relevant Trust policies and procedures.

5.1 Identifying and Reporting safeguarding concerns

Safeguarding concerns cover a wide spectrum from serious issues where a child is harmed or is at risk of harm to lower-level concerns where practice or behaviour is inappropriate, undesirable or not in keeping with usual expectations.

As part of our whole Trust approach to safeguarding, we promote a culture of openness, trust and transparency in which safeguarding is a shared responsibility, and our values and expectations are lived, monitored and reinforced by all staff. **In this context, everyone is expected to report any safeguarding concerns, no matter how small, as soon as they arise.** This includes an expectation of self-reporting where an individual finds themselves in a situation which may be, or appear to be, compromising or where they have fallen short of expectations.

Who to report to

Concerns should be referred to the headteacher or Senior Leader for employees working in central services (or where the concerns relate to the headteacher, to the Chair of Governors or equivalent) or to the Designated Safeguarding Lead (who will share information with the headteacher or chair of governors). In a situation where there is a conflict of interest in reporting the matter internally, it should be reported directly to the local authority designated officer(s) (LADOs).

5.2 Where children have been harmed or may be at risk of harm

Where a concern or allegation suggests that an adult has:

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

the matter must be dealt with in accordance with the Dealing with Safeguarding Allegations against Adults Procedure, as required by Keeping Children Safe in Education.

5.3 Low Level Concerns Policy

A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ - that an adult may have acted in a way that is inconsistent with the code of conduct, including inappropriate conduct outside of work (see 6. below), but which does not meet the “harm test” as set out in 5.2.

Examples of such behaviour could include, but are not limited to:

- being overly friendly with children
- having favourites
- taking photographs of children on their mobile phone, contrary to Trust/school policy
- crossing boundaries between familial and employment/volunteering roles
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
- humiliating children
- use of unauthorised recording devices, wearable technology or AI-enabled tools;
- creating, sharing or storing images, recordings or transcripts relating to pupils or staff outside approved Trust/school systems
- using artificial intelligence platforms in a manner which risks the confidentiality or security of pupil, staff or Trust/school information.
- Misuse of social media and other online applications.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

Our objective is to protect our young people and adults by identifying issues and providing advice, direction and support to improve our collective and individual practice.

In this regard, we want all adults, as well as pupils, to feel empowered and confident to report all concerns in the knowledge that they do so on a neutral basis and that issues raised will be dealt with sensitively and proportionately.

All low-level concerns will be taken seriously, investigated and may be dealt with in the following ways as appropriate:

- Additional support and/or training.
- Provision of advice, guidance or direction either verbally or in writing.
- Through performance management, or in cases of serious poor performance, the Capability Procedure.
- Where there has been a breach of the code of conduct or disciplinary rules, through the Dealing with Safeguarding Allegations against Adults and/or Disciplinary Procedures.

To support our objectives, confidential records of all reported concerns and actions taken will be kept to identify any patterns, enable monitoring and to facilitate improvement in policy and practice.

6. Conduct outside work

The Trust recognises and respects individuals' right to a private life without interference. However, individuals connected with the Trust must not act in a way that would bring the Trust, or their profession, into disrepute or that calls into question their suitability to work with children. This covers:

- relevant criminal offences, such as violence or sexual misconduct
- inappropriate behaviour such as lewd or offensive action
- negative comments about the Trust/school or its community
- personal relationships which may present a risk by association

Workers must disclose to the school (Headteacher and in the case of the Headteacher to the Chair of Governors) immediately, any wrongdoing or alleged wrongdoing by themselves (regardless of whether they deny the wrongdoing/alleged wrongdoing), including any incidents arising from alternative employment or outside of work which may have a bearing on their employment or engagement with the Trust.

Employees should also refer to the expectations set out in their contract of employment and the disciplinary procedures.

Where a person engaged to work at the Trust is in a close personal relationship with a person who may pose a risk to children (e.g. a registered sex offender), this must be disclosed to the headteacher on a confidential basis so that appropriate measures can be put in place to protect the worker and the Trust.

In addition, any worker engaged in a post covered by the Childcare (Disqualification) Regulations 2009 ("the Regulations") must immediately inform the Trust of any events or circumstances which may lead to their disqualification from working in the post by virtue of the Regulations. The statutory guidance relating to Disqualification under the Childcare Act 2006 can be found at the following link:

<https://www.gov.uk/government/publications/disqualification-under-the-childcare-act-2006/disqualification-under-the-childcare-act-2006#disqualification-under-the-childcare-act>.

6.1 Secondary employment

The Trust does not seek to unreasonably preclude employees from undertaking additional employment, but employees are required to devote their attention and abilities to their duties at the Trust during their working hours and to act in the best interests of the Trust at all times. Accordingly, employees must not, without the written consent of the Trust, take secondary employment or engagement once in post. This does not apply to those

whose net average weekly earnings are at or below the lower earnings limit, although they should advise the Trust of any secondary employment so that the employer can have regard to any responsibilities it may have in relation to the Working Time Regulations.

Secondary employment or engagement must not interfere with the performance of the employee's duties with this employer. In addition, employees should not engage in business or employment activities which are incompatible with or might conflict with the Trust's interests.

7. Confidentiality

Confidential information can take various forms and be held and transmitted in various ways, e.g. manual records (files, reports and notes), verbal discussions and electronic records. As a general rule, all information received in the course of employment or whilst volunteering/being engaged by the Trust, no matter how it is received, held or transmitted, should be regarded as sensitive and confidential and must not be disclosed or divulged within or outside the Trust other than in accordance with the requirements of the role and/or where specific permission has been provided.

NOTE: All workers must be aware that they are obliged to disclose information relating to child protection issues and should make it clear to the individual either that confidentiality cannot be guaranteed and/or decline to receive the information and direct them to a more appropriate person e.g. the Designated Safeguarding Lead.

The Trust is committed to being transparent about how it collects and uses the personal data of its workforce, and to meeting its data protection obligations. The Data Protection Policy sets out the Trust's commitment to data protection, and individual rights and obligations in relation to personal data. Workers must not input confidential, personal, safeguarding-sensitive or commercially sensitive information into public artificial intelligence platforms unless specifically authorised by the Trust and subject to appropriate safeguards.

Any actual or suspected/potential breach of data protection must be reported immediately to the Trust's Data Protection Officer.

7(i) Preserving anonymity

The Education Act 2011 contains reporting restrictions preventing the publication of any material which could lead to the identification of a teacher in the event of an allegation against them made by a pupil at the same Trust. Any individual who publishes material which could lead to the identification of the employee who is the subject of an allegation of this kind may be subject to criminal and disciplinary action, up to and including dismissal.

"Publication" includes any speech, writing, relevant programme or other communication in whatever form, which is addressed to the public at large or any section of the public. For the avoidance of doubt, this includes publishing details of an allegation or other information on a social media site which could lead to the identification of the teacher.

7(ii) Media queries

Workers must not speak to the press or respond to media queries on any matter relating to the Trust. All media queries should be referred immediately to the Headteacher/Chair of Governors.

8. Use of computers, email and the internet and social media

The Trust recognises that electronic devices and media are important tools and resources in an educational context and can save time and expense.

Those using the Trust's equipment and networks are expected to do so responsibly and to comply with all applicable laws, policies and procedures, and with normal standards of professional and personal courtesy and conduct.

Personal use of social media and other online applications which may fall into the public domain should not be such that it could bring the Trust into disrepute and/or call into question an individual's suitability to work with children.

Detailed expectations are set out in Appendix [1]. [EFSPT Acceptable Usage Policy 2026](#)

Any worker who is unsure about whether or not something he/she proposes to do might breach that policy or if something is not specifically covered in the policy, should seek advice from their line manager or a member of the Senior Leadership Team.

9. Relationships

9(i) The internal Trust community

All workers are expected to treat members of the Trust community with dignity and respect and to work co-operatively and supportively. Bullying, Harassment and Victimisation will not be tolerated (see also the Trust's Grievance Procedure).

9(ii) The wider community and service users

All workers have a responsibility to ensure courteous, efficient and impartial service delivery to all groups and individuals within the community. No favour must be shown to any individual or group of individuals, nor any individual or group unreasonably excluded from, or discriminated against, in any aspect of Trust business.

9(iii) Contracts

All relationships of a business or private nature with external contractors, or potential contractors, must be made known to the Governing Committee. Orders and contracts must be in accordance with standing orders and financial regulations of the Trust. No special favour should be shown to businesses run by, for example, friends, partners or relatives in the awarding of contracts, tendering process or any other business transaction.

9(iv) Protection Against Third-Party Harassment

The Trust's harassment prohibitions and duty of care extend to all external interactions. Harassment of staff by third parties including parents, carers, delivery personnel, contractors, or school visitors is strictly prohibited.

Staff who experience or witness harassment or abusive behaviour from a non-employee during the course of their duties must report the incident to their line manager or Headteacher immediately. The Trust will take all reasonable steps to protect employees, including issuing formal conduct warnings to visitors, banning abusive individuals from school premises under Section 547 of the Education Act 1996, or terminating commercial contracts.

9 (v) Gifts and Hospitality

Workers may not accept any gift or hospitality from a person intended to benefit from their services (or those whom they supervise) or from any relative without the express permission of the Trust.

Where an outside organisation wishes to sponsor or is seeking to sponsor a Trust/school activity, whether by invitation, tender, negotiation or voluntarily, the sponsorship should always be related to the Trust/school's interests and never for personal benefit.

The Trust's policy on gifts and hospitality is available from the school office/Trust website. Any breaches of this policy may lead to disciplinary action.

9(vi) Neutrality

Workers must not allow their own personal, political, religious or other views and opinions to interfere with their work. They are expected to be neutral in their views in the course of their work at the Trust/school and to present a balanced view when working with pupils.

10. Close personal relationships at work

Close personal relationships are defined as:

- workers who are married, dating or in a partnership or co-habiting arrangement;
- immediate family members, for example parent, child, sibling, grandparent;
- other relationships, for example extended family (cousins, uncles, in-laws), close friendships, business associates (outside the Trust).

It is also recognised that situations arise where close personal relationships can be formed at work.

10 (i) Applicants

Applicants are required to disclose on their application form if they have a close personal relationship with any person connected with the Trust.

Applicants are asked to state the name of the person and the relationship. Failure to disclose such a relationship may disqualify the applicant.

Workers should discuss in confidence with their headteacher/line manager any relationships with an applicant.

It is inappropriate for any worker to sit on an appointment panel for those with whom they have a close personal relationship.

10(ii) References

It is expected that, for those working with children, professional references, and not personal references, are sought and provided. All references provided on behalf of the Trust must be signed by the Headteacher (Chair of Governors for the Headteacher).

Anyone agreeing to act as a personal referee must make it clear in the reference that it is provided as a personal or colleague reference and is not a reference on behalf of the Trust. Personal or colleague references must not be provided on Trust/school headed paper.

10(iii) Prevention of Sexual Harassment

The Trust is committed to taking all reasonable steps to prevent sexual harassment across all Trust academies. All staff have the right to work in an environment free from unwanted conduct of a sexual nature. The Trust maintains a proactive risk-management framework, including annual risk assessments, mandatory staff training, and confidential reporting channels to identify and mitigate harassment risks before they occur.

10(iv) Zero Tolerance Standard

Sexual harassment—defined as any unwanted conduct of a sexual nature that has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating, or offensive environment—will not be tolerated. Headteachers and line managers must immediately record, investigate, and remediate any observed or reported inappropriate conduct.

10 (v) General Conduct

No one should be involved in discipline, promotion, pay or other decisions for anyone where there is a close personal relationship.

Intimate behaviour during work time, in any workplace, such as holding hands, kissing, other close physical contact and discussions of a sexual nature, is not permitted.

Unwanted sexual advances or harassment will not be tolerated and will lead to disciplinary action.

10(vi) Disclosure

All close personal relationships should be disclosed, in confidence, to the line manager/supervisor by the individuals concerned as this may impact on the conduct of the School.

Whilst not all such situations where those in close personal relationships work together raise issues of conflict of interest, implications can include:

- effect on trust and confidence;
- perception of service users, the public and other employees on professionalism and fairness;
- operational issues e.g. working patterns, financial and procurement separation requirements;
- conflicting loyalties and breaches of confidentiality and trust.

Open, constructive and confidential discussion between workers and managers/supervisors is essential to ensure these implications do not occur and that all parties can be protected.

It may be necessary in certain circumstances to consider transferring workers who form close personal relationships at work. Any such action will be taken wherever possible by agreement with both parties and without discrimination.

We are committed to promoting a working environment based on dignity, trust and respect, and one that is free from all forms of bullying, harassment, including sexual harassment, victimisation and discrimination.

Colleagues who feel they are affected by a close personal relationship at work involving other colleagues should at all times feel that they can discuss this, without prejudice, with their Head teacher/line manager, other manager or Governing Committee.

If you find yourself in a situation where you are bullied or harassed while you are at work, including where a personal relationship has broken down, we encourage you to report this immediately and to follow our Grievance Procedure.

10 (vii) Workers related to pupils

Any workers related to, or who are the carer of a pupil, are expected to separate their familial and employment role.

Workers must not show or provide any preferential treatment to them or become involved in their education or care beyond their specific role as an employee/volunteer or their role as a parent/carer/relation.

11. Dress code

Adults in the Trust are expected to adopt smart standards of dress which project an appropriate professional image to pupils, parents and members of the public. Dress should also be fit for purpose according to the specific role and activity, for example, appropriate dress for PE, outdoor activities etc. These standards will apply to all official Trust/school activities, including on-line/virtual teaching.

In all cases, dress should be such that it:

- is not likely to be viewed as offensive, revealing, or sexually provocative;
- does not distract or cause embarrassment;
- does not include political, offensive or otherwise contentious slogans; and
- is not considered to be discriminatory and/or culturally insensitive.
- is mindful of the environment of the workplace and does not neglect the individual's duty of care to themselves and others

12. Use of financial resources

Workers must ensure that they use public and any other funds entrusted to them in a responsible and lawful manner. They must strive to ensure value for money and ensure rigorous adherence to Financial Regulations.

13. Trust Property and personal possessions

Workers must ensure they take due care of Trust property at all times, including proper and safe use, security, appropriate maintenance and reporting faults. If employees are found to have caused damage to Trust property through misuse or carelessness, this may result in disciplinary action.

Workers are responsible for the safety and security of their personal possessions while on The Trust premises. The Trust will not accept responsibility for the loss or damage of personal possessions.

Appendix 1: EFSPT Acceptable Use Policy 2026

[EFSPT Acceptable Use Policy 2026](#)