

Staff Code of Conduct

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VERSION CONTROL			
Version	Date	Author/Reviewer	Substantive changes since the previous version
V1	Sept 23	Checked by DD/JC/GB	Trustees' comments incorporated. No feedback from staff consultation. Issued to all staff.
V1.1	Sept 2023	GB	Added: Para. 15.4: Additional bullet point: 'Inappropriate sharing of confidential work-related initiatives or matters to others outside the organisation' Para. 15.6: Added:
			'Nor should Trust/school-wide plans be compromised via a breach of confidentiality in relation to the sharing of information'.
			Re-issued to all staff.
V1.2	July 2024	JH/DD/GB/JC	Reference to Drugs & Alcohol Policy inserted and policy updated as follows: Para 25 reworded to signpost the new Drugs & Alcohol Policy (separate document) Para. 26.2. Added: 'Is smelling of alcohol or is exhibiting behaviours consistent with the use of alcohol, drugs or illegal highs'.

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1. Introduction

- 1.1 This policy aims to set and maintain standards of conduct that we expect all staff, volunteers, third-party staff e.g. contractors, agency staff and coaches and those working on student/work experience placements working for ONE Academy Trust to follow (all of which will be referred to as 'staff' throughout this policy). By creating this policy, we aim to ensure our trust/schools are environments where everyone is safe, happy and treated with respect.
- 1.2 Following this Code of Conduct will help to safeguard staff from being maliciously, falsely or mistakenly suspected or accused of misconduct in relation to pupils.
- 1.3 ONE Academy Trust values and respects all members of the school community. Colleagues are expected to work in cooperation and collaboration, within an ethos of mutual trust and confidence.
 - All staff must be committed to promoting the safety, welfare and interests of pupils as paramount. The development of respectful, caring and professional relationships between staff and pupils and behaviour by staff that demonstrates integrity, maturity and good judgement are essential.
 - Staff are expected to place the well-being, development and progress of children/young people at the heart of their professional practice.
- 1.4 The public is entitled to expect the highest standards of conduct from everyone at ONE Academy Trust. Staff should adopt high standards of personal conduct in order to maintain the confidence and respect of their colleagues, pupils and the public in general. A member of staff's behaviour or actions, either in or out of the workplace or online, must not compromise their position within the work setting, or bring the trust/school into disrepute.
- 1.5 We expect all staff to fulfil training requirements relevant to their role in a timely manner and in accordance with reasonable timescales set, particularly in relation to statutory requirements including, but not limited to, safeguarding and child protection, the Prevent Duty, data protection and health & safety.
- 1.6 Please note that this code of conduct is not exhaustive. If situations arise that are not covered by this code, staff will use their professional judgement and act in the best interests of the trust, the school and its pupils.
- 1.7 While the Code of Conduct gives guidance to staff in certain situations the trust may deem that a zero-tolerance approach is best suited. Examples include:
 - Behaviour that compromises the safety of or directly harms children or young people in our care, including abuse of authority/trust¹
 - Committing a criminal offence, inside or outside of working hours, which may call in to question their suitability to work with children and/or an educational environment.
 - Online behaviour, inside or outside of working hours, that abuses a position of authority/trust
 - Unsafe, illegal or unethical working practices
 - Violence and aggression
 - Discrimination, bullying or harassment
 - Bribery and corruption

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¹ It is an offence under section 16 of the Sexual Offences Act 2003, which provides that it is an offence for a person aged 18 or over (e.g. teacher, youth worker) 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. A situation where a person is in a position of trust could arise where the child is in full-time education and the person looks after children under 18 in the same establishment as the child, even if s/he does not teach the child.

- Retaliation or action against anyone who speaks up and, in good faith, reports any wrongdoing.
- 1.8 You should read the ONE Academy Trust Code of Conduct in conjunction with other trust policies, and the requirements and guidance regarding standards of conduct in particular areas of work. These include the following policies:
 - Staff Disciplinary Procedures, which will be used if staff breach this code of conduct. It also sets out examples of what we will deem as misconduct and gross misconduct
 - Staff Grievance Procedures
 - School Child Protection and Safeguarding Policy
 - Acceptable Use of IT Policy
 - Drugs & Alcohol Policy
 - E-safety Policies
 - Data Protection Policy
 - Pecuniary Interests Policy
 - Low-Level Concerns Policy
 - Whistleblowing Policy
 - Allegations of Abuse Policy
 - Bullying and Harassment Policy
 - Gifts & Hospitality Policy
- 1.9 This list of policies is not exhaustive and you should familiarise yourself with any relevant guidance which may be provided in relation to your area of work. You should address any further queries you have to your line manager, senior leader or headteacher
- 1.10 Awareness of the relevant policies and their content is covered as part of induction and reviewed annually in the Autumn Term when staff employed by the trust are required to confirm that they have read and understood the content of a range of safeguarding and other key policies (annual safeguarding & policy checklist).
- 1.11 This Code takes account of the most recent versions of the following statutory and nonstatutory guidance:
 - 'Keeping Children Safe in Education' Department of Education ('DfE') (statutory),
 - Working together to safeguard children' HM Government (statutory)
 - 'Guidance for safer working practice for those working with children and young people in education settings' (non-statutory).
- 1.12 This policy complies with our funding agreement and articles of association.
- 1.13 This policy does not form part of your contract of employment and may be amended at any time.

2. Accountability

2.1 It is the responsibility of the trustees (for incidents relating to the conduct of the CEO), the CEO (for trust central team staff and headteachers), headteachers (for school staff) and line managers to address any breaches of good conduct and behaviour promptly, using informal

- procedures (professional/management advice) where possible but implementing formal procedures where necessary.
- 2.2 As a member of staff, you must act in accordance with the principles set out in this Code, recognising the duty of all public sector employees to discharge public functions reasonably and according to the law.
- 2.3 If you fail to comply with the Code's provisions, this will be regarded as a serious matter and may result in action under the ONE Academy Trust Disciplinary Policy.
- 2.4 Any breach of this code of conduct which involves third-party 'staff' e.g. volunteers, contractors, or agency staff, may result in the engagement of the worker/volunteer being terminated, in accordance with any applicable terms of engagement.

3. General obligations

- 3.1 Staff must set an example for pupils. They will:
 - Maintain high standards in their attendance and punctuality
 - Never use inappropriate or offensive language in school
 - Ensure they are a good role model by attending for work in a fit state, free from the smell of alcohol and other impairments
 - Treat pupils and others with dignity and respect
 - Show tolerance and respect for the rights of others
 - Not undermine fundamental British values, including democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs
 - Not express personal beliefs in a way that will not overly influence pupils, and will not exploit pupils' vulnerability or might lead them to break the law
 - Understand the statutory frameworks they must act within
 - Adhere to the Teachers' Standards (if appropriate to their role including headteachers, deputy headteachers, assistant headteachers)
 - place the well-being and learning of pupils at the centre of their professional practice.
 - have high expectations for all pupils, be committed to addressing underachievement, and work to help pupils progress regardless of their background and personal circumstances.
 - treat pupils fairly and with respect, take their knowledge, views, opinions and feelings seriously, and value diversity and individuality.
 - model the characteristics they are trying to inspire in pupils, including enthusiasm for learning, a spirit of enquiry, honesty, tolerance, social responsibility, patience, and a genuine concern for other people.
 - respond sensitively to the differences in the home backgrounds and circumstances of pupils, recognising the key role that parents and carers play in pupils' education.

- seek to work in partnership with parents and carers, respecting their views and promoting understanding and cooperation to support the young person's learning and well-being in and out of school.
- reflect on their own practice, develop their skills, knowledge and expertise, and adapt appropriately to learn with and from colleagues.
- ensure that the same professional standards are always applied regardless of culture, disability, gender, language, racial origin, religious belief and/or sexual identity.

4. Maintenance of standards

4.1 You should inform your line manager/headteacher as soon as practicably possible if you have any concerns relating to breaches of this Code of Conduct, in line with relevant policies e.g. Allegations of Abuse Policy (including low-level concerns), Drugs and Alcohol Policy, Acceptable Use of IT Policy, Whistleblowing Policy, Bullying and Harassment Policy, Disciplinary Policy.

5. Honesty and integrity

- 5.1 Staff will maintain high standards of honesty and integrity in their role. This includes when dealing with pupils, handling money, claiming expenses and using school property and facilities.
- 5.2 The trust has an anti-fraud, bribery and corruption policy in line with the Bribery Act (2010). A bribe is defined as: giving someone a financial or other advantage to encourage that person to perform their functions or activities improperly or to reward that person for having already done so.
- 5.3 Staff will not accept bribes. Staff need to take care that they do not accept any gift that might be construed by others as a bribe or lead the giver to expect preferential treatment. Please see paragraph. 21 for information about gifts and hospitality and refer to the Gifts and Hospitality Policy for more information.
- 5.4 Care should be taken when selecting children for specific activities, jobs, and privileges and when pupils are excluded from an activity to avoid perceptions of favouritism or injustice.

 Methods of selection and exclusion should be subject to clear, fair and agreed criteria.
- 5.5 Staff will ensure that all information given to the trust/school is correct. This should include:
 - Background information (including any past or current investigations/cautions/criminal convictions related to conduct outside of school)
 - Qualifications
 - Employment history
 - Professional experience
- 5.6 Where there are any updates to the information provided to the trust/school, the member of staff will advise the school as such as soon as reasonably practicable. Consideration will then be given to the nature and circumstances of the matter and whether this may have an impact on the member of staff's employment.
- 5.7 Staff should treat all pupils, colleagues, parents/carers and visitors with respect and professional courtesy. Professional boundaries should be maintained, and staff should avoid any behaviour that may lead any reasonable adult to question your behaviour, motivations or intentions

5.8 To maintain high standards of working practice with and/or around children, you are expected to comply with '<u>safer working practice</u>' guidance.

6. Safeguarding pupils

- 6.1 Staff have a duty to safeguard pupils from harm and to report any concerns they have. This includes physical, emotional and sexual abuse, or neglect and any specific safeguarding issues as outlined by the DfE guidance, Keeping Children Safe in Education, which includes responsibilities in relation to Prevent.
- 6.2 Staff will familiarise themselves with our child protection and safeguarding policies and procedures and the Prevent initiative, and ensure they are aware of the processes to follow if they have concerns about a child. New staff and regular volunteers will also be given a briefing on responsibilities as part of the induction process.
- 6.3 You must comply with all trust/school policies that support the wellbeing of pupils, and this includes co-operation and collaboration with external agencies that support the welfare of children/young people.
- 6.4 There is a duty to safeguard pupils including the duty to report any concerns about a pupil/student and to have a working knowledge of the procedures in place for this.
- 6.5 If a member of staff has concerns over an individual's ability to safeguard pupils, including anyone working in school (including but not limited to volunteers, supply teachers, and externally employed individuals), these concerns should be raised in line with the trust's allegations of abuse policy.

Allegations that may meet the harm threshold

- 6.6 You have a professional responsibility to inform an appropriate person if it is believed that anyone working in the school, including supply staff, coaches, volunteers or contractors, 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 they 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 – this includes behaviour taking place inside or outside of school
 - Behaved in a way deemed inappropriate within the workplace
 - Behaved in such a way that contravenes management advice
- 1.1 We will deal with any such allegation quickly and in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.
- 1.2 An independent 'case manager' will lead any investigation.

Low-level concerns about members of staff

1.3 A low-level concern is a behaviour towards a child by a member of staff (either inside or outside of work) that does not meet the harm threshold, is inconsistent with the staff code of conduct, and may be as simple as causing a sense of unease or a 'nagging doubt'. For example, this may include:

- being over-friendly with children
- having favourites
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- · humiliating pupils
- · behaviour deemed to be inappropriate
- smell of alcohol or drugs
- 6.7 All staff should share any low-level concerns they have using the reporting procedures set out in our allegations of abuse policy. Concerns should be shared confidentially, responsibly and as soon as possible after the event. As with all safeguarding concerns, low-level concerns may individually be low-level incidents but may be part of a bigger picture or chronology of events and concerns
- 6.8 We also encourage staff to self-refer if they find themselves in a situation that could be misinterpreted. If staff are not sure whether behaviour would be deemed a low-level concern, we encourage staff to report it.
- 6.9 All reports will be handled in a responsive, sensitive and proportionate way.
- 6.10 Unprofessional behaviour will be addressed, and the staff member supported to correct it, at an early stage.
- 6.11 This creates and embeds a culture of openness, trust and transparency in which our values and expected behaviour are constantly lived, monitored and reinforced by all staff, while minimising the risk of abuse.

Whistleblowing

Confidential reporting (whistleblowing) is the disclosure or communication of information about possible malpractice such as fraud, corruption or other improper activity or health and safety concerns which relate to wrongdoing or dangers at work by individuals or organisations. Examples of malpractice, how to report it and who to report it to are detailed in the trust's whistleblowing policy.

- 6.12 Staff are encouraged to report suspected wrongdoing as soon as possible. Their concerns will be taken seriously and investigated appropriately.
- 6.13 Concerns should be made in writing wherever possible. They should include names of those committing wrongdoing, dates, places and as much evidence and context as possible. Staff raising a concern should also include details of any personal interest in the matter.

7. Staff/pupil relationships

- 7.1 Staff will act in a fair and transparent way that would not lead anyone to reasonably assume they are not doing so.
- 7.2 If staff members and pupils must spend time on a one-to-one basis, staff will ensure that:
 - This takes place in a public place that others can access
 - Others can see into the room
 - A colleague or line manager knows this is taking place
- 7.3 Staff should avoid contact with pupils outside of school hours/clubs/school events if possible. This guidance is not intended to preclude social contact where parents/carers of pupils are personal friends, or the children of staff are friends with pupils.

- 7.4 Personal contact details should not be exchanged between staff and pupils. This includes social media profiles.
- 7.5 If a staff member is concerned at any point that an interaction between themselves and a pupil may be misinterpreted, or if a staff member is concerned at any point about a fellow staff member and a pupil, this should be reported in line with the procedures set out in our child protection and safeguarding policy.
- 7.6 Any staff member related to, or who is the carer of a pupil is expected to separate their familial and employment role. Staff must not show or provide any preferential treatment to them or become involved in their education or care beyond their specific role.
- 7.7 Staff should not behave in a manner, including online, which would lead any reasonable person to question their suitability to work with children or to act as an appropriate role model; make, or encourage others to make sexual remarks to, or about, a pupil; use inappropriate language to or in the presence of pupils; discuss their personal or sexual relationships with or in the presence of pupils; make, or encourage others to make, unprofessional personal comments which scapegoat, demean or humiliate, or might be interpreted as such. Behaving in an unsuitable way, including online, towards children may result in disqualification from childcare under the Childcare Act 2006, prohibition from teaching by the Teacher Regulation Agency, a bar from engaging in regulated activity, or action by another relevant regulatory agency.
- 7.8 A relationship between an adult and a child or young person is not a relationship between equals; the adult has a position of power or influence. There is potential for exploitation and harm of children or vulnerable young people and all adults have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification. Staff must not use their status or position to form or promote relationships with children (whether current pupils or not), that are of a sexual nature, or which may become so. Staff should maintain appropriate professional boundaries and avoid behaviour which might be misinterpreted by others.
- 7.9 Any sexual behaviour or activity, by an adult with or towards a child/pupil or young person is illegal. Children and young people are protected by the same laws as adults in relation to non-consensual sexual behaviour. They are additionally protected by specific legal provisions regardless of whether there is consent or not. Where a person aged 18 or over is in a specified position of trust with a child or young person under 18 years, the Sexual Offences Act 2003 makes it an offence for that person to engage in sexual activity with or in the presence of that child or to cause or incite that child to engage in or watch sexual activity.

Sexual behaviour includes non-contact activities, such as causing a child or young person to engage in or watch sexual activity or the production of indecent images of children. Appendix A of 'Working Together to Safeguard Children', defines sexual abuse as 'forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration or non-penetrative acts. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse'.

- 7.10 Staff must not have sexual relationships with pupils or have any form of communication with a child, which could be interpreted as sexually suggestive or provocative i.e. verbal comments, letters, notes, texts, email, phone calls, social networking contact or physical contact.
- 7.11 Staff must not make sexual remarks to, or about, a child or discuss their own sexual relationships with or in the presence of pupils. Staff should take care that their language or conduct does not give rise to comment or speculation. Attitudes, demeanour and language all require care and thought.

7.12 Staff should be aware that conferring special attention without good reason or favouring a pupil has the potential to be construed as being part of a 'grooming' process, which is a criminal offence.

Infatuations and crushes

- 7.13 A child or young person may develop an infatuation with an adult who works with them. Staff, who becomes aware (may receive a report, overhear something, or otherwise notice any sign no matter how small or seemingly insignificant) that a pupil has become or may be becoming infatuated with them or a colleague, must report this without delay to the headteacher or the most senior manager so that appropriate action can be taken to avoid any hurt, distress or embarrassment. The situation will be taken seriously. Staff should be careful to ensure that no encouragement of any kind is given to pupils. It should also be recognised that careless and insensitive reactions may provoke false accusations.
- 7.14 Examples of situations which must be reported are given below:
 - Where a member of staff is concerned that they might be developing a relationship with a pupil which could have the potential to represent an abuse of trust.
 - Where a member of staff is concerned that a pupil is becoming attracted to them or that there is a developing attachment or dependency.
 - Where a member of staff is concerned that actions or words have been misunderstood or misconstrued by a pupil such that an abuse of trust might be wrongly suspected by others.
 - Where a member of staff is concerned about the apparent development of a relationship by another adult, or receives information about such a relationship.

Physical contact, personal privacy and personal care

- 7.15 There are occasions when it is entirely appropriate and proper for employees to have physical contact with pupils, but it is crucial that they only do so in ways appropriate to their professional role and in relation to the pupil's individual needs and any agreed care plan. When physical contact is made this should be in response to the child's needs at the time, of limited duration and appropriate given their age, stage of development, gender, ethnicity, culture and background. Employees must always use their professional judgement.
- 7.16 Physical contact should never be secretive or casual, or for the gratification of the staff member, or represent a misuse of authority. Staff should never touch a pupil in a way which may be considered indecent. If a member of staff believes that an action could be misinterpreted, the incident and circumstances should be reported as soon as possible to their line manager and recorded accordingly, and, if appropriate, a copy placed on the pupil's file.
- 7.17 Physical contact, which occurs regularly with a pupil or pupils, is likely to raise questions unless the justification for this is part of a formally agreed plan (for example in relation to pupils with SEN or physical disabilities). Any such contact should be the subject of an agreed and open school policy and subject to review. Where feasible, staff should seek the pupil's permission before initiating contact. Staff should listen, observe and take note of the pupil's reaction or feelings and so far as is possible use a level of contact which is acceptable to the pupil for the minimum time necessary.
- 7.18 There may be occasions when a distressed pupil needs comfort and reassurance. This may include age-appropriate physical contact. Staff should always remain self-aware in order that their contact is not threatening, intrusive or subject to misinterpretation. Where a member of staff has a particular concern about the need to provide this type of care and reassurance they should seek further advice from a senior manager.

- 7.19 Some staff, for example, those who teach PE and games, or who provide music tuition will on occasions have to initiate physical contact with pupils in order to support a pupil so they can perform a task safely, to demonstrate the use of a particular piece of equipment/instrument or assist them with an exercise. This should be done with the pupil's agreement. Contact under these circumstances should be for the minimum time necessary to complete the activity and take place in a safe and open environment. Staff should remain sensitive to any discomfort expressed verbally or non-verbally by the pupil.
- 7.20 All parties should clearly understand from the outset what physical contact is necessary and appropriate in undertaking specific activities. Keeping parents/carers informed of the extent and nature of any physical contact may also prevent allegations of misconduct from arising. Any incidents of physical contact that cause concern or fall outside of these protocols and guidance should be reported to a senior manager.
- 7.21 Pupils are entitled to respect and privacy when changing clothes or taking a shower. However, there needs to be an appropriate level of supervision in order to safeguard pupils, satisfy health and safety considerations and ensure that bullying or teasing does not occur. This supervision should be appropriate to the needs and age of the pupils concerned and sensitive to the potential for embarrassment. Staff who are required as part of their role to attend changing rooms should announce their intention of entering any pupil changing rooms and only remain in the room where the pupil/s needs require this.
- 7.22 Employees with a job description which includes intimate care duties will have appropriate training and written guidance including a written care plan for any pupil who could be expected to require intimate care. Staff should adhere to the school's intimate care policy. No other member of staff should be involved in intimate care duties except in an emergency. A signed record should be kept of all intimate and personal care tasks undertaken and, where these have been carried out in another room, include times left and returned. Staff should not assist with personal or intimate care tasks which the pupil is able to undertake independently.

Behaviour management and physical intervention

- 7.23 All pupils have a right to be treated with respect and dignity. Staff must not use any form of degrading treatment to punish a pupil. The use of sarcasm, demeaning or insensitive comments towards pupils is not acceptable in any situation. Deliberately intimidating pupils by shouting aggressively, hectoring or overbearing physical presence is not acceptable in any circumstances.
- 7.24 Physical intervention can only be justified in exceptional circumstances. Staff may legitimately intervene to prevent a pupil from committing a criminal offence, injuring themselves or others, causing damage to property, engaging in behaviour prejudicial to good order and maintaining good order and discipline. Staff should have regard to the health and safety of themselves and others. It is always unlawful to use force as a punishment. The use of unwarranted physical force is likely to constitute a criminal offence.
- 7.25 Where a pupil has specific needs with respect to particularly challenging behaviour, a positive handling plan, including a risk assessment, should be put in place and agreed by all parties. Where it is judged that a pupil's behaviour presents a serious risk to themselves or others, a robust risk assessment that is regularly reviewed and a physical intervention plan, where relevant, must be put in place. All incidents and subsequent actions should be recorded and reported to a manager and the pupil's parents/carers. Where it can be anticipated that physical intervention is likely to be required, a plan should be put in place that the pupil and parents/carers are aware of and have agreed to. Parental consent does not permit the use of unlawful physical intervention or deprive a pupil of their liberty. The trust/school has separate policies on behaviour management and the use of physical intervention.

One-to-one situations and meetings with pupils

- 7.26 One-to-one situations have the potential to make children/young people more vulnerable to harm by those who seek to exploit their position of trust. Staff working in one to one settings with pupils may also be more vulnerable to unjust or unfounded allegations being made against them. Every attempt should be made to ensure that the safety and security needs of both staff and pupils are met. Managers should undertake a risk assessment in relation to the specific nature and implications of one to one work for each member of staff and pupil, which should be reviewed regularly. Where such a meeting is demonstrably unavoidable, remote or secluded areas should be avoided and to ensure that the door of the room is left open and/or visual/auditory contact with others is maintained. Any arrangements should be reviewed on a regular basis.
- 7.27 Pre-arranged meetings with pupils away from the premises or on the trust/school site when the trust/school is not in session are not permitted unless written approval is obtained from their parent/carer and the Head Teacher or other senior colleague with delegated authority.
- 7.28 No pupil should be in or invited into, the home of a staff member who works with them, unless they are family members or close family friends, in which case staff are advised to notify their line manager. Pupils must not be asked to assist staff with jobs or tasks at or in their private accommodation or for their personal benefit.
- 7.29 Other than in an emergency, a member of staff must not enter a pupil's home if the parent/carer is absent. Always make detailed records including times of arrival and departure and ensure any behaviour or situation that gives rise to concern is discussed with a senior manager/head teacher. A risk assessment should be undertaken and appropriate risk management measures put in place prior to any planned home visit taking place. Home visits should not be made alone.

Transporting pupils

- 7.30 In certain situations e.g. out-of-school activities, staff may agree to transport pupils. Transport arrangements should be made in advance by a designated employee who will be responsible for planning and overseeing all transport arrangements and responding to any concerns that may arise. Wherever possible and practicable transport should be provided other than in private vehicles, with at least one staff member additional to the driver acting as an escort.
- 7.31 Staff should ensure that the transport arrangements and the vehicle meet all legal requirements. They must ensure that the vehicle is roadworthy and appropriately insured and that the maximum capacity is not exceeded. It is a legal requirement that all passengers wear seatbelts and the driver should ensure that they do so. The driver should be aware of the current legislation concerning the use of car seats for younger children where applicable. It is illegal to drive using hand-held phones or similar devices and the driver must ensure that they adhere to all driving regulations.
- 7.32 It is inappropriate for staff to offer lifts to a pupil unless the need has been agreed with a manager and, if this falls outside their normal working duties, has been agreed with parents/carers.
- 7.33 There may be occasions where a pupil requires transport in an emergency situation or where not giving a lift may place a pupil at risk. Such circumstances must always be recorded and reported to a senior manager and parents/carers.

Educational visits and school clubs

7.34 Staff should take particular care when supervising pupils in the less formal atmosphere of an educational visit, particularly in a residential setting, or after-school activity. Staff remain in a position of trust and the same standards of conduct apply.

8. Appropriate relationships and behaviours: adults

- 8.1 All adults within ONE Academy Trust should be aware of their own behaviour and how it impacts others. As an employer, we recognise that personalities, characters, and management styles are all different, but the expectation is that the way we approach our working life must always be acceptable to others through applying principles such as:
 - Working co-operatively with others in order to achieve objectives
 - Managing performance in an appropriate manner and fair manner
 - Giving and receiving constructive feedback as part of normal day-to-day work activity, that is evidence-based and that is delivered in an appropriate manner
 - Using an understanding of other people's perspectives to help reach an agreement
 - Establishing good working relationships
- 8.1 Unacceptable behaviour may involve actions, words or physical gestures that could reasonably be perceived to be the cause of another person's distress or discomfort. Unacceptable behaviour does not necessarily have to be face-to-face and may take many forms such as written, telephone or e-mail communications or social media. Some examples of unacceptable behaviour are included below:
 - Aggressive or abusive behaviour, such as shouting or personal insults
 - Spreading malicious rumours or gossip, or insulting someone
 - Overbearing supervision or other misuses of power or position
 - Unwanted physical contact
 - Offensive comments or body language

Further examples of this are detailed in the bullying and harassment policy.

8.2 Issues need to be dealt with promptly and the confidentiality of the matter between the parties will need to be maintained. This is most likely to be in conjunction with the bullying and harassment policy and the disciplinary policy. Many people see workplace 'banter' as a bit of fun which is good for morale. However, banter may cross the line and become unacceptable harassment and staff need to be aware of the potential impact of this.

The local community, school users and other employees

- 8.3 You should always remember your responsibilities to the community you serve and ensure courteous, efficient and impartial service delivery to all users, groups and individuals within that community. These responsibilities apply equally to your conduct with fellow employees, contractors, agency staff, volunteers and those on student/work experience placements.
- 8.4 You are expected to work as part of a whole school team.
- 8.5 You should take positive steps to understand the roles of other colleagues in the children's workforce. You are expected to cooperate with other professional colleagues who have a role in enabling children/young people to thrive and succeed.
- 8.6 Employees must inform their line manager if they have a close personal relationship with another employee, engaged worker or parent which could be considered by colleagues, as impacting the way they conduct themselves or compromises the trust/school in any way.

8.7 You should follow the trust/school's ethos and approach in any communication with parents and carers.

Contractors

- 8.8 If you engage in the provision of work under contract, or supervise contractors or have any other official relationship with contractors or have previously had or currently have a relationship in a private or domestic capacity with contractors, you should formally declare that relationship to the CEO (for trust central team staff), headteacher (for school staff) or a representative of the board of trustees (for the CEO) of governors or board of trustees in accordance with the trust's Pecuniary Interests Policy.
- 8.9 Orders and contracts must always be awarded on merit, in accordance with the Academy Trust Handbook and the trust's Financial Management Policy. No special favours should be shown to businesses run by, for example, friends, partners or relatives in the tendering process. No part of the local community should be discriminated against.
- 8.10 You should be aware of possible conflicts of interest when you buy goods or use the services of firms who have dealings with the trust/school and you should follow official procedures relating to the disclosure of any such transactions.

9. Communications and social media

- 9.1 Expectations in relation to staff use of electronic communication, including the Internet, are detailed in the ONE Academy Trust Acceptable Use of IT policy.
- 9.2 Communication between pupils and staff, by whatever method, should take place within clear and explicit professional boundaries. This includes the wider use of technology such as mobile phones, tablets, text messages, emails, instant messages, websites, social media platforms, chat rooms, forums, blogs, gaming sites, digital cameras, videos, webcams and other handheld devices and wearable technology (e.g. smartphones). Staff should not share any personal information with pupils and they should not request, or respond to, any personal information from the child/young person, other than that which might be appropriate as part of their professional role. They should ensure that all communications are transparent and avoid any communication that could be interpreted as 'grooming behaviour'.
- 9.3 You should also ensure that you are familiar with the requirements of the trust/school Online Safety policy and Data Protection Policy.
- 9.4 School employees' social media profiles should not be available to pupils. If you have a personal profile on social media sites, you are advised not to use your full name, as pupils may be able to find you. You should consider using a first and middle name instead, and set public profiles to private
- 9.5 You must not have any electronic communication, other than via the school's platforms, and/or accept as friends, pupils under the age of 18 including ex-pupils; this includes the use of personal mobiles, and or social networking sites or media. You should not attempt to contact pupils or their parents via social media, or any other means outside school, in order to develop any sort of relationship. You should not make any efforts to find pupils' or parents' social media profiles. This clause is not intended to prevent you engaging with existing friends who are coincidentally parents/carers via social media.
- 9.6 You must not post any images online that identify children who are pupils at the school without the explicit consent of the parents/carers.
- 9.7 Adults must ensure that their online profiles are consistent with the professional image expected by us and must not post material which damages the reputation of the trust/school or

- which causes concern about their suitability to work with children. Those who post material which may be considered as inappropriate could render themselves vulnerable to criticism or, subject to allegations of misconduct which may be dealt with under the Disciplinary Policy. Even where it is made clear that the writer's views on such topics do not represent those of the trust/school, such comments are inappropriate.
- 9.8 It is acknowledged that staff may have genuine friendships and social contact with parents or carers of pupils, independent of the professional relationship. Staff should, however, inform senior management of any relationship with a parent/carer where this extends beyond the usual parent/carer/professional relationship; advise senior management of any regular social contact they have with a pupil or parent/carer, which could give rise to concern; inform senior management of any requests or arrangements where parents/carers wish to use their services outside of the workplace e.g. babysitting, tutoring; and staff should always approve any planned social contact with pupils or parents/carers with senior colleagues, for example when it is part of a reward scheme. If a parent/carer seeks to establish social contact, or if this occurs coincidentally, the member of staff should exercise his or her professional judgement and should ensure that all communications are transparent and open to scrutiny.

10. Acceptable use of technology

- 10.1 Expectations in relation to staff use of technology, including the internet, are detailed in the ONE Academy Trust Acceptable Use of IT policy. You are responsible for familiarising yourself with the policy and adhering to the requirements of the policy.
- 10.2 You must not use technology in school to view material that is illegal, inappropriate or likely to be deemed offensive. This includes, but is not limited to, sending obscene emails, gambling and viewing pornography or other inappropriate content.
- 10.3 You must not use personal mobile phones and laptops, or school equipment for personal use, during school hours or in front of pupils. You must not use personal mobile phones or cameras to take pictures of pupils.
- 10.4 Posting, creating, accessing, transmitting, downloading, uploading or storing any of the following material (unless it is part of an authorised investigation) is likely to amount to gross misconduct and result (where the adult is employed) in summary dismissal:
 - (a) pseudo-images of children (child abuse images), pornographic or sexually suggestive material or images of children or Adults which may be construed as such in the circumstances (that is, writing, texting, pictures, films and video clips of a sexually explicit or arousing nature),
 - (b) any other type of offensive, obscene or discriminatory material, criminal material or material which is liable to cause distress or embarrassment to [the trust/school] or others.
- 10.5 The contents of our ICT resources and communications systems are our property. Therefore, staff should have no expectation of privacy in any message, files, data, document, social media post, conversation or message, or any other kind of information or communications transmitted to, received or printed from, or stored or recorded on our electronic information and communications systems. If necessary, information may be handed to the police in connection with a criminal investigation.
- 10.6 We reserve the right to monitor, intercept and review, without prior notification or authorisation from staff. Usage of our IT resources and communications systems, including but not limited to telephone, e-mail, messaging, voicemail, CCTV, internet and social media postings and

- activities is monitored to ensure that our rules are being complied with. Recordings taken from the CCTV system is recorded and may be used as evidence of any alleged wrong doing.
- 10.7 Staff consent to monitoring by acknowledgement of this Code and the use of our resources and systems.

11. Photography, videos and the use of images

- 11.1 Please refer to the trust/school guidance on e-safety, the use of images and the consent forms therein. Staff should have regard to the ICO guidance on video surveillance including CCTV and the ICO taking photos in schools guidance.
- 11.2 Many educational activities involve the taking or recording of images. This may be undertaken as part of the curriculum, extra school activities, for displays, publicity, to celebrate achievement or, to provide evidence of the activity.
- 11.3 The General Data Protection Regulation 2018 affects the use of photography. An image of a child is personal data and it is, therefore, a requirement under the Act that consent is obtained from the parent/carer of a child before any images are made such as those used for school web sites, notice boards, productions or other purposes.
- 11.4 Staff need to be aware of the potential for such images to be taken and/or misused to create indecent images of children and/or for 'grooming' purposes. Careful consideration should be given as to how these activities are organised and undertaken. There should be an agreement as to whether the images will be destroyed or retained for further use, where these will be stored and who will have access to them.
- 11.5 Staff should only use equipment provided or authorised by the trust/school to make/take images and should not use personal equipment/devices.
- 11.6 The following guidance should be followed:
 - if a photograph is used, avoid naming the pupil
 - if the pupil is named, avoid using the photograph
 - photographs/images must be securely stored and used only by those authorised to do so
 - be clear about the purpose of the activity and about what will happen to the photographs/images when the lesson/activity is concluded
 - only retain images when there is a clear and agreed purpose for doing so
 - ensure that a senior member of staff is aware that the photography/image equipment is being used and for what purpose
 - ensure that all photographs/images are available for scrutiny in order to screen for acceptability
 - be able to justify the photographs/images made
 - do not take images of pupils for personal use
 - only take images where the pupil consents to this
 - do not take photographs in one to one situations
 - do not display or distribute photographs/images of pupils unless there is consent to do so from the parent/carer

- only publish images of pupils where they and their parent/carer have given explicit written consent to do so
- do not take images of pupils in a state of undress or semi-undress
- do not take images of pupils which could be considered as indecent or sexual.

12. Curriculum

- 12.1 Some areas of the curriculum can include or raise a subject matter which is sexually explicit, of a political, cultural, religious or otherwise sensitive nature. Care should be taken to ensure that resource materials cannot be misinterpreted and clearly relate to the learning outcomes identified by the lesson plan. This plan should highlight particular areas of risk and sensitivity.
- 12.2 The curriculum can sometimes include or lead to an unplanned discussion about a subject matter of a sexually explicit, political, cultural, religious or otherwise sensitive nature. Responding to pupils' questions can require careful judgement and staff must take guidance in these circumstances from the Designated Safeguarding Lead. Staff must not enter into or encourage inappropriate discussion about sexual, political or religious activity or behaviour or, discussions which may offend or harm others. Staff should take care to protect children from the risk of radicalisation and should act in accordance with advice given within Keeping Children Safe in Education and accordingly must not express any prejudicial views or, attempt to influence or impose their personal values, attitudes or beliefs on pupils.
- 12.3 Please refer to each school's policy on relationships education (RSHE) and the statutory guidance: relationships, sex education (RSE) and-health education.

13. Confidentiality and the disclosure of information

- 13.1 In the course of your role, you may be privy to sensitive and confidential information about the school, staff, pupils and their parents/carers. This information will never be:
 - Disclosed to anyone without the relevant authority
 - Used to humiliate, embarrass or blackmail others
 - · Used for a purpose other than what it was collected and intended for
- 13.2 This does not overrule your duty to report child protection concerns to the appropriate channel where you believe a child is at risk of harm, as detailed further in our child protection and safeguarding policy.
- 13.3 You have a responsibility to safeguard the security and confidentiality of personal information you hold and you should ensure that only the appropriate amount of information required is provided to those who have an established and legitimate need to use it. Advice and guidance on the legal obligations regarding confidentiality are set out in the Trust's Data Protection Policy.
- 13.4 If a pupil or parent/carer makes a disclosure regarding abuse or neglect, staff must follow the trust/school procedures and the guidance as set out in Keeping Children Safe in Education. Confidentiality must not be promised to the pupil or parent/carer. However, reassurance should be given that the information will be treated sensitively.
- 13.5 You should not use any information obtained in the course of your employment for personal gain or benefit, nor should you pass it on to others who might use it in such a way.

- 13.6 Staff must not speak to the press or respond to media queries on any matter relating to the trust/school without prior permission. All media queries should be referred immediately to the headteacher or the CEO if the query is trust wide.
- 13.7 If you wish to publish books, articles or letters you have written in connection with your duties, you must first consult your headteacher who will consult with the CEO and board of trustees and take legal advice.

14. Dress and appearance

- 14.1 Your appearance, dress and behaviour is expected to promote appropriate boundaries and working relationships between the pupils and the staff/volunteer body, as role models and responsible adults in a position of trust. You should dress in ways that are appropriate and relevant to your role and not likely to be viewed as offensive, revealing or sexually provocative and specifically should not distract, cause embarrassment or give rise to misunderstanding, should be religious and culturally sensitive and free of any political or otherwise contentious slogans, and not considered to be discriminatory.
- 14.2 Clothing and footwear must be safe and clean and take account of health and safety considerations.

15. Conduct outside work

- 15.1 As a general rule, what employees do out of working hours and away from the premises is a personal matter. However, staff must not act in a way that would bring the trust/school, 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, as well as negative comments about the trust, its schools or its community.
- 15.2 Staff must disclosure immediately any wrongdoing or alleged wrongdoing by themselves (regardless of whether they deny the wrongdoing/alleged wrongdoing), to the CEO (for central trust staff), the head teacher (for school stuff) or a representative from the board of trustees (for the CEO), including any incidents arising from alternative employment or outside of work which may have a bearing on their employment or engagement with the trust/school.
- 15.3 Any worker engaged in a post covered by the Childcare (Disqualification) Regulations 2009 ("the Regulations") must immediately inform the trust/school 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.
- 15.4 The trust/school is also likely to become involved if any employee's conduct causes concern, in circumstances such as:
 - o At work-organised parties, drinks events and other work-related social occasions.
 - At third-party occasions where the employee has been invited in their capacity as an employee and representative of the Trust.
 - At work-related conferences and training courses.
 - Where the employee is away on business on behalf of the Trust
 - o Inappropriate work-referenced online interactions or posts on social media.
 - Inappropriate sharing of confidential work-related initiatives or matters to others outside the organisation

- 15.5 ONE Academy Trust's policies will continue to apply at all these events.
- 15.6 An employee should not bring the name of the Trust and/or a specific school into disrepute. Nor should Trust/school-wide plans be compromised via a breach of confidentiality in relation to the sharing of information. Improper behaviour will lead to investigation and possible disciplinary action, including possible dismissal.

16. Equality & Diversity

16.1 You must comply with the ONE Academy Trust Equality & Diversity Policy and legal requirements relating to equality issues. The trust is committed to promoting equality of opportunity, preventing unlawful discrimination in all of its activities and valuing diversity.

17. Appointment and other employment matters

- 17.1 If you are involved in the appointment of staff, you should be aware that it is unlawful for you to make an appointment based on anything other than the ability of the candidate to undertake the duties of the post. To avoid any possible accusation of bias, you should not be involved in an appointment where you are related to an applicant or have/have had a close association with the applicant.
- 17.2 You should not be involved in decisions relating to discipline, promotion or pay and conditions adjustments for another employee who is a relative or with whom you have/have had a close association.

Taking other employment

- 17.3 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 to the trust/school during their working hours and to act in the best interests of the trust/school at all times. The trust/school also has a duty to protect health and safety in relation to employee working hours.
- 17.4 Accordingly, employees must not, without the written consent of the trust/school (normally the headteacher, or in the case of centrally employed trust staff, the CEO), undertake any employment (paid or unpaid) or engagement which will or has the potential to:
 - Create a conflict of interest
 - Overlap with official duties
 - Make use of material to which you have access by virtue of your position
 - Weaken public confidence in the trust/school.

18. Personal Interests

- 18.1 Personal interests must not conflict with your public duty. An official position or information acquired in the course of your employment must not be used to further personal interests or for the interests of others.
- 18.2 You must declare in writing to either the CEO (for trust central team staff), your headteacher (for school staff), or a representative from the board of trustees (for the CEO) any:

- External financial or non-financial interest in any existing or proposed contract with the trust/school or other organisational decision
- Membership of any organisation which could conflict with the trust/school's interests. Please note – staff do not need to declare Trades Union membership and records of Trade Union Memberships are not held by the Trust.

19. Stewardship

- 19.1 You must ensure that you use any public funds entrusted to you responsibly and lawfully and you must not utilise property, vehicles or other facilities of the trust/school for personal use unless authorised in advance to do so. You should strive to ensure value for money to the local community and to avoid a legal challenge to the trust/school.
- 19.2 Any personal use of the school internet or email facilities must be in accordance with the trust's current Acceptable Use Policy.
- 19.3 Personal Telephone Calls:
 - Personal mobile phones should be used for any outgoing personal telephone calls, other than in exceptional circumstances (e.g. no signal available). In these circumstances, the school telephone may be used, following the school's procedure for such use, recording and payment.
 - Such outgoing calls/texts and personal incoming calls should occur infrequently and be kept as short as possible. For those working with children, calls/texts should not be made/taken during lessons, except in emergencies. School mobile phones should not be used for personal use, except in an emergency.
- 19.4 Intellectual Property is a property that enjoys legal protection and is a result of intellectual effort, including patents, copyright, trademarks, designs and software. Where developed in the course of your duties, such intellectual property is the property of the trust/school. You should not make use of the trust/school's intellectual property to conduct private work.
- 19.5 Any copies of material taken for use within the trust/school must only be as allowed under the Copyright Act and under the appropriate licensing agreement.

20. Corruption

20.1 You must be aware that it is a serious criminal offence for you to corruptly receive or give any gift, loan, fee, reward or advantage for doing or neglecting to do something or showing favour or disfavour to any person in your official capacity.

21. Hospitality and gifts

- 21.1 You should only accept hospitality in the form of refreshments/attendance at events if there is a genuine need to impart information or to represent the trust/school. All other offers of hospitality/gifts should be firmly but politely refused. You should also ensure that accepting hospitality does not create a conflict of interest and is not likely to cause embarrassment to the trust/school.
- 21.2 You should report the offer of hospitality, whether accepted or not, to your line manager and should ensure that all such offers are recorded in line with the Gifts and Hospitality Policy.

- 21.3 There are occasions when pupils or parents/carers wish to pass small tokens of appreciation to staff e.g. at Christmas or as a thank-you and this is acceptable. However, it is unacceptable to receive gifts on a regular basis or of any significant value. Gifts that are worth more than £30 must be declared and recorded on the gifts and hospitality register.
- 21.4 Personal gifts must not be given to pupils or their families/carers. This could be misinterpreted as a gesture either to bribe or groom. It might be perceived that a 'favour' of some kind is expected in return. Any reward given to a pupil should be consistent with the school's behaviour policy and not based on favouritism.
- 21.5 If gifts are offered or you suspect that an improper motive exists, you should always decline the offer and report it to the CEO (for central trust staff), head teacher (for school staff) or a representative from the board of trustees (for the CEO). This includes any preferential rates offered for goods and services. This should be reported regardless of whether the offer is accepted or declined.

22. Sponsorship

- 22.1 Where an outside organisation is seeking to sponsor a school or trust activity, whether by invitation, tender, negotiation or voluntarily, the Code of Conduct's provisions concerning the acceptance of hospitality or gifts and working with contractors will apply. No sponsorship deal should be made without the prior agreement of the CEO/head teacher/ or representative of the board of trustees.
- 22.2 Where the trust/school wishes to sponsor an event or service, you must declare in writing to your headteacher any possible conflict of interest or any benefit which you or a member of your family, or anybody with whom you have a close association, is likely to receive. Similarly, where the school is providing sponsorship in the community, you should ensure that impartial advice is given and that there is no conflict of interest involved.

23. Personal property

23.1 Personal property that is likely to be deemed inappropriate for the setting such as: illegal goods/downloads, items of a sexually-explicit nature or property which might be regarded as promoting radicalisation or otherwise inappropriate such as books, magazines, CDs, DVDs or such material on any electronic media including links to such material must not be brought onto, delivered to or stored on trust/school premises or on any trust/school equipment. This is likely to lead to disciplinary action and could result in a charge of gross misconduct.

24. Smoking

- 24.1 Smoking (including vaping) is prohibited in all areas of the trust/school including:
 - access doorways, surrounding areas or within the boundaries of the school premises
 - all trust-owned vehicles
 - any other vehicles provided by the trust/school for use in connection with work
 - premises leased or hired by the trust/school for functions and activities.
- 24.2 This policy applies to everyone who visits or works on the trust/school site.
- 24.3 The trust/school will not provide facilities for smokers either inside or outside school premises.
- 24.4 Staff who wish to smoke may do so in their own time but not on school/trust premises.

- 24.5 The CEO, headteachers and senior managers are responsible for adherence to the non-smoking rules. They will also be responsible for encouraging staff to attend smoking cessation consultations/courses for all staff who want to stop smoking.
- 24.6 Employees who do not adhere to this non-smoking requirement during their working hours will be referred to the Occupational Health provider/Trust HR services for support and be subject to the usual disciplinary procedure.
- 24.7 The Trust Disciplinary policy will be used against:
 - · any employee who smokes while at work
 - any leader/manager who knowingly permits a staff member to smoke while at work
 - any leader/manager who fails to put smoking control measures in place.
- 24.8 Visitors not adhering to the policy will be asked to comply or leave the school premises. In the case of external parties e.g. contractors, supply staff, or coaches who do not comply with the no-smoking requirements, the CEO or headteacher will contact their employer and this may result in the trust/school withdrawing from any engagement for their services.

25. Drugs, alcohol and legal highs (including medication)

- 25.1 Employees, supply staff, student teachers, contractors, visitors and volunteers must not use, possess, distribute, or be under the influence of drugs or alcohol while performing work duties or during working hours, including breaks. This includes whilst on school premises, and school visits, trips and other events where they are responsible for the care and welfare of pupils.
- 25.2 The use of drugs or alcohol on ONE Academy Trust premises, including school grounds and vehicles, is strictly prohibited unless written permission is granted (e.g. alcohol licence for event)
- 25.3 Employees must not report to work while under the influence of drugs or alcohol.
- 25.4 Staff have a duty to inform their line manager or head teacher if they are taking any medication which interferes with the safe performance of their role.
- 25.5 Please see the Drugs and Alcohol Policy for further information.

26. Reporting concerns and recording incidents

- 26.1 All adults must report concerns and incidents in accordance with the guidance set out in Keeping Children Safe in Education guidance and trust and school policies. In the event of an allegation being made, or an incident being witnessed, the relevant information should be immediately recorded and reported as detailed in the allegations of abuse, whistleblowing and disciplinary policies. Reporting must be done as soon as practicably possible to ensure a rapid response and appropriate safeguarding measures can be put into place. Staff who fail to bring a matter of concern to the attention of senior management and/or the relevant agencies will be subject to disciplinary action.
- 26.2 In addition to behaviours outlined elsewhere in this Code and, the types of abuse and neglect set out in Keeping Children Safe in Education, the following is a non-exhaustive list of some further behaviours which would be a cause for concern:

A member of staff who:

Allows a pupil/young person to be treated badly; pretends not to know it is happening

- Gossips/shares information inappropriately
- Demonstrates inappropriate discriminatory behaviour and/or uses inappropriate language
- Dresses in a way which is inappropriate for the job role
- Is smelling of alcohol or is exhibiting behaviours consistent with the use of alcohol, drugs or illegal highs.
- Does not treat pupils fairly demonstrates favouritism
- Demonstrates a lack of understanding about personal and professional boundaries
- Uses his/her position of trust to intimidate, threaten, coerce or undermine
- Appears to have an inappropriate social relationship with a pupil or pupils
- · Appears to have special or different relationships with a pupil or pupils
- Seems to seek out unnecessary opportunities to be alone with a pupil

27. Monitoring and review

- 27.1 The CEO and headteachers will be responsible for monitoring the implementation and effectiveness of this policy.
- 27.2 This policy will be reviewed every three years as a minimum but will be revised as needed.
- 27.3 This policy will be approved by the CEO