Staff Code of Conduct

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Introduction

Steel River Academy Trust is required to set out a Code of Conduct for all employees.

Steel River Academy Trust is committed to promoting diversity and will therefore respect individual preference in terms of customs, culture, religion and tradition.

The Trust fosters a culture of the highest professional standards. The achievement of positive outcomes for our children necessitates the need to ensure that all adults working with children are competent, confident and safe to do so. This Code of Conduct sets out the standards expected and the duty upon all adults including staff, volunteers, Trustees and governors to abide by it. Therefore, all staff at Steel River Academy Trust are expected to comply with the following Code of Conduct. Teaching staff are furthermore expected to conduct themselves within the guidance of the 'personal and professional conduct' section of the Teachers' Standards. Also, Teaching Assistants should refer to the requirements of the Teaching Assistant's Standards. All Staff should apply the same professional standards regardless of culture, disability, gender, language, racial origin, religious belief and/or sexual orientation.

Staff are expected to be conscientious and loyal to the aims and objectives of Steel River Academy Trust. In addition, staff are required to develop and maintain the professional character of the schools within the Trust.

Staff may be in a unique position of influence and must adhere to behaviour that models the highest possible standards. Each employee has an individual responsibility to maintain their reputation and the reputation of the Trust whether inside or outside working hours.

Staff should be aware that a failure to comply with the following Code of Conduct could result in disciplinary action including dismissal.

1. Purpose

1.1 This Code of Conduct is designed to give clear guidance on the standards of behaviour all staff are expected to observe and as such:

- Makes a clear statement about the standards of conduct expected of employees of, and those working with Steel River Academy Trust
- Ensures all employees and associated persons understand their obligations with regard to safeguarding and promoting the welfare of pupils
- Ensures the highest standards of conduct by identifying the school's standards which sit alongside professional codes and guidelines
- Helps all employees to act in a way which upholds the school's standards and, at the same time, protects them from criticism, misunderstanding or complaint

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- Helps build trust between the school and the people who come into contact with those working for it.

1.2 All individuals working in our Academy Trust are expected to comply with the law as it applies to their work in school, particularly in matters such as health and safety, safeguarding of children and data protection. They are also expected to carry out their duties in accordance with the relevant policies, procedures, rules and guidance adopted by the board of Trustees. These other documents are available to be viewed from the individual school offices.

1.3 In addition to this Code of Conduct, all employees engaged to work under teachers' terms and conditions of employment have a statutory obligation to adhere to the Teachers' Standards (England) and in relation to this policy, Part 2 of the Teachers' Standards – Personal and Professional Conduct.

2 Scope

2.1 This Code of Conduct applies to:

- **Employees -** all employees of the school, including apprentices and temporary and casual staff
- **Associated persons -** individuals providing services for the school but who are not employed, e.g. contractors and their sub-contractors, supply and agency staff, students, volunteers, secondees from other establishments and self-employed consultants

2.2 This Code does not apply to Governors when they are fulfilling their statutory role, including as a link governor and when attending meetings with senior staff and/or the Governing Body. However, should a Governor take a volunteer role within the school, then they should be considered to be an associated person under this policy whilst undertaking that role.

2.3 Disregarding this Code will, in certain circumstances, result in disciplinary action being taken in the case of employees. In line with the school's disciplinary policy, no disciplinary action will be taken until a full investigation has been undertaken. For associated persons failure to follow the code may result in the cessation of contractual arrangements.

2.4 All employees will be supplied with a copy of this Code, against which their conduct will be measured. Associated persons will also be issued with a copy of this Code and will be expected to comply with it whilst engaged to work with the school.

2.5 Some provisions contained within this code will continue after employment or the contractual relationship has ended e.g. the requirement to maintain confidentiality. Where this is the case, it will be highlighted within the relevant section of the code.

2.6 For ease of reading, and from this point onwards, the term 'employee' will be used for both directly employed staff and associated persons working within the school. Should the arrangements for each group differ then this will be highlighted accordingly.

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3 Standards and Attitude

3.1 All employees of the trust are expected to give the highest possible standard of service to pupils, parents and carers, fellow employees, Governors and members of the public. The following principles exemplify the standards that are required:

Safeguarding and promoting the welfare of children

3.2 Safeguarding is at the heart of the work of all our schools and all employees must undertake their work in support of the school's duties for safeguarding children and young people. All employees must ensure that they conduct themselves in an appropriate manner which indicates their suitability to work with children at all times while undertaking their duties and should be aware that any concerns, whether these meet the threshold of harm or not, will be considered in line with statutory and local guidance. Further information is given in section 4 below.

Honesty and integrity

3.3 All employees must perform their duties with integrity and be open and honest in their dealings and communications with others. They should strive to deliver on the commitments they have made and observe high ethical standards. Employees must not disclose information given to them in confidence or share confidential information where it is inappropriate or unlawful to do so. They must not allow their own personal or political opinions to interfere with their work and must at all times perform their duties in an objective manner. For further information regarding confidentiality please see section 6.

Responsibility

3.4 All employees must take responsibility for their own actions and be accountable for these. They should use any school funds or resources entrusted to, or handled by, them in a responsible and lawful manner. In addition, they should not make personal use of resources, property or facilities of the school unless properly authorised to do so. Employees must not put themselves in a situation where there is a conflict between their personal and professional interests. Please see sections 7 and 8 below for further information regarding relationships, conflict of interest and outside commitments.

Respect for others

3.5 The Trust believes that every employee has the right to work in a safe environment without the fear of discrimination, harassment or abuse. All employees must treat others with dignity and respect and should value the contribution that others can make. They should not discriminate unlawfully or inappropriately against any person and must always act in a professional and courteous manner. Employees should strive to maintain positive relations with all parties and must not act in a way which could be perceived as bullying.

3.6 Employees should recognise and respect the work demands of, and contributions made by, others within the workplace. This respect can be demonstrated by completing tasks to agreed deadlines, attending calendared meetings promptly and communicating

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effectively with others. Employees are expected to take reasonable direction and leadership from senior staff within each school.

3.7 The Trust will ensure that everyone who comes into contact with it is treated in line with the provisions of the Equality Act 2010, and not in any way disadvantaged by factors which could prevent the implementation of fair policies and operations.

3.8 The Trust takes a zero tolerance approach to aggressive and violent behaviour towards its staff and, in serious cases, the Headteacher may ban an individual or individuals from the school site.

Safeguarding and Promoting the Welfare of Children

4. Safeguarding and promoting the welfare of children is defined as:

- Protecting children from maltreatment
- Preventing impairment of children's mental and physical health and development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care, and
- Taking action to enable all children to have the best outcomes

4.1 Everyone who comes into contact with pupils and their families has a role to play in safeguarding children. The role played by school employees is particularly important as they are in a position to identify concerns early and potentially prevent concerns from escalating.

4.2 All employees have a responsibility to provide a safe environment in which children can learn. In addition, employees have a responsibility to identify children who may be in need of extra help or who are suffering, or are likely to suffer, significant harm. All employees then have a responsibility to take appropriate action, working with other services as needed.

4.3 All employees within the trust are required to remain vigilant around pupils, be mindful of the indicators of possible abuse or neglect and act on issues of concern immediately should they arise in line with school/trust policies. Such issues should be reported to the Designated Safeguarding Lead or the deputy DSL in their absence.

4.4 The trust has a safeguarding policy and each school has a child protection policy which all employees must read and act in accordance with at all times. In addition, all employees must read Part 1 of Keeping Children Safe in Education. Relevant induction and refresher training on safeguarding and the Safeguarding Policy will be made available to all staff within each School and the above documents are available from each school office. Failure to attend this training without good reason will be considered a serious issue which may result in further action being taken. Associated persons may fulfil their safeguarding training requirements through alternative provision e.g. through their own employer, however, they must be able to provide evidence of such training to the school.

4.5 Employees of the trust must maintain an attitude of 'it could happen here' where safeguarding is concerned. Should they have any concerns regarding the welfare of a

OFFICIAL - SENSITIVE

pupil, employees should always follow the school's procedures and act in the interests of the child.

4.6 When allegations are made against a member of staff regarding a safeguarding issue, then the formal policy for dealing with allegations will be invoked, in line with the local Safeguarding Partnership guidance. For associated persons an appropriate process will be followed, involving that person's employer, if relevant. In all cases the school will make referrals to the DBS in line with its statutory obligations.

4.7 Concerns raised in relation to adults working with children, which do not meet the harm threshold for being considered as an allegation in line with the local safeguarding Partnership guidance, but which are deemed to be 'low-level concerns' in line with Keeping Children Safe in Education, will be considered against the further Low Level Concern guidance provided for in the Addendum and found at the end of this policy. Concerns which are deemed to be 'low-level', may be considered as examples of poor performance/capability and or misconduct and disciplinary action may be necessary.

4.8 Failure to report issues of concern and/or failure to act in the best interests of a child will be considered as a serious issue which may, if proven, constitute gross misconduct. For associated persons an alternative process will be followed which may result in cessation of their contractual arrangements.

5 Policies on Behaviour and Restrictive Physical Intervention

5.1 Staff must ensure they fully understand the school's policies on behaviour management, pupil discipline and restrictive physical intervention guidance and training and follow these at all times, using strategies appropriate to the circumstances and situation. Staff should not use any form of degrading or humiliating treatment to censure a pupil.

5.2 There are occasions when it is entirely appropriate and proper for staff to have physical contact with children; however, it is crucial that staff only do so in ways appropriate to their professional role and in relation to the pupil's individual needs and any agreed care plan.

5.3 Any physical contact should be in response to the child's needs at that time, of limited duration and appropriate to their age, stage of development, gender, ethnicity and background. Employees should, therefore, use their professional judgement at all times.

6 Confidentiality, Disclosure and Security of Information

6.1 The trust recognises the importance of an open, transparent culture with clear communication and accountability. It is the school's aim to be as open as possible about its activities. The law requires that certain types of information must be available to auditors, inspectors, the Police, children's services, government departments, parents and the public. If an employee is in any doubt as to whether they can release any particular information, they should always check with the Headteacher first.

OFFICIAL - SENSITIVE

6.2 The confidentiality of information received in the course of an employee's, duties should be respected and must never be used for personal or political gain or to cause damage to the interests and reputation of the school/trust, its employees and its pupils. Employees must not knowingly pass information on to others who might use it is such a way. If employee believe that information should be disclosed in the public interest, they should follow the school's whistle-blowing policy before doing so. In such cases, failure to follow the whistle-blowing policy may result in disciplinary action being instigated or the cessation of contractual arrangements. The Trust's whistle-blowing policy is available from each school office and the Trust website.

6.3 Employees must not communicate confidential information or documents to others who do not have a legitimate right to know. Furthermore, information which is stored on computer or manual systems must only be disclosed in accordance with the requirements of the Data Protection Act 2018.

6.4 When an employee leaves the employment of the school/trust, or an associated person ceases to work with the schools, then the requirement to maintain confidentiality regarding the information gained during their employment/ association will continue. In addition, on ending their employment/association with the trust individuals must ensure all confidential documentation and records are returned and copies are not retained.

6.5 Employees must ensure that confidential information is stored securely, whether it be in documents and files, or held electronically and whether this information is held on the school premises or taken off site.

6.6 Further information is available in the trust's data protection policy, which employees must ensure that they understand and follow at all times. The trust's data protection policy is available from each school off ice and the trust website

7 Outside Commitments

7.1 The Trust recognises that employees are entitled to their private lives. In general, the choices and actions of employees outside of their role are not the trust's concern. However, in order to protect all parties and the schools there are exceptions to this.

Conduct

7.2 Whether in or outside the school environment, employees must ensure their conduct does not bring into question their suitability to work with children.

7.3 All adults working with children and young people have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of children and young people. It is, therefore, expected that they will adopt high standards of personal conduct in order to maintain the confidence and respect of the public in general and all those with whom they work.

7.4 There may be times, for example, when an adult's behaviour or actions in their personal life come under scrutiny from local communities, the media or public authorities. This could be because their behaviour is considered to compromise their position in a school

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setting or indicate unsuitability to work with children or young people. Acts of violence by the employee would be an example of such behaviour.

7.5 Employees working with children and young people should therefore understand and be aware that safe practice also involves using judgement and integrity about behaviours in places other than the work setting.

7.6 The behaviour or actions of an employee's partner or other family members may raise similar concerns. The trust may take action if it believes that this behaviour may be a potential risk to pupils or if it impacts on the suitability of an employee to work with the schools.

Additional work

7.7 Employees are able to take on work in addition to their existing contract of employment, providing it does not conflict with the performance of their duties in the role for which they are employed.

7.8 An employee who wishes to take on addition work must ensure that:

a) the additional hours worked do not contravene the Working Time Regulations or otherwise give the school cause for concern about health and safety at work, and
b) the outside work does not place the employee in a position where their duties and private interests conflict, and
c) the outside work does not damage, or potentially damage, public confidence in the school's conduct or business.

7.9 All teaching staff, and support staff (employed on spinal column point 28 and above), are required to obtain the consent of the Headteacher prior to accepting additional work. The schools will not unreasonably refuse any requests and each will be considered on a case-by-case basis taking into account the particular circumstances. If the additional work involves pupils of the home school, for example babysitting, then the employee must inform the Headteacher regardless of their salary grade. Such notifications should be made to help protect the employee and to ensure that relevant safeguarding information can be shared if appropriate (also see paragraph 12.20 below).

7.10 Associated persons are not required to obtain consent before accepting additional work. However, they should bring to the attention of the Headteacher, any other work or activities which they undertake which may constitute a conflict of interest with the work of the school.

7.11 Employees must not undertake private or personal work, paid or unpaid, of any description during working hours or on the school premises or using school equipment unless that have been given specific permission by the Headteacher. Even if approval is granted, any fees received, e.g. lecture fees or examination board payments, would be passed over to the school, or unpaid leave must be taken. Where approval is granted, the agreed arrangements will be documented and the employee provided with a copy.

Intellectual Property and Copyright

OFFICIAL - SENSITIVE

7.12 All intellectual property rights, (that is copyright, design rights and the right to patent inventions) relating to anything created or invented by staff in the course of his/her duties automatically belongs to the school, unless otherwise agreed; staff cannot exploit the rights to any such thing without the written permission of the Headteacher. Any income raised through the use or sale of these products belongs to the trust.

7.13 The Trust may agree to our schools collaborating with other schools/trusts to create or invent intellectual property to be shared with other schools.

Personal interests

7.14 Employees may have a variety of personal interests, which may, from time-to-time, impact on their role for the trust. To protect the schools and the employee from any accusations of wrong doing the schools have in place a number of safeguards which demonstrate that these interests are not allowed to influence the way the schools operates. These include but are not limited to, the school's Recruitment and Selection Policy and standing financial instructions.

7.15 Whatever an employee's role within the organisation, they must declare to their Headteacher in writing any financial or non-financial interests which could bring about conflict with the trust's interests. This excludes employees undertaking activities, duties and actions as part of a recognised trade union. Employees must not make, or become involved with, any official or professional decision about matters in which they have a personal interest.

Gifts and Hospitality

7.16 A potential source of conflict between public and private interests is the offer of gifts, hospitality or benefits in kind to employees in connection with their official duties. It is important to avoid any suggestion of improper influence and ensure that the school operates in accordance with the highest standards of integrity, probity and openness.

7.17 Employees must not accept gifts (other than small or casual gifts as detailed below), hospitality or any benefits in kind from a third party which might be seen to compromise their personal judgement or integrity or be seen as an inducement.

7.18 Casual gifts offered by contractors, organisations, firms, parents and carers or individuals such as calendars, diaries, pens, food, drink, flowers and other small gifts need not be declared provided their value does not exceed the amount identified in the Trust Gifts and hospitality policy.

7.19 Small gifts from pupils to their class teacher or support staff are acceptable and can be retained by employees provided that they do not exceed the amount identified in the Trust's Gifts and Hospitality policy

7.20 Hospitality is sometimes offered to representatives of the school in an official or formal capacity. Hospitality can take many forms and could include attending exhibitions, seminars, sporting events, shows or concerts. Training events with very low training content and free catering, drink or transport may also be hospitality.

7.21 The following are examples of gifts or hospitality which should be refused by staff:

OFFICIAL - SENSITIVE

- gifts of money or vouchers
- free membership or subscriptions
- free goods, services or equipment which are normally provided by a supplier to the school at a charge
- any gifts/hospitality which exceed the Trust policy

7.22 These gifts and hospitality should be tactfully and courteously refused. If a gift is simply delivered to the school and cannot be returned, or cannot reasonably be refused without causing offence, then this gift must be declared to the Headteacher and recorded in the Register of Gifts and Hospitality. These items should not be retained by the individual and, where suitable, these items should be used for school purposes e.g. fundraising, raffles, etc.

Sponsorship

7.23 Where an outside organisation wishes to sponsor a school activity or project, whether by invitation, tender, negotiation or voluntarily, the basic conventions concerning acceptance of gifts and hospitality apply. Particular care must be taken when dealing with contractors or potential contractors.

7.24 Where the school wishes to sponsor an event or services, neither an employee nor their partner, spouse or relative must benefit from such sponsorship in a direct way with there being full disclosure to the Headteacher of any such interest.

Cautions, Charges, Convictions and Court Orders

7.25 An employee must notify the Headteacher if, during the course of their employment, they are charged with, or convicted of, any criminal offence, or accepts a formal police caution, and should do so as soon as possible after the charge, caution or conviction. If the Headteacher is the subject of the charge they must inform the Chair of Governors.

7.26 The trust acknowledges that a caution is not a criminal conviction, but employees must be aware that cautions have to be declared during Disclosure and Barring checks unless they meet the filtering rules of the Disclosure and Barring Service.

7.27 The trust acknowledges that an employee charged with an offence is innocent until proven guilty. However, special considerations will apply if the offence is one of those which is on the list of offences relevant to safeguarding (a full list is available on the Disclosure and Barring Service's website) or if an employee is imprisoned on remand pending trial.

7.28 Information given to each school will be treated as confidential and stored securely in the same way as other confidential personal information, having regard to the guidance from the Disclosure and Barring Service on the length of time for which particular kinds of information should be retained. Destruction of any charge, caution or conviction information must be done securely.

7.29 Employees must also notify the Headteacher if they are subject to a court order or any other conditions which may affect their suitability to work with children or any

OFFICIAL - SENSITIVE

circumstances which could lead to disqualification under the Childcare Act 2006 if they are employed in relevant childcare.

8 Relationships and Conflicts of Interest

8.1 Appointments should be made on the basis of the ability of the candidate to undertake the duties of the post. Employees and governors involved in making appointments should do everything possible to ensure that these are made on the basis of merit and in accordance with the trust policy on recruitment and selection and the prevailing regulations on safer recruitment.

8.2 In order to avoid any possible accusations of bias, employees and governors must not become involved in any appointment or any other decision relating to the discipline, promotion, pay or conditions of another employee, or prospective employee, if they are a relative of an applicant or have a close personal relationship with him or her, nor where they have the opportunity to benefit, directly or indirectly, from an appointment without the express prior approval of the Headteacher, or Chair of Governors in the case of the Headteacher.

8.3 In this section 'relative' means a spouse, partner, parent, parent-in-law, son, daughter, stepson, stepdaughter, child of a partner, brother, sister, grandparent, grandchild, uncle, aunt, nephew, niece or the spouse or partner of any of the preceding persons.

8.4 'Partner' means a couple who live together or who are involved in a romantic relationship.

8.5 'Close personal relationship' would include a person not employed by the school with whom an employee has a close business connection.

8.6 Personal relationships between colleagues who work together can give rise to conflicts of interest. Therefore, employees who have entered into a close personal or romantic relationship with a colleague are required to disclose this fact to their Headteacher. Any information declared or disclosed should be recorded on both employees' personal files and treated in strict confidence.

8.7 This information should only be considered to ensure that the existence of the relationship does not impact on the smooth running of the trust.

8.8 All relationships of a business or personal nature with external contractors or suppliers, or potential contractors or suppliers, must be declared to the Headteacher (or Chair of Governors in the case of the Headteacher) at the earliest opportunity.

9 Financial and Tendering Procedures

9.1 Employees should exercise fairness and impartiality when dealing with all customers, contractors and subcontractors. Tendering processes must always be carried out in line with the schools' financial policies and procedures and the Council's standing orders and financial regulations.

9.2 Employees responsible for engaging or supervising contractors and who have previously had, or currently have, a relationship in a private or domestic capacity with

OFFICIAL - SENSITIVE

a particular contractor, must declare that relationship to the Headteacher (or Chair of Governors in the case of the Headteacher).

9.3 If employees become privy to confidential information on tenders or costs relating to external contractors they must not disclose that information to any unauthorised person or organisation.

9.4 All employees must ensure that special favour is not shown to current or recent former employees or their partners, close relatives or associates in awarding contracts to businesses run by them or employing them in any capacity.

9.5 All employees involved in financial activities and transactions on behalf of the school, including budgetary control, payments of accounts, payments of salaries and wages, petty cash and orders of works, goods or services must follow the financial regulations detailed in paragraph 9.1 above.

10 Dress and Appearance

10.1 The School recognises that dress and appearance are matters of personal choice and self-expression. However, all employees must dress in a manner that is appropriate to a professional role and which promotes a professional image. Transgender employees will be allowed to follow the dress and appearance requirements in a way which they feel matches their gender identity.

10.2 Employees should dress in a manner that is free from slogans which undermine fundamental British values. They should dress safely and appropriately for the tasks they undertake and pay regard to any health and safety considerations. For safety reasons appropriate footwear should be worn.

10.3 Tattoos and body art, which could reasonably be considered inappropriate in a school context, should be covered while employees are in school, for example offensive language and sexualised images. Discreet earrings and body piercings are acceptable, however, those which could pose a health and safety risk whilst undertaking the tasks of the role should be removed while on school premises.

10.4 Consideration will be given to any reasonable adjustments required to the dress and appearance requirements for employees with a disability.

10.5 No caps or hats may be worn in school, except where necessary for hygiene reasons, on health and safety grounds, or have been permitted on religious or racial grounds. Head dress in line with beliefs and traditions of various religions are allowed, with the exception of those that cover a substantial part of a person's face such that their identity cannot be confirmed. The reasons for this are:

- the school takes the view that in an institution where verbal communication and body language form an important and significant part of the work with children and young persons, it is not appropriate for any employee who comes into contact with pupils in teaching and learning situations to have a substantial part of their face covered; and

OFFICIAL - SENSITIVE

- the school wishes to ensure that it remains vigilant about the safety and security of staff and pupils, and that no person employed by the school should have their faces covered and therefore conceal their identity.

10.6 Face coverings may be worn where this is necessary for health and safety reasons.

11. Transporting pupils during and outside of normal working duties

11.1 In certain circumstances employees may be required or offer to transport pupils in their own vehicle e.g. sporting events, visits to other schools. As with any other activity undertaken at work this should not be undertaken without the knowledge and permission of the Headteacher, or nominated deputy in their absence. To help safeguard this action, it is also recommended that more than one staff member be present in such a scenario.

11.2 Employees should ensure that their vehicle meets all legal requirements, ensuring the vehicle is roadworthy and appropriately business insured and that the maximum carrying capacity is not exceeded. They must ensure that driver checks are up to date and complete

11.3 Employees should never offer to transport pupils outside of their normal working duties, other than in an emergency or where not doing so would mean the child may be at risk. In these circumstances the matter should be recorded and reported both to the Headteacher and the child's parent(s) / carer.

12. Use of information systems

School systems

12.1 The trust wants employees to use information systems to the full and to feel competent and comfortable about doing so. However, it is essential that such systems are used appropriately. Any reference to information systems should be taken to mean computer equipment, associated technology and internet access.

12.2 The misuse of information systems is a serious matter and may result in employees being subject to disciplinary and, where appropriate, legal action following appropriate investigation.

12.3 Guidance documents are available within the school in relation to the use of computers and information technology. Employees must be familiar with, and abide by, the trust's policies on the acceptable use of information systems.

12.4 Private use of school facilities, such as computers (including use of the internet), stationery and photocopiers is governed by these documents. Employees should not arrange to receive correspondence, telephones calls or emails in school related to outside work or private interests.

12.5 The trust will monitor the use of information systems without notice. A record of any websites accessed by employees is recorded by the school's system and may be

OFFICIAL - SENSITIVE

examined later if misuse is suspected. [Further information is available in the school's Policy for the safer use of IT]

Personal devices

12.6 The school accepts that employees will bring their own devices into the workplace and may use them during break times. When employees are using personal devices, including accessing WiFi whilst on school premises, then the standards contained in this code along with other school policies will apply to their use.

12.7 The personal use of mobile phones during working hours should be undertaken with discretion, and be restricted to dealing with emergencies. Employees should not have/check their phone, make or receive calls or texts during work time where pupils are present. Mobile phones should be on silent at all times whilst in school and should not be left on display

12.8 Employees are not permitted to use their personal devices for making voice or video recordings within school or taking photos of pupils. If there is a requirement in the individual's role to take photographs of children for school purposes, this should be carried out using school equipment which will be provided with the agreement of the Headteacher/senior manager and in line with the agreed school procedures and where appropriate permissions have been sought.

Use of social networking sites.

12.09 Employees should not access social networking/media sites during working hours unless this forms part of their work duties. When accessing such sites outside working hours employees are advised not to write about their work or make reference to the school or employer on external web pages. Where an employee chooses to do so they should make it clear that the views expressed are their own and do not reflect the views of the trust.

12.10 In addition, employees must not:

- Disclose any information that is confidential to the school to any third party or disclose personal data or information about any individual, colleague, pupil or parent/carer which could be in breach of data protection legislation
- Disclose any information which is not yet in the public arena
- Post illegal material, e.g. material which incites racial hatred
- Link their own personal web pages to the school's website
- Include any information, sourced from the school, which breaches copyright
- Make defamatory remarks about the school, colleagues, Governors, pupils and parents/carers
- Publish any material or comment that could undermine public confidence in the individual as a representative of the school or in their position of trust within the community
- Misrepresent the trust, by posting false or inaccurate statements about the work of the schools

12.11 In circumstances where an employee makes an inappropriate comment in relation to the school/trust or an employee of the trust but does not actually name them, then the school

OFFICIAL - SENSITIVE

may still consider taking action if it believes that the comment is contrary to the above requirements.

Communicating with pupils

12.12 Employees work in a position of trust with pupils and it is therefore vital that this position is not abused. Individuals also need to ensure that they do not put themselves in a position where they can be accused of abusing that trust.

12.13 In support of this, employees must not have any communication with pupils through personal information and communication systems including personal e-mail accounts, social media sites, mobile phones, text messaging, etc.

12.14 All electronic communication with pupils must be through school e-mail accounts, for both pupils and staff, and should be appropriate to the staff/pupil relationship.

12.15 Employees must not give out their personal mobile phone numbers or e-mail addresses to any pupils or request and/or retain the personal phone numbers or e-mail addresses of pupils.

12.16 The above guidance regarding communication with pupils continues to apply when the pupils have left school and/or the employee has left the trust.

12.17 It is recognised that there may be circumstances where employees of the trust are known to pupils outside of work e.g. family relationships, private tutoring, membership of clubs, etc.

12.18 When employees are related to pupils within the school they are required to inform the Headteacher and this will be recorded on school systems. Electronic communication with pupils to whom an employee is related should take place out of working hours.

12.19 When employees interact with pupils from the trust as a result of any additional employment they hold or volunteering they undertake, they are required to inform the Headteacher of this (or Chair of Governors in the case of the Headteacher). A declaration form is attached at appendix 1. In these circumstances all electronic communications regarding these arrangements should take place out of working hours.

13. Additional Advice and Guidance for Staff

13.1 When we speak to others we will:

- use a calm tone of voice at all times, to explain something to or instruct the children, so that they can follow our words without feeling threatened or uncomfortable.
- speak respectfully to other adults at all times, even if we disagree with them.

13.2 As professionals we will:

- avoid workplace gossip and negativity as it breeds resentment and becomes a roadblock to effective communication and collaboration. We all have a duty to take active steps to divert conversations away from this if we come across it.

OFFICIAL - SENSITIVE

- maintain confidentiality about anything that we see or hear in the workplace or in schools, so that colleagues, parents, children and outside agencies can trust us, and as a way of showing respect to our fellow professionals.

- work as part of a team, contributing as well as learning from others and helping to build up a strong workforce.

- work within the policies and practices set out by Steel River Academy Trust, so that what we do is consistent with what has been agreed between all members of the Trust.

- treat everyone with respect.

- dress appropriately in accordance with the individual school's Staff Handbook guidance.

- behave in a positive and calm way despite any challenging circumstances we may be facing both inside and outside of school, especially in front of children.

- **Home Visits** – Staff are not permitted to visit the home of a student unless pre-arranged and the Headteacher and the designated Safeguarding Lead are informed. The appointment must be logged. No young person should ever be invited into the home of a staff member.

14. Whistleblowing

14.1 Employees are often the first to realise that there may be something seriously wrong within an organisation. However, they may not express their concerns because they feel that speaking up would be disloyal to their colleagues or to the trust. They may also fear harassment or victimisation.

14.2 The trust is committed to the highest possible standards of openness, probity and accountability. In line with that commitment, employees, and those associated with the trust, who have serious concerns about any aspect of the trust's work are expected to come forward and voice those concerns. It is recognised that most cases will have to proceed on a confidential basis.

14.3 In order to ensure that this can happen the trust has adopted a whistle-blowing policy which is available from each school's office or the Trust website. This policy is intended to encourage and enable employees to raise serious concerns within the school rather than overlooking a problem or 'blowing the whistle' outside

Code of Conduct - Confirmation of Compliance

I hereby confirm that I have read, understood and agree to comply with the school's code of conduct.

Name: _____

OFFICIAL - SENSITIVE

Position/Post held: _____

Signed: _____

Date: _____

Once completed, signed and dated, please return this form to the Headteacher.

OFFICIAL - SENSITIVE

Appendix 1 - Declaration of relationships with pupils outside of school

It is recognised that there may be circumstances whereby employees of the school are known to pupils outside of work. Examples include membership of sports groups, uniformed clubs, private tutoring and babysitting

Where employees have a relationship on a one-to-one basis or with a single family they should give the details below:

Student Name	**Relationship**

Continue on reverse if required.

Where employees are, for example, a group leader for a club which multiple pupils attend they should give the details below:

Name of Group	
Meeting place of Group	
Age range of children attending	
Gender of children	Male/Female/Mixed
Governing body details for group if applicable e.g. Girlguiding	
Approximate number of children in group	

I can confirm that I am fully aware of the code of conduct relating to contact out of school with pupils in line with this policy.
If I am tutoring a student outside of school I am aware that the following must be adhered to:

- I do not, at any point, teach the child in question as part of my daily timetable – this is a stipulation of such tutoring
- I emphasise to parents that this is done completely independently of the school
- No monies come through the school at any point, informally (e.g. via the child) or formally
- No private tutoring is to take place on the school premises

I confirm if that if these circumstances change at any time I will complete a new form to ensure that the school are aware of any relationships.

Name: _____

Signed: _____

Date: _____

Once completed, signed and dated, please return this form to the Headteacher.

Appendix 2 – Addendum to School Code of Conduct

Low Level Concerns [Keeping Children Safe in Education]

1. 'Low-level concerns', and the importance of addressing such concerns, is set out within KCSIE. The statutory guidance provides examples as to the type of behaviour which could be deemed to be a low-level concern, i.e. behaviour or conduct which does not meet the threshold to be considered as an allegation against staff in line with the local safeguarding children board procedures, but which may cause a sense of unease or a 'nagging doubt' that an adult working in or on behalf of the school may have acted in a way that;

- Is inconsistent with the code of conduct, including inappropriate conduct outside of work; and
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO

2. Behaviour which may be considered as a low-level concern can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, which however, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse. The advice from NYES HR is that any concern about an individual working with children or on school site should be considered in discussion with LADO and NYES HR to ensure that the advice provided considers the full range of circumstances. Therefore, even when concerns about an adult do not, at first consideration, appear to meet the harm threshold (as per para 4.8), you are advised to seek advice from the LADO and NYES HR.

3. It is crucial that any such concerns, including those which do not meet the harm threshold are shared responsibly and with the right person, and recorded and dealt with appropriately. It is expected that initially, concerns will be raised with the Designated Senior Manager/Headteacher (in line with the schools' child protection manual). Headteachers are advised to discuss any concerns with the LADO and NYES HR.

4. Following initial discussion with the LADO and / or NYES HR, on receipt of a low-level concern from a third party, the Designated Senior Manager/Headteacher should collect as much evidence as possible by speaking to the person who raised the concern and to the individual involved and any witnesses. This information will aide your consideration of any further action that may be necessary.

5. Where it has been confirmed that the concerns do not meet the threshold to be considered as an allegation under the local safeguarding children board procedures, schools are advised to consider whether the matter relates to poor performance or alleged misconduct, and therefore should consider their disciplinary and developing performance / capability policies in determining the most appropriate way of addressing their concerns. Each case will be considered on its merits, and action may range from monitoring and additional supervision, informal management advice through to a more formal disciplinary investigation and the possibility of a formal disciplinary sanction where the concerns are of a more serious nature, or demonstrate a pattern where informal action or support has not been successful in resolving the identified concerns.

6. All actions taken by the school in respect of the low-level concerns, all instances should be recorded clearly and comprehensively in writing, including the details of the concern, the context in which the concern arose, and the action taken. A template form has been provided to help in this process. The name of the individual sharing their concern should also be noted, if the individual wishes to remain anonymous then that should be

respected as far as is reasonably possible. Schools can decide where these records are kept, but they must be kept confidential, held securely and comply with GDPR. It is recommended that records are held in one place and not as part of an individual's own personal file. Schools should consider how long to retain the information, but it is recommended that it is retained at least six years after the individual leaves their employment, in line with other HR file retention protocols.

7. Records should be reviewed regularly so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the school or college should decide on an appropriate course of action, and it is advised that advice is sought from NYES HR and the LADO. Any concerns which have the potential to meet the harm threshold must be referred to the LADO in line with the local safeguarding children board procedures.

Clarity around Allegation vs Low-Level Concern vs Appropriate Conduct

Allegation

Behaviour which indicates that an adult who works with children has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children.

Low-Level Concern

Any concern – no matter how small, even if no more than a 'nagging doubt' – that an adult may have acted in a manner which:

- is not consistent with an organisation's Code of Conduct, and/or
- relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children.

Appropriate Conduct

Behaviour which is entirely consistent with the organisation's Code of Conduct, and the law.

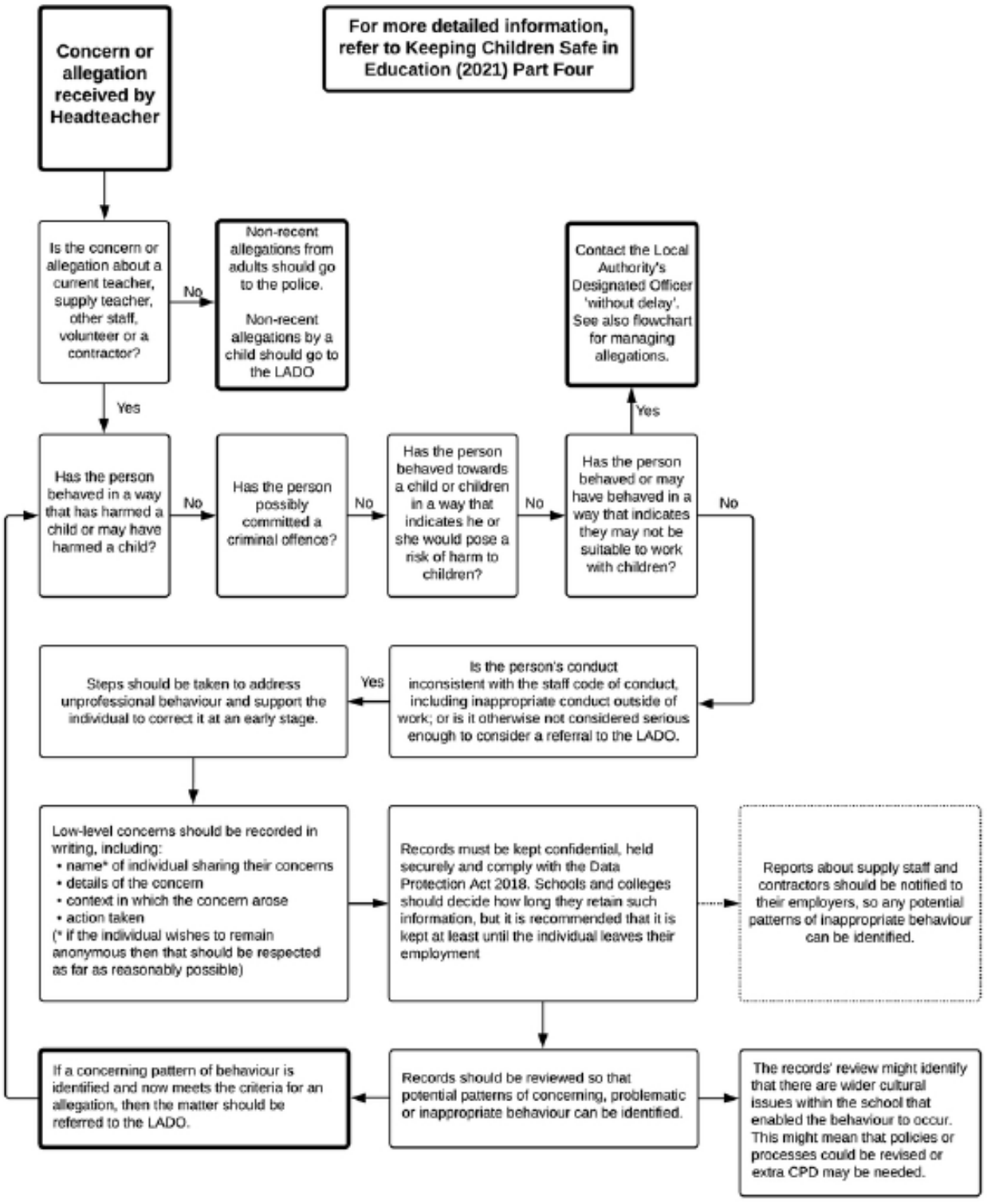
Storing and use of Low-Level Concerns and follow-up information

Low Level Concerns information will be stored securely by the Head Teacher. The staff member(s) reporting the concern must keep the information confidential and not share the concern with others apart from the Head Teacher or those aware in the senior leadership team.
Low-Level Concerns will not be referred to in references unless they have been formalised into more significant concerns resulting in disciplinary or misconduct procedures.
Whenever staff leave Bankfields Primary, any record of low-level concerns which are stored about them will be reviewed as to whether or not that information needs to be kept.

Consideration will be given to:

a) whether some or all of the information contained within any record may have any reasonably likely value in terms of any potential historic employment or abuse claim so as to justify keeping it, in line with normal safeguarding records practice; or
(b) if, on balance, any record is not considered to have any reasonably likely value, still less actionable concern, and ought to be deleted accordingly.

Process to follow when a Low-Level Concern is raised



Key Reference Document

Read this document for further information about Low-Level Concerns, which is referenced in KCSIE 2022.

https://www.farrer.co.uk/globalassets/clients-and-sectors/safeguarding/low-level-concerns-guidance-2020.pdf