

THE CHARTER SCHOOLS

EDUCATIONAL TRUST

Code of conduct for staff

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Contents

1	Purpose	3
2	Scope.....	3
3	Safeguarding and promoting the welfare of children and recognising low level concerns	4
4	Duty of care	5
5	Health & Safety	5
6	Honesty and personal integrity	5
7	Tackling discrimination.....	6
8	Professional boundaries and relationships	7
9	Confidentiality and data protection.....	7
10	Physical contact with students.....	9
11	Behaviour management	10
12	Social contact with students.....	10
13	Photography, videos and other images/media	11
14	Acceptable use of technology	11
15	Personal Phones and Tablets	11
16	Alcohol and Substance Misuse.....	11
17	Working one to one with students	12
18	Curriculum.....	12
19	Dress and appearance	12
20	Gifts and hospitality	12
21	Keeping within the law	13
22	Conduct outside of work and at work related functions.....	14
23	Agency workers	14
24	Review.....	14

1 Purpose

- 1.1 Our Staff Code of Conduct sets out the professional standards expected of all employees and should be read in conjunction with the Trust Disciplinary Policy, Teachers' Standards and the statutory guidance Keeping Children Safe in Education.
- 1.2 This Code should make it clear to employees the expectations The Charter Schools Educational Trust (the 'Trust') has of them. Employees should note that this Code is not exhaustive in defining acceptable and unacceptable standards of conduct and employees must use common sense in adhering to the underpinning principles. If any employee is ever unsure what the expectations are in any given circumstance, they should speak to their direct line manager or the school HR lead.
- 1.3 This Code does not form part of any employee's contract of employment, and it may be amended at any time.

2 Our Values

- 2.1 Our values drive our work in ensuring we deliver on the Trust's mission to inspire and nurture children and young people in South London to excel, through education that transforms lives and strengthens our diverse communities.
- 2.2 We expect that all our staff will conduct themselves with integrity and honesty at all times and uphold the values and reputation of their individual school/department and the Trust as a whole, ensuring that they always act in the best interests of the pupils in our schools.
- 2.3 Our values also stress the importance of belonging within our Trust and so we expect all staff to work successfully with people of many different backgrounds and cultures.
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- 2.5 We also expect that when staff observe other colleagues not behaving in this way, that they raise this appropriately with their line manager or Headteacher, without fear of reprisal.

3 Scope

- 3.1 The Code applies to all employees regardless of length of service including those in their probationary period.
- 3.2 It also applies to consultants, contractors, casual and agency staff, and volunteers (collectively referred to as staff in this policy although, unlike employees, breaches of the Code will not be managed through the disciplinary procedure.

3.3 As recognisable figures our local communities the behaviour and conduct of staff of the Trust and its schools and associated organisations outside of work can impact on their employment. Therefore, conduct outside work may be treated as a disciplinary matter if it is considered that it is relevant to the employee's employment.

4 Safeguarding and promoting the welfare of children and recognising low level concerns

4.1 All staff are responsible for safeguarding children and promoting their welfare. This means that employees are required to take action to protect children from maltreatment, prevent impairment of children's health or development and ensure that children grow up in circumstances consistent with the provision of safe and effective care. This will enable all children to have the best outcomes.

4.2 All employees should be prepared to identify children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.

4.3 All employees must be aware of the signs of abuse and neglect and know what action to take if these are identified.

4.4 All employees must be aware of low-level concerns, no matter how small, and even if no more than causing 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 staff 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 Local Authority Designated Officer (LADO).

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

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone without permission
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating or offensive language.

4.5 To do this, employees must have fully read, understood (and ask if they don't), and comply with the most current 'Keeping Children Safe in Education' document published by the Department for Education ('DfE') and the Trust Child Protection Policy, and be aware of our systems for keeping children safe. Staff must also undertake mandatory training expected of them in relation to safeguarding children.

4.6 This extends to understanding the law and guidance about managing behaviour, physical contact and physical restraint, personal relationships, one to one meetings and tuition, transportation of pupils, educational visits, use of images and photography and safer recruitment.

- 4.7 All staff are required to know how to report any safeguarding concerns and must cooperate with colleagues and with external agencies where necessary.
- 4.8 All staff are required to read and understand the Trust Acceptable use of IT policy, the Online Safety Policy and the Recruitment Policy, where applicable, in relation to safeguarding children.

5 Duty of care

Staff must:

- Understand the responsibilities which are part of their employment or role, and be aware that sanctions will be applied if these provisions are breached
- Always act, and be seen to act, in our pupils' best interests
- Avoid any conduct which would lead any reasonable person to question their motivation and/or intentions
- Take responsibility for their own actions and behaviour.

6 Health & Safety

All employees must ensure that they:

- Read and understand the Trusts' Health and Safety Policy
- Complete any required Health and Safety training as directed
- Comply with Health and Safety Regulations or instructions and use any safety equipment and protective clothing which is supplied to you by the school
- Comply with any hygiene requirements
- Comply with any accident reporting requirements
- Never act in a way which might cause risk or damage to any other members of the community or visitors.
- Inform their line manager of any paid work undertaken elsewhere. This is to comply with the Working Time Regulations, which are a Health and Safety initiative.

7 Honesty and personal integrity

- 7.1 Employees are expected to demonstrate consistently high standards of personal and professional conduct. The following statements define the behaviour and attitudes which set the required standard for conduct for staff across the Trust.
- 7.2 Employees must comply with any lawful or reasonable instructions issued by managers or Trustees.
- 7.3 Employees uphold public trust in our Trust and its schools and maintain high standards of ethics and behaviour, within and outside school, by:
- Treating pupils with dignity, building relationships rooted in mutual respect, and at all times observing proper boundaries appropriate to their professional position

- Having regard for the need to safeguard pupils' well-being, in accordance with statutory provisions
- Showing tolerance of and respect for the rights of others
- Not undermining fundamental British values, including democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs
- Ensuring that personal beliefs are not expressed in ways which exploit pupils' vulnerability or might lead them to break the law.

7.4 Employees must have proper and professional regard for the ethos, policies and practices of our Trust and maintain high standards in their own attendance and punctuality. Staff are expected to attend work promptly on each working day and follow the absence policy if they are unable to attend work. Staff do not have the discretion to work flexible hours without the express permission of their line manager.

7.5 Employees must treat all colleagues with respect, dignity, fairness and courtesy at all times.

7.6 Staff must maintain high standards of honesty and integrity in their work. This includes the handling and claiming of money and the use of Trust/School property and facilities. Staff are expected to treat all the Trust's property and facilities with respect and care, whether these be material or intangible elements such as branding, copyright etc. Staff are expected to protect property and facilities from vandalism and damage caused by their own negligence.

7.7 Staff are not normally permitted to use school premises, facilities, office equipment, e.g. personal computers, fax machines, photocopiers and the like, for personal use without prior authorisation from the Headteacher. If in doubt, please speak to your line manager.

8 Whistleblowing/raising serious concerns

8.1 Staff must raise serious concerns they have about any aspect of school life, including safeguarding or child protection practices by following the Whistleblowing Policy, which is available on the Trust Website and school intranets.

9 Tackling discrimination

9.1 Employees are required to understand the types of discrimination and bullying that pupils and colleagues may be subject to, and to act with courtesy and respect towards all students, colleagues and the wider school community regardless of their background, culture, disability, gender, language, racial origin, religious belief and/or sexual Identity.

9.2 We expect all our staff to uphold our Equality, Diversity and Inclusion policy, and all are required to have read and understood the Trust Respect at Work Policy and the respective school's Anti-Bullying Policy.

9.3 Employees must not ignore any form of discrimination including any inappropriate jokes, comments or behaviours which are dismissed as banter. Employees must positively promote equality and diversity and inclusion at all times.

10 Expected Professional Standards

- 10.1 All staff should be fully aware of the professional standards relating to their specific role and job description, including their professional body, over and above this more general code of conduct. Teachers should comply with the DfE Teachers Standards.
- 10.2 Our school leaders are expected to exemplify high standards of leadership and act as role models for more junior members of staff and students.

11 Professional boundaries and relationships

- 11.1 Employees in our schools are in a position of trust in relation to our pupils which means that the relationship between an employee and a student is not one of equals. It is a specific offence for a person aged 18 or over (e.g. a teacher, youth worker etc) 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.
- 11.2 Employees must ensure that they avoid behaviour which might be misinterpreted by others. This includes any type of communication that they may have with pupils.
- 11.3 Employees must not make sexual remarks to any pupil or discuss their own sexual relationships with, or in the presence of pupils. Employees must not discuss a pupil's sexual relationships in inappropriate settings or contexts. Any sexual behaviour by a member of staff towards any pupil is unacceptable and illegal.
- 11.4 Employees must ensure that professional boundaries are always maintained. This means that employees should not show favouritism to any pupil and should not allow pupils to engage in any type of behaviour that could be seen to be inappropriate. Pupils are not employees' friends and should not be treated as such.
- 11.5 Employees should be aware that it is not uncommon for pupils to become strongly attracted to a member of staff or to develop an infatuation. If any member of staff becomes aware of an infatuation, they should discuss it with their line manager or HR lead immediately so that they can receive support on the most appropriate way to manage the situation.

12 Declaring conflicts of interest

- 12.1 'Conflict of Interest' refers to situations in which personal interests may compromise, or have the appearance of or potential for, compromising professional judgement and integrity and in doing so, the best interests of the Trust.
- 12.2 The best way to handle conflicts of interest is to avoid them entirely. Individuals should avoid placing themselves in a position where there is an actual or potential conflict between their personal and/or 'outside' interests and relationships and their duties to the Trust.
- 12.3 If this is not possible then declaring any conflicts of interest (actual, potential or perceived) will disclose the issue and allow the most appropriate course of action to be taken

- 12.4 Those with a conflict of interest are expected to abstain from decisions where such a conflict exists.
- 12.5 The appearance of a conflict of interest must also be avoided. Members of staff in material breach of the Trust's Conflict of Interest policies and/or code of conduct may, in certain circumstances, be subject to disciplinary action.
- 12.6 In support of the above, the Trust requires staff to declare all actual and possible conflicts of interest. This means that any individual who has an interest (financial, loyalty-based, or otherwise and either directly or through their employing organisation or members of their family or close friends) in any decision they are involved in on behalf of the Trust should declare this interest. This may result in that individual being excluded from participating in the related decision or in the on-going project, service or contract related to this.
- 12.7 Anybody involved in decision-making, procurement or contract management is required to complete the conflict of interests' declaration form annually, declaring any interests (which includes a "None" return).
- 12.8 All parts of the form should be completed. This is available via the link [HERE](#)
- 12.9 Any issues completing the form should be raised with the Trust Head of Governance and Compliance
- 12.10 For employees who are in a relationship with a colleague, parent or carer, or any other person associated with the Trust or any of its schools we expect that they identify this to their respective Headteacher (or CEO in the case of Trust Central Team staff) and ensure that this does not create a conflict of interest or affect their professional judgement or responsibilities in any way.
- 12.11 Where an employee has managerial authority over another employee with whom they are in a close personal relationship, the Trust reserves the right to transfer one or both employees to another role in the Trust following appropriate consultation with both employees in order to seek agreement to the transfer.
- 12.12 Recruitment must always be conducted on merit. Anyone involved in the recruitment and selection of staff must declare a conflict of interest at the start of the recruitment process and remove themselves from the decision-making process.

13 Confidentiality and data protection

- 13.1 Members of staff may have access to confidential information about pupils, colleagues or other matters relating to the Trust. This could include personal and sensitive data, for example information about a pupil's home life. Employees should never use this information to their own personal advantage, or to humiliate, intimidate or embarrass others. Employees should never disclose this information unless this is in the proper circumstances and with the proper authority.
- 13.2 If an employee is ever in doubt about what information can or can't be disclosed, they should speak to the Trust Data Protection Officer or the respective school DSL.

- 13.3 Confidential or personal information about a pupil or their family must never be disclosed to anyone other than on a need- to- know basis and advice should be sought prior to disclosure to ensure such disclosure is in accordance with Data Protection legislation.
- 13.4 There are some circumstances in which an employee may be expected to share information about a pupil, for example when abuse is alleged or suspected. In such cases, staff have a duty to pass information on without delay to those with designated safeguarding responsibilities.
- 13.5 If a student or parent/carer makes a disclosure regarding abuse or neglect, the employee must follow the Trust's procedures and the guidance as set out in Keeping Children Safe in Education DfE. Confidentiality must not be promised to the student or parent/carer however reassurance should be given that the information will be treated sensitively.
- 13.6 Confidential information about pupils and staff must be held securely.
- 13.7 Confidential information should not be held off the school/Trust site other than on security protected school/Trust equipment.
- 13.8 Where it is necessary for staff to take paper documents off-site for legitimate purposes and those documents contain the personal data of pupils or staff, every effort must be made to ensure these are kept secure at all times. The theft/loss of documents/equipment must be reported as soon as possible to the Trust's Data Protection Officer. Loss through negligence may result in disciplinary action.
- 13.9 In accordance with data protection guidelines, information must only be stored for the length of time necessary to discharge the task for which it is required.
- 13.10 Any media or legal enquiries must be passed to the Headteacher/CEO.
- 13.11 We will comply with the requirements of Data Protection Legislation (being the UK General Data Protection Regulation and Data Protection Act 2018) and any implementing laws, regulations and secondary legislation, as amended or updated from time to time. Employees are expected to comply with the Trust's systems as set out in our Data Protection Policy. If any employee becomes aware that data is at risk of compromise or loss or has been compromised or lost, they must report it **immediately** to the Trust Data Protection Officer, in order (where applicable) for relevant breaches to be reported to the Information Commissioners Office within 72 hours.
- 13.12 Employees must read and understand our Data Protection Policy and other relevant policies including in relation to recruitment, ICT and email usage, mobile and remote working, and data retention, copies of which are available on the Trust website or in your school staff handbook.

14 Physical contact with students

- 14.1 There are occasions when it is entirely appropriate and proper for staff to have physical contact with pupils. Employees must ensure that they only do so in ways that are appropriate to their professional role and in response to the pupil's needs at the time. This should be of limited duration and appropriate to the age, stage of development, gender and background of the student.

Employees should always be able to explain how and why they have made physical contact with a student.

- 14.2 There may also be occasions where a Pupil is in distress and needs comfort and reassurance which may include age-appropriate physical contact. If an employee is in this position, then they should consider the way in which they offer comfort, ensuring that it is not open to misinterpretation and is always reported to their line manager.
- 14.3 Staff may legally physically intervene with pupils to prevent them from committing a crime, injuring themselves or others, causing damage to property, engaging in behaviour prejudicial to good order and to maintain good order and discipline. Physical force should never be used as a form of punishment.
- 14.4 Sexual contact, including grooming patterns of behaviour, with pupils is unlawful and unacceptable in all circumstances.

15 Behaviour management

- 15.1 Employees should not use any form of degrading or humiliating treatment to punish a pupil. The use of sarcasm, demeaning or insensitive comments towards students is completely unacceptable.
- 15.2 Where pupils display difficult or challenging behaviour, employees should follow the respective school's behaviour policy (also known as a Positive Discipline Policy) using strategies appropriate to the circumstance and situation.

16 Social contact with students

- 16.1 Employees should not establish or seek to establish social contact, via any channels (including social media), with pupils for the purposes of securing a friendship or to pursue or strengthen a relationship. Employees should use their work provided equipment only for communicating electronically with pupils. If there are any circumstances in which an employee has had to provide their personal contact details, including phone numbers etc, to any pupil then they should report this to their line manager including the reasons why these details have been shared.
- 16.2 The Trust's advice to staff is not to connect to pupils via social media or other communication channels unless this is for professional purposes and that the employee can demonstrate that this is the case.
- 16.3 Our schools are part of our community, and we recognise that, as members of the community, employees will come into contact with pupils outside of work. We expect staff to use their professional judgement in such situations and to report to their respective DSL any contact that they have had with a pupil, outside of school, that they are concerned about or that could be misinterpreted by others.
- 16.4 Staff must not post disparaging or defamatory statements about the Trust or any of its schools or associated organisations, our pupils or their parents or carers; our trustees, governors or staff; suppliers and vendors; and other affiliates and stakeholders. Staff should avoid social media

communications that might be misconstrued in a way that could damage the Trust or any of its schools' reputation, even indirectly.

- 16.5 If you see content in social media that disparages or reflects poorly on our Trust or our stakeholders, you should screen grab the content and contact the Headteacher or the CEO. All staff are responsible for protecting the Trust's reputation.

17 Photography, videos and other images/media

Many educational activities involve recording images. These may be undertaken for displays, publicity, to celebrate achievement and to provide records of evidence of the activity. Under no circumstances should employees use their personal equipment to take images of pupils at or on behalf of the Trust unless given express permission by the respective Headteacher or the CEO.

18 Acceptable use of technology

Employees should read, understand and sign the Trust Technology (IT) acceptable use agreement on appointment.

19 Personal Phones and Tablets

- 19.1 Staff must not use personal electronic communication devices such as mobile phones or iPads as cameras in school unless given prior permission by the Headteacher. Where possible all photographs/video footage must be taken using school equipment. Staff must only save images on school IT hardware/computers.
- 19.2 Staff who are in contact with pupils should not use personal mobile phones in school during their directed/paid hours of employment unless there are exceptional circumstances and they have requested and been given explicit permission to do so by the Headteacher. Outside of these times, mobile phones should only be used in areas of the school where pupils are not present.

20 Alcohol and Substance Misuse

- 20.1 Staff are expected to arrive at work fit to carry out their job and to be able to perform their duties safely without any limitations due to the use or after effects of alcohol or drugs. In this policy drug use includes the use of controlled drugs, psychoactive (or mind-altering) substances formerly known as "legal highs", and the misuse of prescribed or over-the-counter medication.
- 20.2 Alcohol and drug-related problems may develop for a variety of reasons and over a considerable period of time. Therefore, the Trust and its schools will seek, where appropriate, to treat these problems in a similar way to other health issues. Support may be provided at this point, in order to aid a full recovery, allowing a return to work/effective performance and the full range of duties.

21 Working one-to-one with students

21.1 There will be times where an employee is working one-to-one with a pupil, and this is acceptable. Employees need to understand that this means that they may be more vulnerable to allegations being made against them. Therefore, it is important that employees:

- Avoid meeting on a one-to-one basis in secluded areas
- Ensure that the door to the room is open or that there is visual access into the room
- Inform a colleague or line manager of the meeting, preferably beforehand
- Report to their line manager if the student becomes distressed or angry.

22 Curriculum

22.1 Many areas of the curriculum can include or raise subject matter which is sexually explicit or of a political or 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 can be supported by developing ground rules with pupils to ensure sensitive topics can be discussed in a safe learning environment. This plan should highlight particular areas of risk and sensitivity and care should especially be taken in those areas of the curriculum where usual boundaries or rules are less rigorously applied e.g. RSE, PSHE, Drama.

22.2 The curriculum can sometimes include or lead to unplanned discussion about subject matter of a sexually explicit, political or otherwise sensitive nature. Responding to children's questions requires careful judgement and employees should take guidance in these circumstances from the Designated Safeguarding Lead.

23 Dress and appearance

23.1 Staff must maintain an appropriate standard of dress and personal appearance at work which promotes a positive and professional image. Clothing and footwear must be safe and clean and take account of health and safety considerations.

23.2 Schools and Central Services departments have discretion to set their own specific dress code including for Inset/informal relaxed days, but in general terms jeans, leggings, leisure, "beach" clothes and footwear (including flipflops) and t-shirts are not acceptable.

23.3 Any school/departmental specific dress code must take into consideration any cultural or religious requirements of individual members of staff.

23.4 Staff should also check any guidance regarding the dress code for their specific role.

24 Gifts and hospitality

24.1 The Trust has a Gifts, Hospitality and Anti-bribery Policy and employees should read and adhere to this.

- 24.2 For many of our employees there will be a limited opportunity to accept gifts and hospitality, but all staff must be aware that it is not acceptable for staff to accept bribes. Therefore, any gift, promotional offer or hospitality, intended either for the employee or for the school that exceeds a nominal value of £20 must be declared to the school business manager and permission must be obtained before accepting. If an employee is ever unsure, then the best course of action is to politely decline the offer.
- 24.3 It is traditional for pupils and their parents or carers to give gifts as a small token of appreciation or as a thank you to members of staff at certain times throughout the academic year. This Code of Conduct is not designed to stop that practice. Staff may accept gifts from students and their parents or carers provided that they meet this definition. Any member of staff receiving a gift with a value of greater than £20 should inform the school business manager who will then decide whether the gift can be accepted.
- 24.4 Staff should not give gifts to pupils unless this is part of a recognised practice in line with the school behaviour policy as a reward for good behaviour.

25 Keeping within the law

- 25.1 Staff are expected to operate within the law. Unlawful or criminal behaviour, at work or outside work, may lead to disciplinary action, including dismissal, being taken. However, being investigated by the police, receiving a caution or being charged will not automatically mean that an employee's employment is at risk.
- 25.2 Employees must ensure that they:
- 25.2.1 Uphold the law at work
- 25.2.2 Never commit a crime away from work which could damage public confidence in them or the Trust and/or any of its schools, or which makes them unsuitable for the work they do. This includes, for example:
- submitting false or fraudulent claims to public bodies (for example, income support, housing or other benefit claims)
 - breaching copyright on computer software or published documents
 - sexual offences which will render them unfit to work with children or vulnerable adults
 - crimes of dishonesty which render them unfit to hold a position of trust.
- 25.2.3 Write and tell the Headteacher (or CEO as appropriate) immediately if they are questioned by the police, charged with, or convicted of, any crime whilst they are employed at the school/Trust (this includes outside of their working hours). The Headteacher (or CEO) and/or Trustees will then need to consider whether this charge or conviction damages public confidence in the Trust or makes the employee unsuitable to carry out their duties.

26 Conduct outside of work and at work related functions

- 26.1 Unlike some other forms of employment, working at our Trust and its schools means that an employee's conduct outside of work could have an impact on their role.
- 26.2 Staff must not engage in conduct outside work which could seriously damage the reputation and standing of the Trust or any of its schools or the employee's own reputation or the reputation of other members of the Trust community. Employees should be aware that any conduct that we become aware of that could impact on their role within the Trust/school or affect the Trust/school's reputation will be addressed under our disciplinary procedure.
- 26.3 We therefore expect employees to make us aware immediately of any such situations that have happened outside of work.
- 26.4 Employees are required to demonstrate responsible behaviour at work-related functions and work-related social events that take place outside normal work hours and to act in a way that will not have a detrimental effect on our reputation.
- 26.5 Staff must not behave in a way outside work that may impact on their suitability to work with children. This includes behaviour which does not directly involve a child/children. Should we become aware of any such incident or behaviour, we may treat the issue as a safeguarding matter and manage it in accordance with the Keeping Children Safe in Education statutory guidance document. Employees should be aware that any behaviour that we consider may impact on an employee's suitability to work with children will be addressed under our disciplinary procedure and may lead to a referral to the Disclosure and Barring Service (DBS) and the Teaching Regulation Agency (where appropriate).
- 26.6 We therefore expect employees to make us aware immediately of any such situations that have happened outside of work.

27 Agency workers

- 27.1 We will investigate allegations made against agency workers with the cooperation of the agency. Whilst we may decide to cease using the services of an agency worker, this will not prevent us from investigating allegations and liaising with the Local Authority Designated Officer (LADO) to determine a suitable outcome. We expect agency workers and agencies to cooperate with our investigations and with external agencies where applicable.
- 27.2 We will discuss with the agency whether it may be appropriate for them to consider suspending an agency worker, or whether we are prepared to redeploy an agency worker during an investigation.

28 Review

This Code of Conduct is reviewed and amended annually by the Trust. We will monitor the application and outcomes of this code of conduct to ensure it is working effectively.