

Staff Code of Conduct

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Please note that a record of the changes made to the original issue of this document can be found at Schedule 1 after any Appendices to the Policy/Procedure.

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1. INTRODUCTION

- 1.1 This Staff Code of Conduct ('the Code') defines the standards of behaviour expected of all adults working in or on behalf of Cumbria Education Trust ('the Trust').
- 1.2 In line with [Keeping children safe in education](#) (KCSIE), the Code aims to:
- keep students safe, promote their welfare and to protect them from harm;
 - establish clear expectations of professional conduct;
 - support staff to maintain appropriate boundaries;
 - protect staff from misunderstandings or allegations.
- 1.3 Staff are role models and in a unique position of influence and therefore, must act with honesty, integrity and professionalism at all times, both inside and outside work, maintaining both their reputation and the reputation of the Trust.
- 1.4 Creating a culture in which all concerns about adults (including allegations that do not meet the harm threshold) are shared responsibly and dealt with appropriately, is critical (see sections 6 and 23). The Trust encourages an open and transparent culture; allowing us to identify concerning, problematic or inappropriate behaviour early and minimise the risk of abuse. A culture of vigilance will assist in ensuring that adults working in or on behalf of the Trust have clarity around professional boundaries, act within these boundaries, and in accordance with the ethos and values of our Trust.
- 1.5 This Code cannot provide an exhaustive list of what is, or is not, appropriate behaviour for staff. However, it does highlight behaviour that is illegal, inappropriate, or inadvisable.
- 1.6 Designated Safeguarding Leads (DSLs) are responsible for ensuring that suitable procedures are in place for those not employed by the Trust e.g. Local Authority employees, sports coaches, visitors, contractors, etc, to clearly communicate this Code and the conduct expected of them whilst on site or engaging in work with/on behalf of the Trust and the procedures they must follow to report any concerns.

2. SCOPE

- 2.1 This Code applies to all those who work with children in the Trust's settings whether in a paid or unpaid capacity, or on the Trust's behalf, including:
- employees of the Trust;
 - Trust Board Directors;
 - Local Advisory Board (LAB) members;
 - agency staff, volunteers and contractors including Local Authority staff, sports coaches, etc.

For the purposes of this Code, all of the above are referred to as 'adult/s' or 'staff'.

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3. DEFINITIONS

- Child/children/young person/student: refers to those under the age of 18 years. The principles of this Code apply to professional behaviours towards all students, and therefore would also include those over the age of 18 years.
- Parent: any person with parental responsibility of the child concerned e.g. carers, legal guardians, etc.
- Allegation: where it is alleged that a person 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; or
 - behaved or may have behaved in a way that indicates they may not be suitable to work with children.

These are collectively known as the 'harm thresholds'.

4. CORE PRINCIPLES

4.1 All staff must:

- prioritise the safety and welfare of children;
- maintain professional boundaries;
- act as positive role models;
- uphold the reputation of the Trust;
- report concerns promptly and appropriately;
- familiarise themselves and comply with all Trust policies and procedures.

5. EXPECTED PROFESSIONAL STANDARDS

The same professional standards should always be applied regardless of culture, disability, gender, language, race origin, religious belief, and/or sexual identity.

Headteachers / Teachers are required to comply with the [Headteachers' standards - GOV.UK](#) / [Teachers' Standards](#) in force at the time, in particular the part relating to Personal and Professional Standards.

All staff must be familiar with and act in accordance with the DfE's document; 'Keeping Children Safe in Education'.

5.1 Safeguarding Responsibilities

All staff must:

- place the well-being and learning of students at the centre of their professional practice including to always act, and be seen to act, in the child's best interests- the welfare of the child is paramount;
- understand their responsibilities with safeguarding and follow the relevant procedures including how to raise a concern and contact designated staff or partner agencies in the

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event that they have a concern about a child, including interim/cover plan in the event that normal arrangements have to be amended;

- understand their responsibility to report any concerns about the behaviour of any member of staff immediately (see sections 6 and 23);
- contribute to a culture of vigilance and transparency.

There will be occasions and circumstances in which staff have to make decisions or take action in the best interests of the student/s where no specific guidance has been given.

Where no specific guidance exists, staff are expected to:

- discuss the circumstances that informed their action, or their proposed action, with their line manager or, where appropriate, the school's DSL or Head Teacher. This will help to ensure that the safest practices are employed and reduce the risk of actions being misinterpreted;
- always discuss any misunderstanding, accidents or threats with the Head Teacher or DSL;
- always record discussions and actions taken with their justifications;
- record any areas of disagreement and, if necessary, refer to another agency/Local Authority (LA)/Ofsted/Teaching Regulation Agency (TRA)/other regulatory body;
- make responsible and informed judgements about their own behaviour in order to secure the best interests and welfare of the students for which that individual is responsible.

5.2 Professional Conduct

All staff must:

- treat all individuals with dignity, respect and fairness, valuing diversity and individuality. Harassment of any description (including sexual and other unwanted, unwelcome or uninvited conduct) against any member of the Trust community will not be tolerated;
- have high expectations for all students, be committed to addressing underachievement, and work to help students progress regardless of their background and personal circumstances;
- understand that children may copy behaviour or conduct and therefore staff must demonstrate high standards of behaviour to encourage students to do the same, this includes, for example, avoiding the use of inappropriate or offensive language;
- model the characteristics they are trying to inspire in students, including enthusiasm for learning, a spirit of enquiry, honesty, tolerance, social responsibility, patience, and a genuine concern for other people;
- respond sensitively to the difference in the home backgrounds and circumstances of students, recognising the key role that parents and carers play in students' education;
- seek to work in partnership with parents and carers, respecting their views and promoting understanding and co-operation to support the student's learning and well-being in and out of the school;
- reflect on their own practice, develop their skills, knowledge, and expertise, and adapt appropriately to learn with and from colleagues;

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- be seen to work, in an open and transparent way including self-reporting if their conduct or behaviour falls short of the principles outlined in this Code or if they have acted in a way which may give rise for concern;
- understand the expectations in relation to being in a role of trust and therefore be responsible for their own actions and behaviour both within and outside the Trust, avoiding any conduct which would lead any reasonable person to question their motivation and intentions or that may bring the Trust into disrepute (see section 8.1- Nolan Principles).

5.3 Professional Relationships

All staff must:

- maintain professional boundaries and relationships with children avoiding over-familiarity (see 9.4) or favouritism;
- be aware that behaviour by themselves, those with whom they have a relationship or association, or others in their personal lives (in the real world or online), may impact their work with children and the school's ability to safeguard pupils or which may impact their professional standards or reputation. Staff are expected to disclose any such relationship or association issues with the DSL or other senior leader in the first instance.

Senior Leaders should be aware, in particular, of existing relationships between younger members of staff or those undertaking training at school, especially where this work is in the school they originally attended. It is important that these possibilities are identified early and the situation managed carefully. Senior Leaders should seek advice from HR for support in these instances.

5.4 Additional Responsibilities

All staff must:

- not consume or be under the influence of alcohol or any substance, including prescribed medication, which may affect their ability at work including the ability to effectively safeguard children;
- inform the Head Teacher or other specified person of any cautions, convictions, or relevant orders accrued during their employment, and/or if they are charged with a criminal offence regardless of the seriousness; or where they are involved in a Police investigation which may lead to a warning, caution, order or conviction or disqualify them under the Childcare Disqualification Regulations;
- inform the Head Teacher of any name changes that they have not previously declared.

The Trust will not re-check DBS Criminal Record Disclosures as a matter of course but retain the right, however, to undertake a re-check of any member of staff should information come to light which suggests that an individual may no longer be a suitable person to work with children.

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6. LOW LEVEL CONCERNS

6.1 What is a low-level concern?

The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the Trust may have acted in a way that:

- is inconsistent with this Code, 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 are not limited to:

- being over-friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- 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.

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

6.2 Sharing and recording a low-level concern

Low-level concerns must be reported immediately to the Head Teacher, where there are concerns about the Head Teacher or in a situation where there is a conflict of interest in reporting the matter to the Head Teacher, the concern should be reported to the LAB Chair. Reports about supply staff and contractors should be notified to the relevant employer.

All low-level concerns will be recorded in writing (the 'Allegations of Abuse Procedure' includes a 'Low Level Concern Form' at appendix 2), the name of the individual sharing their concerns should also be noted. If the individual wishes to remain anonymous, this will be respected as far as reasonably possible. The following will be recorded:

- details of the concern;
- the context in which the concern arose; and
- details of the action taken.

All records will be kept confidential, held securely, and comply with the Data Protection Act 2018 and UK GDPR. Records will be retained in accordance with the Trust's Data Protection Policy or at least until the individual leaves our employment.

Records will be regularly reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on the correct course of action - disciplinary procedures or where the behaviour meets the 'harm threshold' a referral to the LADO. Consideration will be given to whether there are

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wider cultural issues within the school that enabled the behaviour to occur and where appropriate policies could be revised, or extra training delivered, to minimise the risk of it happening again.

In relation to references for future employment, we will only provide details of substantiated safeguarding allegations. Low-level concerns will not be included in references unless they relate to issues which would normally be included, for example, misconduct or poor performance.

7. CONFIDENTIALITY

- 7.1 As data controllers, all academies are subject to the Data Protection Act 2018 and the UK General Data Protection Regulations (UK GDPR).
- 7.2 Staff may have access to confidential information about students in order to undertake their responsibilities. In some circumstances the information may be highly sensitive. Confidential or personal information about a student or their family must never be disclosed to anyone other than on a need-to-know basis, where legally permissible to do so and in the best interest of the student. In circumstances where the student's identity does not need to be disclosed the information should be used anonymously.
- 7.3 There are some circumstances in which an individual may be expected to share information about a student, for example when abuse is alleged or suspected. In such cases, individuals have a duty to pass information on without delay to those with designated child protection responsibilities.
- 7.4 Staff must never use confidential or personal information about a colleague or other adult in the Trust, student or their family for their own, or others' advantage (including that of partners, friends, relatives or other organisations). Information must never be used to intimidate, humiliate or embarrass the child or another adult.
- 7.5 Confidential information about students must be held securely and not held off site other than on security protected Trust equipment and secure websites. Information must only be stored for the length of time necessary to discharge the task for which it is required.
- 7.6 If a member of staff is in any doubt about the storage or sharing of information they must seek guidance from the DSL or Trust's Data Protection Officer (DPO) accordingly.

8. CONDUCT, REPUTATION AND APPEARANCE

All staff have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of students. They should adopt high standards of personal conduct in order to maintain the confidence and respect of their colleagues, students, and the public in general. An individual's behaviour, either in or out of the workplace, should not compromise their position within the work setting.

Staff must not engage in conduct outside work which could seriously damage the reputation and standing of the Trust or the individual's own reputation or the reputation of other members of the Trust community. In particular, criminal offences that involve violence or possession or use of illegal substances or sexual misconduct are likely to be regarded as unacceptable.

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8.1 Staff are to be aware of and adhere to the Nolan Principles for standards in public life summarised as follows:

- **Selflessness**- holders of public office should act solely in terms of the public interest;
- **Integrity**- holders of public office must avoid placing themselves under any obligation to people or organisations that might try inappropriately to influence them in their work. They should not act or take decisions in order to gain financial or other material benefits for themselves, their family, or their friends. They must declare and resolve any interests and relationships;
- **Objectivity**- holders of public office must act and take decisions impartially, fairly and on merit using the best evidence and without discrimination or bias;
- **Accountability**- holders of public office are accountable to the public for their decisions and actions and must submit themselves to the scrutiny necessary to ensure this;
- **Openness**- holders of public office should act and take decisions in an open and transparent manner. Information should not be withheld from the public unless there are clear and lawful reasons for so doing;
- **Honesty**- holders of public office should be truthful;
- **Leadership**- holders of public office should exhibit these principles in their own behaviour and treat others with respect. They should actively promote and robustly support the principles and be willing to challenge poor behaviour wherever it occurs.

8.2 There is no place for extremist views of any kind in our Trust, whether from internal sources- students, staff, visiting adults, LAB members, etc or external sources- school community, external agencies or individuals. Any prejudice, discrimination or extremist views, including derogatory language, displayed by students, staff, visitors or parents will always be challenged and, where appropriate, dealt with.

8.3 A person's dress and appearance are matters of personal choice and self-expression and some individuals will wish to exercise their own cultural customs. However, staff should select a manner of dress and appearance appropriate to their professional role and which may be necessarily different to that adopted in their personal life. Staff should ensure they are dressed decently, safely and appropriately for the tasks they undertake.

9. SEXUAL CONTACT WITH CHILDREN AND YOUNG PEOPLE AND ABUSE OF TRUST

9.1 A relationship between an adult and a child or young person is not a relationship between equals. There is potential for exploitation and harm of vulnerable young people. Adults should maintain appropriate professional boundaries and avoid behaviour which might be misinterpreted by others, they should report any incident with this potential, this is as relevant in the online world as it is in the educational setting; staff have a responsibility to model safe practice at all times. Adults should also seek to avoid behaviour that seeks to utilise the unequal balance of power for personal advantage or gratification.

9.2 Any sexual behaviour between staff with or towards a child 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.

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- 9.3 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. 'Working Together to Safeguard Children' defines sexual abuse as 'forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening.'
- 9.4 Staff must not have sexual relationships with children, or have any form of communication with a child or young person 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. The adult should not make sexual remarks to, or about, a child or young person or discuss their own sexual relationships with or in the presence of children. Individuals 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. Over-familiarity could be deemed as inappropriate in isolation but it also could lead to an individual being vulnerable to accusation, therefore over-familiarity should be avoided and professional boundaries maintained.
- 9.5 There are occasions when adults embark on a course of behaviour known as 'grooming' where the sole purpose is to gain the trust of a child or young person and manipulate that relationship so that sexual abuse can take place. 'Grooming' is not limited to the contact with the child and can extend to member's of the child's family, for example, as a means of gaining trust and influence. Staff should be aware that conferring special attention without good reason or favouring a student has the potential to be construed as being part of a 'grooming' process, which is a criminal offence. All staff have a responsibility to always report to the Head Teacher any concerns about the behaviour of a colleague or other adult which could indicate that a student is being groomed.
- 9.6 Any sexual behaviour by a member of staff with or towards a student is unacceptable and sexual activity with a child could be a matter for criminal and/or disciplinary procedures.

10. STAFF AND FAMILY RELATIONSHIPS ON ROLL

- 10.1 It is acknowledged that some staff have children or other close family members who attend the school they work at and it is recognised that in these cases the staff fulfil a dual role of parent and employee. Parents/relatives as employees should ensure that they uphold boundaries between the two roles and that their behaviour does not constitute a conflict of interest.
- 10.2 It is important that enrolling a member of staff's children or close family members does not have a negative impact on the standards of work provided and does not make other staff feel that they have to be concerned about enforcing expectations or sanctions as appropriate.
- 10.3 It is generally not appropriate for staff to care for their own child or those of a close relative whilst at work, however, it is recognised that this may not always be possible.
- 10.4 The following principles are provided to prevent:
- embarrassment or awkwardness for co-workers;
 - concerns of lack of objectivity in the event of disagreements within the workplace or in relation to any incidents/investigations;
 - grievances due to perceived favouritism of family members of co-workers; and

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- the risk for employees being accused of improper conduct towards any pupil they come into contact with during the course of their work.

Staff with children or other close family members in school are expected to:

- at all times, fulfil the needs of their own role and adhere to their job description;
- uphold boundaries between the role of parent/relative and ensure that their behaviour does not constitute a conflict of interest. The staff member should discuss any inter-role conflict with the Head Teacher in the first instance;
- remain neutral and treat all students with the same regard;
- avoid making direct contact with their own child or close relative during the school day including breaks. Where a child arrives in school with a working parent, they may be supervised by the parent until the working day or school day (whichever is the earlier) begins;
- allow incidents during the school day to be dealt with through the normal pastoral mechanisms where alternative adults are to be the main point of contact;
- ensure they do not provide medical care, administer medicines or deliver educational support to their own child or close relative at school unless authorised to do so. In exceptional circumstances requiring immediate assistance, staff must notify the Head Teacher and follow established safeguarding procedures;
- maintain strict confidentiality regarding information about their own child or close relative and must not share confidential information with other parents or staff members unless authorised.

11. INFATUATIONS AND CRUSHES

11.1 A child may develop an infatuation with an adult who works with them. An adult who becomes aware that a student may be infatuated with them, or a colleague, however small or seemingly insignificant this may appear, must report this without delay to a senior colleague so that appropriate action can be taken to protect the staff member. This will enable appropriate early intervention to be taken which can prevent escalation and avoid hurt, embarrassment or distress for those concerned. The situation will be taken seriously and the adult should be careful to ensure that their own behaviour cannot be brought into question and that no encouragement of any kind is given to the student.

11.2 Examples of situations which must be reported are given below:

- Where an individual is concerned that they might be developing a relationship with a student which could have the potential to represent an abuse of trust;
- Where an individual is concerned that a student is becoming attracted to them or that there is a developing attachment or dependency;
- Where an individual is concerned that actions or words have been misunderstood or misconstrued by a student such that an abuse of trust might be wrongly suspected by others;
- Where an individual is concerned about the apparent development of a relationship by another adult or receives information about such a relationship.

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12. GIFTS & REWARDS

- 12.1 It is against the law for public servants to take 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. There are occasions when companies, students or parents 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. Any gift must be recorded on the corporate gift log held in each school.
- 12.2 Personal gifts must not be given to students or their families. This could be misinterpreted as a gesture either to bribe or single out a young person. It might be perceived that a 'favour' of some kind is expected in return. Any reward given to a student should be consistent with the guidance in the Trust's Behaviour Policy, available on the Trust website, recorded and not based on favouritism.

13. SOCIAL CONTACT AND SOCIAL NETWORKING

- 13.1 It is acknowledged that staff may have genuine friendships and social contact with parents of students, independent of the professional relationship. Staff should recognise that some types of social contact with students or their families could be perceived as harmful or exerting inappropriate influence on children and may bring the setting into disrepute.
- 13.2 Communication between students and adults, by whatever method, should take place within clear and explicit professional boundaries. This includes the wider use of technology such as computers, tablets, mobile phones, text messaging, instant messaging, emails, digital cameras, videos, social media, web-cams, websites, chatrooms, forums, gaming sites, blogs, etc (Given the ever-changing world of technology it should be noted that this list gives examples only and is not exhaustive). Adults should not share personal information with a child or young person. 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. If a student seeks to establish social contact, or if this occurs coincidentally, the adult should exercise their professional judgement in making a response and should ensure that all communications are transparent and open to scrutiny. This also applies to social contacts made through outside interests or the adult's own family.
- 13.3 Staff must not give their personal details such as home/mobile phone number, home address, personal email or social networking details to students. If children locate these by any other means and attempt to contact or correspond with the adult, they should not respond and report the matter to their manager and/or the designated individual at the Trust.
- 13.4 Staff are expected to ensure that they establish safe and responsible online behaviours, working to local and national guidelines and acceptable use agreements which detail how new and emerging technologies may be used.
- 13.5 It is recommended that individuals ensure that all possible privacy settings are activated to prevent students from making contact on personal profiles and to prevent students from accessing photo albums or other personal information which may appear on social networking sites.

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- 13.6 Individuals must not have any students or any ex-students as friends on their social networking sites. They are advised not to have any online friendships with any students, unless they are family members or close family friends. Staff are advised not to have online friendships with parents or carers of students, or members of the Trust Board or LAB members. Where such online friendships exist, staff must ensure that appropriate professional boundaries are maintained.
- 13.7 Staff are personally responsible for what they communicate in social media and must bear in mind that what is published might be read by the Trust, students, the general public, future employers, friends and family for a long time. Staff must ensure that their online profiles are consistent with the professional image expected by the Trust and should not post material which damages the reputation of the Trust or which causes concern about their suitability to work with children and young people.
- 13.8 Those who post material which may be considered as inappropriate could render themselves vulnerable to criticism or allegations of misconduct.

14. PHYSICAL CONTACT AND PERSONAL PRIVACY

- 14.1 There are occasions when it is entirely appropriate and proper for staff to have physical contact with children, but it is crucial that they do so only in ways appropriate to their professional role. When physical contact is made with students this should be in response to their needs at the time, of limited duration and appropriate given their age, stage of development, gender, ethnicity, background and any agreed care plan. It is not possible to be specific about the appropriateness of each physical contact, since an action that is appropriate with one student in one set of circumstances may be inappropriate in another, or with a different child.
- 14.2 Physical contact should never be secretive or casual, or for the gratification of the adult, or represent a misuse of authority. If an individual believes that an action could be misinterpreted, the incident and circumstances should be reported to the school's safeguarding team who will log this in the school's incident book and, if appropriate, a copy placed on the child/young person's file.
- 14.3 Physical contact, which occurs regularly with a student/s, is likely to raise questions unless the justification for this is part of a formally agreed plan (for example in relation to students with SEND). Any such contact should be the subject of an agreed and open school policy and subject to review. Where feasible, staff should seek the student's permission before initiating contact. Staff should listen, observe, and take note of the student's reaction or feelings and – so far as is possible – use a level of contact which is acceptable to the student for the minimum time necessary.
- 14.4 There may be occasions when a distressed student needs comfort and reassurance. This may include age-appropriate physical contact. Staff should remain self-aware at all times in order that their contact is not threatening, intrusive or subject to misinterpretation.
- 14.5 Where an individual has a particular concern about the need to provide this type of care and reassurance they should seek further advice from a senior manager.

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- 14.6 Some staff, for example, those who teach PE and games, or who provide music tuition will on occasions have to initiate physical contact with students in order to support a student so they can perform a task safely, adjust posture, to demonstrate the use of a particular piece of equipment/instrument or assist them with an exercise. This should be done with the student's agreement. Contact under these circumstances should be for the minimum time necessary to complete the activity and take place in an open environment. Staff should remain sensitive to any discomfort expressed verbally or non-verbally by the student.
- 14.7 Students 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 students, 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 students concerned and sensitive to the potential for embarrassment.

15. BEHAVIOUR MANAGEMENT AND PHYSICAL INTERVENTION

- 15.1 All students have a right to be treated with respect and dignity. Staff must not use any form of degrading treatment to punish a student. The use of sarcasm, demeaning or insensitive comments towards students is not acceptable in any situation. Deliberately intimidating students by overseeing physical presence is not acceptable in any situation.
- 15.2 Staff should understand the importance of challenging inappropriate behaviours between children, including child on child sexual violence and sexual harassment. Downplaying certain behaviours, e.g. dismissing sexual harassment as 'just banter', 'just having a laugh', 'part of growing up' or 'boys being boys', can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios, a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.
- 15.3 Where students display difficult or challenging behaviour, staff must follow the Trust/school's relevant behaviour policy which includes information on when and under what circumstances it is appropriate to use restrictive interventions, including use of reasonable force and what strategies to use which are appropriate to the circumstances and situation.
- 15.4 Where a student has specific needs in respect of particularly challenging behaviour, a plan which incorporates positive handling will be drawn up and agreed by all parties.
- 15.5 Physical intervention can only be justified in exceptional circumstances. Please refer to the Trust/school procedures on behaviour management, including positive handling, and in addition non-statutory guidance is available from the Department for Education website on 'Behaviour in Schools' and 'Use of Reasonable Force'.
- 15.6 Staff may legitimately intervene to prevent a student from:
- committing a criminal offence;
 - injuring themselves or others;
 - causing damage to property;
 - engaging in behaviour prejudicial to good order and to maintain good order and discipline.

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Staff should have regard to the health and safety of themselves and others. Under no circumstances should physical force be used as a form of punishment. The use of unwarranted physical force is likely to constitute a criminal offence. Any use of physical intervention should be recorded.

- 15.7 The legislation on restrictive interventions, use of reasonable force, non-disciplinary seclusion and restraint strategies is complex and staff must take extreme care to avoid any practice that could be viewed as unlawful, a breach of the student's human rights and/or false imprisonment. Staff should therefore ensure that they remain familiar with the relevant behaviour policy and procedures for their setting. Where required, staff are trained in appropriate restrictive intervention techniques.
- 15.8 All schools must have trained first aiders/appointed persons. Staff must have had the appropriate training before administering first aid or medication, except in an emergency.

16. ONE-TO-ONE SITUATIONS AND MEETINGS WITH STUDENTS

- 16.1 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. Adults working in one-to-one settings with students may also be more vulnerable to unjust or unfounded allegations being made against them. All Staff must recognise this possibility and plan and conduct such meetings accordingly, including meetings that may be held virtually. Every attempt should be made to ensure that the safety and security needs of both staff and students are met. Managers should assess the risk in relation to the specific nature and implications of one-to-one work for each adult and student. Where such a meeting is demonstrably unavoidable it is advisable to avoid remote or secluded areas of the school 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.
- 16.2 Pre-arranged meetings with students away from the school premises or on the school site when the school is not in session are not permitted unless approval is obtained from their parent/carer and the Head Teacher or other senior colleague with delegated authority. Two members of staff should always be present in such meetings.
- 16.3 No child or young person should be in or invited into the home of an adult who works with them, unless the reason for this has been established and agreed with parents/carers and a senior manager/Head Teacher and the parent/carer should be present.
- 16.4 In certain situations, staff may be required to transport students as part of their work. This will be subject to approval by the Head Teacher and a documented risk assessment. Staff should never offer to transport students 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 will be recorded and reported to both a senior manager and the child's parent/s. In the best interests of both the child and the adult, one-to-one situations in these circumstances should be avoided where possible with another staff member being present.

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17. HOME VISITS

- 17.1 All work with students and parents will usually be undertaken in the school. There are occasions, however, in response to an urgent, planned or specific situation or job role, where it is necessary to make one-off or regular home visits. In any event, we will ensure that all visits are justified, that staff understand the purpose and limitations of a welfare visit and that they are recorded in detail including the time of arrival and departure. We will also ensure that staff are not exposed to unacceptable risk.
- 17.2 Appropriate risk assessments should be conducted for such situations ensuring that appropriate risk management measures are put in place before the visit is undertaken.
- 17.3 Staff are expected to agree the purpose for any home visit with the Head Teacher or other senior leader and to ensure that any behaviour or situation arising from the visit which gives rise to concern, is discussed with the Head Teacher/DSL as soon as possible.

18. EDUCATIONAL VISITS AND SCHOOL CLUBS

Staff should take particular care when supervising students 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.

19. CURRICULUM AREAS OF A SENSITIVE NATURE

- 19.1 Many areas of the curriculum can include or raise subject matter, which is sexually explicit, or of an 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.
- 19.2 The curriculum can sometimes include or lead to unplanned discussion about subject matter of a sexually explicit or otherwise sensitive nature. Responding to students' questions can require careful judgement and staff must take guidance in these circumstances from a senior member of staff. Staff must not enter into or encourage inappropriate discussion about sexual activity or behaviour which includes not sharing details about their personal life and views.

20. PHOTOGRAPHY, VIDEOS AND OTHER CREATIVE ARTS

On admission to a Trust school, we will ensure that parents complete a Publicity Consent Form. There may be opportunities to publicise some of the activities that a child is involved with and this may involve filming or photographing children for use in local media. As a family of schools we welcome these opportunities. There may be occasions when we will arrange photography for Trust purposes, e.g. displays and school prospectus or brochures and the school/Trust website etc. Please note that web applications mean that information is available worldwide, including countries where there is no data protection legislation. Photography or filming will occur only with the permission of the Head Teacher and under the supervision of a member of school staff, under no circumstances will staff be expected or allowed to use their personal equipment to take/obtain images of students at or on behalf of the Trust. Where filming or photography is carried out by the media, students will be named only when there is good reason e.g. celebrations and achievement etc. A child's home address will never be disclosed.

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21. INTERNET USE AND ELECTRONIC COMMUNICATION

- 21.1 Individual schools have an E-Safety Policy which refers to use of internet, electronic communication, and security. Trust email systems should only be used in accordance with this policy.
- 21.2 Under no circumstances should adults in the Trust access inappropriate images. Deliberately accessing pornography on Trust equipment will be treated as gross misconduct and may be a criminal offence. Accessing indecent images of children on the internet and making, storing, or disseminating such material is illegal and is likely to lead to criminal prosecution and may result in barring from work with children and young people.
- 21.3 Staff must ensure that students are not exposed to any inappropriate or indecent images or web links. Staff must ensure that children have appropriate controls with regard to access and personal passwords should be kept confidential.

22. UNACCEPTABLE USE OF ICT FACILITIES AND MONITORING

- 22.1 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 in summary dismissal (this list is not exhaustive):
- 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, memes, reels, films, and video clips of a sexually explicit or arousing nature);
 - any other type of offensive, obscene or discriminatory material or criminal material or material which is liable to cause distress or embarrassment to the Trust or others.
- 22.2 The contents of our ICT resources and communications systems are the Trust's property. Therefore, staff should have no expectation of privacy in any message, files, data, document, telephone conversation, 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.
- 22.3 We reserve the right to monitor, intercept and review, without further notice, staff usage of our IT resources and communications systems, including but not limited to telephone, email, messaging, voicemail, CCTV, internet and social media postings and activities, to ensure that our rules are being complied with and for the following purposes:
- to monitor whether the use of the email system or the internet is legitimate and in accordance with this Code;
 - to assist in the investigation of alleged wrongful acts; or
 - to comply with any legal obligation.
- 22.4 Individuals consent to monitoring by acknowledgment of this Code and the use of our resources and systems. We may store copies of data or communications for a period of time after they are created and may delete such copies from time to time without notice. If necessary, information may be handed to the Police in connection with a criminal investigation.

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22.5 Where CCTV monitoring is in place in the Trust, this data is recorded and may be used as evidence of any alleged wrongdoing.

23. REPORTING CONCERNS AND RECORDING INCIDENTS

All staff must report concerns and incidents in accordance with the guidance set out in the current version of Keeping Children Safe in Education, the Whistleblowing Policy, and/or the Allegations of Abuse Procedure.

The Trust will ensure:

- that systems are in place for concerns to be raised by encouraging individuals to share those concerns at the earliest opportunity;
- individuals are encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others and/or in reflection they believe they have behaved in such a way that they consider falls below the expected professional standards;
- that staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour in themselves and others;
- unprofessional behaviour is addressed and support is provided to the individual to correct this at an early stage, where possible;
- a responsible, sensitive, and proportionate handling of low-level concerns where they are raised;
- that if there is no trained DSL on each of its sites, that a senior member of staff is identified to lead on safeguarding issues.

24. BREACHES OF THIS CODE

24.1 Any member of staff who is found to have committed a breach of this Code may be subject to disciplinary action. Such behaviour may constitute gross misconduct and, as such, may result in summary dismissal. The Trust and individual schools will take a strict approach to serious breaches of this Code. This Code may be referred to in any disciplinary proceedings following unacceptable actions by staff.

24.2 When an adult is subject to an allegation (as defined at section 3) the Trust and individual academies will follow the Trust's 'Allegations of Abuse Procedure', the Trust's 'Whistleblowing Policy and Procedure' and the guidance set out in the current version of 'Keeping Children Safe in Education', available on the Trust website. In conjunction with the above, where the conduct relates to those employed by the Trust or volunteers (including LAB members) engaged directly by the Trust, the process outlined in the Trust's 'Disciplinary Procedure' will be followed. For those not employed by the Trust, information should be passed to the responsible employer as appropriate and communication should be maintained during their internal processes to ascertain if the individual is suitable to continue working with/on behalf of the Trust.

24.3 Where misconduct by a Teacher is proven, the matter will be referred to the Teaching Regulation Agency (TRA) for their consideration. Misconduct by other staff will be dealt with under normal school disciplinary procedures.

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SCHEDULE 1

DOCUMENT CONTROL – RECORD OF CHANGES

Version Number:	Publication Date:	Nature of, and Reason for, Change(s)
001	March 2020	General review.
002	September 2021	Update in light of changes within KCSIE Sept 21 regulations / guidance – inclusion of low level concerns.
003	October 2022	Revised in accordance with Safer Recruitment Consortium document 'Guidance for safer working practice for those working with children and young people in education settings' revised February 2022.
004	October 2025	Reviewed and updated / no amendments required.
005	June 2026	Reviewed to provide further clarification around expected standards and conduct including an outline of the Nolan Principles, online activity, family members on roll.

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