



PONTEFRACT
ACADEMIES TRUST

Staff Code of Conduct



Summary:

The staff code of conduct is for all employees, contractors, and volunteers within the Trust. The code sets out the standards of behaviour expected of all employees, and provides clear advice about what constitutes illegal behaviour, and what may be considered as misconduct.

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Dec 2019	1.0	New Policy	
July 2023	2.0	Updated.	<ul style="list-style-type: none"> • Safeguarding legislation dates changed to reflect current practice. • Behaviour and Relationships policy referenced. • Low level concerns have been included (Section 9, Paragraph 3) • Inclusion of risk assessments and physical handling added (Section 22, Paragraph 3) • Reference to intimate care plans included. (Section 29, Paragraph 1) • Expectation of staff that the reporting of all suspected or disclosed abuse to be reported as soon as possible in line with the Child Protection and Safeguarding policy. • Amendments to the staff dress code policy. • Home visits have been amended – removal of formal risk assessments in line with the Attendance and Punctuality policy.

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1. Introduction

Pontefract Academies Trust is committed to giving all employees the support and encouragement they need to raise aspirations, unlock potential and work to achieve excellence through encouraging a “can do” culture across all areas of the Trust.

The Trust is committed to creating a positive working environment where all employees fully understand the expectation that all staff exercise the greatest care in their relationships with all stakeholders and conduct themselves with professionalism, openness, and honesty. A high standard of integrity and conduct is expected, and staff should avoid occasion for suspicion or the appearance of improper conduct. Failure to do so may result in disciplinary action up to, and including, dismissal for gross misconduct.

All staff have a responsibility to provide a safe and supportive environment which secures the wellbeing and very best outcomes for pupils in their care. Each school has its own internal procedures and practices relevant to that setting. All staff should familiarise themselves with this information and specific expectations in their place of work.

Aims

The Code sets out the standards of behaviour expected of all employees. This provides clear advice about what constitutes illegal behaviour and what might be considered as misconduct. The safer working practices outlined in this code provides practical advice to staff about which behaviours and actions constitute professional expectations and safe practice, and which behaviours should be avoided. It seeks to ensure that the duty of care towards pupils and staff is promoted by raising awareness of illegal, unsafe, and unwise behaviour. The guidance also outlines to staff professional behaviours that are expected during their day-to-day working lives. It is hoped that it will also assist staff to monitor their own standards and practice.

All staff should be aware that unlawful, unsafe, or unprofessional behaviour will not be tolerated and that, where appropriate, legal, or disciplinary action is likely to follow.

The Staff Code of Conduct is for all employees, contractors and volunteers who work within and for the Trust. It applies to all employees employed within the Trust and for any other persons working on behalf of the Trust (e.g., agency staff, volunteers, contracted services).

Whilst every attempt has been made to cover a wide range of situations, it is recognised that any code cannot cover all eventualities. There may be times when professional judgements are made in situations not covered by this document, or which directly contravene the guidance given by their employer. It is expected that in these circumstances, staff will always advise their senior colleagues of any such action already taken or proposed.

Related policies and legislation

The Code of Conduct should be read in conjunction with any other codes of practice or policies that relate to employee conduct and/or workplace or system security policies and procedures. This includes:

- Safeguarding Policy.
- Disciplinary Policy and Procedure.
- Managing Allegations Against Staff Policy.

- Behaviour and Relationships Policy.
- Relationships Education (Primary) and Relationships and Sex Education (Secondary) Policy
- Social Media Policy.
- Acceptable Use Policy.
- Information Policy.
- Data and Cyber Security Breach Prevention and Management Plan.
- Equality and Diversity Policy.
- Anti-Fraud Bribery and Corruption Policy.
- Conflicts Policy and Register of Business Interests.
- Whistleblowing Policy.
- Health and Safety Policy and Procedures.
- Keeping Children Safe in Education 2023.

2. Roles and responsibilities

Pontefract Academies Trust

The CEO and Executive Directors/Headteacher are responsible for making the Code available to all employees and incorporating it into the induction of new employees. They are responsible for upholding the standards expected in this code and role modelling professional expectations. Senior leaders are expected to appropriately challenge any staff who do not meet these standards.

Employee responsibilities

- All staff are accountable for the way in which they exercise authority; manage risk; use resources; and protect pupils from maltreatment and avoidable harm.
- All staff, whether paid or voluntary, have a duty to keep pupils safe and to protect them from harm. This means that adults should:
 - Always act, and be seen to act, in the child's best interests.
 - Take responsibility for their own actions and behaviour.
 - Refer any situations that cause concern, including those which involve a colleague, family member or friend.
- All staff have a responsibility to provide a safe environment in which pupils can learn.
- All staff have a responsibility to identify and appropriately refer pupils, who may need extra help or who are suffering, or likely to suffer, significant harm.
- All staff have a responsibility to bring to the attention of a leader or manager their concerns regarding the professional conduct or any inappropriate behaviours of others.
- All staff have a legal responsibility to refer children who have disclosed that they are or that are suspected of suffering abuse (as defined in Keeping Children Safe in Education 2023) to the appropriate members of staff or agencies.

The Trust's Whistleblowing Policy provides guidance as to how employees can raise concerns if they believe they are being required to act in a way or are aware of an employee who is acting in a way,

which is:

- Is unlawful, e.g. fraud, bribery, corruption;
- Is against the Trust's Articles of Association, Master Funding Agreement, Financial Regulations and/or other policies;
- Is against the requirements of the EFA Academies Financial Handbook;
- Falls below established standards or practice;
- Amounts to improper conduct;
- Amounts to a failure to comply with a legal duty, e.g. a breach of a statutory duty;
- Amounts to a miscarriage of justice;
- Is a health and safety risk, including risks to the public as well as other employees;
- Damages the environment;
- Comprises deliberately covering up of any of the above.
- Otherwise, inconsistent with this code - then they should refer to the Whistleblowing Policy for details of procedures/actions to take.

Staff can also contact the NSPCC Whistleblowing Advice Line (0800 028 0285) or email help@nspcc.org.uk.

All employees have an individual responsibility to ensure that they understand the provisions of the Code and any related policies or procedures. Where an employee does not fully understand, they must, in their own interests, seek clarification from the CEO/Executive Director/Headteacher or another appropriate leader.

Employees must at all times comply with the law, act within the statutory frameworks which set out their professional duties and responsibilities and comply with this Code of Conduct.

Employees have a duty to inform management should they receive a caution or charge from the Police or provide any information which could impact on the health, safety, or wellbeing of pupils, and/or the integrity of the Trust. Failure to do so may result in disciplinary action being taken against them.

Conflict of interests

A conflict of interest is any situation where an employee's personal interests or loyalties could, or could be seen, to prevent the employee from making a decision in the best interests of the Trust or its schools. The Trust expects conflicts of interest to be identified at an early stage. This may include but is not limited to:

- Is unlawful, e.g. fraud, bribery, corruption;
- Is against the Trust's Articles of Association, Master Funding Agreement, Financial Regulations and/or other policies;
- Is against the requirements of the EFA Academies Financial Handbook;
- Falls below established standards or practice;
- Amounts to improper conduct;
- Amounts to a failure to comply with a legal duty, e.g. a breach of a statutory duty;
- Amounts to a miscarriage of justice;
- Is a health and safety risk, including risks to the public as well as other employees;
- Damages the environment;
- Comprises deliberately covering up of any of the above.

Otherwise, inconsistent with this code - then they should refer to the Whistleblowing Policy for details of procedures/actions to take.

Employees engaged in decisions where conflicts of interest may arise should declare this to their Headteacher/Senior Manager at the earliest opportunity.

Certain employees such as those in a position of leadership, may be required to complete a declaration of interests at periodic intervals or when changes to their interests occur, in accordance with the Trust Conflicts Policy and Register of Business Interests.

Employees should abide by the rules adopted by the Trust in relation to private interest and possible conflict with public duty; the disclosure of official information; and political activities. They should not misuse their official position or information acquired in their official duties to further their position or information acquired in their official duties to further their private interests or those of others.

Where a personal relationship exists between employees, the employees concerned should declare this to their line manager if the relationship could be deemed as a conflict of interest, trust or breach of confidentiality, e.g. where a personal relationship exists between employees who are in a line management or supervisory relationship at work, then they must not be involved in any activity involving the other employee such as, but not limited to, recruitment and selection, performance management, pay and grading, disciplinary, capability, or grievance.

3. Integrity

Staff should conduct themselves with integrity, impartiality, and honesty. They should not deceive, or knowingly mislead, colleagues, members of the School Performance Review Board, Trustees, Members, the Department for Education, Ministers, Parliament, or the public. Staff should offer the public the highest standards of conduct and service.

Staff should not use their position to receive, agree to accept or attempt to obtain any payment or other consideration for doing, or not doing, anything or showing favour, or disfavour to any person.

4. Confidentiality and data protection

All employees should be aware of their obligations under the UK General Data Protection Regulations [Data protection: The Data Protection Act - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/data-protection-the-data-protection-act-2018) and Freedom of Information Act (2000). In particular, the restriction on sharing of information held in any of the Trust's information management systems on staff and pupils with external bodies.

There are some circumstances in which a member of staff may be expected to share information about a pupil, for example when abuse is alleged or suspected. In such cases, individuals have a responsibility to pass information on without delay to those with designated safeguarding responsibilities or to statutory services.

All staff owe a general duty of confidentiality to their employer under civil law. They are therefore required to protect official information held in confidence. Any breach of confidentiality may lead to disciplinary proceedings.

5. Intellectual property

All intellectual property (including, but not limited to, copyright, data rights, trademarks, patents, and designs) created or conceived by you in connection with your employment (referred to as 'intellectual property') shall belong, at all times, to the Trust. At the Trust's request you will disclose or keep confidential, intellectual property.

The corresponding definitions are:

- **Intellectual property rights:** patents, rights to inventions, copyright and related rights, moral rights, trade marks, business names and domain names, rights in get-up, goodwill and the right to sue for passing off rights in designs, rights in computer software, database rights, rights to use and protect the confidentiality of confidential information (including know-how) and all other intellectual property rights, in each case whether registered or unregistered and including all applications and rights to apply for and be granted, renewals or extensions of and rights to claim priority from, such rights and all similar or equivalent rights or forms of protection which subsist or will subsist now or in the future in any part of the world.
- **Invention:** any invention, idea, discovery, development, improvement, or innovation, whether or not patentable or capable of registration, and whether or not recorded in any medium.

6. Communications with the media

All media liaison relating to the Trust and school activities is handled by the Executive Directors/Headteacher in liaison with the Chief Executive Officer. Employees should seek advice from the Chief Executive Officer/Executive Director /Headteacher before any media interviews or information (verbal or written) is given to the media.

7. Anti-fraud, bribery, and corruption

The expectation is that Trustees, School Performance Review Board members and employees at all levels will adopt the highest standards of propriety and accountability and demonstrate that the Trust is acting in a transparent and honest manner.

Any Trustees/School Performance Review Board members and employees of the Trust who commits a fraudulent act against the Trust or is involved with bribery in the performance of their duties will be subjected to the Trust's procedures for dealing with complaints of misconduct against Trustees/School Performance Review Board members operated by the Trust's Audit and Risk Committee and may be reported to the Police. Please refer to the Trust's Anti-Fraud, Bribery and Corruption Policy.

8. Gifts, hospitality, and donations

The expectation is that Trustees, School Performance Review Board members and employees at all levels will adopt the highest standards of propriety and accountability and demonstrate that the Trust is acting in a transparent and honest manner. Please refer to Trust's Hospitality and Gratuities Policy.

9. Safeguarding and child protection

Employees working with our pupils have a responsibility to safeguard and promote the welfare of those pupils during the course of their work. Any breach of policies and procedures meant to safeguard pupils, will be regarded as potential gross misconduct. This may lead to disciplinary action including the possibility of dismissal without notice.

All matters in respect of safeguarding and child protection should be dealt with in accordance with Trust policy and procedures, and the appropriate Local Safeguarding Children Board's child protection guidance and procedures.

Employees will always ensure appropriate boundaries in terms of relationships with pupils educated in the Trust. If an employee has difficulty enforcing or maintaining those appropriate boundaries because of actions or responses of the pupil, the issue should be referred to the Executive Directors/Director of Inclusion and Safeguarding (Headteacher/central employees) or Headteacher (school-based employees) immediately to allow appropriate action to be taken and recorded.

Employees who witness any behaviour which they consider to be detrimental to the safety and welfare of pupils within our Trust have a duty to report it in accordance with the low-level concerns procedures, as set in the Safeguarding Policy.

Under the terms of the Rehabilitation of Offenders Act 1974, employees must disclose all eligible convictions which are not "spent" both before commencement of and during employment. This includes convictions, cautions, reprimands, or final warnings that are not "protected" as defined by the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (as amended in 2013). Failure to disclose such convictions and to comply with any of the above constitutes possible gross misconduct and may result in disciplinary action including the possibility of summary dismissal without notice.

Under the Childcare Act 2006 (Regulations 2018), all staff are expected to disclose any relationship or association (including those online) that may impact on the school's ability to safeguard pupils.

All employees whose work involves driving will declare any motoring offences, health issues, or medication to the CEO (Executive Director/Headteacher/central employees) or Headteacher (school-based employees). Where employees are in charge of a vehicle whilst engaged on Trust activities, they will ensure that it is safe to drive and has the relevant valid insurance.

10. Underpinning principles

- The welfare of the child is paramount (Children Act 1989).
- Staff are responsible for their own actions, attitudes, and behaviour, and should avoid any conduct which would lead any reasonable person to question their motivation and intentions.
- Staff should work and be seen to work, in an open and transparent way.
- Staff should discuss and/or take advice promptly from their line manager or another senior member of staff over any incident, which may give rise to concern. Records should be made of any incidents and of decisions made/further actions agreed, in accordance with the school's/Trust's policy for keeping and maintaining records. This includes low level concerns.
- Staff should acknowledge that deliberately invented/malicious allegations are extremely rare and that all concerns should be reported and recorded.
- Staff should have regards for equal opportunities.

- All staff should know the name of their designated person for child protection and be familiar with the Safeguarding and Child Protection Policy and procedures.
- All staff are responsible for reporting any safeguarding concerns directly to the Designated Safeguarding Lead (DSL) as soon as possible – as per the Safeguarding Policy.
- Staff are responsible for reporting any breaches of this guidance or concerns to a senior leader, Designated Safeguarding Lead (DSL) or a designated Child Protection Officer.
- Staff are responsible for seeking support, guidance, or access to training if they are unsure of any aspect of their professional responsibilities.

Duty of care

- All staff are accountable for the way in which they exercise authority; manage risk; use resources; and protect pupils from maltreatment and avoidable harm.
- All staff, whether paid or voluntary, have a duty to keep pupils safe and to protect them from harm.
- All staff have a responsibility to provide a safe environment in which pupils can learn.
- All staff have a responsibility to identify pupils who may need extra help or who are suffering, or likely to suffer, significant harm.
- All staff then have the responsibility to take appropriate action, working with other services as needed.

This means that adults should:

- Always act, and be seen to act, in the child's best interests.
- Take responsibility for their own actions and behaviour.
- Refer any situations that cause concern, including those which involve a colleague, family member or friend.

The Trust and parents have legitimate expectations about the nature of professional involvement in the lives of pupils. When individuals accept a role that involves working with pupils, they need to understand and acknowledge the responsibilities and trust inherent in that role.

11. Exercise of professional judgement

This guidance cannot provide a complete checklist of what is, or is not, appropriate behaviour for staff. There will be occasions and circumstances in which staff have to make decisions or act in the best interests of the pupil which could contravene this guidance or where no guidance exists.

Individuals are expected to make judgements about their behaviour in order to secure the best interests and welfare of children in their charge and in so doing, will be seen to be acting reasonably.

Where no specific guidance exists, staff should:

- Discuss the circumstances that informed their action, or their proposed action, with a senior leader or DSL. 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 a senior leader or line manager.
- Always record discussions and actions taken with their justifications.

- Always alert a senior leader where pupils have tried to engage them in discussions of an inappropriate nature.

12. Power and positions of trust

As a result of their knowledge, position and/or the authority invested in their role, all adults working with pupils in educational establishments are in positions of trust in relation to the pupils in their care. A relationship between a member of staff and a pupil cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable pupils, and staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.

This means that adults should not:

- Use their position to gain access to information for their own advantage and/or a child's or family's detriment.
- Use their power to intimidate, threaten, coerce, or undermine pupils.
- Use their status and standing to form or promote relationships with children, which are of a sexual nature or may become so.

13. Sexual contact with pupils

Any sexual behaviour by a member of staff with or towards a child is both unacceptable and illegal. Under section 16 of The Sexual Offences Act 2003, it is an offence for a person aged 18 or over (e.g., teacher, youth worker) to have a sexual relationship with a child under 18, where that person is in a position of trust in respect of that child, even if the relationship is consensual. A situation where a person is in a position of trust could arise where the child is in full-time education and the person looks after children under 18 in the same establishment as the child, even if s/he does not teach the child.

The sexual activity referred to does not just involve physical contact. Where a person aged 18 or over is in a position of trust with a child under 18, it is illegal for that adult to engage in sexual activity with, or in the presence of, a child, or to cause or incite a child to engage in, or watch, sexual activity. 'Keeping Children Safe in Education' re-defines sexual abuse as "forcing or enticing a pupil to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening."

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 and manipulate that relationship so sexual abuse can take place. Staff should be aware that conferring special attention and favour upon a child might be construed as being part of a 'grooming' process, which is an offence.

This means that adults should:

- Not pursue sexual relationships with pupils either in or out of the school setting.
- Avoid any form of communication with a pupil which could be interpreted as sexually suggestive or provocative i.e., verbal comments, letters, notes, electronic mail, phone calls, texts, physical contact.

Please refer to the Safeguarding Policy; however, this area of working practice is governed by statutory law.

14. Propriety and behaviour

All staff have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of the pupils. They should adopt high standards of personal conduct in order to maintain the confidence and respect of their peers, pupils and the public in general.

As a community employer, staff should be aware that their behaviour outside the work environment could compromise their professional position and lead staff, parents, or other members of the community to question their ability to safeguard the welfare of pupils. This means that adults should not:

- Behave in a manner either in or out of the workplace which would lead any reasonable person to question their suitability to work with children or act as a role model.
- Make (or encourage others to make) unprofessional personal comments which demean, offend or humiliate, or might be interpreted as such.
- Make sexual remarks to a pupil (including e-mail, text messages, phone, or letter).
- Discuss their sexual relationships or other inappropriate information on their personal life with, or in the presence of, pupils.
- Discuss a pupil's sexual relationships in inappropriate settings or contexts.
- Allow pupils to use their first name or nicknames.
- Take actions or use behaviours that allow pupils to believe that they are peers with a member of staff.

To support this, employees should:

- Challenge pupils when they inappropriately refer to a member of staff.
- Challenge pupils who use nicknames or first names of staff, when addressing or referring to adults.
- Maintain professional boundaries with pupils.

Staff should also be aware of their responsibilities towards role modelling and maintaining a professional image in, and around, a school, including upholding the standards expected of pupils.

15. Social contact

Through working in a community school, it is recognised that pupils and staff may be known to each other socially, or through family links.

Staff should be aware of the professional boundaries that should be maintained with pupils.

Under no circumstances should staff seek to establish social contact with pupils for the purpose of securing, pursuing, or strengthening a relationship. Even if a pupil seeks to establish social contact, or if this occurs coincidentally, the member of staff should exercise her/his professional judgement in making a response and be aware that such social contact could be misconstrued as grooming.

All contact with pupils should be through appropriate channels at all times. All communication must be appropriate and professional. Any communication outside of agreed professional boundaries may be prone to misinterpretation and as a result could put both the employee and pupil at risk.

Staff should not give pupils their personal details such as home or mobile phone number, personal e-mail address or address information.

Staff should not use unapproved methods to contact pupils. Any member of staff found to be in contact with pupils through any unapproved method, without prior consent, could be subject to disciplinary action. This also extends to the inappropriate use of school approved methods to communicate with pupils.

All staff should use the internal school systems to contact pupils. All messages should be appropriate, for educational purposes and role model appropriate use of e-mail communication and language.

This means that adults should:

- Always seek approval from a senior leader for any planned social contact with pupils (for example when it is part of a reward scheme or pastoral care programme).
- Advise senior leaders of any regular social contact they have with a pupil which may give rise to concern, including pupil family members.
- Only contact pupils via school agreed channels is acceptable.
- Challenge pupils when they do not use their school email address for submitting work or having other contact with staff.
- All e-mail contact should be business-like and professional.
- Report and record any situation which they feel might compromise the school or their own professional standing.

16. Dress and appearance

All staff working for the Trust are expected to present a high standard of dress, appearance, and hygiene. All staff should ensure that the Trust's professional image and reputation are maintained and that we project a professional image to parents, stakeholders, visitors, and external agencies. Most importantly, we must ensure that positive role models are presented to pupils.

It is recognised that a person's dress and appearance are matters of personal choice and self-expression, however, staff should be aware that should their interpretation of the dress and appearance standards fall below expectation, then they may be given advice as to what is considered appropriate.

In all cases staff should be aware that if they dress or appear in a manner which could be considered as inappropriate, this could render themselves vulnerable to criticism or allegation, therefore any advice provided is intended to support individuals. A dress code is in place across all areas of the Trust. This is found in Appendix A of this code.

17. Identity badges

All staff and School Performance Review Board members/Trustees have photographic ID badges and appropriate lanyards. These badges must be worn at all times during the working day. Anyone without an ID badge should be challenged and, where required, advice should be sought from a senior leader.

18. Visitors

All visitors will be required to sign in and out. There are different types of visitor badges, depending on the level of access the visitor has to pupils, the frequency of their visit and, if appropriate, vetting checks have been undertaken and recorded on the Single Central Record.

Each employee is expected to escort their visitors from the reception area around the school/workplace and following the visit, return them to the reception area, so they can sign out and return their badge. Generally, visitors should not be left unaccompanied when visiting a school. Please note arrangements for visitors are both a safeguarding and, health and safety (fire evacuation) requirement.

19. Smoking and the consumption of alcohol

The Trust has a strict 'no alcohol' rule for any staff who are supervising pupils; this includes taking part in educational visits, reward trips, after school or residential trips. The 'no alcohol' rule extends to evening events, award ceremonies and events, such as the leavers celebrations (e.g., the Prom). **Under no circumstances should staff involved in supervising or supporting a school event consume alcohol.** This includes trips where pupils who are over 18 may be taking part.

There may be evening events where alcohol is served to guests, VIPs or as part of the price of a ticket (e.g., to a performance), however, the decision on whether alcohol can be served lies with the CEO/Executive Directors. Staff are not permitted to decide on the serving of alcohol.

Where there is a substantial reason to believe that an employee is under the influence of alcohol or drugs whilst on Trust premises, then this will be regarded as potential gross misconduct.

Smoking or use of electronic smoking devices (vaping) is prohibited in all buildings or grounds operated by the Trust. If employees find it necessary to smoke, they are actively required to do so away from the premises (and its boundaries) and out of the sight of pupils, visitors, parents, and the public.

20. Home visits

All work with pupils and parents should usually be undertaken in the school/setting or other recognised workplace. There are, however, occasions in response to an urgent, planned, or specific situation or job role, where it is necessary to make one-off or regular home visits. It is essential that appropriate policies are in place to safeguard both staff and pupils, who can be more vulnerable in these situations.

Consideration should be given to any circumstances which might render the staff member becoming more vulnerable to an allegation being made e.g., hostility, child protection concerns, complaints, or grievances. Specific thought should be given to visits outside of 'office hours' or in remote or secluded locations and appropriate mitigation should take place. Home visits should not be made alone and where possible with a member of the Senior Leadership team.

This means that staff should:

- Agree the purpose for any home visit with their manager within the remit of their role.

- Adhere to agreed risk management strategies.
- Ensure there is visual access and/or an open door in one-to-one situations.
- Ensure any behaviour or situation which gives rise to concern is discussed with their manager.

Where home visits are part of an individual's role, each school should:

- Ensure that they have home visit and lone-working policies which all adults are made aware of. These should include arrangements for risk assessment and management.
- Ensure that all visits are justified and recorded.
- Ensure that staff are not exposed to unacceptable risk and make clear to staff that, other than in an emergency, they should not enter a home if the parent/carer is absent.
- Ensure that staff have access to a mobile telephone and an emergency contact.
- Ensure that a senior member of staff or a line manager has been made aware of the visit and location.

21. Educational visits and after school clubs

Staff should take particular care when supervising pupils in the less formal atmosphere of a residential setting or after-school activity. During activities that take place off a school site or out of school hours, a more relaxed discipline or informal dress and language code may differ from those accepted in the usual school day. However, staff remain in a position of trust and need to ensure that their behaviour cannot be interpreted as seeking to establish an inappropriate relationship or friendship.

Where out of school activities include overnight stays, careful consideration needs to be given to sleeping arrangements. Pupils, staff, and parents should be informed of these prior to the start of the trip. Health and Safety arrangements require members of staff to keep colleagues/employers aware of their whereabouts, especially when involved in an out of school activity. Staff must be aware of and follow guidance.

This means that adults should:

- Always have another adult present for out of school activities
- Undertake risk assessments in line with the educational visits policy – all visits should be recorded using Evolve.
- Have appropriate consent in place for all activities including medical.
- Ensure that their behaviour remains professional at all times.
- Report any concerns or incidents that have occurred off-site or after school hours to the DSL or another senior leader as soon as possible.
- Respect the 'no alcohol' rule.
- Never share beds with a child/pupil.
- Never share bedrooms unless it involves a dormitory situation and the arrangements have been previously discussed with the Headteacher, parents and pupils.
- Refer to local and national DfE and HSE guidance for educational visits, including exchange visits (both to the UK and abroad).

22. Physical contact

There are occasions when it is entirely appropriate and proper for staff to have physical contact with pupils, but it is crucial that they only do so in ways appropriate to their professional role and in

relation to the pupil's individual needs. Reference to the 'Behaviour and Relationships Policy' should be considered and followed.

If a member of staff believes that an action could be misinterpreted, the incident and circumstances should be referred to the DSL, or Deputy DSL, as soon as possible and, if appropriate, a copy placed on the child's file.

Physical contact, which occurs regularly with an individual pupil, is likely to raise questions unless the justification for this is part of a formally agreed plan (for example in P.E. or relation to pupils with SEN or physical disabilities). A physical handling plan and risk assessment should be in place that has been written in consultation with the parents and SENCo.

Extra caution may be required where it is known that a child has suffered previous abuse or neglect. In the child's view, physical contact might be associated with such experiences and lead to staff being vulnerable to allegations of abuse. It is recognised that many such children are extremely vulnerable and may seek inappropriate physical contact. In such circumstances, staff should deter the child sensitively by helping them to understand the importance of personal boundaries.

The general culture of 'limited touch' should be adapted, where appropriate, to the individual requirements of each child. Children with special needs may require more physical contact to assist their everyday learning. The arrangements should be understood and agreed by all concerned, justified in terms of the child's needs, consistently applied and open to scrutiny.

This means that adults should:

- Be aware that even well-intentioned physical contact may be misconstrued by the child, an observer or by anyone to whom this action is described.
- Never touch a child in a way which may be considered indecent.
- Always be prepared to explain actions and accept that all physical contact be open to scrutiny.
- Never indulge in horseplay, tickling or fun fights.

This means each school will:

- Ensure systems are in place for recording serious incidents and how information about incidents and outcomes can be easily accessed by senior management.
- Provide staff, on a "need to know" basis, with relevant information about vulnerable pupils in their care.
- Make staff aware of the statutory guidance in respect of physical contact with pupils and support pupils with medical conditions at school.

23. Physical education and other activities that require physical contact

Some staff, for example, those who teach PE and games or who offer music tuition, will on occasions have to initiate physical contact with pupils in order to support a pupil, so they can perform a task safely, demonstrate the use of a particular piece of equipment/instrument or assist them with an exercise. This should be done with the pupil's agreement and explained as part of the lesson plan.

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 child.

This means that adults should:

- Consider alternatives, where it is anticipated that a pupil might misinterpret any such contact, perhaps involving another member of staff or a less vulnerable pupil in the demonstration.
- Be familiar with and follow recommended Department for Education guidance.
- Always explain to a pupil the reason why contact is necessary and what form that contact will take.

24. Transporting pupils

In certain situations, e.g., out of school activities, staff or volunteers may agree to transport children as part of their work. As for any other activity undertaken at work, the employer has a duty to carry out a risk assessment covering the health and safety of their staff and to manage any known risks.

Staff should not offer lifts to pupils unless the need for this has been agreed by a manager. A designated member of staff should be appointed to plan and provide oversight of all transport arrangements and respond to any concerns that may arise. Members of staff should not transport pupils alone, at least one additional adult should be an escort.

It is a legal requirement that all passengers wear seatbelts and the driver should ensure that they do so. They should also be aware of and adhere to current legislation regarding the use of car seats for younger children.

Staff should ensure that their behaviour is safe and that the transport arrangements and the vehicle meet all legal requirements. They should ensure that the vehicle is roadworthy and appropriately insured, and that the maximum carrying capacity is not exceeded.

Staff 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 to both their manager and the child's parent(s). The school's Health and Safety Policy and/or Educational Visits and School Trips Policy should set out the arrangements under which staff may use private vehicles to transport pupils.

This means that adults should:

- Plan and agree arrangements with all parties in advance, responding sensitively and flexibly where any concerns arise.
- Consider any specific or additional needs of the pupil.
- Have an appropriate licence/permit for the vehicle.
- Ensure they are fit to drive and free from any drugs, alcohol or medicine which is likely to impair judgement and/ or ability to drive.
- Ensure that appropriate seat restraints are used on all journeys.
- Be aware that the safety and welfare of the pupil is their responsibility until this is safely passed over to a parent/carer.
- Report the nature of the journey, the route and expected time of arrival in accordance with agreed procedures.
- Ensure that their behaviour and all arrangements ensure vehicle, passenger, and driver safety. This includes having proper and appropriate insurance for the type of vehicle being driven.

- Ensure that any impromptu or emergency arrangements of lifts are recorded and can be justified.
- Refer to local and national guidance for educational visits.

Please refer to specific off-site or trips policies and procedures in place at your school for further information.

25. Pupils in distress

There may be occasions when a distressed pupil 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. Where a member of staff has a particular concern about the need to provide this type of care, they should seek further advice from a senior leader.

26. One to one situation

Staff working in one-to-one situations with pupils may be more vulnerable to allegations. All staff should recognise this possibility and, plan and conduct such meetings accordingly. Every attempt should be made to ensure the safety and security needs of both staff and pupils are met.

Each school needs to consider these issues alongside safer working practices, offer clear training and guidance for the use of any areas of the school/workplace which place staff or children in vulnerable situations e.g., photographic darkrooms, counselling rooms, detentions. This applies to any other activities which involve one-to-one situations.

School leaders and managers should undertake some form of a risk assessment in relation to the nature and implications of one-to-one working. Any arrangements should be reviewed on a regular basis. It may be necessary to amend these to take account of particular pupil needs.

Meetings with pupils away from the school premises should not be permitted unless approval is obtained from their parent and the Headteacher or other senior leaders with delegated authority.

This means that adults should:

- Avoid meetings with pupils in remote, secluded areas of the site.
- Ensure there is visual access and/or an open door in one-to-one situations.
- Inform other staff of the meeting beforehand, assessing the need to have them present or close by.
- Avoid use of 'engaged' or equivalent signs wherever possible. Such signs may create an opportunity for secrecy or the impression of secrecy.
- Always report any situation where a child becomes distressed or angry to a senior leader.
- Consider the needs and circumstances of the child/children involved.

27. Morning and after school duty

Some teaching and pastoral staff are required to supervise the entrance and bus stop areas to ensure that pupils enter the school safely and wait safely for their transport home.

This means that adults should:

- Advise pupils to use the designated pelican crossings.
- Move on any waiting cars or vehicles near the entrance.
- Keep the areas clear of traffic, wherever possible.
- At the bus area, wait with pupils, ensuring they wait on the pavement and behind the queue barriers.
- Where available, have a radio to ensure they can contact colleagues, in an emergency.

28. First aid and administration of medicine

Each school will have an adequate number of trained first aiders/appointed persons. Staff may volunteer to undertake this task, or it may be a contractual requirement. Staff should receive appropriate training before administering first aid or medication in line with the 'Administration of Medicines Policy.'

29. Intimate care

All children have a right to safety, privacy and dignity when contact of an intimate nature is required (for example assisting with toileting or removing wet/soiled clothing). A care plan should be drawn up and agreed with parents for all children who require intimate care on a regular basis.

Children should be encouraged to act as independently as possible and to undertake as much of their own personal care as is practicable. When assistance may be required, staff should ensure that another appropriate adult is in the vicinity and is aware of the task to be undertaken.

Where pupils need intimate care, advice on how this assistance should be provided should be sought from the school's SENCo or Welfare Officer (or equivalent) and/or the relevant policy in place at their school.

30. Curriculum

Some areas of the curriculum can include or raise subject matter, which is sexually explicit, political or of an otherwise sensitive nature. Care should be taken to ensure that resource materials cannot be misinterpreted. The lesson plan should highlight particular areas of risk and sensitivity.

This means that adults should not:

- enter into or encourage inappropriate or offensive discussion about sexual activity.
- undermine fundamental British values.
- express any prejudicial views.
- attempt to influence or impose their personal values, attitudes, or beliefs on pupils.

The curriculum can sometimes include or lead to unplanned discussion about subject matter of a sexually explicit, political, or otherwise sensitive nature. Responding to pupils' questions can require careful judgement and staff may wish to take guidance in these circumstances from a senior member of staff.

Care should also be taken to abide by the School Performance Review Boards' required policy on Spiritual, Moral, Social, Cultural (SMSC) and Relationships Education (Primary) and Relationships and Sex Education (Secondary) Policy, including the wishes of parents.

Parents have the right to withdraw their child from all or part of any sex education provided (but not from the biological aspects of human growth and reproduction necessary under the science curriculum). Please refer to the senior leader responsible for the curriculum.

31. Photography, media, and other creative arts

Many school activities involve recording images. These may be undertaken as part of the curriculum, extra school activities, for publicity or to celebrate achievement.

Staff need to be aware of the potential for these aspects of teaching to be misused for pornographic or 'grooming' purposes. Careful consideration should be given as to how these activities are organised and undertaken, and the equipment used. Particular regard needs to be given when they involve young or vulnerable pupils who may be unable to question why or how the activities are taking place.

Children who have been previously abused in this way may feel threatened by the use of photography or filming. Staff should remain sensitive to any children who appear uncomfortable and should recognise the potential for misinterpretation.

Under no circumstances should staff take images of children in a state of undress or of an injury, bruising or similar, e.g., following a concern or disclosure.

Using images of children for publicity purposes requires the age-appropriate consent of the individual concerned and their legal guardians. Images should not be displayed on websites, in publications or in a public place without such consent. The definition of a public place includes areas where visitors to the school have access.

This means that adults should:

- Be clear about the purpose of the activity and about what will happen to the photographs when the lesson/activity is concluded.
- Ensure that the appropriate senior leader is aware that photography/image equipment is being used and for what purpose.
- Ensure that all images are available for scrutiny in order to screen for acceptability.
- Be able to justify images of children in their possession.
- Avoid making images in one-to-one situations.

This means that adults must not; take, display, or distribute images of children unless they have consent to do so.

It is recommended that when using a photograph, the following guidance should be followed:

- If the photograph is used, avoid naming the pupil.
- If the pupil is named, avoid using their photograph.
- The school should establish whether the image will be retained for further use.
- Images should be securely stored and used only by those authorised to do so.

32. Infatuations

Staff need to be aware that it is not uncommon for pupils to be strongly attracted to a member of staff and/or develop a heterosexual or homosexual infatuation. All situations should be responded to

sensitively to maintain the dignity of all concerned. Staff should also be aware that such circumstances always carry a high risk of words or actions being misinterpreted and for allegations to be made against staff.

This means that adults should report any indications (verbal, written or physical) that suggest a pupil may be infatuated to the DSL, Deputy DSL, a senior leader, or other Designated Child Protection Officer.

A member of staff, who becomes aware that a pupil may be infatuated with themselves or a colleague, should discuss this at the earliest opportunity with a senior leader so that appropriate action can be taken. In this way, steps can be taken to avoid hurt and distress for all concerned.

Adults should also exercise care when selecting children for specific activities or privileges in order to avoid perceptions of favouritism or injustice. Similar care should be exercised when pupils are excluded from an activity. Methods of selection and exclusion should always be subject to clear, fair, agreed criteria.

33. Gifts

It is against the law for public servants (staff or members of the governance structure) to take bribes. Staff need to take care that they do not accept any gift that might be construed as a bribe by others or lead the giver to expect preferential treatment.

This means that adults should:

- Ensure that gifts received or given in situations which may be misconstrued or unlawful are declared.
- Generally, only give gifts to an individual pupil as part of an agreed reward system.
- Where giving gifts other than as above, ensure that these are of insignificant value and given to all children equally.
- Staff should not give personal gifts to pupils, without the consent of a senior leader. This will avoid the gesture being misinterpreted as a gesture to bribe or single out a pupil.

There are occasions when children 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.

34. Internet use

The Trust has clear policies about access to and the use of the internet and other forms of technology. Please refer to the Trust's:

- Information Policy.
- Acceptable Use Policy.
- Social Media Policy, and
- Data and Cyber Security Breach Prevention and Management Plan.

Staff and users should not share logins or password information with others. Under no circumstances, whilst using Trust IT equipment or resources, access inappropriate images. Accessing child pornography or indecent images of children on the internet and making, storing, or disseminating such material is illegal and if proven will invariably lead to the individual being barred from work with children and young people.

Using Trust equipment to access inappropriate or indecent material, including adult pornography, will give cause for concern particularly if, as a result, pupils might be exposed to inappropriate or indecent material and may lead to disciplinary action.

35. Sharing concerns and recording incidents

All staff should be aware of safeguarding and child protection policies and procedures, including procedures for dealing with allegations against staff. Staff who are the subject of allegations are advised to contact their professional association.

This means that adults:

- Should be familiar with systems for reporting concerns in their workplace(s).
- Should take responsibility for reporting or recording any incident and passing on that information where they have concerns about any matter pertaining to the welfare of an individual in a school or workplace.

In the event of an incident occurring, which may result in an action being misinterpreted and/or an allegation being made against a member of staff, the relevant information should be clearly and promptly recorded and reported to senior management.

The Trust has an effective, transparent, and accessible system for recording and managing concerns raised by any individual in or associated with the school.

Members of staff should feel able to discuss with their line manager any difficulties or problems that may affect their relationship with pupils so that appropriate support can be provided, or action can be taken.

Please refer to the Safeguarding Policy and procedures for further information or speak to the DSL.

Appendix A: Dress code

In all roles in the Trust, staff are required to be role models to pupils and, as such, are required to set a good example. Pupils are expected to wear a smart uniform and this standard of dress is expected of all staff. To dress professionally shows pride, effort and respect for yourself, your profession, and our pupils.

All staff are required to dress in a smart, clean, well-groomed, and business-like manner, and maintain a good standard of personal hygiene whilst at work. This dress code is not exhaustive in defining acceptable standards of dress and appearance, and it is recognised that staff are expected to dress according to their role. Reasonable adjustments would be made for employees who are disabled and subject to this dress code.

The staff dress code is formal rather than casual and should there be uncertainty, a member of senior leadership has the final word in determining whether dress or appearance is appropriate.

General principles

- Clothing should be clean and in a good state of repair.
- Clothing must be business attire, not casual wear. (Examples of casual wear are denim items, leggings, and sportswear – none of these are acceptable).
- Where provided, staff should wear school or Trust branded clothing (e.g., Site and PE staff).
- Hair (including facial hair for male staff) should be neat, tidy, and well groomed.
- Unconventional or outrageous styles and/or extreme hair colours are not acceptable.
- Jewellery must not be excessive, and where staff have piercings, only ear piercings should be visible. (Large earrings pose a health and safety risk to staff and are not acceptable). Nose studs may be worn for reasons of religious or cultural observance only.
- Body art, such as tattoos, should be very discreet or covered up where possible.
- The Trust recognises that religious or cultural dress is acceptable (examples include clerical collar, henna, headscarves, and turbans).

Clothing

- A business suit, smart jacket or blazer is preferred.
- Male staff are expected to wear shirts and ties.
- Tops must cover cleavage and décolleté and must be long enough to cover midriff (with no flesh showing in this area).
- Tops and blouses should at least cover the shoulders. Sleeveless or strapless tops are unacceptable, and underwear should not be able to be seen.
- Trousers may be full length or $\frac{3}{4}$ length.
- Shorts are only suitable for staff teaching PE and must be of an appropriate length.
- Skirts and dresses should be of an appropriate length (just above the knee at the shortest).
- Clothing for some settings, such as Early Years, could be less restrictive but this should still reflect professionalism.

Footwear

- Casual footwear, including open toe sandals, flip flops, or trainers (except for staff teaching PE) are not acceptable.
- Where heels are worn, this must be a sensible heel, such as a court shoe.

Uniforms and protective clothing

- Where uniforms and/or protective clothing are provided staff must ensure that they wear their uniforms/clothing and names badges during working hours, unless otherwise advised by their manager.
- Uniforms and protective clothing remain the property of the Trust and loss or damage must be reported as soon as possible.

INSET, School trips and school closure periods

- As an exception to the formal business dress requirements, the dress code is relaxed on working days where pupils are not present. Unless otherwise advised a smart/casual dress code can be adopted for INSET days and school holidays.
- Generally, a smart/casual code of dress is also acceptable when supporting school trips. Where a dress code is required, this will be advised by the trip leader (e.g., a seminar or public speaking event).
- Staff are reminded that a level of professionalism and decency is always required.

Medical issues

- Where there are medical issues which prevent any part of this code being followed, individuals should discuss these with their manager in the first instance to consider any reasonable adjustments, if applicable.