**South Gloucestershire and Stroud Academy Trust**

# Code of Conduct (Staff) Policy and Procedure

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please contact the SGSAT Human Resources Department.

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| **Job Title/Role:** | HR Advisor |
| **Ref. No.** | **Date of this version: 02/06/2025**<br><br>**Review Date: 01/06/2027**<br>(Subject to any legislative changes)<br><br>**Upload to website? Yes**<br><br>**Uploaded to SharePoint? Yes** |
| **Approved by:** | **SGSAT Trust Board** |
| **Date:** | **09 July 2025** |

## Code of Conduct (Staff) Policy and Procedure

## 1. Policy Aims, Scope and Principles

1.1. This policy aims to set and maintain standards of conduct that we expect all staff to follow. By creating this policy, we aim to ensure the trust is an environment where everyone is safe, happy and treated with respect.

1.2. Many of the principles in this code of conduct are based on the Teachers' Standards.

1.3. Staff have an influential position in the school and will act as role models for pupils by consistently demonstrating high standards of behaviour.

1.4. We expect that all teachers will act in accordance with the personal and professional behaviours set out in the Teachers' Standards.

1.5. We expect all support staff, central Trust staff, Trustees, Local School Board members and volunteers to also act with personal and professional integrity, respecting the safety and wellbeing of others.

1.6. Trustees/Local School Board members are also expected to follow the code of conduct. Throughout this document, the term staff should be taken to include all adults either employed or working within the trust.

1.7. Failure to follow the code of conduct may result in disciplinary action being taken, as set out in our staff disciplinary procedures.

1.8. Please note that this code of conduct is not exhaustive. If situations arise that are not covered by this code, staff will use their professional judgement and act in the best interests of the trust, the school and its pupils.

1.9. The purpose of this code of conduct is to clarify the nature of professional behaviour expected of all employees in support of the Trust's mission and values:

**Our Purpose**:

***We exist so that every student has the best education, and every community has the best school.***

**Our Priorities**:

***We have three strategic priorities for 2024-2027:***

- *Providing an effective, inclusive and ambitious education.*
- *Being an employer of choice and a community anchor.*
- *Securing our future as a thriving and growing trust.*

## 2. Legislation and Guidance

2.1. We must have a policy on staff behaviour, as explained in the Department for Education's governance guide for academy trusts.

2.2. In line with the statutory safeguarding guidance Keeping Children Safe in Education, we should have a staff code of conduct, which should (among other things) cover low-level concerns, allegations against staff and whistle-blowing, as well as acceptable use of technologies (including the use of mobile devices), staff/pupil relationships and communications, including the use of social media.

2.3. This policy also complies with our funding agreement and articles of association.

## 3. General Obligations

3.1. Staff set an example to pupils. They will:

- Maintain high standards in their attendance and punctuality
- Never use inappropriate or offensive language in school
- Treat pupils and others with dignity and respect
- Show tolerance and respect for the rights of others

- Not undermine fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs

- Not express personal beliefs in a way that exploits pupils' vulnerability or might lead them to break the law

- Understand the statutory frameworks they must act within

## 4. Safeguarding

Staff have a duty to safeguard pupils from harm, and to report any concerns they have. This includes physical, emotional and sexual abuse, and neglect.

Staff will familiarise themselves with our child protection and safeguarding policy and procedures, and the Prevent initiative, and ensure they are aware of the processes to follow if they have concerns about a child.

Our child protection and safeguarding policy and procedures are available here. New staff will also be given copies on arrival.

### Allegations that may meet the harm threshold

4.1. This section applies to all cases in which it is alleged that anyone working in the trust, including a supply teacher, volunteer or contractor, has:

- Behaved in a way that has harmed a child, or may have harmed a child, and/or

- Possibly committed a criminal offence against or related to a child, and/or

- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children, and/or

- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place inside or outside of school

4.2. We will deal with any allegation of abuse quickly and in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

4.3. A 'case manager' will lead any investigation. This will be the headteacher, or the chair of the board of trustees where the headteacher is the subject of the allegation.

4.4. **Low-level concerns about members of staff**

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

- Being over-friendly with children
- Having favourites
- Taking photographs of children on a personal device
- Engaging in 1-to-1 activities where they can't easily be seen
- Humiliating pupils

4.4.2. Low-level concerns can include inappropriate conduct inside and outside of work.

4.4.3. All staff should share any low-level concerns they have using the reporting procedures set out in our child protection and safeguarding policy. We also encourage staff to self-refer if they find themselves in a situation that could be misinterpreted. If staff are not sure whether behaviour would be deemed a low-level concern, we encourage staff to report it.

4.4.4. All reports will be handled in a responsive, sensitive and proportionate way.

4.4.5. Unprofessional behaviour will be addressed, and the staff member supported to correct it, at an early stage.

4.4.6. This creates and embeds a culture of openness, trust and transparency in which our values and expected behaviour are constantly lived, monitored and reinforced by all staff, while minimising the risk of abuse.

4.4.7. Reporting and responding to low-level concerns is covered in more detail in our child protection and safeguarding policy.

4.4.8. Our procedures for dealing with allegations will be applied with common sense and judgement.

4.5. **Whistleblowing**

4.5.1. Whistleblowing reports wrongdoing that it is "in the public interest". Examples linked to safeguarding include:

- Pupils' or staff members' health and safety being put in danger
- Failure to comply with a legal obligation or statutory requirement
- Attempts to cover up the above, or any other wrongdoing in the public interest

4.5.2. Staff are encouraged to report suspected wrongdoing as soon as possible. Their concerns will be taken seriously and investigated, and their confidentiality will be respected. The trust aims to encourage openness and will support whistleblowers who raise genuine concerns under this policy, even if they turn out to be mistaken.

4.5.3. Staff should consider the examples above when deciding whether their concern is of a whistle-blowing nature. Consider whether the incident(s) was illegal, breached statutory or trust procedures, put people in danger or was an attempt to cover any such activity up.

4.5.4. Staff should report their concern to the headteacher. If the concern is about the headteacher, or it is believed they may be involved in the wrongdoing in some way, the staff member should report their concern to the chair of the board of trustees.

4.5.5. Concerns should be made in writing wherever possible. They should include names of those committing wrongdoing, dates, places and as much evidence and context as possible. Staff raising a concern should also include details of any personal interest in the matter. The trust will investigate any complaints in a timely, respectful and confidential manner.

4.5.6. For our trust's detailed whistleblowing process, please refer to our Whistleblowing policy.

## 5. Sexual Harassment

5.1 Sexual harassment is any unwanted physical, verbal or non-verbal conduct of a sexual nature that has a purpose or effect of violating a person's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. It also includes treating someone less favourably because they've submitted or refused to submit to unwanted conduct of a sexual nature in the past, or harassment related to sex or gender reassignment. When this behaviour is unwanted, it includes (but isn't limited to):

- Unwanted physical conduct or "horseplay" including touching, pinching, pushing and grabbing
- Continued suggestions for sexual activity after it has been made clear that such suggestions are unwelcome
- Sending or displaying material that is pornographic or that some people might find offensive
- Unwelcome sexual advances or suggestive behaviour (which the harasser may perceive as harmless)
- Offensive emails, text messages or social media content
- Comments and jokes of a sexual nature
- Sexually suggestive looks and staring

- Sexual propositions and advances
- Promising things in return for sexual favours
- Physical contact such as massaging, hugging or kissing
- Sexual contact on social media

5.2 Staff will help create a positive environment that works to prevent sexual harassment. This includes calling out sexual harassment that they witness. All witnesses will be provided with appropriate support and will be protected from victimisation.

5.3 If a staff member is concerned at any point about incidents of sexual harassment (either directed at them or someone else), they should report their concern to the headteacher. If the concern is about the headteacher, or it is believed they may be involved in the wrongdoing in some way, the staff member should report their concern to the chair of the board of trustees. The trust will investigate any complaints in a timely, respectful and confidential manner.

5.4 All staff will receive training on recognising and responding to incidents of sexual harassment. The trust will monitor the treatment and outcomes of any complaints of sexual harassment or victimisation received to ensure that they are properly investigated and resolved, those who report or act as witnesses are not victimised, repeat offenders are dealt with appropriately, cultural clashes are identified and resolved and workforce training is targeted where needed.

## 6. Staff-pupil relationships

6.1 Staff will observe proper boundaries with pupils that are appropriate to their professional position. They will act in a fair and transparent way that would not lead anyone to reasonably assume they are not doing so.

6.2 If staff members and pupils must spend time on a 1-to-1 basis, staff will make sure that:

- This takes place in a public place that others can access
- Others can see into the room

- A colleague or line manager knows this is taking place

6.3 Staff should avoid contact with pupils outside of school hours if possible.

6.4 Personal contact details should not be exchanged between staff and pupils. This includes social media profiles.

6.5 While we are aware many pupils and their parents/carers may wish to give gifts to staff, e.g. at the end of the school year, gifts from staff to pupils are not acceptable.

6.6 If a staff member is concerned at any point that an interaction between themselves and a pupil may be misinterpreted, or if a staff member is concerned at any point about a fellow staff member and a pupil, this should be reported in line with the procedures set out in our child protection and safeguarding policy.

## 7. Communication and social media

7.1 Staff's social media profiles should not be available to pupils. If they have a personal profile on social media sites, they should not use their full name, as pupils may be able to find them. Staff should consider using a first and middle name instead and set public profiles to private.

7.2 Staff should not attempt to contact pupils or their parents/carers via social media, or any other means outside of the trust, in order to develop any sort of relationship. They will not make any efforts to find pupils' or parents'/carers' social media profiles.

7.3 Staff will ensure that they do not post any images online that identify children who are pupils within the trust without their consent.

7.4 Staff should be aware of the trust's online safety policy

## 8. Acceptable use of technology

8.1 Staff will not use technology on site or belonging to the school/trust to view material that is illegal, inappropriate or likely to be deemed offensive. This includes, but is not limited to, sending obscene emails, gambling and viewing pornography or other inappropriate content.

8.2 Staff will not use personal mobile phones and laptops, or school/trust equipment for personal use, in school hours or in front of pupils. Any personal use must be in the employee's own time (before or after working hours or during unpaid lunch breaks). All personal use must comply with the standards and restrictions set out in this Code. They will also not use personal mobile phones or cameras to take pictures of pupils.

8.3 We have the right to monitor emails and internet use on the trust's IT system. Please see the trust's IT Acceptable Use Policy

## 9. Confidentiality

9.1 In the course of their role, members of staff are often privy to sensitive and confidential information about the trust, its schools, staff, pupils and their parents/carers.

9.2 This information should never be:

- Disclosed to anyone unless required by law or with consent from the relevant party or parties
- Used to humiliate, embarrass or blackmail others
- Used for a purpose other than what it was collected and intended for

9.3 This does not overrule staff's duty to report child protection concerns to the appropriate channel where staff believe a child has been harmed or is at risk of harm, as detailed further in our Safeguarding and Child Protection Policy.

## 10. Honesty and integrity

10.1 Staff are encouraged to report suspected wrongdoing as soon as possible. Their concerns will be taken seriously and investigated, and their confidentiality will be

respected. The trust aims to encourage openness and will support whistleblowers who raise genuine concerns under this policy, even if they turn out to be mistaken.

10.2 Staff will not accept bribes. Gifts that are worth more than £30 must be declared and recorded on the gifts and hospitality register as specified in our Gifts and Hospitality Policy.

10.3 Staff will ensure that all information given to the trust is correct. This should include:

- Background information (including any past or current investigations/cautions related to conduct outside of school)
- Qualifications
- Professional experience

10.4 Where there are any updates to the information provided to the trust, the member of staff will advise the trust as such as soon as reasonably practicable. Consideration will then be given to the nature and circumstances of the matter and whether this may have an impact on the member of staff's employment.

## 11. Dress code

11.1 Staff will dress in a professional, appropriate manner.

11.2 Outfits will not be overly revealing, and we ask that tattoos are covered up.

11.3 Clothes will not display any offensive or political slogans.

## 12. Conduct outside of work

12.1 Staff will not act in a way that would bring the trust, school, or the teaching profession, into disrepute. This covers conduct including but not limited to relevant criminal offences, such as violence or sexual misconduct, as well as negative comments about the trust or school on social media, any conduct of this nature could lead to disciplinary action.

## 13. Monitoring arrangements

13.1. The Trust is responsible for ensuring the implementation of the policy.

## 14. Related Policies, Procedures, Charters, Plans, Guidance and Legislation

a. Related SGSAT policies, procedures and guidance can be found on the Trust Intranet and include:

- Absence Policy
- Anti-bribery, Anti-Corruption and Anti-Fraud Policy
- Anti- Bullying and Anti_harassment (Staff) Policy & Procedure
- Data Privacy & Protection Policy
- Declaration of Interests Policy
- Disciplinary Policy (Staff)
- Educational Visits Policy
- Health and Safety Policy
- IT Acceptable Use Policy
- Safeguarding Students and Child Protection Policy
- Guidelines for Maintaining Professional Boundaries
- Grievance Policy and Procedure
- Online Safety Policy
- Whistleblowing Policy

### Equality Impact Assessment 2024-25

| POLICY NAME |
|---|
| Code of Conduct |
| **POLICY PURPOSE** |
| This policy aims to set and maintain standards of conduct that we expect all staff to follow. By creating this policy, we aim to ensure the trust is an environment where everyone is safe, happy and treated with respect. |
| **LAST REVIEW** |
| Vanessa Terry HR Business Partner, 28/06/2024 |
| **/POLICY STATUS** |
| This is an existing statutory policy, that now incorporates the previous Abuse of Trust Policy |

| THIS POLICY WILL AFFECT |
|---|
| • Staff<br>• Students<br>• Parents/ carers |

**Completion details/ EIA owners**

| | |
|---|---|
| EIA completed by: | Moira Foster-Fitzgerald, Chief Operating Officer |
| Contributors to EIA: | N/A |
| Date completed: | 3 June 2025 |

**Impact analysis**

| GROUP | POSITIVE IMPACT | NEUTRAL IMPACT | NEGATIVE IMPACT | WHY WILL THE POLICY HAVE THIS EFFECT? |
|---|---|---|---|---|
| Age | | ✓ | | Consultation on the development of this policy has been undertaken with staff via the JCNC, comprising of staff and external union representatives. |
| Disability | | ✓ | | |
| Gender reassignment | | ✓ | | |
| Marriage or civil partnership | | ✓ | | |
| Pregnancy or maternity | | ✓ | | |
| Race | | ✓ | | |
| Religion or belief | | ✓ | | |
| Sex | | ✓ | | |
| Sexual orientation | | ✓ | | |

| | | | | |
|---|---|---|---|---|
| The following non-protected characteristics may have a specific impact in our schools e.g.:<br>• English as an additional language<br>• Families with separated parents<br>• Looked-after children<br>• Refugees and asylum seekers<br>• Young carers | | ✓ | | |

**Outcomes**

| CONSULTATION AND STAKEHOLDER ENGAGEMENT |
|---|
| • Ahead of presenting this policy to the Board for approval, consultation on the development of this policy has been undertaken with staff via the JCNC, comprising of staff and external union representatives. |
| **FINAL DECISION ON POLICY** |
| • Keep the updated policy without further change. |

**Monitoring arrangements**

| MONITORING ARRANGEMENTS |
|---|
| The EIA outcome will be monitored as follows:<br>• Policy review schedule, to ensure policy is reviewed on schedule or following legislative updates<br>• Any further consultation or stakeholder engagement – ongoing consultation with JCNC and staff groups |
| **DATE OF NEXT POLICY REVIEW** |
| 1 June 2026 |

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