

The Willows School Academy Trust



Staff Code of Conduct Policy

Reviewed: April 2026

Next Review: April 2027

Policy Statement

The Willows School Academy Trust expects the highest standards of personal and professional conduct from all Employees. As such, the school requires all employees to act in a manner which reflects the values and ethos of the school.

Employees must ensure that their behaviour and actions are consistent with their position as a role model to pupils/students and are compatible with working with young people and in a school setting.

Employees must act with integrity, honesty and demonstrate ethical and respectful working practices towards pupils/students, colleagues, parents/carers and other members of the school community.

All Employees have a responsibility to observe appropriate professional boundaries and act at all times in a manner which safeguards and promotes the welfare of pupils/students.

Employees of The Willows School Academy Trust must disclose any relevant information which may impact on their job role or suitability to work with young people or in a school setting.

The Willows School Academy Trust requires Employees to adhere to all School policies and observe the highest standards of business/financial practice.

Each Employee has an individual responsibility to act in a manner which upholds the school's commitment to providing effective and professional education to pupils and protects its reputation to do the same with confidence in the local community.

Employees are accountable for their actions and conduct and should seek advice from their Line Manager//Headteacher if they are not sure of the appropriate action to take.

Employees should be aware that a failure to comply with the following Code of Conduct could result in disciplinary action being considered. A serious breach could potentially result in dismissal.

This policy explains the school's expectations with regards to the conduct of Employees in the following areas:

- Professional conduct
- Safeguarding Pupils
- Use of ICT & social media
- Business conduct

Scope

This Policy applies to all current employees of The Willows School Academy Trust. This Policy should also be adhered to by all volunteers/supply and agency workers engaged by the school.

Reference to the management role of the Headteacher in this policy may include his/her identified nominee. In the case of the Headteacher, this management function is undertaken by the Chair of Governors.

Reference to 'employees' in this document should be considered to also include all volunteers/supply and agency workers. It does not include Governors for whom separate arrangements apply.

Responsibilities of the School and the Employee

The school will:

- Explain the provisions of the Code of Conduct to Employees and signpost Employees to other relevant policies, documents and guidelines
- Provide additional advice and guidance to Employees in relation to queries they may have regarding the application of the Code of Conduct
- Coach, support and provide feedback to Employees on their performance in relation to the required standards of conduct
- Take appropriate action at the earliest opportunity to address breaches of the expected standards of conduct

Employees must:

- Read, understand and comply with the Code of Conduct at all times
- Use this code, alongside other relevant school policies and professional codes, to guide them in their role
- Seek guidance from the Headteacher/Line Manager (or Chair of Governors in the case of the Headteacher) if they are unclear about the conduct or actions expected of them
- Alert the Headteacher (or Chair of Governors in the case of the Headteacher) at the earliest opportunity where an Employee believes they may have acted in a manner which is inconsistent with the Code of Conduct and other relevant school Policies and professional codes

Reference to Other Sources of Information

This Code of Conduct is not exhaustive and does not replace the general requirements of the law, common sense and good conduct.

The Code of Conduct should be read in conjunction with a number of associated policies relating to conduct which are set out throughout this document:

Teachers' Standards

In addition to this policy, all staff employed under Teachers' Terms and Conditions of Employment have a statutory obligation to adhere to the provisions of the STPCD, the latest 'Teachers' Standards 2012' and in relation to this policy, Part 2 of the Teachers' Standards - Personal and Professional Conduct.

Part 2 of the Teachers' Standards is available online via:

https://assets.publishing.service.gov.uk/media/5a750668ed915d3c7d529cad/Teachers_standard_information.pdf

Keeping Children Safe in Education

All Employees must ensure they have read, understood and comply with:

- Part 1 of Keeping Children Safe in Education (KCSIE September 2025)
- KCSIE Part 4 – Allegations that meet the harm threshold
- KCSIE Section Two – Concerns that do not meet the harm threshold (low-level concerns)

This Guidance is available via:

Further safeguarding guidance is provided later in this document.

School Policies

All Employees must also ensure they have read, understood and comply with:

- The School's Safeguarding Policy
- The School's Child Protection Policy
- The School's Complaints Policy - which sets out how complaints from parents, pupils and other stakeholders are handled
- The School's Behaviour Management Policy

All school policies listed above can be accessed on the school website and on the shared server.

Staff must also have due regard to other professional codes, policies and guidance which may be relevant to their specific role.

Professional Conduct

Employees are expected to demonstrate consistently high standards of personal and professional conduct.

Employees are required to work in a diligent and conscientious manner.

Employees are expected to work to the requirements of their job and are required to respect managerial authority and follow reasonable instructions.

Employees must conduct themselves in a manner which reflects the ethos and values of the school and adhere to School policies and procedures at all times.

Employees should ensure they work their contracted hours and are expected to maintain a high level of attendance and punctuality.

❖ Honesty and Integrity

Employees must maintain high standards of honesty and integrity in their work.

Employees should not behave in a manner which would lead a reasonable person to call into question their motivation or intentions.

During the course of their work, Employees should ensure they do not:

- Wilfully provide false/misleading information
- Destroy or alter information/records without proper authorisation
- Wilfully withhold information or conceal matters which they could reasonably be expected to have disclosed
- Misrepresent the School or their position
- Accept or offer any form of bribe/inducement or engage in any other corrupt working practice

Should an Employee become aware of any conduct on the part of a colleague which raises concerns regarding health and safety, safeguarding or criminal activity – they have a duty to disclose this.

Allegations concerning fraudulent, dishonest or corrupt practices or the falsification or withholding of information will be investigated and formal disciplinary action taken where appropriate.

❖ **Setting an Example**

School Employees are role models and must strive to adhere to behaviour that sets a good example to all the pupils/students within the school and is appropriate in a school setting.

This includes:

- Refraining from abusive or potentially offensive/discriminatory language or actions. (The use of profanity, vulgar expressions, personal insults, violence, harassment for example, will be considered unacceptable)
- Being mindful and sensitive to the customs, practices, culture and personal belief of others
- Positively contributing to the creation of a fair and inclusive work environment where everyone can thrive and do their best work
- Demonstrating tolerance and respect towards others by being mindful and sensitive to the customs, practices, culture and personal belief of others
- Contributing to the creation of a fair and inclusive School environment where everyone can thrive and do their best work
- Observing boundaries appropriate to their role and a school setting
- Ensuring any topics of conversation with pupils/students are suitable to the school setting/curriculum
- Not undermining fundamental British values
- Ensuring personal/political opinions or beliefs do not impact on the discharge of duties and/or are not expressed in a way which exploits pupils/students' vulnerability or seeks to unduly influence
- Maintaining high standards of personal presentation, attendance and punctuality

Should Employees be in doubt about the appropriateness of their behaviour they should seek guidance from the Headteacher (or Chair of Governors in the case of the Headteacher). Breaches of expected behaviour may be considered under the disciplinary procedure; this may result in formal disciplinary action including dismissal.

❖ **Confidentiality**

Employees may have access to confidential or sensitive information about pupils/students, colleagues or the business and operation of the school as part of their job role.

Such information must not be disclosed to any person who is not entitled to have access to this or legitimately needs it for work purposes.

Specifically, all Employees must:

- Work in accordance with the requirements of the General Data Protection Regulation (2018) and associated legislation
- Observe the School's procedures for the release of information to other agencies and members of the public
- Not use or share confidential information inappropriately or for personal gain
- Not speak inappropriately about the school community, pupils, parents, staff or governors including discussing incidents, operational or employment matters with parents/members of the public
- Ensure all confidential data is kept secure and password protected

Should Employees be in doubt about the appropriateness of sharing information they should seek guidance from the Headteacher.

Working Relationships & Relationships with other Stakeholders/Community

The Willows School expects Employees to maintain positive and professional working relationships. Colleagues, pupils, parents and other stakeholders should be treated with dignity and respect.

Employees should be polite and courteous in their interactions with parents, pupils and other stakeholders/members of the school community.

Behaviour which constitutes bullying and harassment, intimidation, victimisation, discrimination or abuse of authority will not be tolerated and may be addressed via the school's relevant policies. This includes physical and verbal abuse and use of inappropriate language (for example the use of profanities or vulgar expressions) or unprofessional behaviour (for example being rude or hostile) with colleagues, pupils and parents.

Employees should treat all stakeholders in a fair and equitable way and not behave in a manner which may demean, distress, offend or discriminate against others.

Employees should ensure that policies relating to equality issues are complied with.

Employees must be aware of the school's Complaints Policy and address any concerns from parents, pupils and other stakeholders in accordance with this policy.

Conduct Outside of the Workplace

The Willows School Academy Trust recognises that Employees are entitled to their private lives. In general, the choices and actions of employees outside of their job role are not the school's concern. However, in order to protect all parties, there are exceptions to this.

All Employees working in The Willows School community must be mindful that they have a responsibility to maintain public confidence in their own and the school's ability to safeguard the welfare and best interests of children and young people. It is therefore expected that they will adopt high standards of personal conduct in order to maintain the confidence and respect of the public in general and all those with whom they work.

In this regard, Employees must not engage in conduct outside of work which has the potential to:

- Affect or is likely to affect the suitability of the Employee to undertake their job role or work with children/young people or in a school setting
- Impact on the operation or reputation or standing of the school
- Impact on the operation or reputation of the school's relationship with its staff, parents, pupils, or other stakeholders
- Seriously undermine the trust and confidence that the school has in the Employee to undertake their job role or work with children/young people or in a school setting

In particular, criminal offences that involve violence or possession or use of illegal drugs or sexual misconduct are likely to be regarded as unacceptable.

Concerns related to an employee's actions or inactions outside of work will be reasonably considered in light of the Employee's job role, and the potential impact of the Employee's suitability to do their job within the context of the School Community. If relevant, formal action may be considered following the implementation of the school's disciplinary procedure. Depending on the seriousness of any established concerns, dismissal may be a potential outcome.

Duty to Disclosure

All Employees have a duty to immediately disclose to the Headteacher (or Chair of Governors in the case of a Headteacher) prior to the start of their employment, at the start of their employment or during the course of their employment, any change in their circumstances or any information which may affect or is

likely to affect the suitability of the Employee to undertake their job role or work with children/young people or in a school setting.

This includes, but is not restricted to:

- the Employee being subject to any police investigation/enquiry, arrest, ban, charge, caution, reprimand, warning, fine or pending prosecution or criminal conviction. This includes any actions committed overseas which would be subject to a police investigation or formal action if such actions had been committed in any part of the United Kingdom
- the Employee being subject to any referral, made to, or any investigation, proceedings, or prohibition order being undertaken by the Teaching Regulation Agency, General Teaching Council for Scotland, or the Education Workforce Council in Wales
- the Employee being subject to the inclusion on the DBS Children's Barred List and any change in DBS status during employment, or any referral, made to, or any, investigation or proceedings being undertaken by the DBS
- the Employee being subject to any referral, made to, or any investigation, proceedings, or prohibition order being undertaken by any other regulatory or professional authorities or actions of other agencies relating to child protection and/or safeguarding concerns
- the Employee being subject to any orders made in relation to the care of children, the refusal or cancellation of registration relating to childcare, or children's homes, or being prohibited from private fostering
- the Employee being subject to any 'live' disciplinary process, formal sanction or any other relevant information arising from a previous or current secondary employment/voluntary work which may impact on the Employee's suitability to undertake their role or work with children/young people or in a school setting. This includes substantiated safeguarding allegations
- the Employee's close personal relationships outside of the workplace presenting a 'risk by association' to the safeguarding of children/young people

This list is not exhaustive. Should an employee be unclear about whether it is appropriate to disclose a matter they are encouraged to seek guidance from the Headteacher (or Chair of Governors in the case of a Headteacher) at the earliest opportunity.

The school acknowledges the obligation to disclose protected convictions and cautions is governed by the requirements of the Rehabilitation of Offences Act 1974 (Exceptions) Order 1975 (as amended in 2013). Prospective Employees should be aware that when applying for particular jobs and activities, certain convictions and cautions are considered 'protected'. This means that they do not need to be disclosed to employers, and if they are disclosed, employers cannot take them into account.

Employees are advised that Guidance about whether a conviction or caution should be disclosed can be found here: Check if you need to tell someone about your criminal record: What information you need to give - www.gov.uk

Employees must also report any current or historical information in the public domain or which is likely to come into the public domain which may be of relevance to their job role or their suitability to work with children/young people or in a school setting or matters which may be subject to adverse media attention or have a detrimental impact on the reputation of the school.

❖ **Childcare (Disqualification) Regulations 2009**

In addition, in the case of individuals who work with, or manage the education of, early years pupils (under the age of five) during school hours, and children up to the age of eight in relation to activities outside of the school day (for example breakfast or after school club employees), the following legislative provisions also apply.

In accordance with the Childcare (Disqualification) Regulations 2009 (Section 75 of the Childcare Act 2006) an Employee should immediately disclose to the /Headteacher (or Chair of Governors in the case of the Headteacher) if, at any point during their employment, they:

- Are disqualified from providing childcare provision or being involved in the management of such provision, including where any application for an Ofsted waiver from disqualification has been made, regardless of whether such an application was successful

Such employees also have a duty to ensure that they are fully aware of their obligations and will be asked by the school to confirm that they understand and comply with these provisions.

Further guidance relating to Employee's obligations under the Childcare (Disqualification) Regulations 2009 including details of the relevant offences which must be disclosed to the school is available at:

<https://www.gov.uk/government/publications/disqualification-under-the-childcare-act-2006>

Employees should seek clarification from the Headteacher (or Chair of Governors in the case of the Headteacher) if they are unclear whether they are required to disclose certain information under this provision.

❖ **How the school will respond to Employee disclosures**

Disclosures will be handled sensitively and discreetly, and with regard to data protection considerations.

The Headteacher will consider carefully any disclosure which is made and the appropriate response.

This may result in a suspension from duties with normal pay while an investigation/risk assessment takes place or Ofsted waiver application made (where applicable). Suspension is not a sanction in itself and does not represent any pre-judgement of the outcome of the response to the disclosure.

In instances where the information disclosed constitutes a risk to the safeguarding of children/young people or is incompatible with an employee's job role or their suitability to work with children/young people in a school setting, termination of employment may be considered, following due process.

Any failure to disclose any information required in the course of employment or any other information that may have a bearing on an individual's suitability to carry out their job role or work with children/young people or in a school setting may be the subject of disciplinary action which could lead to dismissal.

Secondary Employment

Employees should ensure that any external paid or unpaid work does not conflict with their duty to the school or pose a potential to damage the Employee's own or the educational setting's reputation within the context of their job role and seniority.

Employees must discuss with their Headteacher and obtain their consent before taking up additional paid/unpaid employment or engaging in any other business.

Requests will not be unreasonably refused providing that:

- It does not affect or is unlikely to affect the suitability of the Employee to undertake their job role or work with children/young people or in a school setting
- There is no detrimental impact on an employee's work performance or their own or others' health and safety
- Privileged or confidential information is not shared
- Work is undertaken outside of the school and of contracted hours of work
- The activity is not in direct competition with those of the school

If school staff work for another organisation, they must not act as a messenger between that organisation and the school. Formal channels of communication must be maintained.

It is an employee's responsibility to monitor the hours they work and ensure they are rested and refreshed to be able to carry out their role. An average working week of 48 hours across all employments should not normally be exceeded unless the Employee has elected to opt out of the Working Time Regulations.

Dress and Presentation

An individual's dress and appearance are a matter of personal choice. However, all Employees must ensure their dress, personal appearance and standard of personal hygiene is appropriate to the nature of their role in the school and promotes a professional image. Employees should be mindful of setting a good example to both pupils and visitors.

Dress should be appropriate to the activities an Employee is engaged in and any related health and safety requirements.

Suitable protective equipment must be worn where provided and appropriate. Uniforms should be worn where provided.

Employees should wear their identity badges at all times whilst in the workplace. Employees should dress in a manner that is not offensive, revealing or sexually provocative.

Employees should dress in a manner that is absent from political slogans, offensive language or other contentious symbols, wording or imagery.

False nails should not be worn (including acrylics). Fingernails must be no longer than fingers, not sharp and must be a suitable shape (e.g., not pointed).

The school recognises the diversity of cultures and religions of its Employees and will take a sensitive approach where this affects dress and uniform requirements.

Health and Safety at Work

All Employees must, by law, take reasonable care for their own health and safety and that of others in the workplace.

Employees are required to comply with the School's Health and Safety policy and agreed procedures at all times. This includes:

- Avoiding risk of injury or danger to yourself or others
- Using any protective clothing and equipment supplied
- Complying with hygiene requirements
- Reporting, at the earliest opportunity, any hazards, defects, accidents or incidents to the Headteacher or other designated person
- Not interfering with, or misusing, anything provided for health, safety or welfare
- Informing the School of any medical condition or medication which has been prescribed which may have an impact on health and safety in the workplace

Employees with specific additional responsibilities and those in managerial roles should also be aware of and comply with any additional health and safety obligations associated with their role.

Employees should inform their manager if they have a medical condition or are taking prescription medication which may impair their work performance or affect their health and safety or that of others.

Contact with the Media

All enquiries from the media should be directed to the Headteacher.

Employees should not make contact with or comment to the media about matters relating to the school without the prior approval of the Headteacher.

Employees should speak to the Headteacher in the first instance about any concerns they have regarding their own employment or operation of the school and/or may refer to the School's Whistleblowing or Grievance policies if they wish to raise a formal complaint.

Should an Employee speak directly to the media about non-school matters care should be taken to ensure that any opinions expressed are personal and that the individual is not acting on behalf of/representing the school.

Any contact with the media in a personal capacity should be compatible with the Employee's role and their position working with children/young people or in a school setting and must not negatively impact on the reputation of the school.

Whistleblowing

Employees may raise concerns about any aspect of the operation of the school which is not directly related to their own employment through the Whistleblowing Policy.

Employees raising a concern with reasonable grounds for doing so will not be subject to discrimination, harassment or victimisation.

Misconduct

Failure to follow the Code of Conduct may result in further action being taken in accordance with relevant school policies and employment law.

Employees should ensure they are familiar with the type of conduct which may be regarded as a breach of School rules and professional standards.

❖ Complaints and Formal Action

Complaints made about staff conduct may be investigated under the School's Complaints Policy.

If a complaint investigation finds that a staff member has breached this Code of Conduct or other school policies, the matter may then be considered through formal management processes, which could include:

- Performance management procedures
- Capability procedures
- Formal investigation
- Formal action in accordance with employment law and contractual terms

Examples of conduct that might lead to both a complaint and formal action include:

- Inappropriate behaviour towards pupils, parents or colleagues
- Failure to follow school policies (including the Complaints Policy)
- Breach of confidentiality

- Inappropriate use of social media
- Failure to maintain professional boundaries
- Failure to handle complaints appropriately
- Dismissing or ignoring legitimate complaints

❖ **The relationship between complaints and formal action:**

The Complaints Policy and any formal management processes are separate but may be linked:

- The Complaints Policy sets out how complaints are investigated
- Formal management processes set out how breaches of conduct are addressed
- These processes may run in parallel or consecutively depending on the circumstances

Serious breaches of this Code of Conduct could result in termination of employment.

Safeguarding Pupils

❖ **General Obligations**

It is essential that everybody working in a school understands their safeguarding responsibilities.

All Employees have a responsibility to:

- Safeguard pupils/students from physical abuse, sexual abuse, emotional abuse and neglect
- Promote the welfare of pupils/students and provide a safe environment in which children can learn
- Identify children who may be in need of extra help or who are suffering, or are likely to suffer, significant harm
- Report as soon as possible and without delay any concerns regarding child protection/safeguarding to the Headteacher/DSL (or Chair of Governors where concerns relate to the Headteacher)

All employees must ensure they have read, understood and comply with:

- Part 1 of Keeping Children Safe in Education 2025 (KCSIE)
- KCSIE Part 4 – Allegations that meet the harm threshold
- KCSIE Section Two - Concerns which do not meet the harm threshold (low-level concerns)
- KCSIE is available via <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>
- School's Safeguarding Policy
- School's Child Protection Policy
- The School's Behaviour Management Policy
- The School's Complaints Policy

Additionally, Employees with managerial responsibilities must ensure they comply with the school's procedure for Managing Allegations Against Staff and Parts 2-4 of Keeping Children Safe in Education and Safeguarding Procedures for Managing Allegations Against Staff.

All school policies listed above can be accessed on the school website and on the public server.

Employees must attend and comply with any training as required by the school associated with the safeguarding of pupils.

❖ **Appropriate relationships with students**

Employees must maintain appropriate professional boundaries with pupils.

Employees are expected to act in an open and transparent way that would not lead any reasonable person to suspect their actions or intent. In order to protect both children and themselves, Employees should also avoid behaviour that might be misinterpreted by others.

Where concerns are raised, appropriate fact finding will be undertaken before considering whether further formal action is warranted in accordance with relevant school policies.

❖ Allegations Against Members of Staff and Volunteers

All Employees have a duty to report to the Headteacher/DSL at the earliest opportunity the conduct of a colleague who may have:

- 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 he or she 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

Failure to report such concerns may be regarded as a serious breach of this Code of Conduct. Where the concerns relate to the Headteacher these should be reported to the Chair of Governors.

❖ IMPORTANT: Safeguarding Allegations Are NOT Complaints

Allegations that a member of staff 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 in a way that indicates they may pose a risk of harm to children
- Behaved in a way that indicates they may not be suitable to work with children

Are NOT dealt with under the School's Complaints Policy.

These allegations are dealt with under **Part 4 of Keeping Children Safe in Education (KCSIE)** and the School's Safeguarding Policy, which involves the Local Authority Designated Officer (LADO).

What to do if you receive a safeguarding allegation:

If staff have a safeguarding concern or an allegation of harming or posing a risk of harm to children is made about another member of staff (including supply staff, volunteers, and contractors), then this should be referred to the headteacher. Where there is a concern/allegation about the headteacher, this should be referred to the chair of governors.

Staff who receive a safeguarding allegation (whether from a parent, pupil, or colleague) must report it immediately to:

- Headteacher/DSL - for allegations about any staff member except the headteacher
- Chair of Governors (Bal Grant) - for allegations about the headteacher

Parents can contact the LADO directly:

Parents do not have to report safeguarding allegations to the school first. They can contact the LADO directly if they have a safeguarding allegation about a member of staff.

LADO contact details:

Hannah Ives, Local Authority Designated Officer (LADO)

Email: hives@hillingdon.gov.uk

If a parent contacts the LADO directly, the LADO will contact the school and work with us to manage the allegation.

This is separate from the complaints procedure:

The LADO process is separate from and takes priority over the complaints procedure. If a safeguarding investigation is ongoing, any related complaint may be paused until the investigation is complete.

Safeguarding allegations must be dealt with under Part 4 of KCSIE, NOT the complaints procedure.

❖ Low-Level Concerns

Some concerns may not meet the above thresholds for safeguarding allegations and may be dealt with as 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 school may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work which has the potential to impact on their suitability to work with children considering their job role; and
- does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO

Low-level concerns are NOT complaints

Low-level concerns are dealt with under the School's Safeguarding Policy and procedures for managing concerns that do not meet the harm threshold (as set out in KCSIE Section Two), NOT the Complaints Policy.

Staff should self-refer

Staff should self-refer if they find themselves in a situation which could be misinterpreted, might appear compromising to others, or on reflection they believe they have behaved in a way that falls below expected professional standards.

All low-level concerns should be reported to the Headteacher/DSL.

How low-level concerns are managed:

Employees are advised that the details of low-level concerns may be shared with the LADO enquiry service to support the school in its decision making regarding any actions which may be appropriate. This permits concerns to be evaluated objectively and to ascertain whether concerns of a similar nature may have already been reported to other schools or the Local Authority.

Low-level concerns will be recorded in writing. The record will include details of the concern, the context in which the concern arose, and action taken. Any records will be held securely and confidentially until the Employee leaves employment and for 6 years after this date. Records will be held in accordance with Data Protection and GDPR regulations.

Guidance for Safer Working Practice

Employees are required to read, understand and comply with the Guidance for Safer Working Practice for those working with Children and Young People in Education Settings.

This guidance can be accessed online via: <https://share.google/I6JkLOqNSWmMV9wrb>

This document explains the school's specific expectations with regard to safeguarding pupils/students and contains practical guidance on behaviours which constitute safe working practice.

Employees should seek immediate guidance from their Headteacher/Line Manager if they are unclear about the conduct or actions expected of them.

Other Safeguarding Considerations

All staff should have an awareness of safeguarding issues that can put children at risk of harm and how to deal with these accordingly. These include:

- Child on Child abuse – including bullying (cyberbullying, prejudice-based and discriminatory bullying)

- Sexual Violence & Harassment - abuse of intimate relationships, physical abuse, sexual abuse & harassment, non-consensual sexual activity/sharing of images, upskirting and initiation/hazing type violence and rituals
- Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)
- Domestic Abuse – including psychological, physical, sexual, financial or emotional abuse
- Mental Health – including the impact of suffering abuse or neglect
- Radicalisation – including the Prevent agenda
- Serious Violence – including Female Genital Mutilation (FGM), honour-based abuse and forced marriage

Employees are guided to refer to Keeping Children Safe in Education (2025) for further information.

ICT and Social Media

Members of staff will ensure that use of any mobile and smart technology, including personal phones and mobile devices, will take place in accordance with the law, as well as relevant school policy and procedures. Employees should ensure that they have read, understand and comply with the school's ICT and Internet Acceptable Use policy.

❖ **Whilst at work or using a work device, all Employees must:**

- only use school-provided equipment (not personal devices) to take photos or videos of pupils in line with our image use policy, to work directly with pupils during lessons/educational activities, and to communicate with parents/carers;
- ensure all electronic communication with pupils/students, parents/carers, colleagues and other stakeholders is compatible with their professional role, appropriate boundaries and in line with school policies;
- not use work IT equipment to browse, create, transmit, display, publish or forward any material/images which is illegal, sexually explicit, obscene or could offend, harass or upset others or anything which could bring an Employee's professional role or the School/Local Authority into disrepute;
- not use personal IT equipment to browse, create, transmit, display, publish or forward any materials/images which are illegal or could offend or harass others or anything which could bring an Employee's professional role or the school/local authority into disrepute;
- ensure that ICT system security is respected and password protocols are observed – including the use of strong passwords and encryption; not install personal software on School equipment or make unauthorised copies of School registered software;
- ensure appropriate privacy settings are applied when using social media sites; refrain from sharing confidential/privileged information, discussing incidents, operational or employment matters or making critical/negative comments about the school/pupils/parents or colleagues on social media forums;
- never share/post images of pupils; not post images of work colleagues without permission;
- not access or update social media sites using school devices/during working time;
- not use any images or videos on social media platforms which include any members of the school community without written permission;
- not make contact with students/pupils or parents via social media accounts or have these individuals as social media 'friends'/'contacts' (it is also recommended that Employees do not have ex-pupils or their families as social media 'friends');
- not make/receive personal calls/texts, send/receive emails or access internet/social media during work time where children are present;

- ensure that mobile devices are silent at all times whilst in the classroom or where children are present and not left on display;
- and not use their personal equipment (mobile phones/cameras/tablets) to take photos or make recordings of pupils/students.
- Use of school internet, email and ICT equipment for personal purposes is not permitted.

Employees at schools can often have more complex relationships than just being a member of staff (for example, staff can also be parents of pupils at the school, in relationships or have friendships with other staff or parents, or also governors) and staff are advised to report any pre-existing social media relationships to the Headteacher for their own protection. Emails, documents or browsing history on school systems should not be considered to be private and may be monitored and recorded to ensure the safety of pupils/students and ensure compliance with this policy; this monitoring will be proportionate and will take place in accordance with data protection/privacy legislation. The school may address concerns regarding unauthorised, unacceptable or inappropriate use of ICT systems/devices or social media through relevant school policies and procedures. Employees should seek guidance from their Headteacher/Line Manager if they are unclear about the conduct or actions expected of them. Breaches of expected use of ICT may be considered under relevant school policies and could result in formal action, including termination of employment.

Business Conduct

❖ Use of Financial Resources

The school requires Employees to observe the highest standards of business/financial practice.

Employees should ensure that School/public funds with which they are entrusted are used in a responsible and lawful manner.

Employees must comply with the school's stipulated financial regulations and any other relevant policies/audit requirements.

Appropriate authorisation should be sought for any expenditure and audit trail/suitable records kept.

School monies, credit/debit cards and accounts should not be used for personal purposes.

The use of personal credit cards/accounts to purchase goods and services on behalf of the school should be avoided unless prior agreement from the Headteacher is obtained (or from the Chair of Governors in the case of the Headteacher).

All expense claims for travel and subsistence should be appropriately authorised and accompanied by receipts/proof of purchase.

Personal loyalty cards should not be used when making purchases on behalf of the school.

❖ Personal Use of Equipment and Resources

Employees may not make personal use of the school's property, materials or facilities unless authorised to do so by the Headteacher.

❖ Declaration of Interests

The school recognises that Employees may wish to take an active role in the local community and undertake additional personal/business activities outside of work.

In the majority of instances such activities will have no impact on their role in school. However, on occasion there may be a potential conflict of interest.

Employees should therefore declare annually to the Headteacher any financial or non-financial interests which may conflict with those of the school. Employees should also declare membership of any professional bodies/organisations which may conflict with their school role.

Should Employees be in doubt about whether a conflict of interest may exist they should seek guidance from the Headteacher (or Chair of Governors in the case of the Headteacher).

❖ **Contracting out of Services**

Employees should follow agreed school protocols for the award of contracts to external providers. Employees should adhere to school rules regarding the separation of roles in procurement/tendering process.

In particular care should be taken to ensure competition between prospective contractors is fair and open and that all competing parties are treated equally.

Employees should ensure that preferential treatment is not shown to current/former Employees or partners, close relatives or friends/associates in the award of contracts.

Employees must not accept any form of financial or other inducement which may be offered by a potential contractor. All such approaches should be reported to the Headteacher (or chair of governors in the case of the Headteacher).

Confidential information relating to the tendering process, must not be disclosed to any unauthorised party or organisation.

❖ **Gifts and Hospitality**

Employees must not accept any fee or reward for work done other than their pay and allowances as set out in their contract of employment except as set out below. It is an offence under the Bribery Act 2010 for school staff to accept gifts, loans, fees or rewards as an inducement to act in a certain way in their official capacity.

School staff must not receive gifts, hospitality or benefits of any kind from a third party which might be seen to compromise their personal judgement or integrity. School staff must immediately report any offer or receipt of such gifts to the Business Manager to be recorded in the Register of Gifts and Hospitality. Governors and School staff may accept the following gifts/hospitality without the need to seek the approval of the school or formally register receipt:

- Courtesy hospitality at business lunches/dinners or in attendance in an official capacity at a public function
- Incidental promotional gifts such as calendars, diaries or pens
- Receipt of small items from suppliers or contractors as expressions of gratitude such as boxes of chocolates or individual bottles of drink (at a value of less than £25)
- Receipt of small items from families of pupils, or from pupils themselves as expressions of gratitude, such as boxes of chocolates or individual bottles of drink (at a value of less than £25). It is unacceptable to give personal gifts to pupils. This could be misinterpreted as a gesture either to bribe, or single out the young person. It might be perceived that a 'favour' of some kind is expected in return. Any reward given to a young person should be agreed practice within the school, consistent with the School's Behaviour Policy, recorded and not based on favouritism

Where the School receives sponsorship of a school activity/event, care should be taken to ensure that this does not infer that the sponsor will receive preferential treatment in any future contracting/tendering process. An Employee or their partner, family member or friend may not benefit from the sponsorship.

Personal Relationships at Work

Employees must not allow a personal relationship with a colleague, parent, Governor or member of the wider school community to influence their conduct at work or have a detrimental impact on the operation of the school.

Employees who are in a personal relationship should behave in an appropriate and professional manner during working time. Preferential treatment or advantage of any kind must not be given.

A personal relationship may be defined as:

- A family relationship
- A romantic/sexual relationship
- A close personal friendship outside of work
- A business, commercial or financial relationship

Employees are expected to disclose to the Headteacher where a personal relationship exists or develops with a parent of a pupil or where there is a pre-existing family connection or friendship with a pupil and/or their family. There will be no requirement to give a detailed account of the involvement. Where an individual is employed in a school in which their child/family member is a pupil, they should ensure that appropriate professional boundaries are maintained.

Employees are expected to disclose to the Headteacher any close personal relationship with a colleague/Governor. There will not be a requirement to give a detailed account of the involvement. Where a personal relationship exists or develops between members of staff where one party is in a supervisory relationship they must not be involved in the recruitment, appraisal, promotion, pay determination or any other management decision involving the other party.

In the case of the Headteacher any disclosures should be made to the Chair of Governors.

Political Activity

Employees may engage in political activity outside of work – however they should not allow personal/political views to interfere with their duties. Any activity should be compatible with the Employee's responsibility as a role model to pupils/students.

Where an Employee is involved in political activity outside of work – care must be taken to ensure that it is clear that any opinions expressed are personal and that the individual is not acting on behalf of/representing the school.

Intellectual Property

Any intellectual property created by an Employee during the course of their employment and for the purposes of their employment will be considered the property of the school, unless specific permission is granted to the Employee to have ownership of such material.

This policy was adopted by the Governing Body of The Willows School Academy Trust in April 2026 and supersedes any previous Code of Conduct. This policy will be reviewed by the Governing Body each year or earlier if there is a need.

Signed: M. Shaw
Headteacher

Bal Grant
Chair of Governors

Date: April 2026