



BONITAS
Multi-Academy Trust

CODE OF CONDUCT FOR TRUST EMPLOYEES

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1. INTRODUCTION

- 1.1 In line with the statutory safeguarding guidance [Keeping Children Safe in Education](#), the trust should have a staff code of conduct, which covers 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.
- 1.2 The Board of Trustees of the Bonitas Multi-Academy Trust have set out this Code of Conduct for all Trust employees. Responsibility for day-to-day implementation will fall to the headteacher.
- 1.3 In addition to this policy, all staff have an obligation to adhere to all relevant statutory legislation and the national and local terms and conditions for both teaching and support staff. Staff are expected to observe their school's equality policy and ensure that they treat everyone with respect, oppose any forms of discrimination and bullying and are sensitive to others people's needs, attitudes and lifestyles.
- 1.4 Employees should be aware that a failure to comply with the following Code of Conduct may result in disciplinary action, which could lead to dismissal.

2. PURPOSE, SCOPE AND PRINCIPLES

- 2.1 This Code of Conduct is designed to give clear guidance on the standards of behaviour all Trust staff are expected to observe, and schools should notify staff (including supply staff) of this code and the expectations therein. Trust staff are role models and are in a unique position of influence and must adhere to behaviour that sets a good example to all the pupils within their school. As a member of a school community, each employee has an individual responsibility to maintain their reputation and the reputation of the school, whether inside or outside working hours.

- 2.2 This Code of Conduct applies to:
- All staff who are employed by the Trust, including the headteacher and any supply staff.
 - All staff in units or bases that are attached to schools within the Trust.
- 2.3 The same expectations will be shared with, and apply to, regular visitors to the school such as peripatetic staff and regular volunteers; though it is acknowledged that external staff are covered by the relevant Code of Conduct of their employing body.
- 2.4 Where employees have complied with the Code of Conduct, the Trust, will protect employees against unjustified allegations of wrong doing.
- 2.5 This Code of Conduct cannot cover every eventuality and further guidance should be sought from the CEO or the headteacher or, in the case of headteachers, from the Chair of Governors and/or the school's HR advisor, if they are unsure of the standards expected of them.

3. SETTING AN EXAMPLE

- 3.1 All staff who work in schools will set good examples of behaviour and conduct which can be copied by pupils. They must demonstrate high standards of conduct in order to encourage pupils to do the same, for example, staff 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
- 3.2 All staff must also avoid putting themselves at risk of allegations of abusive or unprofessional conduct.

4. SAFEGUARDING PUPILS, STAFF AND VISITORS

- 4.1 All staff are required to comply with the health and safety regulations, policies and procedures of the schools within the trust and to actively contribute to the mitigation of risk, including that relating to the spread of infection.
- 4.2 All staff have a duty to familiarise themselves with the safety regulations that apply to their job and the area in which they work.
- 4.3 Everyone who comes into contact with children and their families has a role to play in safeguarding children. School staff are particularly important as they are in a position to identify concerns early on and provide help for children, to prevent situations from escalating, by working with other agencies to protect them from harm.
- 4.4 Staff have a duty to safeguard pupils from harm, and to report any concerns they have. This includes:

- physical abuse
 - sexual abuse
 - emotional abuse, including verbal assaults
 - neglect
 - unequal treatment or discrimination
- 4.5 The duty to safeguard pupils includes the duty to report concerns about a pupil to the school's Designated Safeguarding Lead (DSL) for child protection. The headteacher must ensure that all staff are familiar with, and have received appropriate training annually on, the school's Child Protection and Safeguarding Policy, the Prevent initiative, and ensure they are aware of the processes to follow if they have concerns about a child. Staff should be aware of and understand the provisions of the Whistleblowing Procedure.
- 4.6 Staff must not demean or undermine pupils, their parents or carers, colleagues or visitors to the school.
- 4.7 Staff should ensure they comply with their school's IT and social media policies, particularly with regard to the use of personal equipment. For example, the use of personal mobile phones or devices to record or photograph children is prohibited and staff should only use school equipment for this purpose. Staff are expected to keep mobile phones switched off during staff meetings and for the periods of the working day when they are in contact with children. In exceptional circumstances (such as critical illness of a family member) the headteacher should be notified if a phone needs to be used. Where staff are in any doubt about the school's expectations regarding their behaviour, they should seek guidance immediately from a member of their senior leadership team.
- 4.8 Staff must ensure the highest standards of safety and welfare are observed in respect of pupils under their supervision and other colleagues and visitors to the school.
- 4.9 A low-level concern is a behaviour towards a child by a member of staff that does not meet the harm threshold, is inconsistent with the staff code of conduct, and may be as simple as causing a sense of unease or a 'nagging doubt'. Staff have a duty to inform the headteacher (or suitable senior person in their absence) if they believe that a colleague or visitor is behaving in a way that compromises the safety or wellbeing of any child, group of children or a member of staff. Where staff have concerns about the headteacher, this should be referred to the chair of governors or chair of trustees. Low Level concerns 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
- 4.10 Low-level concerns can include inappropriate conduct inside and outside of work
- 4.11 Staff are encouraged to self-refer if they find themselves in a situation that could be misinterpreted.
- 4.12 If staff are not sure whether behaviour would be deemed a low-level concern, they are encouraged to report it. All reports will be handled in a responsive, sensitive and proportionate way. Unprofessional behaviour will be addressed, and the staff

member supported to correct it, at an early stage. This allows for a culture of openness, trust and transparency in which our values and expected behaviours are constantly lived, monitored and reinforced by all staff, while minimising the risk of abuse.

- 4.13 Staff can report their concerns about child protection directly to the appropriate external agency if they consider the circumstances warrant this; however, they are encouraged to raise this with the school's DSL and/or headteacher initially.
- 4.14 If staff have concerns about safeguarding or child protection practice in the school, they should raise this with the headteacher or chair of governors wherever possible. Staff can also use the Trust's Whistleblowing Policy, where they consider this to be more appropriate. Further advice and support can be obtained from other agencies including trade unions, professional bodies or the independent whistleblowing charity Public Concern at Work (www.pcaw.org.uk).

5. STAFF CONTACT WITH PUPILS AND OTHER YOUNG PEOPLE

- 5.1 All members of staff are required annually to read the updated and most recent DfE document *Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges (September 2024)*, which is available on the DfE's website and from the CEO or headteacher.
- 5.2 The DfE's advisory document, 'Guidance for safer working practice for those working with children and young people in education settings' is endorsed by the Board of Trustees and staff are expected to be guided by it. The guidance includes information on dealing with:
- Infatuations
 - Social Contact
 - Physical Contact
 - Physical Education and other activities which require physical contact
 - Showers and Changing
 - Pupils in Distress
 - Behaviour Management
 - Care, Control and Physical Intervention
 - Sexual Contact with Young People
 - One to One Situations
 - Overnight Supervision and Examinations
 - Transporting Children
 - Educational Visits and After School Clubs
 - First Aid and Administration of Medication
 - Intimate Care
 - Sensitive areas of the Curriculum
 - Photography, Videos and other Creative Arts
- 5.3 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.
- 5.4 If staff members and pupils must spend time on a one-to-one basis, staff will ensure 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
- 5.5 Staff should avoid contact with pupils outside of school hours if possible. Personal contact details should not be exchanged between staff and pupils. This includes social media profiles.
- 5.6 Whilst many pupils and their parents may wish to give gifts to staff, for example, at the end of the school year, gifts from staff to pupils are not acceptable.
- 5.7 It is illegal for anyone in a position of trust to have a sexual relationship with a young person (ie under 18 years) in their care. Intimate or sexual relations of any kind between a member of staff and a pupil of **any** age are deemed to be a breach of professional standards and, as an act of gross misconduct, will result in dismissal. Staff must report any concerns in this regard to the CEO or Headteacher immediately.
- 5.8 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 to the Headteacher.

6. ALLEGATIONS, CRIMINAL CHARGES AND CHANGES TO STATUS

- 6.1 Staff facing allegations, criminal charges and changes to status must disclose this, without delay, to the CEO or their headteacher. They must do this in all circumstances, whether they personally feel the matter is relevant or not. If in doubt, staff should seek advice from their headteacher.
- 6.2 Examples of changes could include revisions to registration status, receiving a conviction, warning, reprimand, caution or awaiting sentence or whilst any criminal allegations made against the employee are being investigated. Such offences include motoring convictions. In all cases these must be declared as soon as practically possible to allow the school to assess the potential risks to their employment. Staff may be suspended if this is felt appropriate in the circumstances, for example, if their clearance status changes or is under review.
- 6.3 Staff are expected to disclose immediately any incidents or allegations of wrongdoing arising from alternative employment, voluntary work, incidents outside of work, or from previous employment which may or may not be covered by pre-employment checks that could affect their suitability to work with children, such as allegations of sexual misconduct or violence. Failure to do this may result in disciplinary action, which could lead to dismissal.
- 6.4 Staff must disclose if they or those who live or work at their home are subject to formalised Child Protection plans with review by multi agency professionals.
- 6.5 Staff in posts covered by the disqualification requirement under the Childcare Act 2006, must ensure that they comply with the requirement to disclose offences relevant to themselves and to those who live or work at their home, and keep this information up to date throughout the year. The headteacher and the Trust's HR advisor can provide further guidance in relation to this and, where in any doubt, Trust employees should seek further advice.
- 6.6 The DBS policy provides more detail on the school and the Trust's position and approach to safeguarding vulnerable groups.

- 6.7 The implications of any disclosures will need to be considered and could result in disciplinary action, possibly leading to dismissal if employees are no longer able to fulfil their role in the school.
- 6.8 Failure to disclose information may result in disciplinary action which could lead to dismissal.

7. PUPIL DEVELOPMENT

- 7.1 Staff must comply with all school policies and procedures, paying particular attention to those that support the well-being and development of pupils.
- 7.2 Staff must co-operate and collaborate with colleagues and with external agencies where necessary to support the development of pupils.
- 7.3 Staff must follow reasonable instructions that support the development of pupils.

8. HONESTY AND INTEGRITY

- 8.1 Staff must maintain high standards of honesty and integrity in their work. This includes the handling and claiming of money and the use of school property and facilities. All staff should therefore familiarise themselves with the relevant trust and school policies, including those in relation to financial procedures.
- 8.2 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
- 8.3 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.
- 8.4 All staff must comply with the Bribery Act 2010. A person may be guilty of an offence of bribery under this act if they offer, promise or give financial advantage or other advantage to someone; or if they request, agree or accept, or receive a bribe from another person. If you believe that a person has acted in a corrupt way, you should refer to the Trust's Whistleblowing Procedure. (Further details of the Bribery Act 2010 can be found at: <http://www.legislation.gov.uk/ukpga/2010/23/contents>).
- 8.5 Gifts from suppliers or associates of the trust or school must be declared to the CEO or headteacher and recorded. This does not include "one off" token gifts from pupils or parents (e.g. at the end of the term or year). However, it could include offers of hospitality and invitations to events. Individual gifts from members of staff to individual pupils should not be given as they are inappropriate and could be misinterpreted.
- 8.6 Staff should not be involved in decisions relating to partners, relatives or close friends. If an employee becomes aware that they are involved in any decision which could result in a particular advantage or disadvantage to a partner, relative or close friend, they must, as soon as practicable, inform the appropriate manager.

- 8.7 Any personal interests, financial or otherwise, which could be seen to conflict with a member of staff's role at the trust must be registered with the CEO or their headteacher. This could include where a close personal relationship exists with a potential supplier tendering for a contract with the school. Staff are expected to complete the annual School Workforce Census in which they declare any pecuniary interests on an annual basis.
- 8.8 Staff must declare any membership of any organisation classed as a secret society. This should be made in writing and sent to the CEO or their headteacher, who will record it.
- 8.9 The advice of the headteacher should be sought wherever doubt exists about the status of gifts, offers of hospitality or a potential situation of conflict of interest.

9. PROFESSIONAL ATTIRE

- 9.1 Whilst it is acknowledged that appearance is a matter of personal taste, it is expected that staff will present themselves in a professional manner which sets a good example to pupils and exhibits the importance of the job they undertake. However, clothes should be practical for the tasks required e.g. sportswear when teaching P.E.
- 9.2 Staff should be mindful of the health and safety implications, for example, when wearing jewellery, ensuring appropriate footwear, etc.
- 9.3 Staff are expected to dress with regard to the audience, particularly when representing the school or Trust at external events.
- 9.4 Staff should not dress in a manner which could cause offence or embarrassment to others.
- 9.5 No dress code can cover all contingencies so staff must exert a certain amount of judgement in their choice of clothing and if in doubt this should be discussed with their line manager.

10. CONDUCT AND PROFESSIONAL RELATIONSHIPS WITHIN WORK

- 10.1 All employees should arrive at a time which enables them to begin their contracted hours promptly. If in doubt, staff should clarify this with their line manager.
- 10.2 Employees are expected to take professional responsibility for fulfilling their role in the trust; whatever that role, this is essential to the overall success of the trust and the schools within. This includes the professional courtesy of meeting deadlines that have been set and having a proactive dialogue with colleagues/line managers at the earliest opportunity if there are issues which prevent a task being completed on time. Therefore, staff will be positive in their thinking and approach, seeking constructive solutions to problems and by de-personalising issues.
- 10.3 Staff will communicate effectively and fairly with all stakeholders and operate under the Nolan principles for those in public life (see Appendix 1). They will treat all colleagues and visitors with professional respect and courtesy, showing appreciation for the contributions of others.
- 10.4 The trust seeks to provide an environment for all staff, contractors and temporary workers which is free from harassment, bullying, intimidation and

victimisation. Should any staff member suffer abuse or harassment at work, it must be reported to their Line Manager. The trust will investigate all reports. The trust cannot be held liable for any resulting action if not informed at the time.

- 10.5 Staff must not engage in alcohol misuse, drug misuse (use of any controlled drug/ intentional misuse of prescribed medication) or substance misuse in a way that affects their work performance, conduct or reputation, or the health and safety of themselves, their work colleagues or the pupils. Alcohol cannot be consumed whilst on duty.
- 10.6 The trust operates a no smoking policy which includes vaping/e-cigarettes. Staff, contractors and visitors to schools are not permitted to smoke anywhere on the school site, or in the immediate vicinity of the site, especially near the entrances to schools.
- 10.7 Any employee who is found to have committed a deliberate or unlawful act of discrimination, sexual or racial harassment or bullying will be subject to disciplinary action.

11. CONDUCT OUTSIDE WORK

- 11.1 Staff should be aware that when attending work-related events, in and outside of worktime, for which attendance could be seen as representing the trust or school, all elements of this Code of Conduct continue to apply.
- 11.2 Staff should not engage in conduct outside work which could seriously damage the reputation and standing of the trust or school. This includes via a variety of methods of communication, e.g. social media, word of mouth, written, phone, text, etc.
- 11.3 Staff must notify the CEO or their headteacher of any criminal charges brought against them, regardless of whether they consider these to be relevant to their working life (see also section 5 above). In some circumstances, criminal offences may need to be referred to the relevant disciplinary body by the CEO or headteacher, and teaching staff need to be aware that this could result in removal of QTS. Offences that involve violence, possession or use of illegal drugs, or sexual misconduct are regarded as unacceptable and will usually result in loss of QTS. Disciplinary action within a school context could also lead to referral to other agencies.
- 11.4 Staff must exercise caution when using information technology and be aware of the risks to themselves and others. Staff must not engage in inappropriate use of social networking sites which may bring themselves, the trust, school or school community into disrepute. Staff must not access illegal, adult or other inappropriate sites using trust or school computers, nor should they use IT equipment for activities that are not related to work, during their paid working hours (e.g. internet shopping).
- 11.5 When using social media sites, staff 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.
- 11.6 Staff should not attempt to contact pupils or their parents via social media, or any other means outside school, in order to develop any sort of relationship. They will not make any efforts to find pupils' or parents' social media profiles.

- 11.7 Staff will ensure that they do not post any images online that identify children who are pupils at the school without their consent.
- 11.8 Staff should be aware of their school's online safety policy.
- 11.9 If staff are intending to undertake additional work outside of the school day, it is expected that they will discuss this with their headteacher, who will review the Working Time Regulations, health and safety implications and the potential effects on their work performance, and carry out a risk assessment, as necessary.
- 11.10 The trust will not unreasonably preclude any of its employees from undertaking additional employment, taking into consideration the personal circumstances of the employee in question, but any such employment must not, in the headteacher's and governing body's view, conflict with or react detrimentally to the trust's or school's interests or endanger the health and safety of themselves or others.
- 11.11 No personal business activity or outside work of any sort may be undertaken by employees during their normal working hours for the trust. Similarly, no trust or school equipment, accommodation or resources may be used in connection with these activities.

12 CONFIDENTIALITY AND DISCLOSURE OF INFORMATION

- 12.1 Staff must treat all information that they have access to within the trust or school as confidential. However, the law requires that certain types of information must be available to the Local Authority, auditors, government departments, service users and, through the Freedom of Information Act, to the public.
- 12.2 Where staff have access to confidential information about pupils or their parents or carers, staff must not reveal such information except to those colleagues who have a professional role in relation to the pupil. Staff are advised to familiarise themselves with the expectations of the Data Protection Policy.
- 12.3 All staff are likely at some point to witness actions which need to be confidential and handled sensitively and according to correct procedures. These must only be discussed in the appropriate forum and with the relevant individuals (whether school staff or third parties). Where in doubt, staff must seek the advice of the Designated Safeguarding Lead (DSL).
- 12.4 However, 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 the school's child protection and safeguarding policy. Staff have an obligation to share with their manager or the school's DSL any information which gives rise to concern about the safety or welfare of a pupil or colleague. Staff must never promise a pupil that they will not act on information that they are told by the pupil.
- 12.5 In order to protect the security of information staff are required to comply with the following:
- Written records and correspondence should be kept securely at all times.
 - Information relating to staff/pupils/public must not be disclosed either orally or in writing to unauthorised persons.

- Information relating to pupils/public must not be given over the telephone unless the caller has given details of their right to ask for such information.
- Confidential matters relating to staff/pupils/public should not be discussed in areas where they may be heard by passers-by, i.e. corridors, reception, staff room, etc.
- Any breach of confidentiality may be regarded as misconduct and be subject to disciplinary action.
- Staff (other than the CEO/Headteacher/Chair of the Trust) should not make statements or write letters to the media. They should refer such matters to the CEO/Headteacher/Chair of the Trust.
- Employees must not provide references for other employees, past or present, without such references being referred to the Headteacher.

13 DISCIPLINARY ACTION

- 13.1 Failure to meet these standards of behaviour and conduct may result in disciplinary action, which could lead to dismissal.

14 LINKS WITH OTHER POLICIES

This policy links with our policies on:

- Staff disciplinary procedures, which will be used if staff breach this code of conduct. It also sets out examples of what we will deem as misconduct and gross misconduct
- Staff grievance procedures
- Child protection and safeguarding
- Data Protection
- Email and home / school communications
- Equality
- Gifts and hospitality
- Low Level Concerns
- Online safety
- Whistle-blowing

Nolan Seven Principles of Public Life

Whilst not applicable to all aspects of school life, the general principles apply.

(Originally published by the Nolan Committee: The Committee on Standards in Public Life was established by the then Prime Minister in October 1994, under the Chairmanship of Lord Nolan, to consider standards of conduct in various areas of public life, and to make recommendations).

Selflessness

Holders of public office should act solely in terms of the public interest. They should not do so in order to gain financial or other material benefits for themselves, their family, or their friends.

Integrity

Holders of public office should not place themselves under any financial or other obligation to outside individuals or organisations that might seek to influence them in the performance of their official duties.

Objectivity

In carrying out public business, including making public appointments, awarding contracts, or recommending individuals for rewards and benefits, holders of public office should make choices on merit and without discrimination or bias.

Accountability

Holders of public office are accountable for their decisions and actions to the public and must submit themselves to whatever scrutiny is appropriate to their office.

Openness

Holders of public office should be as open and transparent as possible about all the decisions and actions that they take. They should give reasons for their decisions and restrict information only when the wider public interest clearly demands.

Honesty

Holders of public office have a duty to declare any private interests relating to their public duties and to take steps to resolve any conflicts arising in a way that protects the public interest.

Leadership

Holders of public office should actively promote and robustly support these principles by leadership and example, and challenge poor behaviour whenever it occurs.