



LEARNING ACADEMY PARTNERSHIP

Code of Conduct Policy

Policy Reference No	PT004
Review Frequency	Annually
Reviewed	September 2025
Next Review Date	Autumn 2026

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Amendments

Page 1 of 16
Policy Title: Code of Conduct for Colleagues Policy
Date: September 2025 (V1.10)



Amendments

Policy Date	New Version Number	Summary of change	Comments
Sep 24	V1.9	EEDI statement added (2)	
Sep 24	V1.0	KCSIE date updated throughout policy	
Sep 24	V1.9	Updated tackling discrimination section (10)	
Sep 24	V1.9	Update to Health and Safety (section 8)	
Sep 25	V1.10	Comprehensive review of the entire policy to ensure more modern, inclusive, and considered language that is clearer and more concise, reflecting our organisational values around equality, diversity, and respect.	
Sep 25	V1.10	KCSIE date updated throughout policy	
Sep 25	V1.10	Accessibility & language Support statement added (1)	
Sep 25	V1.10	Tackling discrimination – section updated (11.3, 11.4, 11.5, 11.6)	
Sep 25	V1.10	Professional boundaries & relationships – section updated (12.2, 12.4, 12.5, 12.6, 12.7)	
Sep 25	V1.10	Dress & appearance – section updated (17.1, 17.2, 17.3 17.4)	
Sep 25	V1.10	E-safety/Online safety – section updated (20.1)	
Sep 25	V1.10	Use of AI section added (21)	
Sep 25	V1.10	Mandatory training responsibilities section added (23)	
Sep 25	V1.10	Secondary employment section added (25)	
Sep 25	V1.10	Confidentiality, monitoring & data protection section updated (26)	
Sep 25	V1.10	Review of policy section updated (27)	

Union Consultation/External Review

Date	Action (meeting, email etc.)	Comments	Attendance
20/11/18	Draft policy sent to all unions and staff for comment	30 day consultation period	
30/05/23	Sent to PHP Law for external review		

* *Trust* – Refers to all Schools, Academies & Business Support Team within the Learning Academy Partnership

* *Colleagues* – Refers to employees

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1 Accessibility and Language Support

- 1.1 If you require this policy in an alternative format or language, please contact the Trust People Team or your Head Teacher /Manager/Executive Head/ Member of Trust Leadership Team/Member of Trust Executive Team (as appropriate). We are committed to ensuring that all colleagues have access to our policies and can fully understand and engage with them and will work with you to provide the necessary support and resources.

2 Aims

- 2.1 This policy aims to set and maintain standards of conduct that we expect all colleagues to follow.
- 2.2 By creating this policy, we aim to ensure our Trust is an environment where everyone is safe, happy and treated with respect. The purpose of this Code of Conduct is to help all colleagues, contractors and volunteers to understand what is expected of them whilst working for our Trust. It is important that everyone understand the expectations set out in the Code of Conduct as failure to adhere could result in disciplinary actions.
- 2.3 Keeping Children Safe in Education (DFE 2024) sets out the requirement for a code of conduct, sometimes referred to as a staff behaviour policy. This Code of conduct applies to all colleagues regardless of length of service including those in their probationary period. It also applies to agency worker, volunteers, and self-employed contractors although, unlike colleagues, breaches of the Code will not be managed through the disciplinary procedure.
- 2.4 This policy does not form part of any colleagues contract of employment and may be amended at any time.
- 2.5 Please note that this code of conduct is not exhaustive. If situations arise that are not covered by this code colleagues and senior leaders will use their professional judgement and act in the best interests of our Trust, our colleagues and our children.
- 2.6 While this policy should be followed, it should be adapted to take into account any needs due to any protected characteristic under the Equality Act 2010.

3 Equality, Equity, Diversity, and Inclusion (EEDI)

- 3.1 As a Trust with diverse communities and workforce we recognise every individual for their uniqueness and aim to create an inclusive culture where people can be their genuine selves in accordance with our values. We believe we are 'stronger together' and will achieve our greatest success as an organisation when every person feels included and is able to flourish. We strive to create an environment where everyone, regardless of their background, feels valued, respected and empowered to contribute to their fullest potential.
- 3.2 We have zero tolerance for any behaviours that cause harm based on identities, backgrounds, cultures, neurodivergence, and/or protected characteristics, whether real or perceived. Identity-based harm, including but not limited to discrimination,

harassment, microaggressions, hate speech, and violence, is unacceptable. Such behaviours are not only damaging to the individuals targeted but also undermine the values, integrity, and inclusive culture of our Trust.

- 3.3 We encourage all members of our Trust to report any incidents of harm based on identity, background, culture and or protected characteristics that they witness or experience. These reports will be handled sensitively, and witnesses will be supported throughout the process. The Trust will protect those who raise concerns in good faith from victimisation or retaliation.
- 3.4 We are all responsible for upholding this policy and contributing to a culture of respect and inclusion. Together, we can ensure that the Trust is a place where everyone feels valued, safe, and welcome.
- 3.5 These commitments are underpinned by our responsibilities under the Equality Act 2010, which protects individuals from unlawful discrimination and promotes equality of opportunity across all protected characteristics.

4 General Obligations

- 4.1 All colleagues are required to demonstrate consistently high standards of personal and professional conduct at all times. Colleagues are required to report any concerns regarding colleagues to their Manager or the Trust People Team.
- 4.2 As recognisable figures in the local community the behaviour and conduct of colleagues of our Trust outside of work can impact on their employment. Therefore, conduct outside work may be treated as a disciplinary matter if it is considered that it is relevant to the colleague's employment.

5 Safeguarding and promoting the welfare of children

- 5.1 All colleagues are responsible for safeguarding children and promoting their welfare. This means that colleagues are required to take action to protect children from maltreatment, prevent impairment of young people's health or development and ensure that young people grow up in circumstances consistent with the provision of safe and effective care. This will enable all children to have the best outcomes.
- 5.2 All colleagues must be aware of the signs of abuse and neglect and know what action to take if these are identified.
- 5.3 To do this a colleague must have fully read and understood our safeguarding policies, undertake safeguarding training as required, be aware of our systems for keeping children safe and must follow the guidance in these policies at all times. In addition, all colleagues should be aware of current DfE guidance including Keeping Children Safe in Education 2025 and Guidance for Safer Working Practice for Adults who work with Children and Young People in Education 2020.
- 5.4 All colleagues must cooperate with Trust colleagues and with external agencies where necessary.

5.5 Colleagues should refer any concerns about another colleague to the Head Teacher/Manager or Designated Safeguarding Lead

6 Allegations of abuse

6.1 Keeping Children Safe in Education 2025 Part 4 Allegations of abuse made against Teachers and other staff including supply teachers and volunteers: this guidance will be followed where it is alleged that anyone working in the school including supply teachers and volunteers has:

- Behaved in a way that has harmed a child, or may have harmed a child
- Possibly committed a criminal offence against or related to a child
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

6.2 Where a colleague or volunteer is involved in an incident outside school, which did not involve children but could have an impact on their suitability to work with children, the Trust will consider what triggered these actions and could a child in our Trust trigger the same reaction, therefore being put at risk.

7 Low level concerns

7.1 Our Trust **Managing Allegations Against Abuse of Colleagues Policy (PT27)** includes a section on low level concerns which enables all staff to share any concerns – no matter how small – about their own or another colleague's behaviour. Safeguarding and promoting the welfare of children is everyone's responsibility. Keeping Children Safe in Education 2025 Part 4 also covers concerns that do not meet the harm threshold and are classified as "low level" concerns. The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold set out in allegations of abuse detailed above.

7.2 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, including supply colleagues, contractors and volunteers, 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; and
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

7.3 It is crucial that any such concerns, including those which do not meet the harm threshold are shared responsibly and with the right person, and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of our Trust from potential false allegations or misunderstandings.

7.4 We wish to encourage an environment in our Trust where you feel confident to refer others or yourself. You may find yourself in a situation which could be misinterpreted or

might appear compromising to others. Equally, you may, for whatever reason, have behaved in a manner which, on reflection, you consider falls below the standard set out in this staff code of conduct. Self-reporting in these circumstances can be positive for a number of reasons: it is self-protective, in that it enables a potentially difficult issue to be addressed at the earliest opportunity; it demonstrates awareness of the expected behavioural standards and self-awareness as to your own actions or how they could be perceived; and, crucially, it is an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

7.5 If you have any concerns that either one of your colleagues or yourself are not following this code of conduct you should report these to your Head Teacher/Manager immediately although it is never too late to share a concern. This can be verbally or in writing. If the concern is about the Head Teacher/Executive Head/Member of the Trust Leadership team it should be raised with the Chief Executive Officer.

8 Duty of care

8.1 Colleagues must:

- Understand the responsibilities, which are part of their employment or role, and be aware that sanctions will be applied if these provisions are breached
- Always act, and be seen to act, in our children's best interests
- Avoid any conduct which would lead any reasonable person to question their motivation and/or intentions
- Take responsibility for their own actions and behaviour

9 Health & Safety

9.1 All colleagues must ensure that they:

- Undertake Health & Safety training as required
- Read, understand and adhere to our Trust's Health and Safety Policy
- Comply with Health and Safety Regulations or instructions and use any safety equipment and protective clothing which is supplied by our Trust
- Comply with any hygiene requirements
- Comply with any accident reporting requirements
- Never act in a way which might cause risk, harm or damage to themselves or any other person who may be affected by their actions.

10 Honesty and personal integrity

10.1 All colleagues are expected to consistently demonstrate the highest standards of personal and professional conduct. The following statements outline the behaviours and attitudes required at our Trust.

10.2 Colleagues must comply with any lawful or reasonable instructions given by Leaders.

10.3 Colleagues uphold public trust in our Trust and maintain high standards of ethics and behaviour, within and outside school, by:

- Treating children with dignity, building relationships rooted in mutual respect, and at all times observing proper boundaries appropriate to their professional position
- Safeguarding children's wellbeing in accordance with statutory provisions
- Showing tolerance of and respect for the rights of others
- Not undermining fundamental British values, including democracy, the rule of law, individual liberty, mutual respect, and tolerance of different faiths and beliefs
- Ensuring that personal beliefs are not expressed in a manner that exploits children's vulnerability or encourages them to break the law

- 10.4 Colleagues must demonstrate professional regard for the Trust's ethos, policies, and practices, and maintain high standards of attendance and punctuality
- 10.5 All colleagues must treat one another with respect, dignity, fairness, and courtesy at all times.
- 10.6 Conduct towards Leaders, Managers, and colleagues must remain appropriate and professional at all times.
- 10.7 Colleagues must uphold high standards of honesty and integrity in all aspects of their work, including handling and claiming money, and the use of Trust property and facilities.
- 10.8 Colleagues should report any behaviour or situation that could give rise to a complaint or misunderstanding about their actions. If you believe your conduct may have fallen short of this Code, you are expected to discuss it with your Manager.

11 Tackling discrimination

- 11.1 Colleagues are required to understand the types of discrimination and bullying that children and colleagues may be subject to. Colleagues are required to have read and understood our Equality, Equity, Diversity and Inclusion policy and undertake any training as required.
- 11.2 We do not accept or tolerate any behaviours which causes harm based on identity, backgrounds, cultures and or protected characteristics real or perceived.
- 11.3 Colleagues should be aware that discriminatory behaviour includes but is not limited to racial slurs, sexist jokes, misgendering, use of ableist language, and exclusionary conduct based on any protected characteristic.
- 11.4 Discriminatory actions, even when framed as **'banter'**, will not be tolerated. Colleagues should feel confident in reporting microaggressions, identity-based harm, and exclusionary behaviour.
- 11.5 Colleagues are encouraged to actively foster an inclusive culture by using respectful language, challenging stereotypes, being aware of unconscious bias, and listening openly to diverse perspectives.
- 11.6 The Trust will monitor incidents of discriminatory conduct and report patterns or concerns to the Trust Leadership Team as part of our EEDI strategy.

11.7 Colleagues must positively promote equality equity, diversity and inclusion at all times.

12 Professional boundaries and relationships

12.1 Colleagues in our Trust are in a position of trust in relation to our children which means that the relationship between a colleague and a child is not one of equals. It is a specific offence¹ for a person aged 18 or over (e.g. teacher, youth worker) to have a sexual relationship with a child under 18 where that person is in a position of trust in respect of that young person, even if the relationship is consensual.

12.2 Colleagues must always conduct themselves in a way that cannot be misinterpreted by others. This includes all forms of communication with children, whether face-to-face, written, online, or via social media.

12.3 Colleagues must not make sexual remarks to any child or discuss their own sexual relationships with, or in the presence of children. Colleagues must not discuss a young person's sexual relationships in inappropriate settings or contexts. Any sexual behaviour by a colleague towards any young person is unacceptable and illegal.

12.4 Professional boundaries must be maintained at all times. Colleagues must avoid showing favouritism, forming inappropriate attachments, or allowing behaviour that could be misinterpreted. Children should be treated with respect and professionalism – they are not peers or friends.

12.5 It is not unusual for children or young people to develop an attachment or infatuation with an adult in a position of trust. If a colleague becomes aware of this, they must report it to a Designated Safeguarding Lead immediately. Support and guidance will be provided on how to manage the situation appropriately.

12.6 Colleagues who are also parents or carers of children attending a setting within the Trust must maintain clear professional boundaries at all times. This includes ensuring that their relationship with their own child, or with other children known to them outside of work (e.g. their child's friends), does not compromise or appear to compromise their professional responsibilities, objectivity, or the safeguarding principles of the Trust. Personal relationships with children or their families must not influence behaviour, decision-making, or lead to preferential treatment. Any situation that may give rise to a real or perceived conflict of interest must be disclosed to a Manager immediately, so that appropriate guidance or adjustments can be made.

12.7 Where colleagues are in a close personal relationship with another colleague, parent, carer, or anyone associated with the Trust, they must inform their Manager. This helps to ensure transparency and avoid conflicts of interest. If a colleague holds a senior or managerial position over someone they are closely connected to, the Trust may explore suitable changes—such as role reassignment—through consultation, to protect fairness and professional integrity

¹ Section 16 of The Sexual Offences Act 2003

13 Physical contact with children

- 13.1 There are occasions when it is entirely appropriate and proper for a colleague to have physical contact with our children. Colleagues must ensure that they only do so in ways that are appropriate to their professional role and in response to the child's needs at the time. This should be of limited duration and appropriate to the age, stage of development, gender and background of the child. Colleagues should always be able to explain why they have made physical contact with a child.
- 13.2 There may also be occasions where a child is in distress and needs comfort and reassurance which may include age appropriate physical contact. If a colleague is in this position, then they should consider the way in which they offer comfort, ensuring that it is not open to misinterpretation. It should always be reported to a Designated Safeguarding Lead (age appropriate).
- 13.3 A colleague may legally physically intervene with children to prevent them from committing a crime, injuring themselves or others, causing damage to property, engaging in behaviour prejudicial to good order and to maintain good order and discipline. Physical force should never be used as a form of punishment.
- 13.4 Sexual contact, including grooming patterns of behaviour, with children is unlawful and unacceptable in all circumstances.

14 Social contact with children

- 14.1 Colleagues should not establish or seek to establish social contact, via any channels (including social media), with our children for the purposes of securing a friendship or to pursue or strengthen a relationship. Colleagues should use their work provided equipment only for communicating electronically with students. If there are any circumstances in which a colleague has had to provide their personal contact details, including phone numbers, email address etc, to any child then they should report this to a Designated Safeguarding Lead.
- 14.2 The Trust's advice to colleagues is not to connect to our children via social media or other communication channels.
- 14.3 Our Trust is part of our community and we recognise that, as members of the community, colleagues will come into contact with children outside of the workplace. We expect colleagues to use their professional judgement in such situations and to report to a Designated Safeguarding Lead any contact that they have had with a child, outside of school, that they are concerned about or that could be misinterpreted by others.

15 Working one to one with children

- 15.1 There will be times where a colleague is working one to one with a student and this is acceptable. Colleagues need to understand that this means that they may be more vulnerable to allegations being made against them. Therefore, it is important that colleagues:

- Avoid meeting on a one-to-one basis in secluded areas of the school/academy
- Ensure that the door to the room is open or that there is visual access into the room
- Inform a colleague or Manager of the meeting, preferably beforehand
- Reports to their Manager if the student becomes distressed or angry

16 Dress and appearance

- 16.1 Our Trust does not feel it necessary to identify a list of prescribed items of apparel or footwear, nor does it feel it appropriate to define acceptable (or unacceptable) types (or colours) of hairstyle and jewellery. Colleagues are expected to present themselves in a way that is professional, appropriate to their role, and consistent with the values of the Trust.
- 16.2 Clothing should be safe, respectful, and practical for the tasks being performed. Colleagues may express their individual, cultural, or religious identities through their appearance, provided this does not conflict with health and safety, safeguarding, or their ability to fulfil their role.
- 16.3 The Trust values diversity and recognises that expectations of dress may vary based on culture, gender identity, religious belief, disability, or neurodivergence. If colleagues require adjustments or have concerns regarding dress expectations, they are encouraged to speak with their Manager or the People Team in confidence.
- 16.4 If there are concerns about a colleague's appearance, the matter will be discussed sensitively and confidentially with the colleague to understand the context. Where needed, this may be escalated in line with the Trust's policies and values of fairness and dignity. Should there be any disagreement as to whether the code has been breached then the matter will be escalated to the Head Teacher /Executive Head/ Member of Trust Leadership Team/Member of Trust Executive Team (as appropriate).

17 Drugs and alcohol

- 17.1 Consuming alcohol or any illegal substances on Trust premises or being under their influence during work hours is strictly prohibited. Being under the influence of alcohol or substances while at work or representing our Trust, or if it affects a colleague's ability to perform their duties, is a disciplinary offense.
- 17.2 Our Trust expressly prohibits the use of any illegal drugs (including psychoactive substances, formerly known as 'legal highs'), or any prescription drugs that have not been prescribed for the user, if they impair the judgement or are abused.
- 17.3 It is a criminal offence to be in possession of, use or distribute an illegal drug, or to produce, supply or possess these with the intent to supply illegal drugs. If any such incidents take place on Trust premises, vehicles or at Trust functions, they will be investigated and may lead to disciplinary action being taken and report to the police.
- 17.4 Colleagues must inform their Manager in confidence regarding any prescribed medication that may have an effect on their ability to carry out their work safely and/or to care for or supervise children in their care. They should seek medical advice before continuing to take such medication and discuss the advice received from their GP or

Occupational Health with their Manager or another appropriate Manager. Managers must ensure that the affected colleagues only work directly with children, if medical advice confirms that the medication is unlikely to impair the colleague's ability to look after children properly.

- 17.5 Colleagues' medication must be kept out of reach of young people at all times.
- 17.6 Colleagues suffering from drug and/or alcohol dependency encouraged to declare these to the Head Teacher /Executive Head/ Member of Trust Leadership Team/Member of Trust Executive Team (as appropriate) or the Trust People Team. The Trust will aim to signpost them to appropriate support services.

18 Criminal charges and convictions

- 18.1 There is a requirement for colleagues to inform the Head Teacher/Manager /Executive Head/ Member of Trust Leadership Team/Member of Trust Executive Team (as appropriate) if they are subject to a Police investigation or are charged with or convicted of any criminal offence during their employment; this includes cautions.

19 E-Safety/Online Safety

- 19.1 Colleagues must model safe, respectful, and ethical online behaviour. This includes responsible use of social media, secure data handling, and awareness of digital footprints. Any use of technology in the classroom must protect pupil privacy and align with safeguarding protocols. Colleagues should not communicate with children via personal accounts and should report any online interactions that raise concern. Colleagues must ensure that they comply with the Trusts E-Safety Policies at all times.

20 Use of Artificial Intelligence (AI)

- 20.1 Colleagues must ensure that they have read the Trust AI Policy and completed the relevant training module on Learning Locker before using any AI tools on school devices or in relation to their work. All AI use must comply with the Trust AI Policy, including adhering to and staying up to date with the Trust's agreed 'Whitelist' of approved AI applications.

21 Gifts and hospitality

- 21.1 For many of our colleagues there will be a limited opportunity to accept gifts and hospitality, but all colleagues must be aware that it is not acceptable for colleagues to accept bribes. Therefore, any gift, promotional offer or hospitality, intended either for the colleague or for the Trust that exceeds a nominal value of £25.00 must be declared on the Trust gift register and permission must be obtained before accepting. If a colleague is ever unsure, then the best course of action is to politely decline the offer.
- 21.2 It is traditional for our children and their parents or carers to give gifts as a small token of appreciation or as a thank you to our colleagues at certain times throughout the academic year. This Code of Conduct is not designed to stop that practice. Colleagues may accept gifts from our children and their parents or carers provided that they meet this definition. Any colleague that receives a gift with a value of greater than **£25.00**

should inform the Head Teacher who will then decide whether the gift can be accepted. A colleague should make the Head Teacher aware of any student who is giving them gifts on a regular basis, or any student or parent or carer who expects something in return for a gift, as this would not be acceptable.

22 Keeping within the law

22.1 Colleagues should uphold the law in a manner that reflects positively on the Trust, acting with honesty, fairness, and integrity. This includes upholding copyright, respecting confidentiality, and complying with equality legislation and safeguarding laws both inside and outside of work. The Trust encourages self-reporting where any legal matters could impact professional duties or public trust

22.2 Colleagues must ensure that they:

- Uphold the law at work
- Never commit a crime away from work which could damage public confidence in them or our Trust, or which makes them unsuitable for the work they do. This includes, for example:
 - Submitting false or fraudulent claims to public bodies (for example, income support, housing or other benefit claims)
 - Breaching copyright on computer software or published documents
 - Sexual offences which will render them unfit to work with children, young people or vulnerable adults
 - Crimes of dishonesty which render them unfit to hold a position of Trust

This list is intended as a guide and is not exhaustive.

22.3 Colleagues should write and tell their Head Teacher/Manager immediately if they are questioned by the police, charged with, or convicted of, any crime whilst they are employed by our Trust (this includes outside of their working hours Head Teacher /Executive Head/ Member of Trust Leadership Team/Member of Trust Executive Team (as appropriate)will then need to consider whether this charge or conviction damages public confidence in the Trust or makes the colleague unsuitable to carry out their duties.

23 Mandatory training responsibilities

23.1 All colleagues are responsible for completing the mandatory training required for their role, as outlined by the Trust. This training is essential to ensure safe, compliant, and effective working practices across all settings.

23.2 The specific training requirements may vary depending on a colleague's role, responsibilities, and the service area in which they work. Managers will ensure that colleagues are informed of the training relevant to their position, including any updates or changes.

23.3 Colleagues are expected to complete their training within the designated timeframes and maintain up-to-date knowledge in accordance with Trust policies. Failure to

complete mandatory training may be treated as a breach of professional responsibility and addressed in line with the Trust's performance or disciplinary procedures.

24 Conduct outside of work and at work related functions

- 24.1 Unlike some other forms of employment, working at our Trust means that a colleague's conduct outside of work could have an impact on their role.
- 24.2 Colleagues must not engage in conduct outside work which could seriously damage the reputation and standing of our Trust/Academy or the colleague's own reputation or the reputation of other members of the Trust community. Colleagues should be aware that any conduct that we become aware of that could impact on their role within the Trust/ Academy or affect our Trust's/Academies reputation will be addressed under our disciplinary procedure.
- 24.3 We expect colleagues to inform us immediately of any such situations that have happened outside of the workplace.
- 24.4 Colleagues are required to demonstrate responsible behaviour at work-related functions and work-related social events that take place outside normal work hours and to act in a way that will not have a detrimental effect on our reputation. If you have any concerns that either one of your colleagues or yourself has not followed this code of conduct you should report these to your Head Teacher/Manager immediately.

25 Secondary Employment

- 25.1 Our Trust understands that employees may wish to undertake additional employment. We encourage everyone to devote their attention and abilities to their duties at the Trust during working hours and to act in the best interests of the Trust at all times. We also have a responsibility to protect health and safety concerning employee working hours.
- 25.2 Therefore, colleagues should seek written consent from your Head Teacher /Executive Head/ Member of Trust Leadership Team/Member of Trust Executive Team (as appropriate) before undertaking any employment or engagement that might interfere with their duties. Additionally, colleagues should avoid engaging in business or employment activities that might conflict with the Trust's interests.

26 Confidentiality, monitoring and data protection

- 26.1 The Trust is committed to ensuring that this policy is applied fairly, consistently, and in a way that supports an inclusive, respectful, and legally compliant working environment.
- 26.2 As part of the implementation of this policy, the Trust may collect, process, and store personal data — including special categories of data — in accordance with our Data Protection Policy. This will always be done in line with current Data Protection legislation, including:
- The UK General Data Protection Regulation (UK GDPR)
 - The Data Protection Act 2018
 - Any successor legislation or updates to these laws

- 26.3 We will ensure that all data collected as part of the application of this policy is handled with integrity and in accordance with the principles of transparency, purpose limitation, and data minimisation. Records will be maintained in line with our:
- Workforce Privacy Notice
 - Records Management and Retention Policy
 - Information Security standards
- 26.4 If any colleague becomes aware that personal data is at risk of compromise, loss, or has been subject to a breach, they must report it immediately to the Trust's Data Protection Officer. Prompt reporting is essential to allow for assessment, mitigation, and, where applicable, notification to the Information Commissioner's Office (ICO) within the required 72-hour window.
- 26.5 Colleagues are responsible for familiarising themselves with and adhering to all related policies, including but not limited to:
- Data Protection and GDPR Policies
 - Criminal Records Information Policy
 - Recruitment and Safer Recruitment Policy
 - Internet, Email and Communications Policy
 - Information Security Policy
- 26.6 Colleagues must ensure that all personal data and sensitive information they access in the course of their work is treated with strict confidentiality. Such information should only be shared with authorised individuals on a need-to-know basis. Any suspected or actual breach of confidentiality must be reported immediately to the Data Protection Officer. Breaches may lead to disciplinary action in accordance with Trust procedures.
- 26.7 These policies are available through the Colleague Portal, your Head Teacher, or the Trust Business Support Team.
- 26.8 By following these expectations, we ensure that data is handled responsibly and that the Trust remains a secure and trustworthy place for colleagues and the communities we serve.
- 26.9 If colleagues are ever unsure about their responsibilities or how to respond to a potential data issue, they are encouraged to seek advice from their line manager, the Trust Business Support Team, or the Data Protection Officer without delay.

27 Review of policy

- 27.1 This policy will be reviewed annually, or earlier if there are changes in relevant legislation, statutory guidance, or internal practice.
- 27.2 The Trust will monitor the application and outcomes of this policy to ensure it remains effective, equitable, and aligned with our Trust values.

27.3 Reviews will take into account feedback from colleagues, evolving best practice, and any identified gaps in fairness, inclusion, or consistency of application. Where appropriate, updates will be made to strengthen the policy and support continuous improvement across the Trust