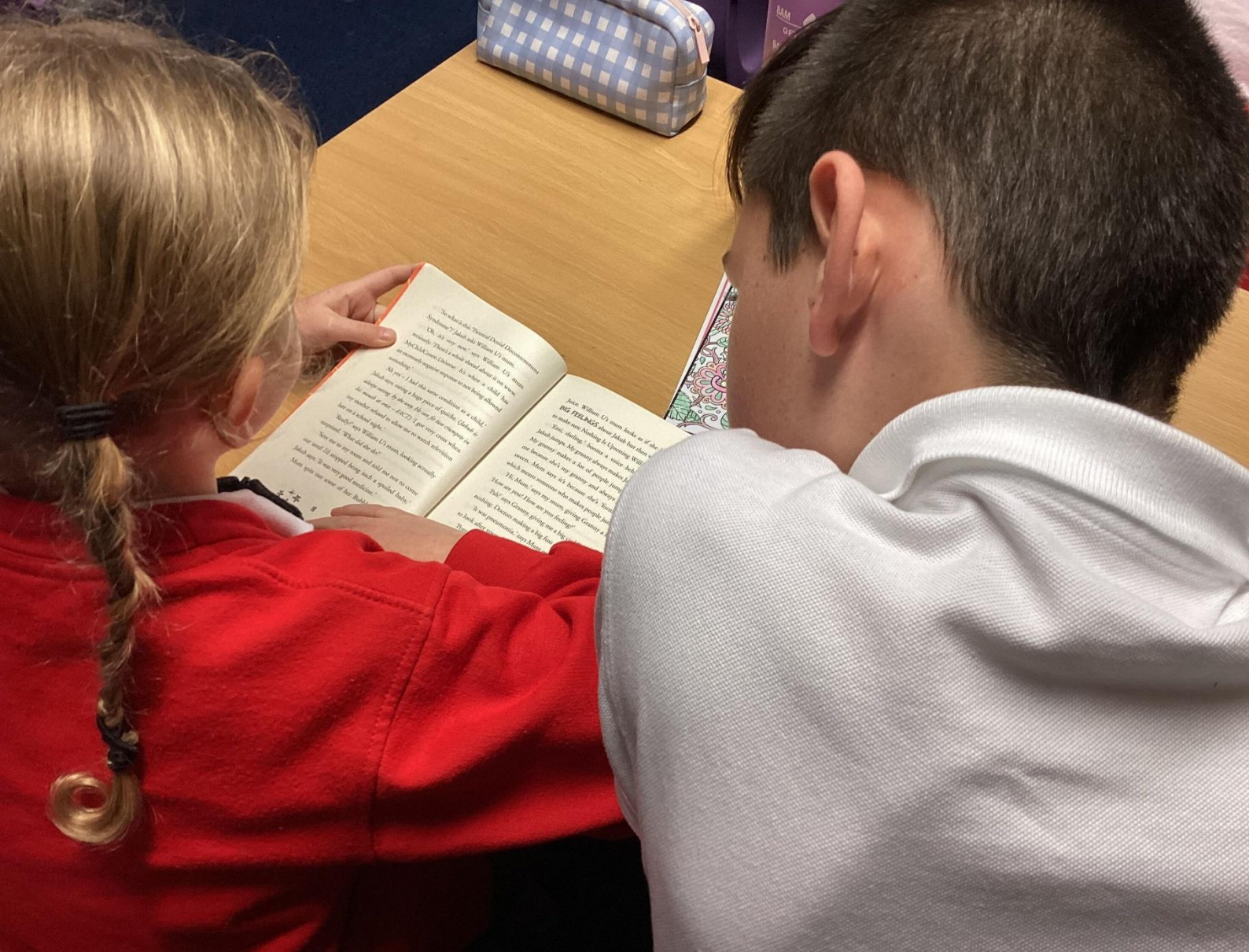




LEARNING ACADEMY PARTNERSHIP

Code of Conduct Policy

Policy Reference No	PT004
Review Frequency	Annually
Reviewed	September 2026
Next Review Date	Autumn 2027

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Amendments

Policy Date	New Version Number	Summary of change
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)
Sep 26	V1.11	Full policy review to modernise language and improve clarity, consistency, EEDI and legislative alignment.
Sep 26	V1.11	KCSIE date updated throughout policy
Sep 26	V1.11	Use of language section added (2)
Sep 26	V1.11	Use of AI, Ed Tech, E-Safety & Dig Tech section added (5)
Sep 26	V1.11	Recording of meetings section added (5)
Sep 26	V1.11	Roles & responsibilities section added (4)
Sep 26	V1.11	Secondary Employment section updated (25)
Sep 26	V1.11	Use of Artificial Intelligence (AI) section updated to reflect Ed Tech (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		

* *Colleagues – Refers to employees*

**Headteacher includes Executive Head*

**For the avoidance of doubt, where this policy refers to a 'Senior Leader', this includes members of the Trust Leadership Team (TLT) and other senior leaders as defined within the Trust's Scheme of Delegation, including for the purposes of decision-making, panels and appeals.*

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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 People Team or your Headteacher/Manager. We are committed to ensuring our policies are accessible to everyone, and we will work with you to provide appropriate support or resources.

2 Use of language

In this policy, the terms “we”, “us” and “our” refer to the Learning Academy Partnership (South West). These terms are used for clarity and ease of reading and should be interpreted as applying to the Trust at all times.

3 Aims

- 3.1 This policy sets out the standards of conduct expected of all colleagues and others working on our behalf.
- 3.2 Our aim is to ensure we remain a safe, respectful and positive environment for everyone. This Code applies to colleagues, contractors, volunteers, agency workers and self-employed contractors, in line with Keeping Children Safe in Education (DfE, 2026). Failure to meet these standards may result in appropriate action, including disciplinary procedures where applicable.
- 3.3 For individuals who are not employees, breaches of this Code will not be managed through our disciplinary procedure but may still lead to appropriate action.
- 3.4 This policy does not form part of any colleague's contract of employment and may be amended at any time.
- 3.5 This Code is not exhaustive. Where situations are not explicitly covered, colleagues and senior leaders are expected to use professional judgement and act in our best interests, and in the best interests of our colleagues and our children.

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

- 4.1 We value the uniqueness of every individual and are committed to creating an inclusive culture where everyone can be their authentic selves. Rooted in the diverse communities we serve, we believe we are stronger together and achieve our best when all colleagues feel included, respected and able to thrive.
- 4.2 We have zero tolerance for behaviours that cause harm related to identity, background, culture, neurodivergence, or protected characteristics whether real or perceived. Identity-based harm, including discrimination, harassment, microaggressions, hate speech, or violence, is unacceptable and undermines our values and inclusive culture.
- 4.3 We encourage all colleagues to report any incidents of identity-based harm they experience or witness. Reports will be handled sensitively, and anyone raising concerns in good faith will be supported and protected from victimisation or retaliation.

- 4.4 Our commitments are grounded in the Equality Act 2010, which protects individuals from unlawful discrimination and promotes equality of opportunity across all protected characteristics.

5 Recording of Meetings

- 5.1 Covert (secret) recordings of any meetings are strictly prohibited. Any recording of a meeting, whether audio or visual, may only take place with the prior knowledge and explicit consent of all participants and with approval from us.

6 Roles and Responsibilities

6.1 We are responsible for:

- Maintaining a safe, inclusive environment and up-to-date, compliant policies
- Providing appropriate training, support and resources
- Responding promptly, fairly and consistently to concerns or breaches of this Code
- Protecting those who raise concerns in good faith from victimisation or retaliation
- Monitoring the effective and consistent application of this Code across all settings

6.2 Headteacher, Manager or Senior Leader (as appropriate) are responsible for:

- Modelling expected standards of conduct
- Ensuring colleagues understand this Code and know where to seek advice
- Promoting a culture where concerns can be raised safely
- Addressing and escalating concerns in line with our procedures
- Ensuring compliance with mandatory training and legal requirements, including safeguarding, data protection, EEDI and the Equality Act 2010, and making reasonable adjustments where required

6.3 All colleagues are responsible for:

- Maintaining acceptable standards of professional and personal conduct
- Safeguarding and promoting the welfare of children
- Treating others with dignity, respect and fairness
- Reporting concerns, including low-level concerns, without delay
- Completing mandatory training and following relevant policies
- Using professional judgement, maintaining appropriate boundaries and protecting confidentiality
- Upholding Equality, Equity, Diversity and Inclusion
- Informing their Manager of any matter that may affect their role or suitability to work with children
- Ensuring any use of Educational Technology (Ed Tech) tools is appropriate, transparent, and in line with our policies and procedures

6.4 **Volunteers, agency workers, and contractors must:**

- Comply with this Code and relevant policies
- Promote safe, respectful, and inclusive behaviours
- Maintain professional boundaries and act in the best interests of children
- Report any safeguarding or conduct concerns immediately

7 General Obligations

7.1 Colleagues must act in accordance with our policies, uphold professional standards, and recognise that conduct outside work may be relevant where it impacts safeguarding or public confidence in our organisation.

7.2 Colleagues are required to:

- Act in accordance with policies, values, and statutory responsibilities.
- Report any concerns about the conduct or behaviour of colleagues to their Manager or the People Team without delay.
- Recognise that, as visible members of the community, behaviour outside of work may be relevant to their employment where it affects safeguarding, public confidence, or our reputation.
- Ensure that their actions and behaviour always reflect professionalism, integrity, and respect for others.

7.3 Where conduct outside of work is considered relevant to a colleague's role, it may be treated as a disciplinary matter in line with our procedures.

8 Safeguarding and promoting the welfare of children

8.1 Safeguarding is everyone's responsibility. All colleagues must place the welfare of children at the centre of their practice and follow statutory guidance, including Keeping Children Safe in Education. All colleagues must:

- Protect children from maltreatment and prevent impairment of their health or development.
- Ensure children grow up in safe, supportive environments that promote positive outcomes.
- Be alert to signs of abuse, neglect, or exploitation and know how to respond appropriately.
- Read, understand, and follow all our safeguarding policies, including procedures for reporting concerns.
- Complete all required safeguarding training and keep up to date with changes in local and national guidance.
- Be familiar with our systems for keeping children safe, including how to report concerns promptly and appropriately.

- Follow the principles and expectations set out in Keeping Children Safe in Education (DfE, 2026) and Guidance for Safer Working Practice for Adults Who Work with Children (2020).

8.2 Colleagues must work collaboratively with leaders, Designated Safeguarding Leads (DSLs), and external agencies where necessary to safeguard children.

8.3 Any concerns about the conduct or behaviour of a colleague must be referred immediately to the Headteacher, Manager or Senior Leader (as appropriate) or Designated Safeguarding Lead. Where the concern relates to the Headteacher, Senior Leader or Trust Leader, it must be raised with the Chief Executive Officer.

9 Allegations of abuse

9.1 We follow the procedures set out in Keeping Children Safe in Education (DfE, 2026), Part 4 when responding to allegations that a colleague, supply colleague, contractor, or volunteer has:

- Harmed, 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
- Behaved, inside or outside of work, in a way that may indicate they are unsuitable to work with children

9.2 Where behaviour outside of school does not involve children, we will consider whether it raises concerns about suitability to work with children, including whether similar circumstances could arise in a school context.

9.3 All allegations must be reported immediately to the Headteacher or Manager. Where the allegation concerns the Headteacher, Senior Leader or Trust Leader it must be reported to the Chief Executive Officer without delay.

10 Low level concerns

10.1 We are committed to a culture in which colleagues feel confident to recognise, discuss, and report low-level concerns as part of a proactive safeguarding approach.

10.2 Low-level concerns may include behaviour that falls short of expected professional standards, inside or outside work, such as minor boundary issues, conduct that could be misinterpreted, or actions that may escalate if repeated.

10.3 All low-level concerns are taken seriously and must be reported and recorded promptly in line with our Managing Allegations and Concerns Policy. They will be addressed proportionately, fairly, and supportively.

10.4 Colleagues are expected to report low-level concerns about themselves or others to their Headteacher, Manager or Senior Leader (as appropriate) as soon as possible, verbally or in writing. Self-reporting is encouraged and supports transparency and safeguarding.

- 10.5 Where a concern relates to the Headteacher, Senior Leader or Trust Leader must be reported to the Chief Executive Officer.

11 Duty of care

- 11.1 All colleagues have a duty of care to act in ways that protect the safety, wellbeing, and best interests of children, families, colleagues, and the wider school community.
- 11.2 In relation to children, colleagues must:
- Act, and be seen to act, in children's best interests at all times
 - Maintain professional boundaries and avoid conduct that could reasonably call their judgement into question
 - Take responsibility for their behaviour and understand that breaches of this Code may result in disciplinary action
 - Seek advice from a Manager or Designated Safeguarding Lead (DSL) when unsure how to respond to a situation
- 11.3 This duty applies to conduct both within and outside the workplace where safeguarding may be affected.
- 11.4 Colleagues also have a duty of care towards one another and must contribute to a safe, respectful, and supportive working environment by:
- Treating others with dignity, fairness, and respect
 - Supporting wellbeing and inclusion
 - Challenging or reporting behaviour that undermines safety or professional standards
 - Communicating respectfully and using professional judgement
- 11.5 Colleagues should seek advice from their Manager, the People Team, or another appropriate leader if unsure how to respond to concerns about wellbeing or conduct.

12 Health & Safety

- 12.1 We are committed to providing a safe, healthy, and supportive environment for colleagues, children, and visitors. Health and safety is a shared responsibility, and everyone must contribute to maintaining safe working practices.
- 12.2 All colleagues must:
- Complete health and safety training relevant to their role
 - Comply with our Health & Safety Policy and related procedures
 - Follow all health and safety regulations, instructions, and safe working practices
 - Use safety equipment or protective clothing as required
 - Adhere to hygiene and infection control requirements appropriate to their role
 - Report accidents, incidents, hazards, near misses, or unsafe conditions promptly and in line with our procedures

- Take reasonable care for their own health and safety and that of others
- Not act in a way that could reasonably cause risk, harm, or damage

13 Honesty and personal integrity

13.1 All colleagues are expected to uphold the highest standards of honesty, integrity and professionalism at all times. This applies to conduct at work, when representing us, and outside of work where behaviour may affect professional trust or suitability to work with children.

13.2 Colleagues must:

- Comply with all lawful and reasonable instructions from leaders and Managers
- Act ethically and responsibly to maintain public trust and confidence in what we do
- Treat children with dignity and respect, maintaining appropriate professional boundaries
- Safeguard children's wellbeing in line with statutory guidance, our policies and safer working practices
- Show respect for the rights, dignity, beliefs and backgrounds of others
- Not undermine fundamental British values, including democracy, the rule of law, individual liberty, mutual respect and tolerance
- Ensure personal beliefs are not expressed in ways that exploit children's vulnerability, influence them inappropriately, or encourage unlawful behaviour

13.3 Colleagues must demonstrate professional regard for our values, policies and procedures, including meeting expectations around attendance, punctuality and reliability.

13.4 All colleagues are expected to:

- Treat one another with respect, fairness, dignity, and courtesy
- Maintain professional relationships with leaders, colleagues, families, and external partners
- Act honestly and responsibly in relation to our property, finances, and resources

13.5 Colleagues must report any behaviour, incident, or situation that could lead to concern, complaint, or misunderstanding. Where a colleague believes their conduct may have fallen below the standards in this Code, they are expected to discuss this promptly with their Manager.

14 Tackling discrimination

14.1 We are committed to equality, equity, dignity, and respect. Discrimination, bullying, harassment, or victimisation of any kind will not be tolerated.

14.2 All colleagues must:

- Act in line with the our Equality, Equity, Diversity and Inclusion (EEDI) Policy and the Equality Act 2010
- Treat children, colleagues, families, and community members with fairness, dignity, and respect
- Challenge and report discriminatory behaviour or language in accordance with our procedures

- 14.3 Discriminatory behaviour includes, but is not limited to, language or conduct relating to a protected characteristic, including racism, sexism, homophobia, transphobia, ableism, misgendering, stereotyping, exclusion, unequal treatment, or so-called “banter” or microaggressions that cause offence or harm.
- 14.4 Harassment, including bullying, unwanted conduct, microaggressions, or behaviour that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment, will not be tolerated.
- 14.5 Concerns relating to bullying or harassment will be managed in line with our policies.
- 14.6 All colleagues are expected to contribute to an inclusive culture through respectful language, awareness of bias and inclusive practice. Discriminatory behaviour may be treated as a breach of this Code and managed in line with our policies

15 Professional boundaries and relationships

- 15.1 Colleagues hold a position of trust in relation to children. Relationships with children are not equal, and clear professional boundaries must be maintained at all times.
- 15.2 It is a criminal offence under the Sexual Offences Act 2003 for a person aged 18 or over, who is in a position of trust, to engage in a sexual relationship with a child under 18, regardless of consent.
- 15.3 All colleagues must:
- Act in a way that cannot reasonably be misinterpreted
 - Maintain appropriate professional boundaries in all interactions with children, including in person, in writing and online
 - Avoid behaviour that shows favouritism, creates dependency or could be perceived as inappropriate
 - Treat children with respect and professionalism; children are not peers or friends
 - Never make sexual comments, engage in sexualised behaviour or discuss their own sexual relationships with or in the presence of children
 - Never engage in any sexual behaviour towards a child
- 15.4 Where a colleague becomes aware that a child has developed an attachment or infatuation towards them, this must be reported immediately to the Designated Safeguarding Lead. Advice and support will be provided to manage the situation safely.

- 15.5 Colleagues who are parents, carers, or have personal or close relationships with children or others connected to our settings or organisation must maintain clear professional boundaries. Any actual or perceived conflict of interest must be declared to a Manager, and where a power imbalance exists, appropriate arrangements may be agreed.

16 Physical contact with children

- 16.1 Physical contact with children may be appropriate where it is necessary, proportionate, and in response to a child's needs. Any physical contact must be professional, respectful, and consistent with the colleague's role.
- 16.2 Colleagues must ensure that physical contact:
- Is appropriate to the child's age, development, and individual circumstances
 - Is minimal, proportionate, and never secretive
 - Can always be clearly explained and justified
- 16.3 Where a child is distressed, age-appropriate comfort may be appropriate. Colleagues should ensure such contact cannot be misinterpreted and report any significant concerns to a Designated Safeguarding Lead (DSL).
- 16.4 Reasonable physical intervention may be used only as a last resort to prevent injury, damage, or serious disruption, and must never be used as punishment.
- 16.5 Sexual contact or grooming behaviour towards a child is unlawful and will not be tolerated under any circumstances.

17 Social contact with children

- 17.1 Colleagues must not establish or seek to establish social contact with children for the purposes of securing friendship, forming personal relationships, or extending professional relationships beyond appropriate boundaries.
- 17.2 Colleagues must:
- Use our approved systems and equipment for all communication with children wherever possible.
 - Not communicate with children through personal social media accounts or personal messaging platforms.
 - Avoid sharing personal contact details with children unless this is authorised and required for professional purposes, and report this to a Designated Safeguarding Lead (DSL) or Manager.
 - Maintain professional boundaries in all interactions and avoid behaviour that could be misinterpreted.
- 17.3 We recognise that colleagues may encounter children outside of the workplace as part of community life. In these situations, colleagues must exercise professional

judgement and report any contact that causes concern, feels inappropriate, or could be perceived as such to a DSL.

18 Working one to one with children

- 18.1 There are occasions when colleagues may need to work one-to-one with a child, and this can be appropriate. However, colleagues must recognise that one-to-one situations increase vulnerability for both the child and the adult and require additional safeguards.
- 18.2 Where one-to-one working is necessary, colleagues must:
- Ensure the interaction takes place in a visible and appropriate environment, avoiding secluded or isolated areas.
 - Keep doors open or ensure there is clear visual access wherever possible.
 - Inform a Manager or colleague of the session in advance, where practicable.
 - Maintain professional boundaries and conduct at all times.
 - Report immediately to a Manager or Designated Safeguarding Lead (DSL) if a child becomes distressed, anxious, or if any aspect of the interaction causes concern.
- 18.3 Colleagues should always exercise professional judgement and take steps to protect the safety, wellbeing, and dignity of the child, as well as themselves.

19 Dress and appearance

- 19.1 We value professionalism while respecting individuality. Colleagues are expected to present themselves in a way that is appropriate to their role, supports safeguarding and health and safety requirements, and reflects our values.
- 19.2 There is no prescribed list of acceptable clothing, hairstyles, or jewellery. Instead, colleagues are expected to exercise professional judgement and ensure their appearance is:
- Professional, respectful, and appropriate to the work being undertaken
 - Safe and practical for their role, particularly where health and safety considerations apply
 - Consistent with maintaining positive professional relationships and safeguarding expectations
- 19.3 We recognise and respects that dress and appearance may reflect personal identity, culture, religion, gender identity, disability, or neurodivergence. Colleagues may express their individuality in these ways, provided this does not compromise safety, safeguarding, or their ability to fulfil their role.
- 19.4 Where a colleague requires flexibility or reasonable adjustments relating to dress or appearance, they are encouraged to discuss this with their Manager or the People Team in confidence.

- 19.5 If concerns arise about a colleague's appearance, these will be addressed sensitively, respectfully, and confidentially, taking account of individual circumstances and our values. Any ongoing concerns will be managed in line with our policies.

20 Drugs and alcohol

- 20.1 We are committed to maintaining a safe, healthy, and professional environment for children, colleagues, and visitors. Being under the influence of drugs or alcohol at work, or in any situation where it may affect professional judgement, safeguarding, or safety, is not acceptable.
- 20.2 Colleagues must not:
- Consume alcohol on our premises during working hours, unless expressly authorised for a specific event.
 - Attend work, or represent the organisation, while under the influence of alcohol or drugs.
 - Use, possess, supply, or be involved with illegal drugs, including psychoactive substances, on our premises, in our vehicles, or at work related activities.
- 20.3 Any impairment caused by alcohol or substances that affects a colleague's ability to work safely or professionally may be treated as a disciplinary matter.
- 20.4 Colleagues must inform their Manager, in confidence, if they are taking prescribed medication that may affect their ability to work safely or care for or supervise children. Appropriate advice will be considered and, where necessary, reasonable adjustments or alternative arrangements explored,
- 20.5 Medication must be stored securely and kept out of reach of children at all times.
- 20.6 We recognise that dependency on drugs or alcohol is a health and wellbeing issue. Colleagues are encouraged to seek support and to raise concerns in confidence with a Manager, senior leader or the People Team. We will support access to appropriate help while balancing safeguarding and operational responsibilities.

21 Criminal charges and convictions

- 21.1 Colleagues must inform their Headteacher, Manager or Senior Leader (as appropriate) if, during their employment, they:
- Are subject to a police investigation
 - Are charged with a criminal offence
 - Receive a caution or conviction
- 21.2 This requirement applies whether the matter relates to work or occurs outside of working hours.

- 21.3 We will consider such information sensitively and fairly, considering safeguarding responsibilities, the nature of the offence, and its relevance to the colleague's role. Disclosure does not automatically result in disciplinary action.

22 Gifts and hospitality

- 22.1 Colleagues must act with integrity and transparency when offered gifts, hospitality, or benefits in connection with their role. Such offers must never influence, or be perceived to influence, professional judgement or decision-making.
- 22.2 Colleagues must not accept any gift, hospitality, or benefit that could reasonably be regarded as a bribe or inducement.
- 22.3 Any gift, hospitality, or promotional offer with a value over £25 must be declared to the Headteacher, Manager or Senior Leader (as appropriate), approved in advance, and recorded on our gift register.
- 22.4 Colleagues should exercise caution and seek advice from their Manager or politely decline where there is any doubt.
- 22.5 Modest, appropriate gifts from children or parents/carers, such as end-of-term tokens of appreciation, may be accepted provided they do not exceed the stated value. Frequent gifts, or any situation where something appears to be expected in return, must be reported to the Headteacher, Manager or Senior Leader (as appropriate).

23 Keeping within the law

- 23.1 Colleagues must act lawfully, ethically, and with integrity at all times, both within and outside of work, in a manner that upholds public trust and confidence in what we do.
- 23.2 Colleagues must comply with all relevant laws, regulations and statutory guidance, as well as our policies, and act honestly and responsibly where their conduct may affect their role or our reputation.
- 23.3 Colleagues must not engage in criminal behaviour that could bring us into disrepute or make them unsuitable to work with children, young people, or vulnerable individuals. This includes, but is not limited to:
- Safeguarding-related offences
 - Crimes of dishonesty or fraud
 - Breaches of confidentiality or data protection
 - Copyright or intellectual property offences
- 23.4 Colleagues must inform the Headteacher, Manager or Senior Leader (as appropriate) without delay if they are questioned by the police, charged with, or convicted of a criminal offence during their employment, whether inside or outside working hours.
- 23.5 Each case will be considered fairly and proportionately, taking account of safeguarding responsibilities, the nature of the offence, its relevance to the colleague's role, and any impact on public confidence in us.

24 Mandatory training responsibilities

- 24.1 All colleagues are responsible for completing the mandatory training required for their role. Mandatory training supports safe, compliant, and effective practice and is essential to safeguarding, wellbeing, and professional standards.
- 24.2 Colleagues must:
- Complete all mandatory training relevant to their role within the required timescales.
 - Keep their knowledge and training up to date in line with our requirements.
 - Engage fully with training and apply learning in their day-to-day practice.
- 24.3 Mandatory training requirements may vary depending on role, responsibilities, and service area. Managers are responsible for informing colleagues of required training and supporting access to appropriate learning opportunities.

25 Conduct outside of work and at work related functions

- 25.1 Colleagues are expected to uphold our values and maintain professional standards of conduct both at work and, where relevant, outside of work.
- 25.2 We recognise that colleagues have a right to a private life. However, conduct outside of work may be considered a work-related matter where it:
- Impacts safeguarding or suitability to work with children
 - Undermines public trust or confidence in us
 - Brings us, our schools, or colleagues into disrepute
 - Affects a colleague's ability to carry out their role effectively
- 25.3 Colleagues must:
- Behave responsibly at work-related events, including those held outside normal working hours
 - Avoid behaviour that could reasonably damage our reputation
 - Inform the Headteacher, Manager or Senior Leader (as appropriate) promptly of any conduct or incident outside of work that may be relevant to their role with us
- 25.4 Relevant conduct outside of work may be addressed in accordance with our disciplinary procedures.
- 25.5 Any concerns about conduct, whether personal or relating to another colleague, should be reported promptly to the Headteacher, Manager or Senior Leader (as appropriate).

26 Secondary Employment

- 26.1 We recognises that colleagues may undertake secondary employment. However, this must not conflict with duties, safeguarding responsibilities, or our interests.
- 26.2 Colleagues must:
- Ensure any additional work does not adversely affect their performance, wellbeing, or working hours.
 - Avoid any conflict of interest or activity that could undermine safeguarding or our values.
 - Seek prior written approval from the Headteacher, Manager or Senior Leader (as appropriate) where secondary employment could reasonably impact their role.
- 26.3 Approval will not be unreasonably withheld but may be reviewed if circumstances change.

27 E-Safety, Online Safety and Use of Education Technology (EdTech)

- 27.1 Colleagues must model safe, respectful, and professional online behaviour at all times. This includes responsible use of social media, secure handling of data, and awareness of digital footprints. The use of Education Technology (EdTech), including AI, must protect pupil privacy and comply with safeguarding and data protection requirements.
- 27.2 Colleagues must only use approved systems and applications and must ensure they have read relevant policies and completed any required training before using EdTech in their role. All use must comply with our policies.
- 27.3 Colleagues must not communicate with pupils through personal accounts or unapproved platforms. Any online interactions or concerns that may pose a safeguarding risk must be reported in line with our procedures.
- 27.4 The use of personal devices capable of capturing, recording, live-streaming, analysing, or transmitting audio, images, or video, including smart glasses (e.g. Meta Smart Glasses) and other wearable AI-enabled technology, is prohibited when working with pupils unless expressly authorised for a legitimate educational or operational purpose and appropriate safeguarding, privacy, and data protection measures are in place.
- 27.5 Colleagues must comply with our E-Safety, Online Safety, and EdTech policies at all times.
- 27.6 Colleagues must comply with our E-Safety and Online Safety policies at all times.

28 Breach of the Code of Conduct

- 28.1 Failure to comply with the expectations set out in this Code of Conduct may be treated as a breach of our standards and managed in line with our disciplinary, safeguarding, or people policies, as appropriate.
- 28.2 Each matter will be considered fairly and proportionately, taking account of:

- The nature and seriousness of the concern
- Any safeguarding implications
- The colleague's role and responsibilities
- Relevant policies or statutory guidance

28.3 Nothing in this Code prevents colleagues from raising concerns in good faith, and we will ensure that all matters are handled sensitively, lawfully, and consistently.

29 Confidentiality, monitoring and data protection

29.1 We are committed to ensuring that this policy is applied fairly, consistently, and in a way that supports an inclusive, respectful, and legally compliant working environment including where digital systems and education technology (EdTech) are used.

29.2 Personal data, including special category data, may be collected, processed and stored where necessary to apply this policy. This will be done in accordance with our Data Protection Policy and applicable data protection legislation, including the UK GDPR and the Data Protection Act 2018.

29.3 All personal data will be handled securely and in line with our Workforce Privacy Notice, Records Management and Retention Policy, and Information Security requirements.

29.4 Any actual or suspected loss, breach or compromise of personal data must be reported immediately to the Data Protection Officer to allow timely assessment, mitigation and, where required, notification to the Information Commissioner's Office.

29.5 Colleagues are expected to treat all personal and sensitive information with strict confidentiality, sharing it only where authorised and on a need-to-know basis. Failure to do so may be managed in line with our procedures.

29.6 Colleagues must ensure that all personal data and sensitive information they access in the course of their work whether in paper form, electronic systems, or EdTech platforms 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 our procedures.

30 Review of policy

30.1 This policy will be reviewed annually, or earlier if there are changes in relevant legislation, statutory guidance, or internal practice.

30.2 We will monitor the application and impact of this policy to ensure it remains effective, equitable and aligned with our values.

30.3 Reviews will take account of colleague feedback, emerging best practice and any identified issues relating to fairness, inclusion or consistency, with updates made where appropriate to support continuous improvement.