



Community First Academy Trust

Code of Conduct For Employees

Community First Academy Trust
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ADOPTED AT THE MEETING OF TRUSTEES

CHAIR OF BOARD: Mr J Pugh

This is a Trust-wide policy adopted and reviewed by either the Trust Board or Finance Committee and relates to all schools that are partners within the Trust.

Specific Academy policies, e.g. curriculum policies will be found on the individual school websites.

Date: September 2018

Planned Review Date: September 2020

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Statement of intent

Community First Academy Trust expects all pupils to receive high-quality teaching and learning in a positive and respectful environment.

Employees at the school should understand that their own behaviour, and the manner in which they conduct themselves with their colleagues, pupils, parents and other stakeholders, sets an example.

We recognise that the majority of staff members act appropriately and treat each other with dignity and respect; however, we consider it important to clarify the expected standards.

This policy forms part of a staff member's contract of employment and failure to comply with it, and with the associated school policies, may result in disciplinary action being taken, including legal action where this is warranted.

This document applies to all staff members who are:

- Employed by the school, including the Headteacher, head of school, executive team and volunteers.
- Employed in units or bases that are attached to the school.

This document does not apply to:

- Peripatetic staff members who are centrally employed by the LA.
- School catering staff employed by Dolce and CFAT Facilities Limited.
- Employees of external contractors.

These employees are governed by their employment contracts and any relevant laws pertaining to their activities within the school, for example, the GDPR and the Data Protection Act 2018.

1. Legal framework

- 1.1. This policy has due regard to all legislation including, but not limited to, the following:
 - The General Data Protection Regulation (GDPR)
 - The Data Protection Act 2018
 - The Education Act 2002
 - The Children Act 1989
 - The Working Time Regulations 1998 (as amended)
 - Sexual Offences Act 2003

- 1.2. This policy also has due regard to statutory guidance including, but not limited to, the following:
 - DfE (2019) 'Keeping children safe in education'
 - DfE (2018) 'Working Together to Safeguard Children'
 - DfE (2018) 'Staffing and employment advice for schools'

- 1.3. This policy operates in conjunction with the following school policies and documents:
 - GDPR Policies and Procedures
 - Child Protection and Safeguarding
 - Dignity at Work
 - Anti-Fraud and Corruption
 - Gifts and Hospitality
 - E-Safety
 - Confidentiality
 - Disposal of Confidential Waste
 - Equality Scheme
 - Guidance for Safer Working Practice
 - Health and Safety Welfare
 - Internet and Acceptable use
 - ICT Security
 - Retention and Disposal of Records
 - Use of Force
 - Conflicts of Interest Policy
 - Whistleblowing Policy

2. Safeguarding pupils

- 2.1. In accordance with 'Keeping children safe in education', and Our Child Protection procedures all staff members have a responsibility to safeguard pupils and protect their welfare.

- 2.2. All staff members have a responsibility to ensure that they provide a learning environment in which pupils feel safe, secure and respected.

- 2.3. To effectively safeguard pupils, staff members are required to follow the procedures outlined in this Staff Code of Conduct and the Child Protection and Safeguarding Policy, ensuring that they do not act in a way that may put pupils at risk of harm, or lead others to question their actions.
- 2.4. In accordance with the school's Child Protection and Safeguarding Policy, staff members will be prepared to identify pupils who may be subject to, or at risk of, the following types of abuse and neglect:
- Physical abuse
 - Emotional abuse
 - Sexual abuse
 - Neglect
 - Peer-on-peer abuse
 - Serious violence
 - FGM
- 2.5. If a staff member identifies a pupil who is subject to, or at risk of, the abuse and neglect mentioned in 2.4, they will follow the necessary reporting and referral procedures.
- 2.6. Any staff member that has concerns about a staff member's actions or intent that may lead to a pupil being put at risk of harm will report this in line with the Whistleblowing Policy to the Headteacher or Head of School immediately so appropriate action can be taken.
- 2.7. Upskirting is not tolerated by the school and any incidents of upskirting must be reported to the DSL who will decide on the next steps to take, which may include involving the police.
- 2.8. If a staff member feels unable to raise an issue with the school, they will use other whistleblowing channels, including contacting the NSPCC's helpline on 0800 028 0285 (between the hours of 8:00am and 8:00pm Monday to Friday) or email help@nspcc.org.uk. Staff members can also access guidance at www.gov.uk/whistleblowing.
- 2.9. If the concern is regarding the headteacher, staff will report this to the chair of the relevant governing board i.e. Trustee or Local Academy Board.
- 2.10. All staff will partake in the appropriate safeguarding and child protection training; additionally, all staff will receive regular safeguarding and child protection updates but at least annually.
- 2.11. Staff will be aware that confidentiality will never be promised to a pupil – staff will understand the procedure for if a pupil discloses a potential safeguarding issue, in accordance with the school's Child Protection and Safeguarding Policy.

2.12. Staff will be aware of the school's legal duty to refer anyone who has harmed, or poses a risk of harm to, a child or vulnerable adult to the DBS – this includes where:

- The harm test is satisfied in respect of that individual
- The individual has received a caution or conviction for a relevant offence, or if there is reason to believe that the individual has committed a listed relevant offence
- The individual has been removed from working in regulated activity or would have been removed if they had not left their post

3. Appearance and dress

The school expects that staff members will:

- Ensure that their appearance is clean and neat when at work or representing the school.
- Dress in a manner that is appropriate to their role.
- Remember that they are role models for pupils, and that their dress and appearance should reflect this.
- Not dress in a way that would cause embarrassment to pupils, parents, colleagues or other stakeholders.
- Cover any tattoos or body art whilst in school; small earrings are acceptable, but all other body piercings must be removed.

Dress Code

Male staff are required to wear a formal suit or smart trousers and a shirt and tie.

Female staff are required to wear a tailored skirt, full length trousers, dress, or suit with a jacket.

Footwear should be of sufficient strength and stability to allow staff to carry out tasks related to their duties safely.

Our expectations are for the academy environment:

- No denim /canvas /corduroy
- No revealing clothing e.g. low cut /strappy /tight fitting tops or short skirts
- Shoulders should be covered
- No leisure shoes e.g. flip flops /trainers
- No inappropriate slogan tops
- No cropped tops, cropped trousers, leggings

During the summer months' staff should be mindful that students still wear the same formal uniform.

PE staff should dress in accordance with their role (sportswear) and formalwear at school events and during PE work only.

All staff must wear their names badges /ID.

Appearance

- Make up should be subtle
- No extreme hairstyles /colour
- No visible body piercings (except one pair of earrings in the lower lobe)
- Jewellery discrete
- Any tattoos to be covered at all times
- Staff should look clean, tidy and well groomed

INSET /Trips /School events /Parents' Evenings

All staff should dress formally for school events, including Parents' Evenings.

Staff should be dressed appropriately for the event.

During INSET days, any arranged meetings with parents or carers outside agencies should be done so in formal attire.

4. Attendance

4.1. The trust expects that staff members will:

- Attend work in accordance with their contract of employment and associated terms and conditions in relation to hours, days of work and holidays.
- Make routine medical and dental appointments outside of their working hours or during holidays where possible.
- Refer to the school's Staff Leave of Absence Policy if they need time off for any reason other than personal illness.
- Follow the school's absence reporting procedure when they are absent from work due to illness or injury.

5. Professional behaviour and conduct

- 5.1. Staff members are expected to treat other colleagues, pupils, parents, and external contacts with dignity and respect.
- 5.2. The use of foul and abusive language will not be tolerated.
- 5.3. Discrimination, bullying, harassment or intimidation, including physical, sexual and verbal abuse, will not be tolerated.
- 5.4. Staff members will not misuse or misrepresent their position, qualifications or experience, or bring the school into disrepute.

- 5.5. Staff members will inform the headteacher or head of school if they are subject to a criminal conviction, caution, ban, police enquiry, investigation or pending prosecution.
- 5.6. Staff will be aware that professional behaviour and conduct is expected to be extended to extra-curricular trips and visits too. All staff attending a trip or visits will act in accordance with this policy.
- 5.7. Staff will act appropriately in terms of the views they express (in particular political views) and the use of school resources at all times and will not use school resources for party political purposes.

6. Conduct outside of work

- 6.1. Staff may undertake work outside school, either paid or voluntary, provided that it does not conflict with the interests of the school. The nature of the work cannot be seen to bring the school into disrepute, nor be at a level which may contravene the working time regulations or affect an individual's work performance.
- 6.2. Staff will not engage in outside work which could seriously damage the reputation and standing of the school or the employee's own reputation, or the reputation of other members of the school community. In particular, criminal offences that involve violence, possession or use of illegal drugs or sexual misconduct are unacceptable.
- 6.3. Staff will not engage in inappropriate use of social network sites which may bring themselves, the school, school community or employer into disrepute. This is explored further in [section 15](#).

7. Smoking, alcohol and other substances

- 7.1. Staff will not smoke on, or within a [five](#)-mile radius of, the school premises.
- 7.2. Staff will not smoke whilst working with or supervising pupils off-site, such as when on educational visits and trips.
- 7.3. The taking of illegal drugs or alcohol during working hours is unacceptable and will not be tolerated. Staff members must never attend work under the influence of alcohol or illegal drugs.
- 7.4. If alcohol or drug usage impacts on a staff member's performance, the school has the right to discuss the matter with the employee and take appropriate action in accordance with the school's disciplinary procedures, including referral to the police.

8. Health and safety

- 8.1. Staff members will:

- Be familiar with and adhere to the school's Health and Safety Policy and/or Procedures and ensure that they take every action to keep themselves and everyone in the school environment safe and well.
- Comply with health and safety regulations and use any safety equipment and protective clothing which is supplied to them.
- Comply with hygiene requirements.
- Comply with accident reporting requirements.
- Inform the headteacher or head of school of any paid work which is undertaken elsewhere, for compliance with The Working Time Regulations 1998 (as amended).

9. Declaration of interests

- 9.1. Staff members are required to declare their interests, both personal and financial, where the group or organisation they are affiliated with would be considered to be in conflict with the ethos of the school.
- 9.2. For the purposes of this policy, a financial conflict of interest is one where there is, or appears to be, opportunity for personal financial gain, financial gain for close relatives or friends, or where it may be reasonable for a third party to take the view that financial benefits may affect an individual's actions.
- 9.3. The term 'financial interest' means anything of monetary value, including the following:
 - Payments for services
 - Equity interests
 - Intellectual property rights
 - Hospitality or gifts
- 9.4. Examples of financial interests that must be declared include, but are not limited to, equity interests in services considered for use by the school.
- 9.5. Non-financial conflicts of interest can also come into conflict, or be perceived to come into conflict, with an individual's obligations or commitments to the school. These interests may include any benefit or advantage including, but not limited to, direct or indirect enhancement of an individual's career or gain for immediate family or someone with whom the individual has a close relationship.
- 9.6. Examples of situations that could give rise to non-financial conflicts of interest include the following:
 - Pressure or temptation to accept gifts, inducements or hospitality
 - Participating in the appointment, hiring, promotion, supervision or evaluation of a person with whom the individual has a close personal relationship

- Where a member of staff has or develops a close personal relationship with a colleague
- 9.7. Membership to a trade union or staff representative group does not need to be declared.
- 9.8. Staff members will also carefully consider whether they need to declare their relationship with any individual where this might cause a conflict with school activities.
- 9.9. Failure to make a relevant declaration of interests is a very serious breach of trust and, therefore, if employees are in doubt about a declaration, they are advised to contact the school or trade union.
- 9.10. All declarations, including nil returns, will be submitted in writing to the trust central team for inclusion on the Register of Business Interests.

10. Relationships with pupils

- 10.1. The school expects that staff will:
- Maintain professional boundaries and relationships with pupils at all times, and will consider whether their actions are warranted, proportionate, safe and necessary.
 - Act in an open and transparent way that would not lead to others questioning their actions.
 - Ensure that they do not establish social contact with pupils for the purpose of securing a friendship, or to pursue or strengthen a relationship.
 - Ensure that they do not develop personal or sexual relationships with pupils: this includes sexual remarks and discussing their own sexual relationships with, or in the presence of, pupils.
 - Only contact pupils via the school's established mechanisms: personal phone numbers, email addresses or social media platforms will not be used to contact pupils.
- 10.2. Under the Sexual Offences Act 2003, it is an offence for a person aged 18 or over to have a sexual relationship with a child under 18 where that person is in a position of trust in respect to that child, even if the relationship is consensual.

11. Physical contact with pupils

- 11.1. The school understands that there are circumstances in which it is entirely necessary for staff to have physical contact with pupils, e.g. when applying first aid and assisting with intimate care, but staff will only do so in a professional and appropriate manner in line with relevant school policies.
- 11.2. When physical contact is made with pupils, it is imperative that it is conducted in a way which is responsive to the pupil's needs, is of limited duration and is

appropriate to their age, stage of development, gender, ethnicity and background.

- 11.3. Staff will seek the pupil's permission, where possible, before initiating contact.
- 11.4. Staff will always use their professional judgement when determining what physical contact is appropriate, as this may differ between pupils. As such, the pupil's feelings and wishes will always be taken into account.
- 11.5. Staff will never touch a pupil in a way which is indecent and will always be prepared to explain their actions.
- 11.6. Staff will be aware that even well-intentioned physical contact may be misconstrued by a pupil, an observer or by anyone to whom this action is described and, therefore, will be prepared to justify their actions.
- 11.7. Staff will not engage in rough play, tickling or play fights with pupils.
- 11.8. Extra caution will be taken where it is known that a pupil has previously suffered from abuse or neglect.
- 11.9. Physical contact will never be secretive; if a member of staff believes an action could be misinterpreted, this will be reported to the headteacher or DSL and appropriate procedures will be followed.
- 11.10. Where it is necessary in PE classes for teachers to demonstrate use of equipment, this will be conducted with another member of staff if possible. If a pupil is required to participate, their consent will be given before doing so.
- 11.11. If a child is in distress and in need of comfort as reassurance, staff may use age-appropriate physical contact, such as placing their hand on the pupil's shoulder. Staff will remain self-aware of their actions at all times and ensure that their contact is not threatening, intrusive or subject to misinterpretation.
- 11.12. Staff may also use reasonable force as a means of physical contact with pupils for restraint purposes, such instances will always be in accordance with the school's Use of Reasonable Force Policy.

12. Showering and changing

- 12.1. Pupils are entitled to respect and privacy whilst they are changing before/after PE; however, a level of supervision is required to ensure that pupils are safe, and that they are not subjected to bullying.
- 12.2. The supervision will be appropriate to the needs and ages of the pupils, and sensitive to the potential for embarrassment.
- 12.3. Staff will announce their intention of entering the changing room to allow pupils to maintain their privacy.

12.4. Staff will never change or shower in the same area as pupils.

13. Transporting pupils

13.1. When it is necessary to transport pupils off-site, staff will ensure that the transport arrangements of the vehicle meet all legal requirements, they have an appropriate licence and the vehicle is roadworthy, has a valid MOT certificate and is insured.

13.2. Staff will gain consent from parents before transporting pupils and will be aware that the welfare of all pupils in the vehicle is their responsibility.

13.3. Two or more staff will be present in the vehicle to avoid any discrepancy regarding safeguarding concerns.

14. Financial inducements

14.1. Staff members will:

- Familiarise themselves and comply with the school's financial regulations.
- Declare to the governing board, in writing, any gifts received, with the exception of:
 - Low cost, functional items suitable for business rather than personal use and displaying the supplier's logo – these items may be accepted.
 - Gifts offered by parents or pupils to school staff to express their gratitude, but staff members should always refuse monetary gifts.
 - Hospitality in the form of meals and drinks where it is part of a normal business meeting.
 - Authorised visits to exhibitions, demonstrations, conferences, business meals and social functions in connection with the school's business, which shall be at the school's expense.
- Not accept a personal gift, payment, or other incentive from a business contact – any such gifts should be returned.
- Declare any gift that cannot be returned to the governing board, who will decide how it will be used.
- Only accept offers to specific events after authorisation from the governing board.

15. Acceptable use of technology

15.1. Staff will adhere to the procedures outlined in the school's E-safety Policy and Acceptable Use Agreement at all times.

15.2. Staff are required to employ the highest security settings on any personal profiles they may have.

- 15.3. Staff will not engage in inappropriate use of social networking sites including contacting pupils or their family members, accepting or inviting friend requests from pupils or their family members, or following pupils or their family members on social media.
- 15.4. The school understands that some staff members are also parents of pupils at the school and, therefore, may wish to contact other parents. When doing so, staff will exercise their professional judgement and will not contact family members on social media if this would lead to a conflict of interest.
- 15.5. Staff will remain mindful of their use of social media and their web-based presence including written content, videos or photographs, and views expressed directly or indirectly which may bring themselves, the school or the school community into disrepute.

16. Premises, equipment and communication

- 16.1. School equipment and systems are available only for school-related activities and will not be used for the fulfilment of another job or for personal use, unless specifically authorised by the Headteacher or head of school.
- 16.2. Illegal, inappropriate or unacceptable use of school equipment or communication systems may result in disciplinary action and, in serious cases, could lead to an employee's dismissal.
- 16.3. Employees receiving inappropriate communication or material, or who are unsure about whether something he/she proposes to do might breach this policy, should seek advice from the Headteacher or head of school.
- 16.4. The school reserves the right to monitor emails, phone calls, internet activity or document production, principally in order to avoid offensive or nuisance material and to protect systems from viruses, but also to ensure proper and effective use of systems.
- 16.5. Communication systems may be accessed when the school suspects that the employee has been misusing systems or facilities, or for the investigation of suspected fraud or other irregularity. Access will be secured by the systems manager, only with the permission of the executive team led by the chief executive and/or board of trustees.
- 16.6. Passwords should not be shared and access to computer systems must be kept confidential except on the express request of the Headteacher/head of school or systems manager. Breaches of this confidentiality may be subject to disciplinary action.
- 16.7. School equipment that is used outside the premises, e.g. laptops, will be returned to the school when the employee leaves employment or if requested to do so by the Headteacher or head of school.

17. Photography and videos

- 17.1. Photographs and videos will only be taken using school equipment – using personal mobile phones for this purpose is prohibited, in accordance with the school's GDPR Policy.
- 17.2. Consent for taking photographs will be obtained from parents, or the pupil themselves, if they are deemed old enough and able to make the decision for themselves.
- 17.3. The age of consent that is legislated is 13 and above; however, this is only applicable for online services provided directly to children. For everything else, an appropriate age for consent is considered on a case-by-case basis by the DPO, headteacher or head of school and a pupil's parents (where appropriate).
- 17.4. Pupils who have not provided consent, either personally or via their parents, to have their photograph taken or be filmed will have their wishes respected, in line with the GDPR Policy.
- 17.5. The headteacher or head of school will be notified of the proposed use of the imagery or video and the equipment and ensure that the use of such is included in lesson plans where this is necessary.
- 17.6. All photographs and videos will be available for scrutiny, and staff will be prepared to justify the images or footage taken.
- 17.7. Careful consideration will always be given to the activities which are being filmed or photographed, to ensure that images or videos are not indecent and cannot be misused.

18. Data protection and confidentiality

- 18.1. Regarding personal and sensitive data, staff members are required, under the GDPR and the Data Protection Act 2018, to:
 - Consider the legal basis for collecting the data, ensuring that this is documented.
 - Ensure that the data is stored on a GDPR-compliant server, and that the data is not held for any longer than necessary.
 - Securely dispose of the data when the relevant retention period ends.
- 18.2. Staff members will not disclose sensitive information about the school, its employees or the LA, DfE to other parties.
- 18.3. The only exception whereby it is acceptable for a staff member to disclose information that would otherwise be considered confidential is when the confidential information gives rise to concerns about the safety or welfare of a pupil.

- 18.4. Staff members have the right to request access to data that is held about them. Such requests will be made to the Headteacher or head of school in writing in accordance with the school's Data Protection Policy.

19. Probity of records

- 19.1. The deliberate falsification of documents, such as references, academic qualifications or legal documents, is unacceptable. Where a staff member falsifies records or other documents, including those held electronically, this will be regarded as a serious disciplinary matter and potentially a criminal offence.

20. Contacts

- 20.1. Staff members will not use school business contacts for acquiring materials or services at trade/discount prices for non-school activities, unless participating in concessionary schemes arranged by trade unions or other such groups.

21. Monitoring and review

- 21.1. This policy will be reviewed on an annual basis by the trust executive team and any changes made will be communicated to all members of staff.
- 21.2. All members of staff are required to familiarise themselves with this policy as part of their induction programme.

CODE OF CONDUCT FOR SCHOOL EMPLOYEES

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Community First Academy Trust expects all pupils to receive high-quality teaching and learning in a positive and respectful environment.

Employees at the school should understand that their own behaviour, and the manner in which they conduct themselves with their colleagues, pupils, parents and other stakeholders, sets an example.

We recognise that the majority of staff members act appropriately and treat each other with dignity and respect; however, we consider it important to clarify the expected standards.

This policy forms part of a staff member's contract of employment and failure to comply with it, and with the associated school policies, may result in disciplinary action being taken, including legal action where this is warranted.

Appendix 1 – Further Compliance with the Code of Conduct

The Code of Conduct forms part of an employee's contract. Failure to comply with it and with the associated policies may result in disciplinary action being taken and the school reserves the right to take legal action against employees where breaches of the Code warrant such action.

Professional behaviour and conduct

Treating other people with dignity and respect

All employees are expected to treat other colleagues, pupils and external contacts, such as parents, with dignity and respect.

Staff are required to comply with the school/centre equality policies in respect of colleagues, pupils and other contacts such as parents. Unacceptable behaviour such as discrimination, bullying, harassment or intimidation will not be tolerated in schools. This includes physical and verbal abuse and use of inappropriate language or unprofessional behaviour with colleagues, pupils and parents.

Professional behaviour

Employees must not misuse or misrepresent their position, qualifications or experience or bring the reputation of the school into disrepute. Such behaviour may lead to disciplinary action.

Criminal actions

School employees must inform the Headteacher (Members of the trust if the employee is the Headteacher) immediately if they are subject to a criminal conviction, caution, ban, police enquiry, investigation or pending prosecution.

The Headteacher or the Trustees will discuss this with the employee in the context of their role and responsibilities in order to help safeguard children and other employees at the school. School and early years' employees must comply with the DfE advice for schools (Oct 14) in relation to 'disqualification by association'. Staff suitability declarations will be completed annually.

Declaration of interests

An employee is required to declare this where the group or organisation would be considered to be in conflict with the ethos of the school. Membership of a trade union or staff representative group would not need to be declared.

Employees should also consider carefully whether they need to declare to the school their relationship with any individual(s) where this might cause a conflict with school activities. For example, a relationship with a Governor, another staff member or a contractor who provides services to the school.

Failure to make a relevant declaration of interests is a very serious breach of trust and therefore if employees are in doubt about a declaration, they are advised to take advice from their school or union.

Probity of records and other documents

The deliberate falsification of documents is not acceptable. Where an employee falsifies records or other documents, including those held electronically, this will be regarded as a serious disciplinary matter and potentially a criminal offence.

Where an employee who has claimed any benefit, including housing benefit, either directly or indirectly and has failed to disclose their full earnings, this will be treated as gross misconduct and the employee may be dismissed and referred to the Police.

Financial inducements

Financial Regulations for schools

All school employees must comply with Academy's Financial Regulations. Employees should familiarise themselves with the regulations but some of the principal employee requirements are summarised below (see also Anti Fraud & Corruption Policy).

Business Contacts

In this section, "business contact" refers to any person, body or organisation with which the school is involved on a financial or charitable basis (including contractors; developers; consultants; regional or national charities). This also includes business contacts who are potential suppliers (e.g. they are tendering for future business).

Declaration of gifts

See Gifts and Hospitality Policy

Other employment

Employees are permitted to take up secondary employment outside the school, as long as the activity does not constitute a conflict of interest, adversely affect their primary employment at the school or exceed the legal maximum working week of 48 hours as defined by the Working Time Regulations.

The secondary employment must be undertaken outside the working hours of the employee's normal post and employees are required to keep the Headteacher informed of their employment at other organisations.

Health and safety

Employees must adhere to the school's Health and Safety policy, procedure and guidance and must ensure that they take every action to keep themselves and everyone in the school environment safe and well.

This includes taking immediate safety action in a potentially harmful situation (either at school or off-site) by complying with statutory and school guidelines and collaborating with colleagues, agencies and the local authority. See schools Health and Safety Policy (school website)

Use of alcohol and illegal drugs

The taking of illegal drugs during working hours is unacceptable and will not be tolerated. All employees are expected to attend work without being under the influence of alcohol or illegal drugs and without their performance being adversely impacted by the consumption of alcohol or illegal drugs will be robustly dealt with.

If alcohol or drug usage impacts on an employee's working life, the school has the right to discuss the matter with the employee and take appropriate action, having considered factors such as the school or academy trust's and public confidence in education.

Social networking websites

School employees must not access social networking websites for personal use (i.e. non- job related use) during work time.

Access to some journals, blogs and social networking sites is permitted during work time for the purposes of undertaking job related duties only. School employees must act in the best interests of the school and not disclose personal data or information about any individual including staff, young people or children. This includes images. Access may be withdrawn and disciplinary action taken if there is a breach of confidentiality or defamatory remarks are made about the school, staff, young people or children.

The school respects an employee's private life. However, it must also ensure that confidentiality and its reputation are protected. Employees using social networking websites in their private life;

- Must refrain from identifying themselves as working for the school, in a way which has, or may have, the effect of bringing the school into disrepute
- Must not identify other school employees, children or young people without their consent
- Must not make any defamatory remarks about the school or trust, its employees, children or young people, or conduct themselves in a way that is detrimental to the school
- Disclose personal data or information about the school or trust, employees, children or young people, that could breach the Data Protection Act 1998 for example, posting photographs or images of children or young people
- Must not allow pupils to access their personal social networking accounts and where they are contacted by a pupil they should bring it to a senior leaders attention.

Confidentiality

All employees at the school and the Board of Trustees / Members of the Local Academy Board come into contact with a significant volume of data and information in relation to pupils, staff, school activities and many other matters. There is an obligation to read and to observe the requirements of the General Data Protection Regulations and Data Protection Act.

Where staff have access to confidential information about students or their parents / carers, staff must not reveal such information except to those colleagues who have a professional role in relation to the pupil/student.

All staff are likely at some point to witness actions which need to be confidential. For example, where a student is bullied by another student (or by a member of staff), this needs to be reported and dealt with in accordance with the appropriate academy procedure. It must not be discussed outside the academy, including with the student's parent or carer, nor with colleagues in the academy except with a senior member of staff with the appropriate role and authority to deal with the matter.

However, staff have an obligation to share with their manager or the academy's Designated Senior Person any information which gives rise to concern about the safety or welfare of a

student. Staff must never promise a student that they will not act on information that they are told by the student.

Managing data

Under the General Data Protection Regulations GDPR, staff are required to collect, maintain and dispose of sensitive or personal data in a responsible manner. Please see Annual Employee Data Protection Privacy Statement for more detailed information.

Disclosing data

Staff should **never** disclose any sensitive information of any kind about the school, its employees, pupils or the local authority to other parties, for example, parents, pupils or colleagues. There are particular exceptions to this; for example, disclosure of suspected or alleged abuse of a pupil to Child Protection officers; discussion with a person accompanying or representing an employee in a formal meeting or disclosure under the Whistleblowing Procedure. All communication with the media must be directed through the Headteacher or their nominee.

There are circumstances in which staff are obliged to release pupil data, for example, parents seeking information about pupil progress or other colleagues in the school.

Staff should be aware that, from time to time, information about employees' salaries is matched with other public sector information (for example housing benefits) in order to prevent fraudulent claims.

(see data management policies – trust website).

Access to data

Everyone has the right to request access to data that is held about them and such requests should be made to the Headteacher who will address the request in conjunction with the Trust's Data Protection Officer.

Copyright

Employees are required to adhere to the copyright guidance about use of educational resources and must not copy share or disclose information belonging the school/trust to any third party without prior authorisation.

