

CODE OF CONDUCT FOR ADULTS

Policy Review

Next Review Date:	January 2028 This document should be reviewed 3-years after ratification or earlier if there is any change to national guidance, changes in process, legislation, or best practice
Ratified by:	Trust Board
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Document Control - Policy Amendments

Date	Version	Summary of Changes	Author / Reviewer/s
November 2024	1.00	<ul style="list-style-type: none">The Worker Protection (Amendment of Equality Act 2010) Act 2023. The law came into effect on 26 October 2024 – advised to be aware of the Sexual Harassment policyDisclosure of AssociationFull re-write to advice links to other Trust policies	People Directorate; Executive Leadership Team
September 2025	2.0	<ul style="list-style-type: none">Branding update	People Directorate

Contents

1.	Terms of Reference	4
2.	Introduction	4
3.	Whistleblowing	5
4.	Safeguarding and Child Protection	5
5.	Adult/Pupil Relationships	7
6.	Infatuations and Crushes	8
7.	Expected Professional Standards	9
8.	Disclosure of Association	10
9.	Conduct Outside of Work	10
10.	Dress Code & Personal Appearance	11
11.	Confidentiality	11
12.	Workplace Bullying and Harassment (Including Sexual Harassment)	12
13.	Gifts, Rewards, favouritism, and Exclusion	12
14.	Social Contact and Social Networking	13
15.	Physical Contact/Personal Care	14
16.	Behaviour Management and Physical Intervention	14
17.	First Aid and Medication	15
18.	Transporting Pupils	15
19.	Close Personal Relationships at Work	16
20.	Educational Visits and Trust Clubs	17
21.	Curriculum, Photography, Videos, and other Creative Arts	17
22.	Unacceptable Use of ICT Facilities and Monitoring	18
23.	Register of Business Interests/Outside Interests	19
24.	Policy Status, Monitoring and Review	19

1. Terms of Reference

Definitions

Headteacher also refers to any other title used to identify the leader of an academy within the Trust e.g., Principal, Head of School, or Executive Headteacher, where appropriate.

Adult refers to the following: local governing body and Trust members, all teaching and other staff (whether or not paid or unpaid, employed or self-employed and whether or not employed directly by the school/academy/Trust, external contractors providing services to pupils, teacher trainees and other trainees/apprentices, volunteers and any other individuals who work for or provide services on behalf of or for the school/academy/Trust to include but not limited to all those detailed in the single central record.

Employee refers to any employee, teaching and support, employed to work in Active Learning Trust academies or within the Central Team.

‘Young person/people,’ ‘pupils’ and ‘child/ren’ refer to and include all those for whom the Trust provides education or other services.

Trust refers to any school, academy, provision, or service provided by Active Learning Trust (ALT).

Senior Manager refers to employees delegated by the Headteacher to deal with a disciplinary matter under this procedure. The senior manager may only decide to issue up to and including a final written warning.

2. Introduction

The overriding expectation is for everyone to adopt the highest standards of personal integrity and conduct both in and outside work. As role models, everyone must act appropriately, through their words and actions, at all times in a manner that demonstrates their suitability to work with children and upholds the standards, values, and reputation of the Trust.

This code of conduct sets out the professional standards expected of employees, volunteers, and those engaged to work in any ALT Academy (or the Central Team) and provides a framework of the behaviours expected.

This code should be read in conjunction with:

- other Academy/Trust policies and procedures
- the terms of any employment or service contracts and agreements
- relevant professional standards

All adults have a duty to keep pupils safe, promote their welfare, and protect them from radicalisation (the Prevent duty), abuse (sexual, physical, and emotional), neglect, and safeguarding concerns. This duty is, in part, exercised through the development of respectful, caring, and professional relationships between adults and pupils and behaviour by adults that

demonstrates integrity, maturity, and good judgment.

This Code takes account of the most recent versions of the following guidance (statutory and non-statutory):

- ‘Keeping Children Safe in Education’ Department of Education (‘DfE’) (statutory),
- Working together to safeguard children’ HM Government (statutory) and
- ‘Guidance for safer working practice for those working with children and young people in education settings’ (non-statutory).

These documents, and this code of conduct, are not intended to be exhaustive, and individuals should use sound professional, ethical, and moral judgements to act in the best interests of the Academy/Trust, its pupils, and its community. If anyone has any doubts or areas unclear to them, they should seek advice from their line manager and/or the People Directorate.

Failure to follow this code of conduct may result in disciplinary action being taken, as set out in our disciplinary procedures.

3. Whistleblowing

Whistleblowing reports wrongdoing that is “in the public interest”.

Examples include:

- Pupils’ or employees’ health and safety being put in danger
- Failure to comply with a legal obligation or statutory requirement
- Attempts to cover up the above, or any other wrongdoing in the public interest

The Trust wishes to promote an open environment that enables individuals to raise issues in a constructive way and with confidence that they will be acted upon appropriately, without fear of recrimination.

Staff are encouraged to report suspected wrongdoing as soon as possible. Their concerns will be taken seriously and investigated, and their confidentiality will be respected where possible in line with safeguarding and Trust policies. Staff will not receive any negative treatment for raising a concern. Where appropriate, individuals should refer to the Whistleblowing policy or Allegations of Abuse Against Teachers and other Staff and Volunteers.

4. Safeguarding and Child Protection

All adults working with children must understand that the nature of their work and the responsibilities related to it place them in a position of trust.

Safeguarding concerns cover a wide spectrum from serious issues where a child is harmed or is at risk of harm to lower-level concerns where practice or behaviour is inappropriate, undesirable, or not in keeping with usual expectations.

Adults must be clear about appropriate and safe behaviours for working with children in paid or unpaid capacities, in all settings and all contexts, including outside work. This includes physical, emotional, and sexual abuse, neglect, exploitation, and radicalisation.

The relevant requirements specific to safeguarding and child protection are set out in:

- the Academy/Trust Child Protection and Behaviour Management Policies and Procedures
- Trust Safeguarding Policies
- the Department for Education Statutory Guidance “Keeping Children Safe in Education” (as amended from time to time).
- “Guidance for Safer Working Practice for those working with Children and Young People in Education Settings” issued by the Safer Recruitment Consortium sets out key expectations for adult interactions with children and young people – the full guidance is available [here](#).
- Trust Home Visits and Lone-working policies/guidance.

In addition, individuals should be aware that it is a criminal offence (s 16, Sexual Offences Act 2003) 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 of that child, even if the relationship is consensual.

Individuals should familiarise themselves with these documents, in conjunction with the body of this Code of Conduct and any other relevant Academy/Trust policies and procedures.

Where a child(ren) has been harmed or may be at risk of harm (harm threshold)

Where a concern or allegation suggests that an adult has:

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

the matter must be dealt with in accordance with the Allegations of Abuse Against Adults Procedure, as required by Keeping Children Safe in Education: primarily contacting the Local Authority Designated Officer (LADO) without delay.

Low-Level Concerns

In Keeping Children Safe in Education, a low-level concern is defined as behaviour towards a child that does not meet the harm threshold but is a concern (no matter how small) that an adult, working in or on behalf of the Trust, may have acted in a way that is inconsistent with the code of conduct, including inappropriate conduct outside of work, and does not meet the threshold or is otherwise not considered serious enough to consider a referral to the Local Authority Designated Officer (LADO).

For example, this may include, but is not limited to:

- Being over-friendly with children
- Having favourites
- Taking photographs of children on a personal device
- Engaging in 1-to-1 activities where they cannot easily be seen
- Humiliating children

Reporting Concerns

As part of the Trust's approach to safeguarding, we promote a culture of openness, trust, and transparency in which safeguarding is a shared responsibility and our values and expectations are lived, monitored, and reinforced by all staff.

In this context, everyone is expected to report any safeguarding concerns, no matter how small, as soon as they arise. This includes an expectation of self-reporting where an individual finds themselves in a situation which may be or could appear to be compromising or where they have fallen short of expectations.

All reports will be handled in a responsive, sensitive, and proportionate way and will be taken seriously, investigated, and dealt with in line with Trust policies and procedures.

Concerns should be referred to the headteacher (or, where the concerns relate to the headteacher, to the Executive Leadership Team or Trust Safeguarding Lead). In a situation where there is a conflict of interest in reporting the matter internally, it should be reported directly to the Local Authority Designated Officer (LADO). An employee who fails to bring matters of concern to the attention of senior management and/or the relevant agencies is liable to be subject to disciplinary action.

To support our objectives, confidential records of all reported concerns and actions taken will be kept, identifying any patterns, enabling monitoring, and facilitating improvement in policy and practice.

5. Adult/Pupil Relationships

All adults working with children have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of pupils. They should adopt high standards of personal conduct to maintain the confidence and respect of their colleagues, pupils, and the public in general. An adult's behaviour or actions, either in or out of the workplace, must not compromise their position within the work setting or bring the Trust into disrepute. Non-exhaustive examples of unacceptable behaviour are contained in the Disciplinary Procedure.

Adults are required to notify their line manager and the Head of Safeguarding (or Director of People) immediately of any allegation/s of misconduct of a safeguarding nature made against them (or implicating them), by a child or adult in relation to any outside work or interest (whether paid or unpaid) and, of any arrest or criminal charge whether child related or not. Where employees fail to do so, this will be treated as a serious breach of this Code and dealt with under the Disciplinary Procedure.

All adults will be expected to observe proper boundaries with pupils that are appropriate to their professional position. They will act fairly and transparently, which would not lead anyone to reasonably assume they are not doing so.

Any sexual behaviour by a member of staff, volunteer, or governor with or towards a child or young person is illegal. Children and young people are protected by the same laws as adults in relation to non-consensual sexual behaviour. They are additionally protected by specific legal provisions regardless of whether there is consent or not. It is an abuse of trust and never appropriate to have an intimate relationship with a pupil who attends the school where you work/volunteer. This remains the case even if the pupil is over the age of 18.

If staff members and pupils must spend time on a one-to-one basis, staff will ensure that:

- This takes place in a public place that others can access
- Others can see into the room
- A colleague or line manager knows this is taking place

Staff must never groom pupils in preparation for abuse. The responsibility not to groom continues once pupils leave the Academy and until they reach the age of 18. Staff must avoid contact with pupils and their parents outside of school hours if possible. Any personal relationships between staff and pupils or their parents must be declared to the Designated Safeguarding Lead at the Academy, who will keep a register (Central Team employees must inform the Trust Safeguarding Lead).

6. Infatuations and Crushes

A child or young person may develop an infatuation with an adult who works with them. An adult, who becomes aware (may receive a report, overhear something, or notice any sign no matter how small or seemingly insignificant) that a pupil has become or may be becoming infatuated with them or a colleague must report this without delay to the Headteacher or other senior manager so that appropriate action can be taken to avoid any hurt, distress or embarrassment.

The situation will be taken seriously, and the adult should be careful to ensure that no encouragement of any kind is given to the pupil. It should also be recognised that careless and insensitive reactions may provoke false accusations.

Examples of situations that must be reported are given below:

- Where an adult is concerned that they might be developing a relationship with a pupil, which could have the potential to represent an abuse of trust.
- Where an adult is concerned that a pupil is becoming attracted to them or that there is a developing attachment or dependency.
- Where an adult is concerned that actions or words have been misunderstood or misconstrued by a pupil, such that an abuse of trust might be wrongly suspected by others.
- Where an adult is concerned about the apparent development of a relationship by another adult or receives information about such a relationship.

7. Expected Professional Standards

All Adults, as appropriate to the role and/or job description of the individual, must:

1. Not express personal beliefs in a way that exploits pupils' vulnerability or might lead them to break the law. Professional boundaries should be maintained.
2. Understand the statutory frameworks they must act within:
 - place the well-being and learning of pupils at the centre of their professional practice.
 - have high expectations for all pupils, be committed to addressing underachievement, and work to help pupils progress regardless of their background and personal circumstances.
 - treat pupils fairly and with respect, take their knowledge, views, opinions, and feelings seriously, and value diversity and individuality.
 - model the characteristics they are trying to inspire in pupils, including enthusiasm for learning, a spirit of inquiry, honesty, tolerance, social responsibility, patience, and a genuine concern for other people.
 - respond sensitively to the differences in home backgrounds and circumstances of pupils, recognising the key role that parents and carers play in pupils' education.
 - seek to work in partnership with parents and carers, respecting their views and promoting understanding and cooperation to support the pupils' learning and well-being in and out of school.
 - reflect on own practice, develop skills, knowledge, and expertise, and adapt appropriately to learn with and from colleagues.
 - ensure that the same professional standards are always applied regardless of culture, disability, gender, language, racial origin, religious belief, and/or sexual identity.
 - present themselves in a professional and appropriate manner.
3. Set a positive example to pupils by:
 - Maintaining high standards in their attendance and punctuality
 - Never use inappropriate or offensive language in school
 - Treating everyone with dignity and respect
 - Showing tolerance and respect for the rights of others
 - Not undermining fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs
4. Ensure that if a teacher complies with the Teachers' Standards, in particular Part 2 Personal and Professional Standards.
5. Not ignore any form of discrimination. Employees must positively promote equality, diversity, and inclusion.

8. Disclosure of Association

As part of our commitment to safeguarding, all adults should be reminded annually of their responsibilities under the Primary provision regarding Disclosure of Association. This is particularly relevant as Secondary adults may frequently work with Primary-aged children.

Adults must not be asked about any criminal convictions or details regarding household members; instead, adults should be reminded of circumstances where their personal circumstances may make it inappropriate for them to work with children. Adults should acknowledge their understanding of these professional responsibilities by signing a declaration confirming their awareness.

9. Conduct Outside of Work

The Trust recognises and respects individuals' right to a private life without interference. However, staff will not act in a way that may bring any individual academy, an employee of the Trust, the Trust, or the teaching profession, into disrepute or call into question their suitability to work with children. This covers conduct including but not limited to relevant criminal offences, such as violence or sexual misconduct, as well as negative comments about the Trust on social media.

Adults must disclose to the Academy/Trust immediately any wrongdoing, or alleged wrongdoing by themselves (whether it is denied or not), including any incidents arising from alternative employment or outside of work which may have a bearing on their employment or engagement with the Trust.

Employees should also refer to the expectations set out in their contract of employment and the Trust's disciplinary procedures.

In addition, anyone engaged in a post covered by The Childcare (Disqualification) Regulations 2009 must immediately inform the Academy/Trust of any events or circumstances that may lead to their disqualification from working in the post by virtue of the Regulations.

Secondary employment

The Trust does not seek to unreasonably preclude employees from undertaking additional employment provided it does not conflict with the performance of their duties in the role for which they are employed.

Employees who wish to take on additional work must ensure that:

- Permission is sought and given by the Headteacher in writing
- The additional hours worked do not contravene the Working Time Regulations or otherwise give the Trust cause for concern about health and safety at work
- The outside work does not place the employee in a position where their duties and private interests conflict
- The outside work does not cause damage or potentially damage, public confidence in

the Trust's conduct or business.

10. Dress Code & Personal Appearance

A person's dress and appearance are matters of personal choice, self-expression, and religious or cultural customs. However, all staff are expected to maintain an appropriate standard of dress and personal appearance in the workplace to promote a positive and professional image.

Clothing and footwear must be clean, safe, and in line with health and safety guidelines. Attire should not be overly revealing, offensive, or sexually provocative. Tattoos with potentially offensive content should be covered. Clothing should also avoid offensive, political, or otherwise contentious slogans, and must not be discriminatory or culturally insensitive.

Employees must dress in ways that are appropriate to their role and should avoid attire that could cause distraction, embarrassment, or misunderstanding. Dressing inappropriately may render an individual vulnerable to criticism or, in the case of employees, could result in a formal investigation and potential disciplinary action.

11. Confidentiality

As data controllers, all Trust sites are subject to the UK GDPR (General Data Protection Regulations) and the Data Protection Act 2018. In addition, teachers owe a common law duty of care to safeguard the welfare of their pupils. This duty is acknowledged in the provisions governing the disclosure of information about pupils.

Adults may have access to confidential information about pupils to undertake their responsibilities. In some circumstances, the information may be sensitive data and/or confidential. Confidential or personal information about a pupil or their family must never be disclosed to anyone other than on a need-to-know basis, and advice should be sought prior to disclosure to ensure such disclosure is in accordance with the Trust Data Protection Policy.

There are some circumstances in which an adult may be expected to share information about a pupil, for example, when abuse is alleged or suspected. In such cases, adults have a duty to pass information on without delay to those with designated safeguarding responsibilities.

Confidential information about pupils will be held securely. Confidential information about pupils must not be held off the Trust site other than on security-protected Trust equipment. Information must only be stored for the length of time necessary to discharge the task for which it is required.

If a pupil or parent/carer makes a disclosure regarding abuse or neglect, the adult must follow the Trust's procedures, and the guidance as set out in Keeping Children Safe in Education DfE. Confidentiality must not be promised to the pupil or parent/carer; however, reassurance should be given that the information will be treated sensitively.

No communication with the press or media should be responded to. All enquiries should be referred to the Trust.

12. Workplace Bullying and Harassment (Including Sexual Harassment)

We are committed to promoting a working environment based on dignity, trust and respect, and one that is free from all forms of bullying, harassment, including sexual harassment, victimisation and discrimination.

Bullying and harassment are behaviours that make someone feel intimidated or offended and will not be tolerated (see the Trust's Bullying and Harassment and Sexual Harassment policies).

Examples of bullying or harassing behaviour include spreading malicious rumours, unfair treatment, picking on or regularly undermining someone, denying someone's training or promotion opportunities, and any form of sexual harassment. Bullying and harassment can happen face-to-face, by letter, by email, or by phone.

Unwanted behaviour can be related to one of the following protected characteristics:

- age
- sex
- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race
- religion or belief
- sexual orientation

If an employee feels that they are being bullied or harassed, they should aim to resolve informally themselves first if appropriate. If they cannot, they should talk to their line manager, a member of the People team, a trusted colleague, or a trade union representative. If this does not work, they can make a formal complaint using the Trust's grievance procedure.

13. Gifts, Rewards, Favouritism, and Exclusion

It is against the law to offer, promise, give, request, agree, receive, or accept bribes. Adults need to take care that they do not accept any gift that might be construed by others as a bribe or lead the giver to expect preferential treatment.

There are occasions when pupils or parents/carers wish to pass small tokens of appreciation to adults (e.g., at Christmas or as a thank-you) and this is acceptable and reasonable, if of a trivial value (not more than £30). However, it is unacceptable to receive gifts regularly or of any significant value. Gifts that are worth more than £30 must be declared and recorded on the gifts and hospitality register. The Trust has Gifts & Hospitality and Anti-Fraud, Corruption & Bribery Policies, and all employees should act in accordance with them.

Personal gifts must not be given to pupils or their families/carers. It might be perceived that a 'favour' of some kind is expected in return. Any reward given to a pupil should be consistent with the Trust's behaviour or rewards policy, recorded, and not based on favouritism.

Care should be taken when selecting children for specific activities, jobs, and privileges, and when pupils are excluded from an activity to avoid perceptions of favouritism or injustice. Methods of selection and exclusion should be subject to clear, fair, and agreed criteria.

14. Social Contact and Social Networking

Communication between pupils and adults, by whatever method, should take place within clear and explicit professional boundaries. This includes the wider use of technology such as mobile phones, tablets, text messages, emails, instant messages, websites, social media (in all forms), chatrooms, forums, blogs, apps such as WhatsApp, gaming sites, digital cameras, videos, webcams, and other handheld devices.

Adults must ensure that their online profiles are consistent with the professional image expected and must not post material that damages the reputation of the Trust, or which causes concern about their suitability to work with children and young people. Those who post material that may be considered inappropriate could render themselves vulnerable to criticism or, in the case of an employee, allegations of misconduct, which may be dealt with under the Disciplinary Procedure. Even where it is made clear that the writer's views on such topics do not represent those of the Trust, such comments are inappropriate.

Adults should not share any personal information with pupils, and they should not request, or respond to, any personal information from the child/young person, other than that which might be appropriate as part of their professional role. They should ensure that all communications are transparent and avoid any communication that could be interpreted as 'grooming behaviour.' Any contact attempts made from a child/young person to an adult in a personal capacity should be reported to the Designated Safeguarding Lead.

It is recommended that adults ensure that all privacy settings are activated to prevent pupils from making contact on personal profiles.

Adults are personally responsible for what they communicate on social media and what is published online, is deemed in the public domain, irrespective of privacy settings, and might be read by the Trust, pupils, parents and carers, the public, future employers and friends, and family.

Adults are advised not to have any online friendships with any young people under the age of 18 (unless they are family members or close family friends) or online friendships with parents or carers of pupils, or members of the governing body/Trustees. Where such online friendships exist, appropriate professional boundaries must be maintained.

Adults should inform senior management of any relationship that extends beyond the usual

parent/carer/professional relationship; of any requests or arrangements where parents/carers wish to use their services outside of the workplace e.g., babysitting, tutoring; and adults should always approve any planned social contact with pupils or parents/carers. If a parent/carer seeks to establish social contact, or if this occurs coincidentally, the adult should exercise his or her professional judgment and ensure all communications are transparent and open to scrutiny.

Some employees may, as part of their professional role, be required to support a parent or carer. If that person comes to depend upon the employee or seeks support outside of their professional role, this should be discussed with senior management, and where necessary, referrals made to the appropriate support agency.

15. Physical Contact/Personal Care

There are occasions when it is acceptable for employees to have physical contact with pupils, but it is crucial they only do so appropriate to their professional role and in relation to the pupil's individual needs and any agreed care plan.

When physical contact is made with pupils, this should be in response to their needs at the time, of limited duration and appropriate given their age, stage of development, gender, ethnicity, culture, and background. Employees must always use their professional judgment.

Physical contact should never be secretive or casual, or for the gratification of the adult, or represent a misuse of authority. Adults should never touch a pupil in a way that may be considered indecent. If an adult believes that an action could be misinterpreted, the incident and circumstances should be reported as soon as possible to a senior manager, recorded, and, if appropriate, a copy placed on the pupil's file.

Staff should adhere to the Trust's intimate and personal care policies.

16. Behaviour Management and Physical Intervention

All pupils have a right to be treated with respect and dignity. Staff must ensure they fully understand Trust policies on behaviour management, pupil discipline, and restrictive physical intervention and always follow these, using strategies appropriate to the circumstances and situation.

Adults must not use any form of degrading treatment to punish a pupil. The use of sarcasm and demeaning or insensitive comments towards pupils is not acceptable in any situation. Deliberately intimidating pupils by shouting aggressively or overbearing physical presence is not acceptable in any situation. Any sanctions or rewards used should be in line with the Trust's behaviour management policy/practices.

Physical intervention can only be justified in exceptional circumstances. Non-statutory guidance is available from the Department of Education website - 'Use of reasonable force in schools - GOV.UK

Adults may legitimately intervene to prevent a pupil from committing a criminal offence, injuring themselves or others, causing property damage, engaging in behaviour prejudicial to good order and to maintain good order and discipline. Adults should have regard to the health and safety of themselves and others. The use of unwarranted physical force is likely to constitute a criminal offence. All incidents and subsequent actions should be recorded and reported to a manager and the pupil's parents/carers.

Where a pupil has specific needs in respect of particularly challenging behaviour, a positive handling plan, including a risk assessment, should be put in place and agreed by all parties.

17. First Aid and Medication

The Trust has a separate policy on supporting pupils with a medical condition. Employees should have regard to the statutory guidance Supporting pupils with medical conditions at school - GOV.UK, which includes advice on managing medicines.

All settings must have an adequate number of qualified first aiders/appointed persons. Employees must have had the appropriate training and achieved the necessary level of competency before administering first aid or medication or taking the responsibility to support pupils with medical conditions.

Adults taking medication that may affect their ability to care for children should seek medical advice and should not work with pupils whilst taking medication unless medical advice confirms they can do so. Adult medication on the premises must be securely stored out of the reach of children.

18. Transporting Pupils

In certain situations, e.g. out of out-of-school/academy activities, adults may agree to transport pupils. Transport arrangements should be made in advance by a designated employee who will be responsible for planning and overseeing all transport arrangements and responding to any concerns that may arise. Wherever possible and practicable, transport should be provided rather than the use of private vehicles, with at least one adult additional to the driver acting as an escort.

Adults should ensure that their vehicle meets all legal requirements, ensuring that the vehicle is roadworthy and appropriately business insured and that the maximum capacity is not exceeded. It is a legal requirement that all passengers wear seatbelts, and the driver should ensure that they do so. The driver should be aware of the current legislation concerning the use of car seats for younger children, where applicable. It is illegal to drive using hand-held phones or similar devices, and the driver must ensure that they adhere to all driving regulations.

It is inappropriate for adults to offer lifts to a pupil unless the need has been agreed with a senior manager and, if this falls outside their normal working duties, has been agreed with

parents/carers.

There may be occasions where a pupil requires transport in an emergency or where not to give a lift may place a pupil at risk. Such circumstances must always be recorded and reported to a senior manager and parents/carers.

19. Close Personal Relationships at Work

Close personal relationships are defined as:

- workers who are married, dating, or in a partnership or cohabiting arrangement;
- immediate family members for example, parent, child, sibling, grandparent;
- other relationships for example, extended family (cousins, uncles, in-laws), close friendships, business associates (outside the school).

Applicants

Applicants are required to disclose on their application form if they have a close personal relationship with any person connected with the Trust and are asked to state the name of the person and the relationship. Failure to disclose such a relationship may disqualify the applicant.

It is inappropriate for any worker to sit on an appointment panel or be a decision maker for those with whom they have a close personal relationship.

References

It is expected that, for those working with children, professional references, and not personal references, are sought and provided. All references provided on behalf of an Academy or the Trust must be signed by the Headteacher or a member of the Executive Leadership Team.

Anyone agreeing to act as a personal referee must make it clear in the reference that it is provided as a personal or colleague reference and is not a reference on behalf of the Trust, and must not be provided on school-headed paper or via a work email address.

Relationships at work

It is recognised that situations arise where close personal relationships can be formed at work. Such relationships should be disclosed, in confidence, to the Headteacher by the individuals concerned.

Whilst not all such situations where those in close personal relationships work together raise issues of conflict of interest, implications can include:

- effect on trust and confidence;
- perception of service users, the public, and other employees on professionalism and fairness;

- operational issues e.g., working patterns, financial and procurement separation requirements;
- conflicting loyalties and breaches of confidentiality and trust.

Open, constructive, and confidential discussions are essential to ensure these implications do not occur and that all parties can be protected.

No one should be involved in discipline, promotion, pay, or other decisions for anyone where there is a close personal relationship.

It may be necessary in certain circumstances to consider transferring workers who form close personal relationships at work. Any such action will be taken wherever possible by agreement with both parties and without discrimination.

Colleagues who feel they are affected by a close personal relationship at work involving other colleagues should feel able to discuss this, without prejudice, with their Headteacher/line manager, the People Team, or a member of the Executive Leadership Team.

Workers related to pupils

Any workers related to, or who are the carer of a pupil, are expected to separate their familial and employment roles. Workers must not show or provide any preferential treatment to them or become involved in their education or care beyond their specific role as an employee/volunteer or their role as a parent/carer/relative.

20. Educational Visits and Trust Clubs

Adults should take particular care when supervising pupils in the less formal atmosphere of an educational visit, particularly in a residential setting or after-school activity. Adults remain in a position of Trust, and the same standards of conduct apply.

21. Curriculum, Photography, Videos, and other Creative Arts

Please refer to the Trust's Internet, social media, and E-Safety and Photography Policies on the use of images and the consent forms therein, together with policies regarding sex and relationship education on spiritual, moral, social, and cultural development.

Adults should also have regard to the ICO CCTV code of practice and the guidance Taking photos in schools | ICO.'

An image of a child is personal data, and it is, therefore, a requirement that consent is obtained from the parent/carer of a child before any images are made, such as those used for Trust websites, notice boards, productions, or other purposes.

Adults need to be aware of the potential for such images to be taken and/or misused to create indecent images of children and/or for 'grooming' purposes. Careful consideration should be given as to how these activities are organised and undertaken. There should be an agreement as to whether the images will be destroyed or retained for further use, where these will be

stored, and who will have access to them.

Adults should only use equipment provided or authorised by the Trust to make/take images and should not use personal equipment, mobile telephones, or any other similar devices.

22. Unacceptable Use of ICT Facilities and Monitoring

This section should be read in conjunction with the Trust's ICT Security and Internet, social media and E-Safety, and CCTV Policies or procedures.

Posting, creating, accessing, transmitting, downloading, uploading, or storing any of the following material (unless it is part of an authorised investigation) is likely to amount to gross misconduct and result (where the adult is employed) in summary dismissal (this list is not exhaustive):

- pseudo-images of children (child abuse images), pornographic or sexually suggestive material or images of children or adults which may be construed as such in the circumstances (that is, writing, texting, pictures, films, and video clips of a sexually explicit or arousing nature),
- any other type of offensive, obscene or discriminatory material, criminal material or material which is liable to cause distress or embarrassment to the Trust or others.

If indecent images of children are discovered at the premises or on the Trust's equipment/devices, an immediate referral should be made to the individual Trust designated Safeguarding Lead and Headteacher (unless they are implicated) and the external Designated Officer and, if relevant, the police. The images/equipment should be secured, should not be used by others, and should be isolated from the network. There should be no attempt to view, tamper with or delete the images as this could jeopardise any necessary criminal investigation. If the images are of children known to the Trust, a referral should also be made to children's social care in accordance with local arrangements.

The contents of our ICT resources and communications systems are our property, and we reserve the right to monitor, intercept, and review all content. Therefore, adults should have no expectation of privacy in any message, files, data, document, facsimile, telephone conversation, social media post, conversation, or message, or any other kind of information or communications transmitted to, received, or printed from, or stored or recorded on our electronic information and communications systems.

Staff will not use technology on-site or belonging to the Trust to view material that is illegal, inappropriate, or likely to be deemed offensive. This includes, but is not limited to, sending obscene emails, gambling, and viewing pornography or other inappropriate content.

Staff will not use personal mobile phones and laptops, or Trust equipment for personal use, during school hours or in front of pupils. They will also not use personal mobile phones or cameras to take pictures of pupils.

23. Register of Business Interests/Outside Interests

Senior employees – defined as the Trust’s executive leadership team, academy improvement leads, Executive Headteachers, Headteachers, Heads of School, Central Service Heads, Assistant Directors, and School Business Managers – along with Members, Trustees, and Local Governors, must complete the Register of Business Interests Form annually. The form is circulated at the beginning of each academic year.

All other employees are contractually required to complete the Outside Interest Disclosure Form if they have a relevant business interest to declare or amend. While no exhaustive definition exists, disclosures should include any financial interests or relationships that could potentially influence or conflict with an employee’s professional duties.

These declarations ensure transparency, foster trust, and uphold compliance with governance and legal standards. Employees with declared business interests are encouraged to keep their disclosures up to date to ensure the Trust maintains accurate and relevant records.

24. Policy Status, Monitoring, and Review

This policy does not form any part of an employee contract of employment and may be amended at any time, subject to changes in Trust policy, best practice, legislation, or government guidance, or otherwise, subject to consultation with recognised Trade Unions.

The Headteacher is responsible for monitoring the implementation, use, and effectiveness of this policy. This policy will be reviewed and monitored by the Trust, as necessary.