



# EMMAUS CATHOLIC MAC

## Staff Code of Conduct

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Post Holder Responsible for Review:	Chief Executive Officer (CEO)



**Commitment to Equality:**

We are committed to providing a positive working environment which is free from prejudice and unlawful discrimination and any form of harassment, bullying or victimisation. We have developed a number of key policies to ensure that the principles of Catholic Social Teaching in relation to human dignity and dignity in work become embedded into every aspect of school life and these policies are reviewed regularly in this regard.

To ensure the positive development of young people, all staff work within a framework of equal opportunities and other relevant legislation, statutory guidance and school policies. Within this framework, staff challenge stereotypes and oppose prejudice to safeguard equality of opportunity, respecting individuals regardless of sex, marital status, religion, race, ethnicity, sexual orientation, disability and age.

**Motto**

Our Journey with Christ.

**Mission**

As a family of schools, united in Christ and working together as one, we exist to deliver excellent Catholic education and faith formation to every young person, in every classroom, every day.

**Vision**

Transforming Lives: inspiring ambition and empowering young people to change the world.

**This Staff Code of Conduct has been approved and adopted by Emmaus Catholic Multi Academy Company on 26<sup>th</sup> June 2026 and will be reviewed in August 2026.**

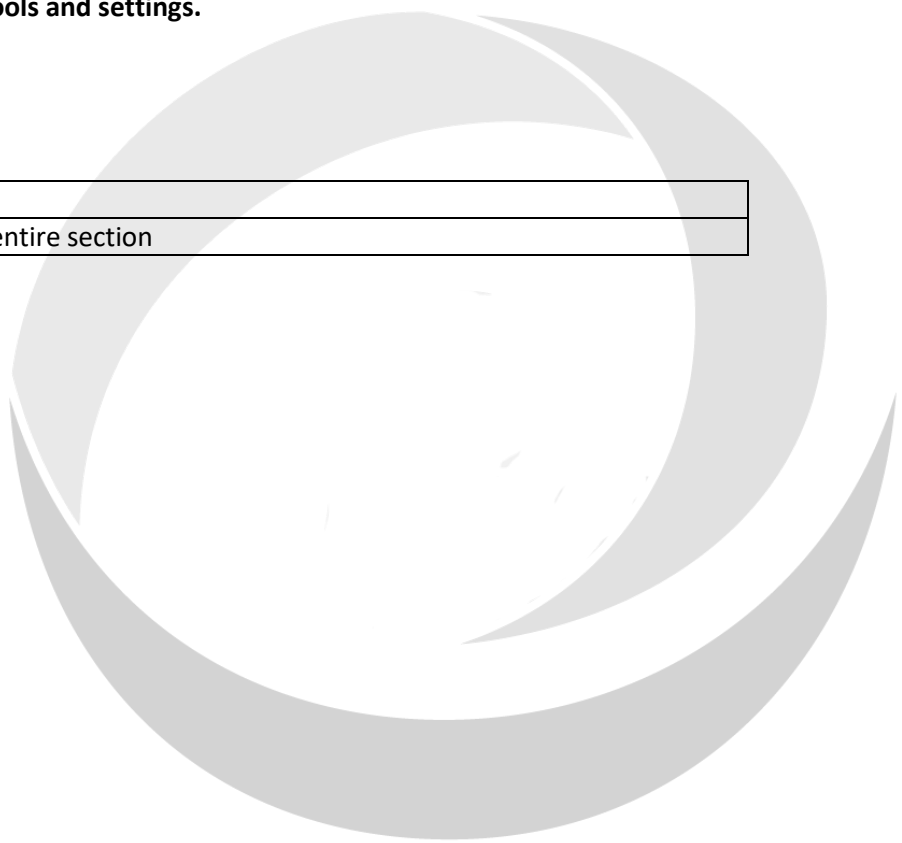
Signed by Director of Emmaus Catholic MAC: *J Griffin*

Signed by CEO for Central Team: *S Horan*

**This policy relates to all Emmaus schools and settings.**

**Table of Changes:**

Section	Change
Section 7.0	Amendment to entire section



## 1.0 Introduction

As an employer, Emmaus Catholic MAC is required to set out a Code of Conduct for all staff.

As a Catholic Multi Academy Company, all adults in our company are expected to actively follow and live out our Mission Statement which reflects how the Emmaus family is to conduct itself at all times. All communication and interaction between members of the Emmaus family – directors, local governing body members, staff, pupils, parents, carers and visitors must reflect our mission statement.

As part of the Catholic Education Service terms and conditions, staff are expected to be conscientious and loyal to the aims and objectives of the MAC.

In addition, staff are required to develop and maintain the Catholic character of the MAC. Staff are to have regard to the Catholic character of the MAC and not do anything in any way detrimental or prejudicial to the interests of the same at any time, at work or at home.

This Policy is produced with reference to the documents Keeping Children Safe in Education (Sept. 2025) and 'Guidance for safer working practice for those working with children and young people in education settings' (updated February 2022) published by the Safer Recruitment Consortium.

This Policy is applicable and relevant to all staff, both teaching and support, fixed term, part and full-time employed by Emmaus Catholic MAC as well as those who work in any casual, or voluntary, unpaid capacity.

All teachers employed by Emmaus Catholic MAC, irrespective of whether they have a permanent or temporary contract or are employed on a full or part time basis, have a statutory obligation to adhere to the National Teachers' Standards (2013 revision, Dec 2021 update) and in relation to this policy, Part 2 of the Standards-Personal & Professional Conduct.

Part 2 of the Standards states that teachers are expected to demonstrate consistently high standards of personal and professional conduct. In Emmaus Catholic MAC these standards will apply to all staff, both teachers and support. This means that staff uphold public trust and maintain high standards of ethics and behaviour, within and outside school, by:

- Treating pupils with dignity, building relationships rooted in mutual respect, and at all times observing proper boundaries appropriate to their position.
- Having regard for the need to safeguard pupils' well-being, in accordance with statutory provisions.
- Showing tolerance of and respect for the rights of others.
- Not undermining fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs.
- Ensuring that personal beliefs are not expressed in ways which exploit pupils' vulnerability or might lead them to break the law.

Staff must have proper and professional regard for the ethos, policies and practices of the MAC/school and maintain high standards in their own attendance and punctuality.

Staff must have an understanding of, and always act within, the statutory frameworks which set out their professional duties and responsibilities.

## **2.0 Employee Behaviour**

The following general standards are required by all staff:

- staff should behave in a respectful, professional and polite manner and ensure their behaviour does not breach the Equality Act 2010.
- staff should comply with all reasonable management instructions.
- staff should cooperate fully with colleagues and management.
- staff should uphold and further the Emmaus Catholic MAC positive public image at all times.
- satisfactory standards of performance should be maintained at all times.
- Emmaus Catholic MAC policies and procedures and individual school policies and procedures should be adhered to at all times.

All staff will be expected to act in accordance with this Code of Conduct and should be aware that any breach or failure to follow the policy could result in disciplinary action being taken against them, including dismissal and referral to statutory authorities, (including the LADO, the Police & the DBS), and if a teacher, referral to the Teacher Regulation Agency (TRA).

The Disqualification under the Childcare Act 2006 (Regulations 2018) states that schools should make clear their expectation that staff should disclose any relationship or association (in the real world or online) that may impact on the school's ability to safeguard pupils, and therefore, we encourage staff to be open about their relationships which may impact safeguarding at our schools so appropriate safeguards can be put in place to minimise any potential risk posed to pupils.

This applies to all staff, not just those in early or later years' childcare. However, also in accordance with these regulations Emmaus Catholic MAC will not ask intrusive questions of staff regarding those with whom they live or have relationships/associations.

All staff will be given a copy of the Staff Code of Conduct at the start of the academic year. All new staff will be taken through the policy as part of the staff induction programme.

### **2.1 Principles**

Staff are responsible for their own actions and accountable for how they use their authority and position of trust.

Staff must treat all members of the MAC community (pupils, colleagues & parents) with consideration & respect.

Staff must demonstrate a clear understanding of and commitment to non-discriminatory practice.

All staff have a duty of care to keep pupils safe, recognising that safeguarding is everyone's responsibility.

Staff should ensure that they are seen to work in a transparent way.

Staff must report matters of concern at the earliest opportunity to the appropriate member of staff.

### **2.2 Setting an Example**

All staff who work in Emmaus Catholic MAC must set positive examples of behaviour and conduct which can be copied by the pupils. All staff must demonstrate high standards of conduct in order to encourage the pupils to do the same. As a result, staff must:

- Ensure that their relationships with fellow staff and pupils are always conducted in a courteous and professional manner.
- Not use abusive or inappropriate language (homophobic, racist or gender stereotyping).
- Never make personal comments which will humiliate or scapegoat pupils or other members of staff.
- Ensure that they do not censure or criticise the work of other staff in the hearing of pupils or parents. The criticism of the work of staff by other staff should always be undertaken professionally, constructively and in the appropriate setting.
- Observe the highest standards of dress, behaviour, attendance and punctuality. Staff should not do anything that prevents them from carrying out their role properly and efficiently whether on Emmaus premises or on Emmaus related business taking place away from a school site or the central offices.

### **3.0 Staff Dress**

During working/school hours staff must ensure they are dressed decently, safely and appropriately for the tasks they undertake. It is important that all staff promote a positive professional image with regard to appearance and standards of dress at all times. Where uniforms are provided, these must be worn at all times whilst at work and laundered on a regular basis.

On non-uniform or training days, casual dress may be authorised. Whilst we wish you to be comfortable, staff must continue to wear appropriate attire that is suitable for the working environment.

Please refer to the Emmaus Catholic MAC Professional Appearance Policy for further details.

### **4.0 Safeguarding Pupils**

All staff have a duty of care towards all pupils at all times when on a school site irrespective of whether or not they are directly supervising the pupils.

Staff who have reason to believe that a student may be the victim of emotional, physical or sexual abuse or neglect must report their concerns to the School's Designated Safeguarding Lead (DSL) at the earliest opportunity following the procedures as outlined in the school's Safeguarding Policy (including Child Protection).

Staff must be aware of their responsibilities as stated in the MAC/school's Safeguarding Policy (including Child Protection), Online Safety Policy, Health and Safety (including First Aid) Policy and Whistleblowing Policy (Appendix One).

When taking pupils off site, staff must follow the school's Educational Visits Policy in all relevant respects. The policy and supporting documents and guidance will be made available by the (Executive) Principal or Educational Visits' Coordinator and must be referred to prior to arranging an off-site visit.

#### **4.1 Confidentiality**

Where staff have access to confidential information about pupils, parents, carers or other members of staff they must not disclose or reveal such information except to those colleagues who have a professional role in relation to the student/member of staff.

Staff have an obligation to share with the school's Designated Safeguarding Lead any information which gives rise to concern about the safety or welfare of a pupil. Staff must never promise a pupil that they will not act on information that they are told by the pupil. The Data Protection Act 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows

practitioners to share information without consent, if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent or if to gain consent would place a child at risk.

Staff must be aware that the information held on the company/school's information system about pupils and other staff is strictly confidential and every effort must be made to ensure that it is not inappropriately disclosed and/or shared.

To ensure confidentiality, after using the MAC computer network, staff must always either lock or log out from the computer being used.

The storing and processing of personal information is governed by the General Data Protection Regulations 2017 (GDPR) and Data Protection Act 2018. Staff must follow the MAC's Data Protection Policy which clearly defines their responsibilities under this legislation so that, when considering sharing confidential information, those principles apply.

Staff must not use the MAC/school ICT network if they have not submitted a signed copy of the MAC Acceptable User Agreement for IT.

#### **4.2 One To One situations**

Staff are more vulnerable to accusations when alone with a pupil and/or parents and should avoid such situations where possible.

Where undertaking one to one situations with pupils and/or parents, staff must:

- Leave the door to the room being used open or undertake the meeting where they can be seen (making use of the school's CCTV system if applicable).
- Ensure that a colleague is aware that the meeting is taking place.
- End the meeting if the pupil or parents become agitated, threatening etc.
- Never arrange to meet a pupil and/or parents away from the school site unless permission has been given by the (Executive) Principal.
- Avoid travelling in a car with one pupil unless permission has been received from the (Executive) Principal to do so. In the unavoidable event where a member of staff has permission from the (Executive) Principal to travel in a car with a single student, the member of staff should be accompanied by another member of staff.

Staff must never have one to one meetings on their own with known difficult students and/or parents or where the meeting is being held to address challenging or difficult matters.

#### **4.3 Safeguarding Concern or an Allegation against a staff member**

If staff have safeguarding concerns or an allegation is made about another member of staff (including supply staff, volunteers, and contractors) posing a risk of harm to children, then;

- This should be referred to the CEO for the Central Team and (Executive) Principal in a school.
- Where there are concerns about the CEO, this should be referred to the Chair of the Board. Where there are concerns about an (Executive) Principal, this should be referred to the CEO.
- In the event of concerns/allegations about the CEO or (Executive) Principal, where there is a conflict of interest in reporting the matter to the Chair of the Board or CEO, this should be reported directly to the LADO.

If staff have a safeguarding concern or an allegation about another member of staff (including supply staff, volunteers or contractors) that does not meet the harm threshold, then this should be shared in

accordance with the low-level concerns procedure as outlined in section 4.4 of this Staff Code of Conduct.

#### **4.4 Low-level Concerns**

This section should be read in conjunction with the Emmaus Catholic MAC Allegations Against Staff (including low-level concerns) Policy.

As part of our MAC-wide approach to safeguarding, we promote a culture of openness, trust and transparency in which the MAC values and expected behaviour set out in the Staff Code of Conduct are lived, monitored and reinforced constantly by staff and in which all concerns about all adults working in or on behalf of the MAC/School (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

All concerns about adults including allegations that do not meet the harms threshold (see KCSIE 2025 Part Four - Section two, pages 107 - 111) are shared responsibly and with the right person, recorded and dealt with appropriately. We encourage an open and transparent culture; to enable us to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the MAC/schools are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the MAC/schools.

#### **What is a low-level concern?**

As set out in KCSIE 2025 (para. 430) The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold for harm. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that:

- is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside of work, and
- does not meet the harm threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

- being over friendly with children.
- having favourites.
- taking photographs of children on their mobile phone; contrary to MAC policy.
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door.
- humiliating children.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

Low-level concerns may arise in several ways and from a number of sources. For example: suspicion, complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

It is crucial that all low-level concerns are shared responsibly and with the right person, and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools and colleges from becoming the subject of potential false low-level concerns or misunderstandings.

#### **4.5 Sharing Low-level Concerns:**

Low-level concerns about a member of staff should be reported to the CEO for the Central Team or (Executive) Principal for a member of staff in a school. Low-level concerns about the (Executive) Principal should be reported to the CEO. The CEO/(Executive) Principal should be the ultimate decision maker in respect of all low-level concerns, although depending on the nature of some low-level concerns, the CEO/(Executive) Principal may wish to consult with the DSL and take a more collaborative decision making approach.

We aim to create an environment where staff are encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

Where a low-level concern relates to a person employed by a supply agency or a contractor working within the MAC/school, that concern should be shared with the CEO for the Central Team and the (Executive) Principal in a school. The concern should be recorded and their employer notified about the concern, so that any potential patterns of inappropriate behaviour can be identified.

In the event of any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, then the CEO for the Central Team and (Executive) Principal for schools should consult with their LADO.

All low-level concerns should be recorded in writing, including details of the concern, the context in which the concern arose and the action taken. The name of the person sharing the concern should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible. The records must be kept confidentially, held securely and comply with the Data Protection Act 2018 and UK GDPR. The data will be retained as per the Emmaus MAC policy for retaining staff personnel records.

Records regarding low-level concerns will be reviewed across the MAC so that potential patterns of concerning, inappropriate, problematic or concerning behaviour can be identified. Where a pattern of behaviour is identified the MAC/school will decide on a course of action, either through the Emmaus Catholic MAC Disciplinary Policy and Procedure or where a pattern of behaviour moves from a low-level concern to meeting the harm threshold, in which case it should be referred to the LADO (as per Part four, Section one of KCSIE, Sep 2025). Consideration will also be given to whether there are wider cultural issues within the school or college that enabled the behaviour to occur and where appropriate policies could be revised, or extra training delivered to minimise the risk of it happening again.

The guidance in KCSIE, Sep 2025, para. 445 will be followed in respect of references and low-level concerns.

#### **5.0 Honesty and Integrity**

Staff must maintain high standards of honesty and integrity in their work. This particularly includes the handling and claiming of money and the use of company facilities, property and resources.

##### **5.1 Dealing with MAC Money**

Staff must ensure that public funds are used in a responsible and lawful manner, in accordance with MAC procedures and the Academy Trust Handbook.

##### **5.2 Bribery Gifts and Hospitality**

Colleagues should ensure that they comply with the guidance as set out in the Anti-Fraud and Corruption Policy (including gifts and Hospitality).

### **6.0 Communicating with Students**

Staff must never use their personal private e-mail address or personal private mobile telephone number to communicate with pupils. All electronic communication with pupils must be from the member of staff's company/school e-mail account or the company/school's virtual learning environment or by using a company/school provided mobile telephone.

Staff must not have pupils as "friends" on any social network which they may use and should take every possible precaution to ensure that their privacy settings are at the highest possible setting.

Staff must exercise extreme caution and professional judgement in deciding whether to have former pupils as "friends" on any social network which they use.

Staff should refer to the MAC Online Safety Policy including MAC Staff ICT Acceptable Use Policy for further guidance.

### **7.0 Restrictive Interventions and the Use of Reasonable Force**

This section outlines the professional standards and legal frameworks governing physical contact, restrictive interventions, and the use of reasonable force by employees within Emmaus Catholic MAC. It aligns with the Department for Education (DfE) guidance 'Restrictive interventions, including use of reasonable force, in schools', statutory safeguarding requirements in 'Keeping Children Safe in Education' (KCSIE), and the provisions of the Emmaus Catholic MAC Restrictive Interventions and Use of Reasonable Force Policy.

#### **7.1 Professional Conduct and Intent**

As an employee of the MAC, you are required to uphold the dignity, safety, and wellbeing of every young person at all times. Behaviour from pupils is frequently a form of communication signalling a need for support. Therefore, you must adopt a proactive approach to anticipating, managing, and minimising potential triggers of distressed behaviour to avoid escalation.

The use of physical intervention must be avoided if at all possible. Restrictive interventions and reasonable force must only be deployed as a last resort, when all alternative, non-physical de-escalation options have been exhausted or are deemed insufficient to prevent harm

#### **7.2 Core Definitions for Staff**

To ensure compliance with the Restrictive Interventions and Use of Reasonable Force Policy, staff must understand the following legal and operational terms:

- Restrictive Intervention: An umbrella term for any action or measure used to prevent, limit, or control the movement of a pupil's body, or part of their body.
- Reasonable Force: The minimum level of force necessary, applied for the shortest possible duration, and proportionate to the specific circumstances of the incident.
- Seclusion: A non-disciplinary safety measure involving the confinement of a pupil to a safe, supervised space away from others, where their freedom to leave is restricted. Seclusion must never be used as a disciplinary consequence or punishment
- Restraint: A non-disciplinary intervention that immobilises a pupil or restricts their movement, whether through direct physical contact or the removal of mobility aids.

#### **7.3 Training Requirements**

To ensure the safety of both pupils and staff, all employees authorised to use reasonable force must receive appropriate, up-to-date training. Refresher training must be provided regularly to maintain competency, precision, and adherence to legal standards. Where school staff have been appropriately trained, it is preferable for these individuals to deal with incidents requiring reasonable force. Senior leaders and the Principal will determine whether specific staff members require additional training tailored to the precise needs of the pupils within their setting.

#### **7.4 Operational Guidelines and Use of Force**

All members of school staff have the statutory power to use reasonable force. Ultimate responsibility and decision-making regarding whether to control or restrain a child rests on your professional judgement within the context of the law and individual circumstances.

Before executing any restrictive intervention, you must explicitly question whether the action is:

- **Necessary:** Evaluating if there are less restrictive ways to manage the situation, or if the intervention itself might escalate the behaviour or cause more harm than the behaviour itself.
- **Proportionate:** Ensuring the least amount of force or least restrictive measure is used for the shortest time required. You must carefully consider the pupil's age, size, characteristics, and specific vulnerabilities.
- **Welfare-Focused:** Maintaining respect for the pupil's dignity and using calm, clear communication. For pupils with communication difficulties or EAL, verbal and non-verbal strategies must be used to ensure they understand what is happening

By law, you may use such force or physical contact as is reasonable and proportionate in the circumstances to prevent a pupil from:

- Injuring themselves or others.
- Committing a criminal offence.
- Causing damage to property, including their own.
- Engaging in any behaviour prejudicial to good order and behaviour at the school or among any of its pupils.

Emergencies can occur very quickly, such as a pupil running into a busy road or a violent fight breaking out. Staff will not be penalised for resorting to physical intervention or reasonable force in sudden situations where it is fully justified to prevent immediate harm.

#### **7.5 Supporting Pupils with SEND and Additional Vulnerabilities**

You must make reasonable adjustments for pupils with Special Educational Needs and Disabilities (SEND), mental health problems, or medical conditions, owing to their heightened vulnerability.

The SENDCO will support staff to ensure they are fully aware of agreed proactive adjustments and de-escalation strategies to meet these needs without using force. For pupils where an increased risk of restrictive intervention is foreseeable, individual risk assessments and co-produced behaviour support plans must be established alongside the pupil and parents to manage trigger points.

#### **7.6 Mandatory Recording and Reporting**

Every significant event involving the use of force, restraint, or seclusion must be recorded and reported. This duty applies even if the intervention was previously agreed with parents as part of a pupil's behaviour support plan.

- **Recording:** The staff members involved must log the details onto the school's CPOMS system as soon as practicable, and no later than the same day. This log must contain the names of those involved, the duration, a brief account of the triggers, the preventative strategies attempted, the degree of force used, why it was necessary, and any physical injuries sustained.

- Parental Notification: Parents/carers must be informed of the incident in person and in writing as soon as practicable, and no later than the same day. This occurs unless doing so is explicitly assessed as likely to cause serious harm to the pupil, in which case the local authority must be notified and the rationale documented.
- Post-Incident Support: Following an incident, the pupil and staff member must be offered a medical assessment if required, alongside an impartial debrief and support structure to facilitate reflection, learning, and wellbeing.

### **7.7 Complaints and Allegations**

Any concerns or complaints regarding physical contact or restrictive interventions will be dealt with in accordance with the school's Complaints Procedures Policy. If an allegation of inappropriate force or abuse is directed against a member of staff, the procedures outlined in Keeping Children Safe in Education (KCSIE) and the Emmaus Catholic MAC Staff Code of Conduct will be strictly enacted, including the potential suspension of staff during investigations.

### **8.0 Conduct Outside of Work**

All staff have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of children. They should adopt high standards of personal conduct in order to maintain confidence and respect of the general public and those with whom they work.

Staff may undertake work outside the MAC/School, either paid or voluntary, provided that it does not conflict with the interests of the MAC/School nor be at a level which will affect the member of staff's work performance. Staff undertaking additional employment must not use company time or equipment for that purpose without the prior and express permission of the CEO/(Executive) Principal.

Staff should not:

- Behave in a manner which would lead any reasonable person to question their suitability to work with children or to act as an appropriate role model.
- Make, or encourage others to make sexual remarks to, or about, a student.
- Use inappropriate language to, or in the presence of students, discuss their personal or sexual relationships with, or in the presence of students.
- Make (or encourage others to make) unprofessional personal comments which scapegoat, demean or humiliate, or might be interpreted as such.
- The responsibility to maintain public confidence and not to bring Emmaus Catholic MAC into disrepute also extends to standards of behaviour outside of School. All employees should ensure they behave in a way that befits the high status of their profession.
- Reports of public disorder, impropriety and behaviour which has the potential to cause the MAC reputational damage, could all be grounds for disciplinary action in line with the Emmaus Catholic MAC Disciplinary Policy and Procedure.

In addition to the above, all teachers are required to uphold the Teacher Standards, Part A and Part B, at all times.

Whilst we do not intend to restrict outside activities, it is important to remember that activities whether during or outside of working hours which result in adverse publicity to Emmaus Catholic MAC, or which cause us to lose faith in your integrity, may result in disciplinary action.

Staff should avoid unnecessary contact with pupils outside of school and must maintain a professional approach and distance if they find themselves in a social setting where students are present. Staff must:

- Never give pupils details of their home address, home telephone number, mobile telephone number or personal e-mail address.
- Never make arrangements to meet pupils, individually or in groups, unless permission to do so has been received from the (Executive) Principal for a school-related activity.
- Never invite pupils, individually or in groups to their home.
- Never transport pupils, individually or in groups, in their own vehicle unless permission to do so has been received from the (Executive) Principal. And in accordance with the OEAP National Guidance 'Transport In Private cars' (updated March 2024).

Staff must notify the CEO and (Executive) Principal at the earliest possible opportunity if charged with, or convicted of, any criminal offence, or if they accept a formal police caution. The MAC acknowledges that a caution is not a criminal conviction, but staff must be aware that cautions have to be declared during Disclosure & Barring checks unless they meet the filtering rules of the Disclosure & Barring Service.

Criminal offences that involve violence or inappropriate financial activity or the use of illegal drugs or sexual misconduct are likely to be regarded as incompatible with that person working in an education/school setting. Such behaviours are likely to result in the member of staff's dismissal and for teachers a prohibition order.

The MAC acknowledges that a member of staff charged with an offence is innocent until proven guilty, however, special considerations will apply if the offence is relevant to safeguarding.

Staff must exercise extreme caution when using all forms of information technology and social media (Facebook, Instagram, Twitter etc.) and be aware of the risks to themselves and others. Staff should have privacy controls set at the highest possible setting and must not engage in the inappropriate use of social network sites in a manner which may bring themselves, the MAC, the school or school community into disrepute. In line with the MAC Online Safety and Staff ICT Acceptable Use policies, staff must remember that:

- Anything posted online is potentially public and permanent.
- That the privacy settings of their "friends" may not be as secure as their own.
- It is always necessary to use "strong" passwords that contain a mixture of upper & lower case letters, numbers and symbols.

### **9.0 Attendance and Timekeeping**

- Staff contracts of employment contain the main terms and conditions of their employment with the MAC.
- Staff must follow the Central Team/each school's requirements for reporting absence due to sickness.
- Staff should be present and ready to start work in line with their contractual working hours.
- Staff must also remain in the workplace and continue to work until they have completed their contractual working hours.

### **10.0 Signing In And Out/Staff ID etc**

Staff must follow the signing in and out procedures in operation in their school or the Central Team.

An Emmaus Catholic MAC lanyard must be worn at all times on all MAC premises.

### **11.0 Communications**

Staff should have their personal mobile and other smart devices either switched off, or in silent mode, during working hours. Discretion should be exercised when using a personal mobile device and any use must not cause a distraction from work for the employee themselves or their colleagues. Personal calls and text messages should not be made during working hours; they should only be made during your lunch or other breaks. Staff should obtain authorisation from their line manager if they need to make or receive an urgent personal phone call. In addition, it is forbidden to:

- give personal phone numbers or home phone numbers to students / parents etc.
- take pictures of students / colleagues, company premises, customers or clients using personal mobile devices.
- transfer files via Bluetooth or other insecure mobile networks.

### **12.0 Alcohol, Illegal Substances and Medication**

The MAC accepts that alcohol is legally and freely available and acknowledges that some illegal substances are also readily obtainable. Staff are not expected to use illegal substances. Staff must ensure that the use of alcohol out of working hours does not adversely affect their work performance, and that, in accordance with their obligations under health and safety legislation, they take reasonable care of the health and safety of themselves and others whilst at work. Emmaus MAC schools and Central Team are alcohol and illicit substance free establishments. The MAC will not accept employees arriving at work under the influence of alcohol or illicit drugs and whose ability is impaired in any way by reason of the consumption of alcohol or illicit drugs. Neither alcohol nor illicit drugs should be consumed on MAC premises. Staff should have regard to the expectation that they will not bring the MAC into disrepute.

Staff who are prescribed a type of medication which they have not taken before should make themselves aware of possible side-effects. In accordance with their duty to take reasonable care of their own and their colleagues' health and safety, they should advise the MAC if the medication starts to affect their ability to do their job or travel safely to work, or if there is a likelihood that this will happen. The MAC should undertake risk assessments and take occupational or other specialist advice as appropriate.

### **13.0 Smoking**

The MAC is a non-smoking educational establishment. No-one is permitted to smoke in the buildings or on the sites at any time.

### **14.0 Use of MAC Premises or Facilities For Work Not Connected With The MAC**

Staff must not use the MAC/school's premises or facilities for activities that are not connected with their employment at the school without express prior written agreement from the (Executive) Principal/Local Governing Body or CEO/Directors. This includes the personal use of school email, telephones, computers, photocopiers or other equipment.

### **15.0 Health and Safety**

Staff must ensure that they follow the procedures relating to health and safety as set out in the Emmaus MAC Health and Safety Policy.

### **16.0 Personal Property**

Staff are solely responsible for the safety of their personal possessions on company premises and should ensure that their personal possessions are kept in a safe place at all times.

### **17.0 Publications and Dealing With The Press**

Employees must not make comments to the press or other media, including social networking sites, on behalf of the MAC/school unless specifically authorised to do so by the CEO. Where requests for

comments are received, they must be passed on to the (Executive) Principal who will contact the CEO immediately.

Staff must not publish any material which will bring the MAC/school into disrepute.

If employees wish to publish an article unconnected with the MAC/school, then the article should not link them to the MAC/school without express prior permission from the CEO.

**18.0 Other Linked Policies:**

- Emmaus Catholic MAC Online Safety Policy including Acceptable Use Policy
- Emmaus Catholic MAC Anti-Fraud and Corruption Policy (including Gifts and hospitality)
- Emmaus Catholic MAC Data Protection Policy
- Emmaus Catholic MAC Staff Professional Appearance Policy
- Emmaus Catholic MAC Disciplinary Policy and Procedure
- Safeguarding Policy (including Child Protection) – school versions as provided by the relevant LA
- Emmaus Catholic MAC Health & Safety Policy
- School Educational Visits Policy and Procedures
- Emmaus Catholic MAC Allegations Against Staff (including low-level concerns) Policy
- Emmaus Catholic MAC Statement of Behaviour Principles

Staff who have concerns about any aspect of the professional conduct of any colleague, should also refer to the MAC Whistleblowing Policy (Appendix One).

This Staff Code of Conduct will be reviewed annually, or in line with changes to KCSIE, by the Board of Directors.



## Appendix One - Whistle Blowing Policy

### Commitment to Equality:

We are committed to providing a positive working environment which is free from prejudice and unlawful discrimination and any form of harassment, bullying or victimisation. We have developed a number of key policies to ensure that the principles of Catholic Social Teaching in relation to human dignity and dignity in work become embedded into every aspect of school life and these policies are reviewed regularly in this regard.

**This Whistleblowing Policy has been approved and adopted by all school in Emmaus Catholic Multi Academy Company on 21<sup>st</sup> August 2025 and will be reviewed in August 2026.**

Signed by Director of Emmaus MAC: *J Griffin*

Signed by CEO for Central Team: *S Horan*

This statement relates to all Emmaus schools and settings.



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### 1. Statement of intent

Emmaus Catholic Multi Academy Company (MAC) is committed to open and honest communication and ensuring the highest possible standards in integrity – we will always treat whistleblowing as a serious matter.

In line with the MAC’s commitment to openness, probity and accountability, members of staff are encouraged to report concerns. This policy will work to ensure that, if an employee sees or suspects that something is wrong, they will raise this with the school/setting. This is known as “blowing the whistle” – a phrase that is used throughout this policy and should be viewed as a positive action of speaking up.

This policy seeks to ensure that any member of staff who suspects malpractice knows how to raise concerns and what procedures are in place to deal with the concern.

Where this policy necessitates personal or special category data to be processed, it will be done so in accordance with the MAC Data Protection Policy. This policy will not be confused with the procedure on dealing with harassment at work or the MAC Grievance Resolution Policy and Procedure and Disciplinary Policy and Procedure.

This policy will:

- Give confidence to members of staff when raising concerns about conduct or practice that is potentially illegal, corrupt, improper, unsafe or unethical, or which amounts to malpractice or is inconsistent with school standards and policies.
- Provide members of MAC staff with avenues to raise concerns.
- Ensure that members of staff receive a response to the concerns they have raised and feedback on any action taken.
- Offer assurance that members of staff are protected from reprisals or victimisation for whistleblowing action undertaken in good faith and within the meaning of the PIDA.

Under this policy, any of the following can raise a concern:

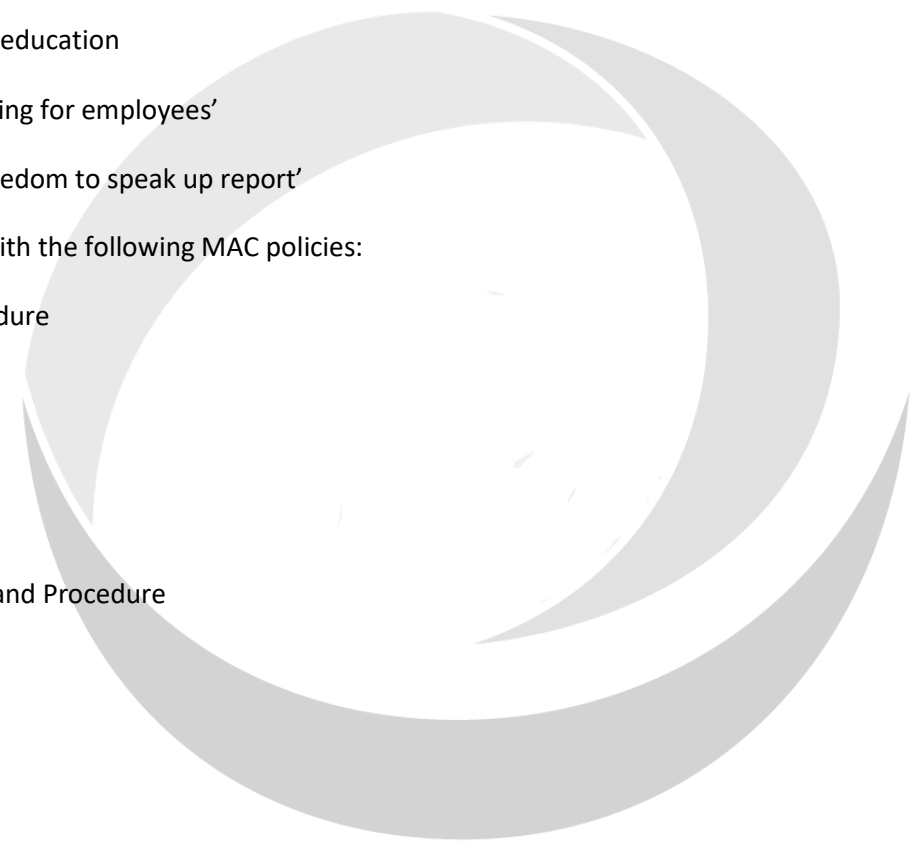
- Employees working in Emmaus Catholic MAC schools and settings
- Voluntary workers working within Emmaus Catholic MAC schools and settings
- Trainees, such as student teachers

## 2. Legal framework

This policy has due regard to all relevant legislation and guidance including, but not limited to, the following:

- Public Interest Disclosure Act 1998
- Employment Rights Act 1996
- Academy trust handbook
- DfE 'Keeping children safe in education'
- GOV.UK (2012) 'Whistleblowing for employees'
- Sir Robert Francis (2015) 'Freedom to speak up report'

This policy operates in conjunction with the following MAC policies:

- Disciplinary Policy and Procedure
  - Records Management Policy
  - Complaints Policy
  - Data Protection Policy
  - Grievance Resolution Policy and Procedure
- 

### 3. The Public Interest Disclosure Act

The Public Interest Disclosure Act 1998 (PIDA) protects employees who “blow the whistle” where the employee reasonably believes that the disclosure falls within the remit of the prescribed person or body, and that the information and any allegations are substantially true. Disclosures made under this procedure will be monitored for statistical purposes as required under the PIDA. The details of any disclosure will remain confidential.

The (Executive) Principal is the first point of contact for whistleblowing queries in a school and the CEO for whistleblowing queries for Central team. If the allegation is related to the (Executive) Principal, the concern should be raised with the CEO. If the allegation is related to the CEO, the concern should be raised with the MAC named Director for Whistleblowing listed at the end of this policy. If the allegation is related to a member of the Local Governing Body or a Director the concern should be raised with the Named Director for Whistleblowing.

Any member of the school community or the general public is able to “blow the whistle”; however, the PIDA only protects employees. The ‘Non-employees’ section of this policy includes further details on how whistleblowing affects non-employees.

### 4. Definitions

“**Whistleblowing**” is when an employee reports suspected wrongdoing, or ‘qualifying disclosures’, at work to their employer.

As outlined by the PIDA, “**qualifying disclosures**” pertain to when any of the following takes place:

- A criminal offence has been committed, is likely to be committed or is being committed
- A person has failed, is failing or is likely to fail to comply with any legal obligation to which they are subject
- A miscarriage of justice has occurred, is occurring or is likely to occur
- The health or safety of any individual has been, is being or is likely to be endangered
- The environment has been, is being or is likely to be damaged
- Information tending to show any matter falling within any of the preceding points has been, is being or is likely to be deliberately concealed

“**In the public interest**” means that an individual acted outside of their own personal interest – they acted for more than personal gain. It is not necessary for the disclosure to be of interest to the entire public. The following considerations are often used as a test to establish whether something is within the scope of public interest:

- The number of people in the group whose interests the disclosure served
- The nature of the interests and the extent by which individuals are affected by the wrongdoing disclosed

- The nature of the wrongdoing disclosed
- The identity of the alleged wrongdoer

**“Blacklisting”** refers to an individual who is being refused work because they are viewed as a whistleblower.

**“Grievances”** involve someone filing a complaint because they personally have been mistreated in some way – the person making the complaint will have a direct interest in the outcome. It is important to understand the difference between raising a grievance and blowing the whistle.

## 5. Roles and responsibilities

The MAC Board of Directors will be responsible for:

- Establishing and agreeing the whistleblowing procedure.
- Ensuring the agreed whistleblowing procedure is published on the MAC website.
- Monitoring the effectiveness of this policy and undertaking any necessary reviews, e.g. in relation to good practice recommendations or changes in legislation.
- Ensuring all members of the MAC community have access to this policy.
- Investigating, in liaison with the CEO/(Executive) Principal any concerns that are raised.
- Ensuring this policy provides an open and transparent framework where employees of the school can raise their concerns.
- Taking the necessary action against members of staff following an investigation into any alleged malpractice.
- Ensuring that the minutes of the relevant MAC Committee and each school’s Local Governing Body include a record of the MAC whistleblowing arrangements and who, both internally and externally, staff members should report concerns to.
- Appointing one named Director and one member of staff for schools and the Central Team to act as points of contact for staff members when reporting concerns.
- Ensuring that all concerns raised by whistleblowers are responded to properly and fairly.
- Ensuring that whistleblowing forms part of the staff Code of Conduct as part of a wider approach to having in place appropriate safeguarding policies and procedures.

The (Executive) Principal in schools and CEO for the Central Team will be responsible for:

- Ensuring all members of staff have read and understood this policy.
- Receiving, investigating and responding to any concerns that have been raised by MAC staff.
- Being the first point of contact regarding whistleblowing.

The CEO will be responsible for receiving any concerns raised about the (Executive) Principals and the named Director for receiving any concerns about the CEO, Directors or Local Governing Body members.

All members of staff will be responsible for:

- Raising any concerns that meet the definitions in the 'Definitions' section of this policy.
- Being truthful and reasonable with any concerns that they have.
- Not raising malicious or unfounded concerns.

## **6. Harassment and victimisation of staff**

The MAC recognises that the decision to report a concern can be a difficult one to take, not least because of the fear of reprisal from those responsible for the malpractice or from the school/setting as a whole; however, the MAC will not tolerate any such harassment or victimisation and will take appropriate action to protect staff who raise a concern in good faith.

Staff are protected in law by the PIDA, which gives employees protection from detriment and dismissal where they have made a protected disclosure, providing the legal requirements of the Act are satisfied, e.g. the disclosure was in the public interest.

Any member of staff who victimises or harasses a member of staff as a result of their having raised a concern in accordance with this policy will be dealt with under the MAC Disciplinary Policy and Procedure.

## **7. Non-employees**

The PIDA and the Employment Rights Act 1996 do not protect non-employees as far as whistleblowing is concerned. Irrespective of this, the MAC will not allow harassment, dismissal or exclusion for any non-employee who raises a genuine concern.

Where an individual feels that they have been unfairly treated following blowing the whistle, they should make a complaint under the MAC Complaints Policy.

Directors and Local Governing Body members are not employees and, while they are responsible for ensuring there is a whistleblowing procedure in place, they are not protected under the PIDA.

## **8. Good practice principles**

The MAC will implement the core whistleblowing principles, as outlined in the 'Freedom to speak up report', to ensure that whistleblowing procedures are fair, clear and consistent.

The MAC will ensure the following principles are reflected in our ethos and values – there will be a culture:

- Of safety in Emmaus Catholic MAC schools and settings.
- Where people feel confident with raising concerns.

- Free from bullying.
- Of visible leadership.
- Of valuing staff.
- Of reflective practice.

By providing a clear procedure for mediating and resolving cases, as outlined in the 'Procedure' section of this policy, the Emmaus Catholic MAC schools and settings will ensure that all cases are efficiently handled. This procedure includes:

- How to raise and report concerns.
- How investigations will be conducted.
- How the school will mediate and resolve disputes.

The MAC will implement **measures to support good practice** by ensuring adherence to the following principles:

- Offering relevant training to staff
- Providing the necessary support to staff
- Providing support to staff who are seeking alternative employment
- Being transparent
- Being accountable
- Conducting an external review of any concerns raised, where necessary
- Undertaking regulatory action as required
- Informing staff what protection is available to them if they report someone
- Ensuring that alternative whistleblowing channels are in place for members of staff who feel unable to raise an issue with their employer

The MAC will ensure there are **particular support measures in place for vulnerable groups** by adhering to the following principles:

- Ensuring non-permanent staff are taught, and receive training on, the same principles as permanent staff
- Ensuring trainees are subject to all the safeguarding and whistleblowing principles
- Ensuring staff from ethnic minorities are supported, as they may feel particularly vulnerable when raising concerns
- Ensuring staff are empowered and protected, enabling them to raise concerns freely

## 9. Procedure

When raising concerns, individuals will express them preferably in writing to:

The (Executive) Principal in a school and the CEO for whistleblowing queries for Central team. If the allegation is related to the (Executive) Principal, the concern should be raised with the CEO. If the allegation is related to the CEO, the concern should be raised with the MAC named Director for Whistleblowing listed at the end of this policy. If the allegation is related to a member of the Local Governing Body or a Director the concern should be raised with the Named Board Director for Whistleblowing.

When individuals raise their concern, they will include the following information as far as possible:

- The background and history of the concern
- Any relevant names, dates and places
- The reasons for the concern

The MAC encourages individuals to let their identity be known when they raise concerns, as anonymous concerns can be challenging to investigate.

Individuals who would like to seek professional and confidential advice should contact Protect, a registered charity that advises on whistleblowing queries. The Protect website can be accessed [here](http://www.protect-advice.org.uk) (www.protect-advice.org.uk), or they can be contacted on 020 31172520.

Once an individual has raised a concern, the MAC will be responsible for investigating it.

Employees are encouraged to exhaust all internal procedures before contacting external agencies. This whistleblowing policy is designed to reduce the need for external disclosure and to encourage co-operation, cohesiveness and honesty.

In certain instances, however, it may be appropriate for the individual to raise the concern with an outside agency, e.g. the police, depending on the severity of the concern. Equally, it may be appropriate for the individual to request that their recognised trade union raises the matter.

Appropriate whistleblowing procedures will be put in place for concerns about poor or unsafe practice and potential failures in any MAC school's safeguarding system should be raised with the Principal/DSL.

If a member of staff feels like they are unable to raise a safeguarding-related concern with the school, or feels that their genuine concerns are not being addressed, they are able to contact the NSPCC Whistleblowing Helpline on 0800 028 0285 or the LADO.

One option for external whistleblowing is via 'prescribed persons'. Prescribed persons are mainly regulators and professional bodies. A complete list of prescribed persons can be found at: [gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies](http://gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies)

The MAC school, or the appropriate external agency, will acknowledge receipt of a disclosure but, unless additional information is required, will not contact or engage in dialogue with the whistleblower, as this may undermine the legitimacy of the investigation outcome.

## 10. Interview and investigation

The (Executive) Principal/CEO or named Director for Whistleblowing, as relevant, will write to the individual within 10 working days of the initial meeting to confirm that the concern has been received, as well as to indicate proposals for dealing with the matter.

The initial stage will be an interview with the whistleblower, and then an assessment of further action will be discussed. During this initial stage, the (Executive) Principal/CEO or named Director for Whistleblowing, as appropriate, will establish if:

- There are grounds for a concern and that it is genuine.
- The concern was raised in accordance with this policy.

During the initial interview, the (Executive) Principal/CEO or named Director for Whistleblowing, as appropriate, will request the individual puts their concern in writing, if they have not already done so. The (Executive) Principal/CEO or named Director for Whistleblowing, as relevant, will write a summary of the concern if the individual is unable to put it in writing.

The (Executive) Principal/CEO or named Director for Whistleblowing, as relevant, will explain the following to anybody raising a concern:

- How they will communicate with them throughout the process. It should be noted, the need for confidentiality may prevent the MAC/school giving the person raising the concern specific details of any necessary investigation or any necessary disciplinary action taken as a result of the concern.
- That their identity will be kept confidential from the alleged wrongdoer.
- That the MAC will do everything in its power to protect the person raising the concern from discrimination.
- That if the concern is genuine, even if the concern is not confirmed, no disciplinary action will be taken against the person raising the concern.

If clear evidence is uncovered that the concern raised is malicious or unfounded, disciplinary action may be brought against the person raising the concern.

If an investigation is carried out, the whistleblower will be informed of the final outcome.

A record will be kept of the seriousness of the issues raised and the credibility of the concern. All records will be kept confidential and will be stored in line with the MAC's Records Management Policy.

It may be possible for the concern to be resolved by simply agreeing the necessary action or explaining procedures to the alleged wrongdoer; however, depending on the severity and nature of the concern, it may:

- Be investigated by management, an internal audit or through the disciplinary process.
- Be referred to the police or an external auditor.
- Form the subject of an independent inquiry.

If the investigating officer needs to talk to the whistleblower, they are permitted to be accompanied by a recognised trade union representative or a fellow member of staff not involved in the area of work that the concern relates to. This person will provide support only and will not be allowed to become involved in the proceedings.

A record will be made of the nature and outcome of the concern. The purpose of this is to ensure that a central record is kept which can be cross-referenced with other complaints to monitor any patterns of concern across the school and to assist in monitoring the procedure.

The whistleblower will be informed of the results of the investigation, and any action that is proposed will be subject to third party rights. It should be noted that the need for confidentiality may prevent the MAC/school giving the person raising the concern specific details of any necessary investigation or any necessary disciplinary action taken as a result of the concern. Where action is not taken, the individual will be given an explanation.

#### **11. What the MAC asks of whistleblowers**

The purpose of this policy is to enable individuals to raise concerns in confidence, without any fear of reprisal. It is important that whistleblowers:

- Do not talk about the concern outside the MAC/school unless it is to report the concern through the proper external channels, e.g. the LA.
- Declare any personal interest in the matter, as the policy is designed to be used in the interest of the public and not for individual matters.

#### **12. Appeal process**

If the individual is not satisfied with the way the matter has been handled, they can make a complaint under the Emmaus Catholic MAC Complaints Policy.

#### **13. Unfair treatment**

An individual can take a case to an employment tribunal if they feel that they have been treated unfairly as a result of whistleblowing. Further information can be sought from the [Citizen's Advice Bureau](#), the whistleblowing charity [Protect](#), or from an individual's trade union.

Any claims of unfair dismissal needs be made within three months of the investigation ending.

#### **14. Anonymous Allegations**

It may be appropriate for anonymous complaints to be made although employees are encouraged to make their identity known. Concerns expressed anonymously will still be investigated but the process may be hampered if there need to be follow-up enquiries but the employee making the

disclosure cannot be contacted.

If an employee makes an anonymous allegation, it can be more difficult for them to qualify for protection as a whistleblower. This is because there would be no documentary evidence linking the worker to the disclosure for a tribunal to consider.

In the case of an anonymous allegation, the following factors will be taken into account when establishing the scope and depth of the investigation:

- the seriousness of the issues raised
- the credibility of the concern
- the likelihood of confirming the allegation from attributable sources and information.

Employees can make a disclosure via their trade union rather than personally, in order to further maintain confidentiality. In this circumstance the employee making the disclosure will still be protected by the workers' legal right to make a protected disclosure to certain third parties under the Public Interest Disclosure Act 1998 (PIDA), as incorporated into the Employment Rights Act 1996.

The trade union representative whom the employee approaches will also have protection given to complainants under PIDA – provided they act in accordance with this procedure.

#### **15. Monitoring and review**

The MAC Board of Directors will review this policy annually, ensuring that all procedures are up-to-date.

Any changes made to this policy will be communicated to all members of staff.

#### **16. Contact Details**

The Chief Executive Officer (CEO) of Emmaus Catholic Multi Academy Company can be contacted at the address below:

Mrs S Horan  
Chief Executive Officer/Accounting Officer  
Emmaus Catholic Multi Academy Company  
c/o Hagley Catholic High School  
Hagley  
Worcestershire  
DY8 2XL  
Tel: 01384 210542

Named Director for Whistleblowing

Ms J Edgecombe  
Director  
Emmaus Catholic Multi Academy Company  
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