



Code of Conduct

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This code of conduct has regard to the DfE statutory guidance, *Keeping Children Safe in Education* and also includes extracts from *Guidance for Safer Working Practice for Adults who Work with Children and Young People in Education Settings*¹. The full version of this guidance should be used as a working reference document for all members of staff working with children and young people and it will be used during induction and to inform relevant policies and procedures within the Trust.

Inclusive Education Trust (IET) expects all students to receive high-quality teaching and learning in a positive and respectful environment.

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

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

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

Whilst this code predominantly refers to 'employees or members of staff', the Trust expects all those working for and on behalf of the Trust, including in a voluntary capacity to reflect the standards of conduct and behaviour contained within this document.

Reference to the Trust represents the Inclusive Education Trust and reference to 'the school' in this document represents each school in the MAT. .

Where there is reference to the HoS, the HoS should always inform or seek advice from the DoE

Copies of the Trust's policies can be found on either the Trust website <https://www.ietmat.co.uk/> or the shared drive or with assistance from hr@ietmat.co.uk

2. Statement on Personal Conduct

The Trust expects all employees to promote and maintain high standards of personal conduct to sustain the good reputation of the Trust and to safeguard and promote the welfare of children and young people. In particular employees are expected to:

- Perform their duties to the highest possible standards, with honesty, integrity and impartiality and be accountable for their own actions.
- Maintain the confidence and respect of the general public and those with whom they work.
- Treat others with respect, fairness and dignity at all times.
- Prevent harassment by recognising and challenging inappropriate behaviour.
- Reporting any witnessed or suspected harassment promptly and in good faith.
- Communicate promptly any relevant concerns they may have about the quality of provision or the safety and welfare of children and young people.
- Familiarise themselves with systems and procedures, including reporting requirements, within the Trust that support the protection of children and to attend training and read safeguarding briefings provided to ensure that they remain up to date.
- Familiarise themselves with systems and procedures, including reporting requirements, within the Trust that support the protection of employees from bullying and all forms of harassment (including sexual harassment).
- Be aware that their behaviour inside and outside the workplace, as well as the behaviour of others in their personal lives, could compromise their position within the Trust in relation to the protection of children, loss of trust and confidence or bringing the employer into disrepute. It could also result in action by regulatory bodies.

¹ May 2019, Safer Recruitment Consortium, adapted and updated from an original IRSC / DfE document

- Inform the Director of Education (DoE) immediately if at any time they are subject to a criminal conviction, caution, ban, police enquiry, investigation or pending prosecution.
- Attend work in accordance with their contract of employment and associated terms and conditions in relation to hours, days of work and holidays. To make personal appointments outside of their working hours or during holidays where possible. To follow the Trust's 'Other Leave and Absence Policy' for time off other than through personal illness. To follow the Trust's Managing Sickness Absence Policy due to time off for illness or injury.

In addition to this code of conduct, teachers are also expected to meet the professional conduct standards outlined in the DfE Teachers' Standards.

3. Managing Allegations Against Staff, Volunteers and Contractors

The Trust encourages an open and transparent culture in which *all concerns* (including those deemed to be low-level) about adults working for, or on behalf of, the Trust are dealt with promptly and appropriately.

The Trust has procedures for dealing with concerns and/or allegations against those working in or behalf of the Trust in a paid or unpaid capacity which can be found in the Child Protection Policy. These procedures are consistent with the statutory guidance document, *Keeping Children Safe in Education* and will be followed where it is alleged that anyone working in the Trust 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 (including behaviour outside the Trust).

Any such allegations will be investigated and responded to in accordance with the procedure contained within the Child Protection Policy.

As part of ensuring a culture of openness, trust and transparency, the Trust also has procedures within the Child Protection Policy for addressing 'low-level concerns' which do not meet the threshold above. This would include any concern, however small, that an adult working for, or on behalf of, the Trust may have acted in a way that is inconsistent with this code of conduct and/or associated Trust policies but which does not warrant a referral to the Local Authority Designated Officer (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;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating or offensive language.

Reports of 'low-level' concerns should be made to the HoS/DoE in a timely manner. If the HoS/ DoE has any doubts as to whether the information which has been shared about the individual as a low level-concern in fact meets the harm threshold, they will consult with the LADO. Low-level concerns will be investigated, and the evidence collected will determine what further action may need to be taken. Records of low-level concerns will be retained on file for no less than the duration of employment.

Members of staff are in a position to identify concerns relating to the safety and welfare of children at an early stage, allowing for prompt intervention and preventing concerns from escalating. It is therefore vitally important that, if staff have any safeguarding concerns, however small, or an allegation is made about another member of staff, this is referred to the HoS promptly (or to the DoE in respect of HoS or CEO in respect of the DoE and Chair of Trustees in respect of CEO) in accordance with the Child Protection Policy. We also encourage staff to self-refer in circumstances 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 may have behaved in such a way that they consider falls below the expected professional standards.

4. Compliance with Trust Instructions

The Trust expects all employees to comply with lawful written and oral instructions unless to do so would result in a health and safety risk.

5. Probity of records

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

6. Data Protection

The Trust takes its obligations under data protection laws very seriously. All staff are expected to familiarise themselves with the Trust's Data Protection Policy and any associated procedures which govern day-to-day working practices as well as how to report a suspected data breach and to recognise when someone may have made a subject access request. If in any doubt you should consult your HoS promptly or contact the Trust's data protection officer (whose details can be found on the Data Protection Policy).

6.1 Disclosure of Information

All employees should develop a clear understanding about what information can be disclosed to government departments, internal or external auditors, parents, pupils and the wider public, and what information should remain confidential. Any information made available should be provided in a clear and concise way. Employees should seek the advice of their HoS if they are at all unsure of the level of confidentiality which is required.

Employees should not use any information gained in the course of their employment for personal gain or pass it on to others who might use it in such a way. Information concerning another person's personal affairs should not be divulged without prior approval, except where that disclosure is required or sanctioned by law.

6.2 Sharing Information about Pupils

There are some circumstances in which a member of staff may be expected to share information about a pupil, for example when abuse is alleged or suspected. In such cases, individuals have a responsibility to pass information on without delay, but only to those with designated safeguarding responsibilities.

If a child – or their parent / carer – makes a disclosure regarding abuse or neglect, the member of staff should follow the Trust's procedures. The adult should not promise confidentiality to a child or parent but should give reassurance that the information will be treated sensitively.

If a member of staff is in any doubt about whether to share information or keep it confidential he or she should seek guidance from the Designated Safeguarding Lead.

6.3 Media / Legal Enquiries

Any media or legal enquiries should be passed to DoE/CEO.

7. Whistleblowing

If an employee becomes aware of activities which they believe to be illegal, improper, unethical or otherwise inconsistent with this code of conduct, the employee should report the matter in accordance with the Trust's Whistleblowing Procedure or Child Protection Policy, as relevant. All employees are required to comply with any investigation undertaken as a result of such allegations being raised.

8. Appearance and Dress

A person's dress and appearance are matters of personal choice and self-expression and some individuals will wish to exercise their own cultural customs. Members of staff should, however, select a manner of dress and appearance appropriate to their professional role and this may be different to that adopted in their personal life. Staff should ensure they are dressed decently, safely and appropriately for the tasks they undertake. Those who dress or appear in a manner which could be viewed as offensive or inappropriate will render themselves vulnerable to criticism or allegations.

Members of staff act as role models and often have a professional relationship with a range of other stakeholders. For most staff, appropriate dress will be smart casual. Staff may wear sportswear or casual clothing and footwear for practical or physical activities.

9. Smoking/Vaping, Drugs and Alcohol

Employees must not smoke/vape on Trust premises or when working with or supervising students, such as when on educational trips. Employees must never arrive at work incapable through the effects of alcohol or drugs. Drinking alcohol or taking drugs (apart from appropriately prescribed medication or over-the-counter remedies) at work or during breaks is also strictly prohibited. The consumption of alcohol at staff events or meetings is subject to the authorisation of the HoS.

10. Political Neutrality

Employees should ensure that their own personal or political opinions do not interfere with any Trust Policy.

11. Appointment of Staff

Employees should not be involved in a staffing appointment, or in any decision relating to the discipline, promotion or pay and conditions of another employee (or prospective employee) to whom they are related or have a close personal relationship.

12. Equality, Bullying and Harassment

All employees and members of the local community have a right to be treated with fairness and equality. Employees must ensure that they comply at all times with the Trust's Equality Diversity & Inclusion Policy, Anti-Bullying & Harassment (including Sexual Harassment) Policy and other employment policies in relation to equality issues.

The bullying or harassment of other work colleagues, pupils or other members of the community is considered to be gross misconduct. Employees are expected to report any concerns or suspicions they may have about the treatment of others to the HoS.

13. Contractors and Competitive Tendering

Contractors may include individuals who are temporarily working alongside Trust staff, or employees of an external firm that has been awarded a contract to provide services. All contractors should be treated with courtesy and respect.

Any orders and contracts must be awarded by fair and open competition against other tenders. No special favour must be shown to current or recent former employees or associates in awarding contracts.

Employees must declare any relationship with a particular contractor, or any potential contractors, to the appropriate manager.

Employees should be clear on the separation of client and contractor roles. Senior employees who have both a client/contractor responsibility must be aware of the need for accountability and openness.

Employees privy to confidential information on tenders of costs relating to contractors should not disclose the information to any unauthorised party or organisation.

14. Use of the Trust's Materials, Property or Resources

Employees must ensure that Trust funds entrusted to them are used in a responsible and lawful manner. Employees should not make personal use of any Trust property, facilities, equipment, materials, vehicles or resources unless properly authorised to do so.

The Trust reserves the right to monitor emails, phone calls, internet activity or document production, principally in order to avoid offensive or nuisance material and to protect systems from viruses, but also to ensure proper and effective use of systems.

15. Hospitality and Acceptance of Gifts

All Trust staff and those working on behalf of the Trust are expected to refuse the offer of inappropriate and disproportionate hospitality and gifts made as part of the discharge of their duties unless there are compelling reasons or exceptional circumstances for doing so. The acceptance of gifts and hospitality must be treated with extreme caution and may be regarded as a breach of the code of conduct. The onus is on the individual to take responsibility for making informed judgements about any offers of gifts and hospitality made to them and for seeking advice if they are unsure whether they can accept. As to what is 'inappropriate and disproportionate', something like a small token of appreciation to a teacher, a small bouquet of flowers sent in thanks or a small buffet lunch to facilitate networking, would not seem unreasonable whereas anything which is significant, such as tickets to football matches or concerts, have a value to them which could have the potential to be interpreted as recompense, inducement or endorsement.

Gifts or hospitality must not be accepted where it might be perceived to influence a decision in respect of purchasing goods or services, awarding contracts, preferential treatment or in the discharge of any other aspect of the Trust's day-to-day business. It is the responsibility of individual members of staff to refuse such offers and to report any possible conflict of interest and any cases where they believe that the Trust may be compromised.

It is a criminal offence for employees, or those working on behalf of the Trust, to corruptly receive any gift, loan, fee, reward or advantage for doing, or not doing anything, or showing favour, or disfavour, to any person in their official capacity.

In no circumstances should a statement ever be made in return for a personal gift or money.

It is expressly prohibited for an employee to accept any gift or hospitality from an organisation if they are actively involved in a tender process with the organisation on behalf of the Trust. This prohibition commences at the point that an invitation to tender is published and extends to a period of three months after a contract has been awarded.

For reasons of probity and transparency, the principle of receipt of gifts or hospitality extends to the spouse, partner or immediate family of the employee.

If an employee has any doubt about such an offer of a gift or hospitality, they are responsible for notifying and discussing this with their HoS.

15.1 Giving Gifts

It is inadvisable to give personal gifts to pupils or their families. This could be interpreted as a gesture either to bribe or groom. It might also be perceived that a 'favour' of some kind is expected in return.

Any reward given to a pupil should be in accordance with agreed practice, consistent with the Trust's Behaviour Policy, recorded and not based on favouritism.

16. Working Relationships and Social Contact Outside the Workplace

Internal and external working relationships are formed on a daily basis with colleagues, pupils, parents and contractors. These should be conducted in a professional, friendly and respectful manner, whilst maintaining professional boundaries and relationships at all times, considering whether their actions are warranted, proportionate, safe and necessary.

It is acknowledged that staff may have genuine friendships and social contact with parents of pupils, independent of the professional relationship. Staff should, however, also be aware that professionals who sexually harm children often seek to establish relationships and contact outside of the workplace with both the child and their parents, in order to 'groom' the adult and the child and/or create opportunities for sexual abuse, exploitation or radicalisation.

Staff should recognise that some types of social contact with pupils or their families could be perceived as harmful or exerting inappropriate influence on children, and may bring the Trust into disrepute (e.g., attending a political protest, circulating propaganda).

If a pupil or parent seeks to establish social contact, or if this occurs coincidentally, the member of staff should exercise their professional judgement. This also applies to social contacts made through outside interests or the staff member's own family.

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

17. Communication with Children and Young People and E-Safety

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

Employees should not seek to communicate, make contact with or respond to contact with pupils outside of the purposes of their work and should not give personal contact details (e.g., email address, home or mobile telephone numbers, details of web-based identities eg., on social media) to children.

Staff must employ the highest security settings on any personal profiles they may have and will remain mindful of their use of social media and other web-based presence including written content, videos or photographs and views expressed directly or indirectly which may bring themselves, the Trust into disrepute.

Only equipment and services provided by the Trust should be used for communication and employees are expected to adhere to the Trust's IT Use Policy. Internet-enabled personal devices must only be used in line with Trust guidance on the use of mobile technologies which is found in our E-Safety Policy.

Employees are expected to report to their HoS any contact or correspondence with children they receive via personal contact mechanisms.

Members of staff should always report any indications (verbal, written or physical) that suggest a pupil may be infatuated with a member of staff to their line manager and HoS.

18. Physical Contact with Pupils.

There are occasions when it is entirely appropriate and proper for staff to have physical contact with children, however it is crucial that they only do so in ways appropriate to their professional role and in relation to the pupil's individual needs and any agreed care plan. Any physical contact should be in response to the child's needs at the time, of limited duration and appropriate to their age, stage of development, gender, ethnicity and background. Adults should, therefore, use their professional judgement at all times.

Members of staff should:

- be aware that even well-intentioned physical contact may be misconstrued by the pupil, an observer or any person to whom this action is described;
- never touch a pupil in a way which may be considered indecent;
- always be prepared to explain actions and accept that all physical contact is open to scrutiny;
- never indulge in horseplay or fun fights;
- always allow/encourage pupils, where able, to undertake self-care tasks independently;
- ensure the way they offer comfort to a distressed pupil is age appropriate;
- always tell a colleague when and how they offered comfort to a distressed pupil;
- establish the preferences of pupils;
- consider alternatives, where it is anticipated that a pupil might misinterpret or be uncomfortable with physical contact;
- always explain to the pupil the reason why contact is necessary and what form that contact will take;
- report and record situations which may give rise to concern;
- be aware of cultural or religious views about touching and be sensitive to issues of gender.

In certain curriculum areas (e.g., PE, drama or music), staff may need to initiate some physical contact with children, for example, to demonstrate technique in the use of equipment, adjust posture or support a child so they can perform an activity safely or prevent injury. Physical contact should take place only when it is necessary in relation to a particular activity. It should take place in a safe and open environment, i.e., one easily observed by others, and last for the minimum time necessary. The extent of the contact should be made clear and undertaken with the permission of the pupil. Contact should be relevant to their age and understanding and adults should remain sensitive to any discomfort expressed verbally or non-verbally by the pupil. Staff working in these areas are expected to have regard to any particular guidance or protocols provided to them on appropriate physical contact.

19. Behaviour Management and Physical Intervention

All members of staff must avoid any form of degrading or humiliating treatment to punish a child or use force as a means of punishment. Staff are expected to act as role models and should avoid shouting at children other than as a warning in an emergency situation. Adults may reasonably intervene to prevent a child from committing a criminal offence, injuring themselves or others, causing damage to property or engaging in behaviour prejudicial to good order and to maintain good order and discipline. The use of physical intervention should, however, be avoided wherever possible and, where necessary, should only use minimum force and for the shortest time needed.

All members of staff are expected to understand and to follow the Trust's Behaviour Policy and Physical Intervention Policy as appropriate to their role.

20. Sexual Conduct

Any sexual behaviour by a member of staff with or towards a pupil is unacceptable. It is an offence under section 16 of the Sexual Offences Act 2003 for a member of staff in a position of trust to engage in sexual activity with a pupil under 18 years of age, even if the relationship is consensual, and sexual activity with a child could be a matter for criminal and/or disciplinary procedures. A situation where a person is in a position of trust could arise where the child is in full-time education and the person looks after children under 18 in the same establishment, even if they do not teach the child.

The Trust has zero-tolerance approach towards sexual harassment. Sexual harassment can occur in many forms, and can take place either at work, outside work, in person, or online.

Examples include:

- physical conduct of a sexual nature, unwelcome physical contact or intimidation;
- persistent suggestions to meet up socially after a person has made clear that they do not welcome such suggestions;
- showing or sending offensive or pornographic material by any means (e.g. by text, video clip, email or by posting on the internet or social media);
- unwelcome sexual advances, propositions, suggestive remarks, or gender-related insults;
- offensive comments about appearance or dress, innuendo or lewd comments;
- leering, whistling or making sexually suggestive gestures; and
- gossip and speculation about someone's sexual orientation or transgender status, including spreading malicious rumours.

If an employee feels that they are being sexually harassed or witnesses sexual harassment in the course of their employment they should raise these concerns at the earliest stage. This may be done informally or formally. Reporting mechanisms are specified in the Anti-Bullying and Harassment (including Sexual Harassment) Policy.

21. Lone Working and One-to-One Situations Involving Pupils

Staff working on a one-to-one basis with pupils, including visiting staff from external organisations, can be more vulnerable to allegations or complaints and should ensure that, wherever possible, they work in an area/room that is covered by CCTV or there is visual access and/or an open door in one-to-one situations.

Members of staff should not arrange to meet with pupils from the Trust away from the work premises unless the necessity for this is clear and approval is obtained from the HoS, the pupil and their parents/carers.

Staff are expected to adhere to the Trust's policies on lone working.

The Trust will conduct risk assessments in relation to the specific nature of any planned home visits.

22. Transporting Pupils / Educational Visits

A designated member of staff will be appointed to plan and provide oversight of all transport arrangements and respond to any concerns that may arise. Staff should not offer lifts to pupils unless the need for this has been agreed by a manager.

Wherever possible and practicable it is advisable that transport is undertaken other than in private vehicles and with at least one adult additional to the driver acting as an escort.

It is a legal requirement that all passengers wear seatbelts and the driver should ensure that they do so. They should also be aware of and adhere to current legislation regarding the use of car seats for younger children. Staff should ensure that their behaviour is safe and that the transport arrangements and the vehicle meet all legal requirements. They should ensure that the vehicle is roadworthy and appropriately insured and that the maximum carrying capacity is not exceeded.

Staff should never offer to transport pupils outside of their normal working duties, other than in an emergency or where not doing so would mean the child may be at risk. In these circumstances the matter should be recorded and reported to both their manager and the child's parent(s). The Trust's Health and Safety Policy and Educational Visits Policy set out the arrangements under which staff may use private vehicles to transport pupils.

Educational visits will be undertaken in accordance with the Trust's Educational Visits Policy and any member of staff accompanying children on an educational visit are required to familiarise themselves with and adhere to this policy.

23. Administering First Aid and Medication

Any member of Trust staff may agree to become a qualified first-aider or to provide support to pupils with medical conditions, including the administration of medicines, but cannot be required to do so unless this forms part of their contract of employment. Any such employee will receive suitable training and will be expected to adhere to Trust guidelines and policies on undertaking such responsibilities.

24. Health and Safety

All employees have a shared duty to help prevent injuries or accidents occurring at work by complying with the Trust's Health and Safety Policy and all instructions relating to safety and security procedures.

25. Photography, Videos and Other Images

The Trust has strict rules of the taking and use of images which are contained within the Trust's Child Protection Policy & Photography and Video Policy. All members of staff should have regard to these rules. Under no circumstances should members of staff use their personal equipment to take images of pupils at, or on behalf of, the Trust or display or distribute images of pupils except as authorised by the Trust and with appropriate consent.

26. Declaration of Personal Interests and Outside Commitments

Employees are responsible for ensuring that their private interests, beliefs and personal associations do not conflict with their professional duties.

All employees should declare any non-financial or financial interest which might conflict with the ethos or work of the Trust or any relationship which, by the employee's association with that person, might adversely affect the Trust's reputation, attract negative publicity or potentially bring into question the employee's suitability to work with children and young people.

Declarations should be made to the DoE via the HR team hr@ietmat.co.uk who should ensure that a written record is made in accordance with the Trust's procedure. Declarations must extend to acknowledging the involvement of a relative or partner of an employee in an organisation with which the Trust does business (or seeks to do business), particularly if they are directors, partners or hold senior managerial positions in those organisations.

Where employees are in any doubt about whether any personal relationships, interests, or outside commitments should be declared in particular circumstances, they should either declare the information in any case or seek further advice from the HR team.

27. Secondary Employment

Employees are permitted to take up additional employment other than at the Trust provided the employment concerned does not constitute a conflict of interest or adversely affect their employment at the Trust.

Employees should, however, keep the Trust informed of other employment they undertake so that the Trust may ensure that the 48-hour weekly working time limit under the Working Time Regulations 1998 is adhered to. In the event that an employee's combined working hours are likely to exceed this figure they will be asked to sign a working time 'opt out' agreement.

28. Trust Policies

The Trust has in place a range of policies, some of which have been referred to in this code of conduct. Employees are expected to familiarise themselves with any policy the Trust has provided or drawn to their attention and to ensure that they take account of any future policy changes communicated to them. If in doubt about the application or interpretation of any policy an employee should seek advice from their line manager in the first instance. Trust's policies can be found on either the Trust website <https://www.ietmat.co.uk/> or the shared drive

29. Status of Code of Conduct

The content and operation of this policy is reviewed as and when deemed necessary by the Board of Trustees.

Employees will be expected to read this code at least annually.