



Transform Trust Code of Conduct January 2022

Code of Conduct

Key points:

All staff:

- Are role models for children and as such aspire to model high standards of behaviour, in and outside school.
- Are committed to actively safeguarding the interests of children and promoting their wellbeing.
- Work proactively to uphold principles of equality and diversity.
- Demonstrate high levels of personal integrity, honesty and confidentiality in their professional relationships.

Introduction

Transform Trust has set out this Code of Conduct for all school and Trust employees. Responsibility for day to day implementation will fall to the Headteacher in each individual school. The CEO will be responsible for Trust Centre staff and senior leaders in schools. It has been consulted on and agreed with the trade unions recognised in all Transform Trust schools.

In addition to this policy, all staff have an obligation to adhere to all relevant statutory legislation and the national and local terms and conditions for both teaching and support staff. Staff are expected to observe their school equality policy and ensure that they treat everyone with respect, oppose any forms of discrimination and bullying and are sensitive to other people's needs, attitudes and lifestyles.

Employees should be aware that a failure to comply with the following Code of Conduct may result in disciplinary action, which could lead to dismissal.

Purpose, Scope and Principles

A Code of Conduct is designed to give clear guidance on the standards of behaviour all Trust staff are expected to observe, and the school / Centre should notify staff (including supply staff) of this code and the expectations therein. School staff are role models and are in a unique position of influence and must adhere to behaviour that sets a good example to all the pupils within the school. As a member of a school community, each employee has an individual responsibility to maintain their reputation and the reputation of the school, whether inside or outside working hours.

This Code of Conduct applies to:

- All staff who are employed by the school, including the headteacher and any supply staff.

- All staff in units or bases that are attached to the school.
- All staff employed directly by the Trust to work in a school or who work with those who are employed in a school.

The same expectations will be shared with, and apply to, regular visitors to the school / Trust such as peripatetic staff and regular volunteers; although it is acknowledged that external staff are covered by the relevant Code of Conduct of their employing body.

Where employees have complied with the Code of Conduct, the school and Trust, will protect employees against unjustified allegations of wrong doing.

This Code of Conduct cannot cover every eventuality and further guidance should be sought from the headteacher or, in the case of headteachers, from the CEO and /or the Trust HR Lead, if they are unsure of the standards expected of them.

Setting an Example

All staff who work in schools will set good examples of behaviour and conduct which can be copied by pupils. Therefore, they must demonstrate high standards of conduct in order to encourage our pupils to do the same, for example, staff must not use offensive language.

All staff must take reasonable measures to ensure they are not placed in situations or find themselves in situations which could risk a suggestion of unprofessional conduct. Transform Trust and its schools will ensure policies, procedures and expectations are put in place to support employees put these reasonable measures into place.

Safeguarding Pupils, Staff and Visitors

Everyone who comes into contact with children and their families has a role to play in safeguarding children. School staff are particularly important as they are in a position to identify concerns early on and provide help for children, to prevent situations from escalating, by working with other agencies to protect them from harm.

Staff have a duty to safeguard pupils from:

- physical abuse
- sexual abuse
- emotional abuse, including verbal assaults
- neglect
- unequal treatment or discrimination

The duty to safeguard pupils includes the duty to report concerns about a pupil to the school's Designated Safeguarding Lead (DSL) for child protection. The headteacher must ensure that all

staff are familiar with, and have received appropriate training annually on, the school's Safeguarding Policy, and understand the provisions of the Whistleblowing Procedure. In addition, all staff should read the Department for Education's (DfE) statutory document *Keeping children safe in education: Information for all school and college staff* (September 2020, or subsequent edition), which is available on the DfE's website and from the headteacher / Trust Central team. Transform Trust and its schools will ensure regular updates and safeguarding training is offered to our employees to support them in meeting this requirement.

Staff must not demean or undermine pupils, their parents or carers, colleagues or visitors to the school.

Staff should ensure they comply with the school's IT and social media policies, particularly with regard to the use of personal equipment. For example, the use of personal mobile phones or devices to record or photograph children is prohibited, and staff should only use school equipment for this purpose. Staff are expected to keep mobile phones switched off during staff meetings and for the periods of the working day when they are in contact with children. In exceptional circumstances (such as critical illness of a family member) the headteacher should be notified if a phone needs to be used. Where staff are in any doubt about the school's expectations regarding their behaviour, they should seek guidance immediately from a member of the senior leadership team. Trust Centre staff should follow the same principles with regard to equipment and mobile phone use. Members of the Executive Team should be contacted should there be any doubt about expectations.

Staff must ensure the highest standards of safety and welfare are taken in respect of pupils under their supervision and other colleagues and visitors to the school.

Staff have a duty to inform the headteacher (or suitable senior person in their absence) if they believe that a colleague or visitor is behaving in a way that compromises the safety or wellbeing of any child, group of children or a member of staff. Where staff have concerns about the headteacher, this should be referred to the CEO or a member of the Executive Team within the Trust.

Staff can report their concerns about child protection directly to the appropriate external agency if they consider the circumstances warrant this; however, they are encouraged to raise this with the school's DSL and/or headteacher initially.

If staff have concerns about safeguarding or child protection practice in the school, they should raise this with the headteacher or chair of governors wherever possible. Consideration should also be made to raising it with the CEO of the Trust. Staff can also use the school's Whistleblowing Policy, where they consider this to be more appropriate. Alternatively, a specific confidential disclosures e-mail address has been set up for anyone in the Trust to identify concerns they consider are necessary or appropriate (disclosures@transformtrust.co.uk) Further advice and support can be obtained from other agencies including trade unions, professional bodies or the

independent whistleblowing charity Public Concern at Work (www.pcaaw.org.uk).

Allegations, Criminal Charges and Changes to Status

Staff facing allegations, criminal charges and changes to status must disclose this, without delay, to their headteacher, line manager or to the CEO. They must do this in all circumstances, whether they personally feel the matter is relevant or not. If in doubt, staff should seek advice from the headteacher, their line manager or the CEO of the Trust.

Examples of changes could include revisions to registration status, receiving a conviction, warning, reprimand, caution or awaiting sentence or whilst any criminal allegations made against the employee are being investigated. Such offences include motoring convictions. In all cases these must be declared as soon as practically possible to allow the school/Trust to assess the potential risks to their employment. Staff may be suspended if this is felt appropriate in the circumstances, for example, if their clearance status changes or is under review.

Staff are expected to disclose immediately any incidents or allegations of wrongdoing arising from alternative employment, voluntary work, incidents outside of work, or from previous employment which may or may not be covered by pre-employment checks that could affect their suitability to work with children, or for the Trust, such as allegations of sexual misconduct or violence. Failure to do this may result disciplinary action which could lead to dismissal.

Staff in posts covered by the disqualification requirement under the Childcare Act 2018, must ensure that they comply with the requirement to disclose offences relevant to themselves and keep this information up to date throughout the year. The headteacher and the Trust HR team can provide further guidance in relation to this and, where in any doubt, all working at the school should seek further advice.

The DBS policy provides more detail on the school and Trust's position and approach to safeguarding vulnerable groups.

The implications of any disclosures will need to be considered and could result in disciplinary action, possibly leading to dismissal if employees are no longer able to fulfil their role in the school/for the Trust.

Failure to disclose information may result in disciplinary action which could lead to dismissal.

Allegations of abuse

Keeping Children Safe in Education 2021 Part 4 Allegations of abuse made against Teachers and other staff including supply teachers and volunteers: this guidance will be followed where it is alleged that anyone working in the school including supply teachers and volunteers has:

- behaved in a way that has harmed a child, or may have harmed a child;

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

Where a member of staff or volunteer is involved in an incident outside school, which did not involve children but could have an impact on their suitability to work with children, the Trust and the school will consider what triggered these actions and could a child in the school trigger the same reaction, therefore being put at risk.

Low level concerns policy - This policy enables all staff to share any concerns – no matter how small – about their own or another member of staff’s behaviour with the Headteacher. Safeguarding and promoting the welfare of children is everyone’s responsibility. Keeping Children Safe in Education 2021 Part 4 also covers concerns that do not meet the harm threshold and are classified as “ low level “ concerns. 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 set out in allegations of abuse detailed above.

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, including supply staff, contractors and volunteers, working in or on behalf of the school 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 allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

It is crucial that any such concerns, including those which do not meet the harm threshold 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 potential false allegations or misunderstandings.

We wish to encourage an environment in our schools where you feel confident to refer others or yourself. You may find yourself in a situation which could be misinterpreted, or might appear compromising to others. Equally, you may, for whatever reason, have behaved in a manner which, on reflection, you consider falls below the standard set out in this staff code of conduct. Self-reporting in these circumstances can be positive for a number of reasons: it is self-protective, in that it enables a potentially difficult issue to be addressed at the earliest opportunity; it demonstrates awareness of the expected behavioural standards and self-awareness as to your own actions or how they could be perceived; and, crucially, it is an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

If you have any concerns that either one of your colleagues or yourself are not following this code of conduct you should report these to your Headteacher immediately although it is never too late to share a concern. This can be verbally or in writing. If the concern is about the Headteacher then this should be reported to the CEO of the Trust: pa.ceo@transformtrust.co.uk

When you share what they believe to be a low-level concern, the Headteacher will speak to the adult who is the subject of that concern – no matter how “low level” the concern may be perceived to be, to gain the subject’s account – and to make appropriate records which may be referenced in any subsequent disciplinary proceedings.

Training on low level concerns will be provided by the school as part of the safeguarding training.

Pupil Development

Staff must comply with all school policies and procedures, paying particular attention to those that support the well-being and development of pupils.

Staff must co-operate and collaborate with colleagues and with external agencies where necessary to support the development of pupils.

Staff must follow reasonable instructions that support the development of pupils.

Honesty and Integrity

Staff must maintain high standards of honesty and integrity in their work. This includes the handling and claiming of money and the use of school / Trust property and facilities. All staff should therefore familiarise themselves with the relevant school / Trust policies, including those in relation to financial procedures.

All staff must comply with the Bribery Act 2010. A person may be guilty of an offence of bribery under this act if they offer, promise or give financial advantage or other advantage to someone; or if they request, agree or accept, or receive a bribe from another person. If you believe that a person has acted in a corrupt way, you should refer to the school’s Whistleblowing Procedure. (Further details of the Bribery Act 2010 can be found at: <http://www.legislation.gov.uk/ukpga/2010/23/contents>).

Gifts from suppliers or associates of the school must be declared to the headteacher and recorded. This does not include “one off” token gifts from pupils or parents (e.g. at the end of the term or year). However, it could include offers of hospitality and invitations to events. Individual gifts from members of staff to individual pupils should not be given as they are inappropriate and could be misinterpreted.

Any personal interests, financial or otherwise, which could be seen to conflict with a member of

staff's role at the school / for the Trust, must be registered with the headteacher and / or the CEO of the Trust. This could include where a close personal relationship exists with a potential supplier tendering for a contract with the school. Staff are expected to complete a form declaring any pecuniary interests on an annual basis.

Staff must declare any membership of any organisation classed as a secret society. This should be made in writing and sent to the headteacher, who will record it.

The advice of the headteacher, a member of the Trust Executive Team, should be sought wherever doubt exists about the status of gifts, offers of hospitality or a potential situation of conflict of interest.

Professional Attire

Whilst it is acknowledged that appearance is a matter of personal taste, it is expected that staff will present themselves in a professional manner which sets a good example to pupils and visitors to the Trust, and exhibits the importance of the job they undertake. However, clothes should be practical for the tasks required e.g. sportswear when teaching P.E.

Staff should be mindful of the health and safety implications, for example, when wearing jewellery, ensuring appropriate footwear, etc.

Staff are expected to dress with regard to the audience, particularly when representing the school or Trust at external events.

Staff should not dress in a manner which could cause offence or embarrassment to others.

No dress code can cover all contingencies, so staff must exert a certain amount of judgement in their choice of clothing and if in doubt this should be discussed with their line manager/ Headteacher

Conduct and Professional Relationships within Work

All members of staff should arrive at a time which enables them to begin their contracted hours promptly. If in doubt, staff should clarify this with their line manager.

Staff are expected to take professional responsibility for fulfilling their role in school and, whatever that role, it is essential to the overall success of the school / to the business of the Trust. This includes the professional courtesy of meeting deadlines that have been set and having a proactive dialogue with colleagues / line managers at the earliest opportunity if there are issues which prevent a task being completed on time. Therefore, staff will be positive in their thinking and approach, seeking constructive solutions to problems and by de-personalising issues.

Staff will communicate effectively and fairly with all stakeholders and operate under the Nolan principles for those in public life (see Appendix 1). They will treat all colleagues and visitors with professional respect and courtesy, showing appreciation for the contributions of others.

Conduct Outside Work

Staff should consider the full implications of how their conduct outside work could impact on the school and the role they undertake within schools. This includes via a variety of methods of communication, e.g. social media, word of mouth, written, phone, text, etc. It is a shared responsibility between Trust schools and employees in ensuring appropriate mechanisms are in place to fully understand what the responsibilities are of behaviour and actions outside of work.

Staff must notify the headteacher / CEO in the cases of headteacher's and members of the Trust Centre of any criminal charges brought against them, regardless of whether they consider these to be relevant to their working life (see also section 5 above). In some circumstances, criminal offences may need to be referred to the relevant disciplinary body by the headteacher / CEO, and staff need to be aware that this could result in removal of QTS. Offences that involve violence, possession or use of illegal drugs, or sexual misconduct are regarded as unacceptable and will usually result in loss of QTS. Disciplinary action within a school context could also lead to referral to other agencies.

Staff must exercise caution when using information technology and be aware of the risks to themselves and others. Transform Trust will ensure it has clear policies and procedures in place which outlines expectations of practice. Staff must not engage in inappropriate use of social networking sites and must always consider the impact of any communication they engage in on themselves, the school, school community and the Trust. Staff must not access illegal, adult or other inappropriate sites using school computers, nor should they use IT equipment for activities that are not related to work, during their paid working hours (e.g. internet shopping).

If staff are intending to undertake additional work outside of their school day, it is expected that they will seek permission from the Headteacher or if the Headteacher with the CEO for the Trust. The Headteacher or CEO will review the Working Time Regulations, health and safety implications and the potential effects on their work performance, and carry out a risk assessment, as necessary. The school Trust will not unreasonably preclude any of its employees from undertaking additional employment, taking into consideration the personal circumstances of the employee in question, but any such employment must not, in the Trust's/headteacher's view, conflict with or react detrimentally to the school's/Trust's interests or endanger the health and safety of themselves or others.

No personal business activity or outside work of any sort may be undertaken by employees during their normal working hours for the school/Trust. Similarly, no school equipment, accommodation or resources may be used in connection with these activities.

Confidentiality

Staff must treat all information that they have access to within the school and relating to school as confidential.

Where staff have access to confidential information about pupils or their parents or carers, staff must not reveal such information except to those colleagues who have a professional role in relation to the pupil. Staff must ensure they have undertaken relevant training in GDPR and Safeguarding.

All staff are likely at some point to witness actions which need to be confidential and handled sensitively and according to correct procedures. These must only be discussed in the appropriate forum and with the relevant individuals (whether school staff or third parties). Where in doubt, staff must seek the advice of the Designated Safeguarding Lead (DSL).

However, staff have an obligation to share with their manager or the school's DSL any information which gives rise to concern about the safety or welfare of a pupil or colleague. Staff must never promise a pupil that they will not act on information that they are told by the pupil.

Disciplinary Action

This code of conduct forms part of the Disciplinary Rules. Failure to meet these standards of behaviour and conduct may result in disciplinary action, which could lead to dismissal.

Appendix 1

Nolan Seven Principles of Public Life

Whilst not applicable to all aspects of school life, the general principles apply.

(Originally published by the Nolan Committee: The Committee on Standards in Public Life was established by the then Prime Minister in October 1994, under the Chairmanship of Lord Nolan, to consider standards of conduct in various areas of public life, and to make recommendations).

Selflessness

Holders of public office should act solely in terms of the public interest. They should not do so in order to gain financial or other material benefits for themselves, their family, or their friends.

Integrity

Holders of public office should not place themselves under any financial or other obligation to outside individuals or organisations that might seek to influence them in the performance of their official duties.

Objectivity

In carrying out public business, including making public appointments, awarding contracts, or recommending individuals for rewards and benefits, holders of public office should make choices on merit.

Accountability

Holders of public office are accountable for their decisions and actions to the public and must submit themselves to whatever scrutiny is appropriate to their office.

Openness

Holders of public office should be as open as possible about all the decisions and actions that they take. They should give reasons for their decisions and restrict information only when the wider public interest clearly demands.

Honesty

Holders of public office have a duty to declare any private interests relating to their public duties and to take steps to resolve any conflicts arising in a way that protects the public interest.

Leadership

Holders of public office should promote and support these principles by leadership and example.