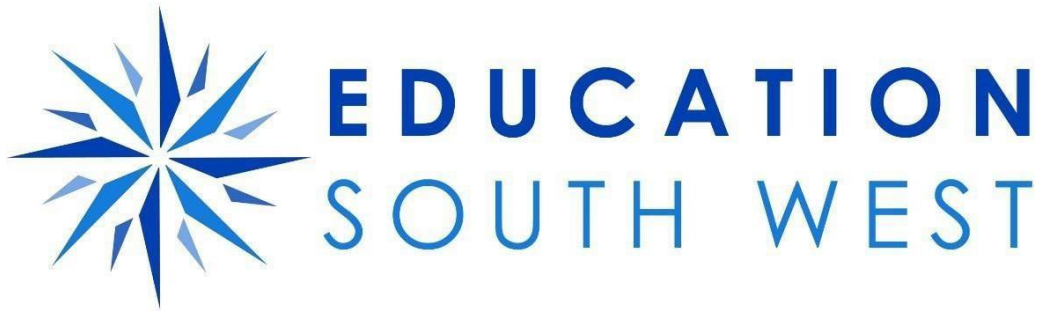




Code of Conduct Policy

Board Approved Date	July 2026
Version	1.5
Author Initials	MS/MC/RC
Review Date	July 2027

(This policy supersedes all previous Code of Conduct policies)

Amendments

Policy Date	New Version Number	Summary of change	Comments
15/02/2019	1.0	No changes made	
27/01/2021	1.1	No changes made	
20/03/2023	1.2	Minor changes made	
30/01/2026	1.3	Minor changes made	
18/05/26	1.4	Changes made to reference the Nolan Principles in Section 1.1, addition of 6.1a / 2.5 / 4.4 / 17.3	
26/06/2026	1.5	Strengthened consultation/implementation	Draft amendments following Trustee governance/compliance feedback

		assurance, explicit sexual harassment section, related policies, AI use, online conduct, conflicts of interest, personal relationships at work, and review in light of case learning. 1.5 Added on policy awareness and compliance 6.4 added on staff declarations *Section 8 (new)***03added on Sexual Harrassment 9.5 Added on staff declaration of personal relationships 10.5 Reference to AI added 12.4 added on online behaviour 19.2 Added – policy will be reviewed in light of new cases	
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Union Consultation

Date	Action (meeting, email etc)	Comments	Attendance
10/07/17	Meeting with Union Reps		UNISON, GMB, NASUWT, ATL, NUT
June/July 2026	Recognised trade unions to be shared revised draft for comment	Record responses and/or nil returns before final approval	To be confirmed

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1. Purpose

- 1.1 The aim of this Code of Conduct is to set out the standards of conduct expected of all individuals working for, on behalf of, or representing the Trust, and to provide further information on expected behaviours. This includes employees, agency workers, volunteers, contractors, Trustees, Members, and Local Governors. This Code should be read in conjunction with the Trust's disciplinary procedure (where applicable), Teachers' Standards and the statutory guidance Keeping Children Safe in Education (KCSIE – latest edition). This Code is underpinned by the **Seven Principles of Public Life (Nolan Principles)**, which inform the ethical framework and expectations for all individuals working within or on behalf of the Trust.
- 1.2 This Code should make it clear to individuals the expectations the Trust has of them. It is not exhaustive in defining acceptable and unacceptable standards of conduct and individuals must use common sense in adhering to the underpinning principles. If any individual is unsure what the expectations are in any given circumstance, they should speak to their line manager, Chair of Governors, Trust Executive Lead, or the Trust HR / Governance Team as appropriate.
- 1.3 The policy has been implemented following consultation with staff and recognised trade unions and approved by the Trust Board.
- 1.3 This procedure does not form part of any employee's contract of employment, and we may amend it at any time.
- 1.4 For Trustees, Members, Governors, volunteers and contractors, this Code forms part of the Trust's governance and assurance framework and is enforceable through the Trust's governance, contractual or removal processes.
- 1.5 All staff must confirm annually that they have read and understood this Code of Conduct. This will be recorded through the Trust's agreed HR, induction or annual compliance process. The Trust will ensure periodic training or briefing on key elements of the Code, including safeguarding, professional boundaries, conduct, discrimination, sexual harassment, online conduct and confidentiality. Line managers are responsible for reinforcing expectations through induction, supervision, appraisal, staff briefings and relevant case learning.

2. Scope

- 2.1 This Code applies to all individuals associated with the Trust, including employees (regardless of length of service), agency workers, volunteers, Trustees, Members, Local Governors and self-employed contractors, insofar as it is relevant to their role.
- 2.2 Breaches of this Code by employees will normally be managed under the Trust's disciplinary procedure. Breaches by Trustees, Members or Governors will be managed in accordance with the Trust's governance procedures, Scheme of Delegation, Articles of Association, and, where relevant, the Academy Trust Handbook.
- 2.3 As recognisable figures in the local community, the behaviour and conduct of individuals associated with the Trust outside of work or formal duties can impact on the Trust's reputation and effectiveness. Therefore, conduct outside formal duties may be addressed where it is relevant to the individual's role or position of trust.
- 2.4 As a Multi-Academy Trust, this Code applies consistently across all academies and central services. References to 'line manager' or 'school leader' should be read as including Trust Executive Leaders, Chairs of Governors, or Trustees, where appropriate.
- 2.5 Trustees, Members and Local Governors are additionally expected to demonstrate alignment with the Seven Principles of Public Life (Nolan Principles) in the execution of their governance duties.

3. Safeguarding and promoting the welfare of children

- 3.1 Employees must have fully read and understood our safeguarding and child protection policies, be aware of our systems for keeping children safe and must always follow the guidance in these policies.
- 3.2 The Trust's child protection and safeguarding policy are available on the Trust's website.
- 3.3 All employees must cooperate with colleagues and with external agencies where necessary.
- 3.4 3.4 Staff must be aware of and comply with the Trust's Managing Allegations Against Staff and

- Low-Level Concerns policy and are required to report concerns about the behaviour of adults, including concerns that do not meet the threshold for harm, in accordance with Trust procedures.
- 3.5 Safeguarding concerns may arise from conduct in person or online, including through the use of social media, messaging platforms, remote learning tools, or other digital technologies.

4. Duty of care

Staff must:

- 4.1 Understand the responsibilities which are part of their employment or role, and be aware that sanctions may be applied if these responsibilities are not undertaken with reasonable care.
- 4.2 Always act, and be seen to act, in students' best interests.
- 4.3 Avoid any
- 4.4 Take responsibility for their own actions and behaviour, demonstrating accountability and professionalism in line with the Seven Principles of Public Life.

5. Health & Safety

All employees must ensure that they:

- 5.1 Read and understand the Trust's Health and Safety Policy.
- 5.2 Comply with Health and Safety Regulations or instructions and use any safety equipment and protective clothing supplied by the Trust.
- 5.3 Comply with hygiene and accident reporting requirements.
- 5.4 Never act in a way which might cause risk or damage to any member of the Trust community or visitors.
- 5.5 Inform their line manager of any paid work undertaken elsewhere to support compliance with the Working Time Regulations.

6. Honesty and integrity

- 6.1 Employees are expected to demonstrate consistently high standards of personal and professional conduct. This includes maintaining appropriate attendance, and punctuality, treating colleagues with respect and professionalism, and having proper regard for the Trust's ethos, policies and practices.

6.1a All individuals are expected to uphold the **Seven Principles of Public Life (the Nolan Principles)**:

- Selflessness - Holders of public office should act solely in terms of the public interest.
- Integrity – Holders of public office must avoid placing themselves under any obligation to people or organisations that might try inappropriately to influence them in their work. They should not act or take decisions in order to gain financial or other material benefits for themselves, their family, or their friends. They must declare and resolve any interests and relationships.
- Objectivity – Holders of public office must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.
- Accountability – Holders of public office are accountable to the public for their decisions and actions and must submit themselves to the scrutiny necessary to ensure this.
- Openness - Holders of public office should act and take decisions in an open and transparent manner. Information should not be withheld from the public unless there are clear and lawful reasons for so doing.
- honesty - Holders of public office should be truthful; and
- leadership - Holders of public office should exhibit these principles in their own behaviour and treat others with respect. They should actively promote and robustly support the principles and challenge poor behaviour wherever it occurs.

These principles underpin the standards of behaviour expected across the Trust and apply to all roles, particularly those in positions of governance and leadership.

- 6.2 Employees must comply with any lawful and reasonable instructions issued by managers, school leaders, Trustees or Local Governors.

- 6.3 Employees uphold public trust in the Trust and maintain high standards of ethics and behaviour, within and outside the workplace, by:
- Not misusing, damaging, removing or allowing improper use of Trust property or resources.
 - Treating students with dignity and respect and maintaining appropriate professional boundaries.
 - Safeguarding students' wellbeing in accordance with statutory guidance.
 - Showing tolerance of and respect for the rights of others.
 - Not undermining fundamental British values
- Ensuring personal beliefs are not expressed in ways that exploit students' vulnerability or encourage unlawful behaviour.
- 6.4 Staff must declare any actual or potential conflicts of interest, including:
- External employment
 - Financial interests
 - Relationships that could influence decision-making
- Declarations must be made in line with the Trust's governance and financial procedures.

7. Tackling discrimination

- 7.1 Employees are required to understand discrimination, bullying and harassment and must comply with the Trust's policies, including, Equality, Diversity and Inclusion policies, which can be found on the Trust's website
- 7.2 Employees must not ignore or condone discrimination, including inappropriate language, jokes or 'banter', and must actively promote inclusion.

8. Sexual harassment and inappropriate conduct

- 8.1 The Trust has a zero-tolerance approach to sexual harassment.
- 8.2 Sexual harassment is unwanted conduct of a sexual nature which violates a person's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment.
- 8.3 Sexual harassment may include, but is not limited to, sexual comments, jokes or gestures; displaying or sharing sexual images; unwanted physical contact; intrusive questions about a person's private life; and online sexual harassment, including through messaging, social media or other digital platforms.
- 8.4 Staff must not engage in sexual harassment or inappropriate conduct towards colleagues, students, parents, carers, trustees, governors, visitors, contractors or any other third party.
- 8.5 Staff must report concerns in line with the Trust's safeguarding, low-level concerns, whistleblowing or HR procedures, as appropriate. The Trust will take appropriate action, which may include disciplinary procedures.
- 8.6 Third-party harassment, including harassment by parents, carers, contractors, visitors or external partners, must be reported and will be addressed by the Trust.

9. Professional boundaries and relationships

- 9.1 Employees are in a position of trust in relation to students. It is a criminal offence for a person aged 18 or over in a position of trust to engage in a sexual relationship with a student under their care, including where the student is over 18.
- 9.2 Employees must avoid behaviour or communication that could be misinterpreted, including online communication.
- 9.3 Sexualised behaviour, comments or discussions with or in the presence of students are unacceptable and unlawful.
- 9.4 Employees must always maintain professional boundaries and must not show favouritism or form inappropriate relationships.
- 9.5 Where staff become aware of a student infatuation or boundary concern, this must be reported to the Designated Safeguarding Lead (DSL). The details of the DSL can be found in the ESW Safeguarding Policy located on each school website.

10. Confidentiality and protection of data

- 10.1 Staff may have access to confidential and sensitive information relating to students, staff or Trust business and must not misuse or improperly disclose such information.
- 10.2 Where uncertainty exists about disclosure, advice must be sought from senior leadership or the Trust Executive Team.
- 10.3 The Trust processes personal data in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, Data Protection Act 1998. Employees must comply with all Trust data protection, IT and information security policies.
- 10.4 Any actual or suspected data breach, loss or misuse of information must be reported immediately in line with Trust procedures.
- 10.5 Use of artificial intelligence (AI) tools. Staff must use AI tools responsibly and in line with Trust policies. Confidential, personal or sensitive information must not be entered into AI systems unless explicitly authorised. Staff remain accountable for all professional outputs, including those supported by AI.

11. Physical contact with students

- 11.1 Appropriate physical contact may be necessary and must be proportionate, time-limited and appropriate to the student's age, needs and context.
- 11.2 Any physical contact for comfort or reassurance must be capable of justification and, where appropriate, reported to the DSL.
- 11.3 Physical intervention may be used only in accordance with the law and Trust policy.
- 11.4 Sexual contact or grooming behaviour is unlawful and unacceptable.

12. Social contact and online communication with students

- 12.1 Staff must not establish or seek to establish social relationships with students, including via social media or messaging platforms, outside of professional purposes.
- 12.2 Staff should not connect with students on personal social media accounts and must use Trust-approved systems for professional communication.
- 12.3 Staff must exercise professional judgement when encountering students outside school and report any contact that could be misinterpreted.
- 12.4 Staff must ensure their online conduct, including use of social media, AI platforms and digital forums, upholds public trust and professional standards at all times.
- 12.5 Staff's social media profiles should not be available to pupils or their families. If staff choose to maintain personal accounts on social media platforms, they should be aware that pupils and families may still be able to find them. Staff should therefore consider using an alternative profile name and ensure that their profile(s) are set to private.

13 Working one-to-one with students

- 13.1 One-to-one working is permitted but presents additional risk. Staff must:
 - Avoid secluded locations.
 - Ensure visibility into rooms where possible.
 - Inform colleagues or managers in advance where practicable.
 - Report concerns immediately.

14. Dress and appearance

- 14.1 Staff are role models and must dress in a professional, appropriate and respectful manner.

15. Gifts and hospitality

- 15.1 Gifts or hospitality exceeding **£15** must be declared and approved. Gifts exceeding **£30** must be declared to the school leader.
- 15.2 Staff must not accept gifts or hospitality that could be perceived as inducements.
- 15.3 Staff should not give gifts to students unless this is part of a recognised practice in line with the Trust's behaviour policy.

16. Keeping within the law

- 16.1 Unlawful or criminal behaviour inside or outside work may lead to disciplinary action.
- 16.2 Staff must inform the Headteacher or Trust Executive immediately if they are investigated, charged or convicted of a criminal offence that may impact their suitability to work with children or in a position of trust.

17. Conduct outside of work and at work-related functions

- 17.1 Staff conduct outside work may impact on Trust reputation and suitability for employment.
- 17.2 Staff must act responsibly at work-related events and social functions.
- 17.3 Staff must not act in a way that would bring the Trust into disrepute. This includes, but is not limited to, relevant criminal offences and posting negative or inappropriate comments about the Trust on social media platforms.

18. Whistleblowing and protected disclosures

- 18.1 Staff are encouraged to raise concerns about wrongdoing, safeguarding, financial impropriety or governance in accordance with the Trust's Whistleblowing Policy, which is available on the Trust's website.
- 18.2 Staff who make protected disclosures in the public interest will be supported and protected from detriment in line with legislation.
- 18.3 The Trust promotes a culture of openness and accountability consistent with the Seven Principles of Public Life.

19. Review of policy

- 19.1 This policy will be reviewed annually or earlier in response to changes in legislation, statutory guidance or Trust operations.
- 19.2 The Trust will review this policy considering any disciplinary or safeguarding cases to ensure clarity and continued fitness for purpose.