

STAFF CODE OF CONDUCT

Policy Owner Human Resources & Director of Operations and Finance	Applies to Prior Park Schools (Trust Wide)	Superseded documents Staff Code of Conduct v1
Associated documents Safeguarding Policy Staff Handbook PPS Anti-Bribery and Corruption Policy Anti-Money Laundering and Financial Crime Policy Gift Acceptance Policy Health and Safety Policy Raising a Concern at Work 'Whistleblowing' Policy Use of Restraint Policy E-Safety Policy Social Media Policy Mobile Phone Policy Equal Opportunity Policy Dignity at Work Policy Data Protection Policy Low-level Concerns Policy	Review frequency Every year (unless the legislation/regulations update before this time) Implementation date 10 December 2021	Legal Framework KCSIE 2021 Working Together to Safeguard Children 2018

This policy is reviewed annually, or more regularly as required, prior to approval by Trustees (if applicable)

Last reviewed by:	Head of Compliance (Emma Wickham) & HR Manager (Kasia Niec)
Date last reviewed:	November 2021
Approved by Trustees:	Board of Trustees
Date last approved:	9 December 2021
Date for next approval:	August 2022

1. Introduction

Prior Park Schools (PPS) comprises three schools. Two of those schools, Prior Park College (PPC) and The Paragon School (TP) are incorporated in England as Prior Park Educational Trust Ltd. The third school, Prior Park School Gibraltar (PPSG), is incorporated in Gibraltar as Prior Park School Ltd. Both are companies limited by guarantee and registered charities.

Safeguarding and child protection are at the forefront of all that we do and underpin all relevant aspects of process and policy development. Ultimately, all systems, processes and policies should operate with the best interests of the child at their heart.

2. Scope

This Code of Conduct sets out the standards of behaviour expected from all Staff at PPS. The aim of this Code of Conduct is to provide clear guidance about behaviour and actions so as not to place children or Staff at risk of harm or of allegations of harm to a child. A large proportion of the expected standards of behaviour included in this document focusses on safeguarding. Safeguarding is at the forefront of what we do at PPS and all Staff must be aware of the Safeguarding Policy. Staff are responsible for their own actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motivation and intentions.

Staff are reminded that it is a criminal offence for a person aged 18 or over to have a sexual relationship with a child under 18 where that person is in a position of trust in respect of that child, even if the relationship is consensual.

Failure to observe this Code of Conduct and the associated policies may result in a disciplinary action including, in cases of gross misconduct, summary termination to employment. In some cases misconduct and could be reported to the police.

3. Policy

In respect of the safeguarding, Staff must always behave in a formal and professional manner. The following standards of behaviour and rules must be observed:

- Relationships between students and Staff must be conducted on a professional basis.
- Anticipation of risks and prevention of misunderstandings and false allegations must inform our behaviour.
- All Staff must be mindful of safe working practice.
- All Staff must ensure a sense of accountability between Staff to ensure that poor practice does not go unchallenged.
- Staff must be made aware of their duty under the Prior Park Schools' Raising a Concern at Work 'Whistleblowing' Policy.

- Aim to empower children to discuss their rights and responsibilities and understand what they can do if there is a problem.
- Always avoid behaviour which could be interpreted as poor practice.
- Never promote partisan political views.

Staff must never:

- Hit or physically assault children.
- Develop any relationship that could be considered to be exploitative. This entails the prohibition of any sexual relationship between any member of Staff with any student. This is regardless of, in the case of those students aged 16 and over, whether or not the relationship is consensual.
- Discriminate against a student.
- Inappropriately touch any student.
- Staff should avoid showing favouritism and should strive at all times to treat all students equally.
- Take images of students on any personal device.
- Use corporal punishment.

a. Safeguarding

Prior Park Schools recognise the duty to safeguard the welfare of children: protecting them from maltreatment; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care and taking action to enable all children to have the best possible outcome. This policy outlines the three schools' approach to safeguarding.

All staff, volunteers and Trustees have a role to play in safeguarding children, including the promotion of each child's welfare. Prior Park Schools will work with all relevant agencies to promote the welfare of children and protect them from harm as a fundamental part of our intent to provide excellent pastoral care to all students.

The purpose of a Safeguarding Policy is to inform the school community- staff, volunteers, parents, Trustees and students about the school's responsibilities for safeguarding children and to enable everyone to know how these responsibilities should be carried out. This is part of an environment where children and staff feel secure, are encouraged to talk, and all are listened to when they have a worry or concern.

Sharing a concerns

Any concerns relating to a student, or a group of students must be passed onto the DSL immediately. Each Prior School has its own procedure in place for reporting a concern. All Staff must read the **Safeguarding Policy**, which will detail the appropriate process.

Arrangements for dealing with allegations of abuse by teachers or other Staff, including supply Staff, volunteers, and contractors

Allegations that may meet the harms threshold: These should be reported to the Head immediately.

**If the Head is the subject of an allegation, it must be reported to the Chair of Trustees. Where an allegation is against the Head, the Head must not be informed of the allegation prior to contact with the chair and LADO.*

These are allegations that might indicate that a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in a school or college.

Where it is alleged that anyone working in the school or a college that provides education for children under 18 years of age, including supply teachers, volunteers and contractors 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 because of transferable risk).

Concerns that do not meet the threshold (Low Level Concerns): These should be reported to the Head.

All concerns about adults must be shared responsibly and with the right person, recorded and dealt with appropriately. This enables PPS to have an open and transparent culture, enable the early identification of concerning, problematic or inappropriate behaviour, minimise the risk of abuse, ensure that adults working in schools are clear about and act within professional boundaries in accordance with the values and ethos of the Trust, and protect those working in or on behalf of our schools from potential false allegations or misunderstandings.

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 Trust may have acted inappropriately.

Further information, and a concern form, can be found in the Low-Level Concerns Policy

All Staff must have read the following Policies; Safeguarding Policy, Low-level Concern Policy, Peer-on-Peer Abuse Policy and Prevent Duty Policy.

b. Physical Contact and Restraint

There are occasions when it is entirely appropriate and proper for Staff to have physical contact with students, for example, to avert ‘an immediate danger of personal injury to, or an immediate danger to the property of, a person’ (including the child), but it is crucial that they only do so in ways appropriate to their professional role. In the EYFS setting, physical intervention may be used to avert immediate danger of personal injury. Any occasion on which physical intervention is used it must be recorded and parents informed on the same day or as soon as reasonably practicable.

Staff should always use their professional judgement. Staff should not have unnecessary physical contact with students and should be alert to the fact that minor forms of friendly physical contact can be misconstrued by students or onlookers.

A member of Staff can never take the place of a parent in providing physical comfort and should be cautious of any demonstration of affection. It is recognised, however, that those Staff working with students in the Boarding community or the EYFS provision may need to comfort an upset child, but they are reminded to do so in a professional manner.

Physical contact should never be secretive, or for the gratification of the adult, or represent a misuse of authority. If a member of Staff believes that an action could be misinterpreted, the incident and circumstances should be recorded as soon as possible, the DSL informed and, if appropriate, a copy placed on the student’s file.

Staff need to ensure that their behaviour does not inadvertently lay them open to allegations of abuse. They need to treat all students with respect and try, as far as possible, not to be alone

with a child or young person. Where this is not possible, for example, in an instrumental music lesson, or sports coaching lesson, it is good practice to ensure that others are within earshot. Where possible, Staff should try to avoid any physical contact when coaching children. Seek to describe or demonstrate, rather than touch. If physical contact is required in order to convey how to perform a particular skill, the teacher should ask the student if they can position their arm, etc, before touching them.

Be alert for student infatuation and always maintain professional boundaries. Alert your line manager or Deputy Head/Assistant Head Pastoral if you have any specific concerns about any student infatuation.

Any physical restraint is only permissible when a child is in imminent danger of inflicting an injury on himself/herself or on another, and then only as a last resort when all efforts to diffuse the situation have failed. Another member of Staff should, if possible, be present to act as a witness. All incidents of the use of physical restraint should be recorded in writing and reported immediately to the DSL/Head who will decide what to do next.

Staff must never use or threaten to use corporal punishment.

For further information and guidance please ensure you are familiar with the Behaviour Policy and Use of Restraint Policy.

c. Physical Education and other activities requiring physical contact

Where exercises or procedures need to be demonstrated, extreme caution should be used if the demonstration involves contact with students and, wherever possible, contact should be avoided. It is acknowledged that some Staff, for example, those who teach PE, Games and/or Sport, or who offer music tuition, will, on occasions, have to initiate physical contact with students in order to support a student so they can perform a task safely, to demonstrate the use of a particular piece of equipment/instrument or assist them with an exercise. This should be done with the student's agreement.

Contact under these circumstances should be for the minimum time necessary to complete the activity and take place in an open environment. Staff should remain sensitive to any discomfort expressed verbally or non-verbally by the child.

If students are required to get changed for PE and Games, then Staff are reminded to exercise caution and should only be present if there is a direct need and should always inform the students before entering the changing rooms.

d. Contact with Students outside of school

All work with students and parents should be undertaken in the school or other recognised workplace.

e. Communication with Students including the use of social media and other electronic means of interaction

Staff should not give their personal mobile phone numbers or email addresses to students (or parents), nor should they communicate with them by text message, WhatsApp messenger (or other mobile apps) or personal email. If they need to speak to a student by telephone, they should use one of the school's telephones and email using the school system (SchoolBase).

The group leader on all trips and visits involving an overnight stay should take a school mobile phone with him/her and may ask the students for their mobile numbers before allowing them out in small, unsupervised groups (PPC and PPSG only). The school mobile should be used for any contact with students that may be necessary.

The group leader will delete any record of students' mobile phone numbers at the end of the trip or visit and should ensure that students delete any Staff numbers that they may have acquired during the trip.

Staff should be aware that it is not appropriate to use social media to communicate with students. Staff will undertake regular training on the internet and safety online as part of the annual Safeguarding training. For further information and guidance please ensure that you are familiar with the Social Media Policy and the E-Safety Policy.

In line with our Staff welfare procedure, Staff are discouraged from sending work emails before 7.00am and after 7.00pm, this applies to communication with students and their parents. (It is recognised that Boarding Staff will need to communicate with parents and students whilst they are working in the evenings).

f. Day and boarding houses (Prior Park College only)

For further information on the expected standards of Staff behaviour in boarding and day houses please see Boarding Ethos and Principles, Policy Guide for HsMs and Tutors and House Handbooks.

g. Transporting students

It is inadvisable for a teacher to give a lift in a car to a student alone. Wherever possible and practicable it is advisable that transport is undertaken other than in private vehicles, with at least one adult additional to the driver acting as an escort. If there are exceptional circumstances that make unaccompanied transportation of students unavoidable, the journey should be made known to a senior member of Staff.

h. Tuition

When giving one-to-one tuition, inform a colleague and do so in a venue that is seen by other Staff. If one-to-one sessions become a regular arrangement, the student's parents and relevant HsM (or Deputy Head at TP and PPSG) should be informed. Staff should use a room with a window in the door/room which allows for visibility, or when not possible, keep the door open.

i. Conducting Interviews with students

Try to be accompanied by a colleague or interview with the door open and a colleague nearby if intending to interview a student alone. Remember that visual access safeguards all.

j. Confidentiality

Staff members should never give absolute guarantees of confidentiality to students or adults wishing to tell them about something serious. They should guarantee only that they will pass on information to the minimum number of people who must be told in order to ensure that the proper action is taken to sort out the problem and that they will not tell anyone who does not have a clear need to know. They will also take whatever steps they can to protect the informing student or adult from any retaliation or unnecessary stress that might be feared after a disclosure has been made.

All information gained during the course of your employment is consideration confidential, for the duration of your employment and post-employment. Staff are expected to keep this information confidential, unless required by law not to do so.

Further information is contained within your contract of employment.

k. Equal treatment

We promote and are committed to equality of opportunity for all members of the PPS and each school's community regardless of their protected characteristics as defined by the Equality Act

2010. We aim to create a friendly, caring and perceptive environment in which every individual is valued. We keep a record of discriminatory incidents.

In respect of students, we endeavour to contribute positively towards the growing autonomy, self-esteem and safety of each child. Our Staff undertake regular consultation activities with our students e.g. through safety questionnaires, participation in anti-bullying week and speaking to students about their experiences at House Assemblies and Tutor time etc.

For further guidance please refer to the Equal Opportunity Policies.

l. Dignity at Work

At PPS we are committed to creating a work environment free from hostility, where everyone is valued, treated with dignity and respect and is enabled to develop to their full potential.

We treat all our Staff, Trustees, visitors, students and their parents fairly and with consideration and we expect them to reciprocate towards each other, the Staff and the school.

We will not tolerate behaviour which may have the effect of belittling another person. Examples of this behaviours include: bullying, harassment, derogatory comments, unwanted physical contact and any other act which creates an intimidating work environment.

Staff must be able to carry out their work duties without fear of unfair treatment. Any kind of hostile behaviour is unacceptable, and the school will keep a record of any incidents of which it will become aware.

Please see our Dignity at Work policy for further details.

m. Complaints

Staff can make a complaint via the Trust's Grievance Policy. Issues that may cause grievances include, but are not limited to:

- terms and conditions of employment
- health and safety
- work relations
- bullying and harassment
- new working practices
- working environment
- organisational change
- discrimination

n. Whistleblowing

PPS wishes to foster a culture of openness and safety and the PPS Raising a Concern at Work 'Whistleblowing' Policy reflects this. Should any member of Staff have any concerns about the behaviour of another member of Staff towards a student, he or she should report it at once to the Head (or to the Chair of Trustees where the concern relates to the Head or a Trustee). A non-exclusive list of legitimate concerns classed as whistleblowing is as follows:

- harm or risk of harm to children
- possible fraud, financial irregularities, corruption or bribery
- malpractice
- danger to health and safety
- criminal offences or breach of any legal obligations
- miscarriages of justice
- damage to the environment
- inappropriate behaviour or acting contrary to the Staff code of conduct

- dishonesty, unethical conduct
- the deliberate concealing of information about any of the above.

Any concern will be thoroughly investigated under the PPS whistleblowing procedures. Such reporting will be without prejudice to the member of Staff's position in the school. Where there are allegations of criminal activity, the LADO will always be informed, and advice taken, before the school undertakes any investigation of its own and, if appropriate, contacts the police.

Wherever possible, and subject to the rights of the student, the member of Staff will be informed of the outcome of the investigation. No one who reports a genuine concern in good faith needs to fear retribution.

Under the Public Interest Disclosure Act 1998 the member of Staff may be entitled to raise a concern directly with an external body where the circumstances justify it.

For further details please see the PPS Raising a Concern at Work 'Whistleblowing' Policy.

o. Acceptable Use of ICT

Any property belonging to PPS should be treated with respect and care and used only in accordance with any training and policies provided. Staff must report any faults or breakages without delay to the ICT Department. The provision of PPS email accounts, Wi-Fi and internet access is for official school business, administration and education. Staff should keep their personal, family and social lives separate from their school IT use and limit as far as possible any personal use of these accounts. The Trust has a right to monitor and access web history and email use.

Staff must not give their log in credentials to other staff members, for example, when on annual leave. An 'out of office' should be used directing contacts to available personnel.

4. Daily conduct requirements for Staff

Employee Behaviour

The following general standards are required by all PPS Staff:

- Staff should behave in a respectful, professional and polite manner and ensure their behaviour does not breach the Equality Act 2010
- Staff should model good behaviour and set an example for students
- Staff should comply with all reasonable management instructions
- Staff should cooperate fully with colleagues and management
- Staff should always uphold and further PPS's positive public image
- satisfactory standards of performance should be maintained at all times
- PPS's policies and procedures should be adhered to at all times.

Attendance and Timekeeping

Should a Staff member need to be absent or expect to be late for any reason, where possible, they should ask or inform their line manager in advance. If this is not possible, they are asked to contact the line manager at the earliest opportunity. Please observe the terms of your contract of employment as these may provide specific protocol which should be followed. Any issues around persistent poor attendance and/or lateness will be dealt with under PPS Disciplinary Policy.

Signing in and out

During the school holidays we operate a sign in/sign out policy with which all Staff are expected to comply. Upon arrival to work, you must immediately personally sign in the time you entered the premises. Upon leaving the premises you must ensure that you personally sign out using the same system. Some departments operate signing in and out protocol throughout the year. The employee will be informed by their line manager if this applies to them.

Smoking

Prior Park Schools operates a policy under which smoking, including e-cigarettes or vaping, is not permitted anywhere onsite.

Alcohol and Illegal Drugs

PPS is committed to ensuring the health, safety and welfare of its Staff and those affected by its activities. It will take all reasonable steps to reduce, if not eliminate, the risk of injuries or incidents occurring due to individuals suffering from the effects of alcohol or substance abuse.

The organisation prohibits the drinking of alcohol by Staff during their working day/hours, unless it is an organised event e.g. New Parents event, House Dinners. Staff can drink modest amounts of alcohol after school hours at social events, but should continue to model a healthy attitude to the amount they consume.

PPS regards unacceptable level of drinking as any of the following situations:

- The individual is over the legal limit stipulated for driving (i.e. 35mcg/100ml of breath alcohol concentration).
- In the opinion of management, the individual's performance is impaired. This may be at less than the legal limit stipulated for driving.
- In the opinion of management, the individual's behaviour may cause embarrassment, distress or offence to others.
- Staff' conduct and performance is adversely impacted by alcohol.
- The individual continues to drink when instructed to stop by a manager.

Boarding and Residential Staff: Staff that reside on site may consume alcohol in private accommodation, when they are not on duty, but should remain mindful of the boarding community and continue to behaviour appropriately and professionally if, at any point, they come into contact with students.

PPS will take all reasonable steps to prevent Staff carrying out work-related activities if they are considered, in the reasonable opinion of the management, to be unfit/unsafe to undertake the work as a result of alcohol consumption or substance abuse.

PPS expressly prohibits the use of any illegal drugs (including psychoactive substances, including those formerly known as "legal highs") or any prescription drugs that have not been prescribed for the user. It is a criminal offence to be in possession of, use or distribute an illicit substance and to produce, supply or possess with intent to supply psychoactive substances. If any such incidents take place on organisation premises, in organisation vehicles or at a company function, they will be regarded as serious, will be investigated by the organisation, and may lead to disciplinary action and possible reporting to the police.

No employee or other person under the organisation's control shall, in connection with any work-related activity:

- report, or endeavour to report, for duty having consumed drugs or alcohol likely to render them unfit and/or unsafe for work;
- consume or be under the influence of drugs or alcohol while on duty;
- store drugs or alcohol in personal areas such as desk drawers; or
- attempt to sell or give drugs or alcohol to any other employee or other person on the school premises.

Staff must inform the line manager of any prescribed medication that may have an effect on their ability to carry out their work safely, and must follow any instructions subsequently given. Care should be taken when using prescribed drugs as some can cause drowsiness and should not be used while at work.

Any employee suffering from drug or alcohol dependency should declare such dependency, and PPS will subsequently provide reasonable assistance, treating absences for treatment and/or rehabilitation as any other sickness absence. Failure to accept help or continue with treatment will render the employee liable to normal disciplinary procedures.

Security

In the interests of security, Staff must carry their identity card whilst on any of the school sites and produce it on request.

Staff must take responsibility for the security of their own working areas. Upon leaving they should ensure all door and windows are secure.

All IT equipment should be kept secure. Staff should lock their laptops/computers when they are not working on them, not leave them in unsafe places e.g. their car, classrooms where students can access them. All mobile devices should be password protected. Staff should refer to the Social Media Policy for more information.

Representing the School

PPS recognises the importance of work life balance. 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 the Trust, or which cause us to lose faith in your integrity, or to question the trust and confidence we expect, may give us grounds for your dismissal.

When attending any work-related social function an appropriate standard of conduct is expected from all Staff.

Work-related social functions can be a great opportunity to celebrate our community. However, it is important to remember that our policies on anti-harassment and bullying, personal harassment, disciplinary and equal opportunities apply fully at these events.

Personal Appearance

Each school regularly receives visits from parents, potential parents and others, and naturally wishes to convey an impression of efficiency and organisation. Therefore, whilst not wishing to impose unreasonable obligations on Staff they are, nonetheless, required to look smart and professional in appearance.

Mobility and Flexibility

Due to the demands and nature of the schools, Staff should be prepared to transfer upon request within departments temporarily (e.g. to provide lesson cover/attend a school trip), to undertake work of a different nature, providing it is reasonable and safe to do so and the Staff member is adequately trained.

Use of Mobile Phones and Cameras

Photographs will only be taken of children with their and/or their parents' permission (provided in writing via consent form). Photographs will only be taken by a designated Staff member/s on school equipment. Where photographs are taken by Staff to give evidence of children's progress, photos can only be taken on school cameras. They must then be downloaded onto school computers, where they will be monitored. Photos cannot be used or passed on outside the school.

Discretion should be exercised when using a personal mobile device for personal purposes and any use must not cause a distraction from work for the employee themselves, their colleagues or students. Personal use of mobile phone during working hours should not be excessive. For further information please see the school-specific Mobile Phone Policy.

Personal Mobile Phones and cameras are not permitted to be used in the EYFS setting.

Professional Language and Conduct

Staff are encouraged to be polite and friendly towards others but it is important that professional boundaries are not crossed. Language and conduct should be polite, measured and considered. Staff should maintain professionalism at all times and under no circumstances should become overfamiliar with others in a way that may be seen to disrupt the operations or reputation of PPS.

Staff should avoid any communication that could be seen as inappropriate, notably remarks that may be seen as sexually suggestive or provocative.

Staff are role models for our students and should act with this in mind at all times.

Environment

PPS aims to keep use of consumables to a minimum by promoting the effective and efficient usage of equipment, facilities, supplies and services.

Staff should make every effort to reduce wastage, turn off excessive lights or heating/cooling equipment, use water resources appropriately and switch off any electronic equipment which is not in use.

Handling Money

Staff that have been authorised to handle monetary transactions on behalf of PPS are responsible for those transactions they carry out as detailed in the Standing Financial Instructions. For transparency and to avoid any confusion, Staff who collect money in any form must ensure that a clear record is kept regarding the collection. All purchases must be authorised and agreed and Staff who purchase products must ensure that receipts are kept.

Bribery

Bribery is, in the conduct of the PPS business, the offering or accepting of any gift, loan, payment, reward or advantage for personal gain as an encouragement to do something which is dishonest, illegal or a breach of trust. Bribery is a criminal offence. No gift should be given nor hospitality offered by Staff to any party in connection with the PPS's business without receiving prior written approval from the employee's line manager.

Staff will face disciplinary action if it is discovered that they have accepted, offered or given any bribe, which could include dismissal for gross misconduct. Accepting a bribe also carries separate criminal liabilities for the employee personally and for the school.

The PPS Anti-Bribery and Corruption, Anti-Money Laundering and Financial Crime and the Gift Acceptance policies contain more information on this topic.

Health and Safety

Staff are responsible for their own Health and Safety (H&S) and that of others and for ensuring that they are familiar with and that they follow PPS Health and Safety policies and procedures.

Breaching any rules surrounding health and safety may lead to disciplinary action. A breach may be considered gross misconduct which can result in summary termination of employment.

School Property and Equipment

Staff who cause any damage to the school property through misuse, recklessness or carelessness may be required to repay to the school the cost of repair or replacement. The school reserves the right to recover this cost by way of a deduction from your next salary payment. Separate

agreement may be in force between the employee and the school in respect of the equipment issued to them.

When an employee's employment is terminated, Staff should return all school property, including IT equipment, keys, ID card, credit card, stationery, company mobile phone or tablet and any other items belonging to the school.

Property or equipment may not be removed from the school premises unless this has been approved by their line manager.