



Education Trust

Inspiring the individuals of today, for a better society tomorrow

“Aspire, Belong, Collaborate”

CODE OF CONDUCT

Review Frequency	Annual
Reviewed	August 2026
Next Review	August 2027
Agreed by Trustees	August 2026



The Trust is committed to safeguarding and promoting the welfare of children and expects all staff, volunteers, and visitors to share this commitment. The schools within Riviera Education Trust provide a safe, happy, and stimulating environment where pupils can develop as successful learners, confident individuals, and responsible citizens. We are dedicated to creating a whole-school, whole-Trust culture that is both safe and inclusive.

Introduction

This document provides guidance for adults working in schools (including staff, governors, trainee teachers, volunteers and visitors) on acceptable and appropriate conduct to protect both adults and children. It is underpinned by the advice contained within Safer Working Practice for Adults Working with Children and Young People in Education. It refers to and complements other policies and guidance, including:

- Safeguarding Policy
- Child Protection Policy
- Equalities Statement
- Positive Behaviour Management Policy
- Online Safety Policy (Acceptable Use Policy in Appendices 1 – 6)
- Health and Safety Policy
- Intimate Care Policy
- Keeping Children Safe in Education - current version
- Working Together to Safeguard Children – current version
- Whistleblowing Policy
- SEND Policy
- Data Protection Policy
- Guidance for safer working practice for those working with children and young people in education settings
- Low-Level Concerns Policy & Guidance

This Code is informed by the Guidance for safer working practice for those working with children and young people in education settings, published by the Safer Recruitment Consortium, alongside Keeping Children Safe in Education and other relevant statutory guidance. All adults working in school must read the policies and statutory guidance identified as mandatory for their role and be familiar with other Trust policies and guidance relevant to their responsibilities. All staff must read and understand the Trust's Staff Code of Conduct, Child Protection and Safeguarding Policy, Low-Level Concerns Policy and the relevant sections of the current version of Keeping Children Safe in Education. All adults must know who the Designated Safeguarding Lead (DSL) is within their school and how to contact them. They should also be familiar with local child



protection arrangements and understand their responsibilities to safeguard and protect children and young people.

Basic Principles

- The child's welfare is paramount (Children Act 1989)
- Adults working in school are responsible for their actions and behaviour and should avoid any conduct which would lead a reasonable person to question their motivation or intentions.
- Adults working in school must work and be seen to work openly and transparently.
- Adults should promptly discuss and seek advice from a senior member of staff about any incident which could give rise to concern.
- A record should be kept of any such incident and of decisions made/further actions agreed, in accordance with school record-keeping policy.
- Staff should be aware that breaches of the law and other professional guidelines could result in criminal or disciplinary action being taken against them.

Setting an Example

This policy helps all employees to understand what behaviour is and is not acceptable. Regard should be given to the disciplinary rules set out in the Trust's Disciplinary Policy and Procedures.

Employees must not discriminate, harass or victimise someone because they have or are perceived to have a protected characteristic as defined by the Equality Act 2010 or are associated with someone who has a protected characteristic.

Protected characteristics are:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

All staff working in schools are expected to model appropriate standards of behaviour and conduct for pupils. Staff must therefore, for example, avoid using inappropriate or offensive language at all times when on the school site or when representing the school.



All staff must also avoid putting themselves at risk of allegations of abusive or unprofessional conduct.

Duty to Disclose

Staff must promptly inform the Head of School or HR of any relevant change in their personal circumstances which may affect their suitability to work with children, their ability to undertake their role safely, or the Trust's safeguarding responsibilities.

This may include relevant criminal investigations, charges, convictions or other circumstances which could affect their suitability for their role. Staff should seek advice from HR if they are unsure whether a matter needs to be disclosed.

Any information disclosed will be handled appropriately and confidentially in accordance with the Trust's safeguarding and data protection responsibilities.

Safeguarding

Staff have a duty to safeguard pupils from physical abuse, sexual abuse, emotional abuse and neglect and must be familiar with the child protection procedures within the school.

The duty to safeguard pupils includes the duty to report concerns about a child to the school's Designated Safeguarding Lead (DSL) and to report concerns about the conduct of an adult in accordance with the Trust's Low-Level Concerns Policy and Child Protection and Safeguarding Policy.

All staff will be familiar with the school's Child Protection and Safeguarding Policy, Low-Level Concerns Policy and the sections of the latest version of Keeping Children Safe in Education relevant to their role.

Staff should treat children with respect and dignity and must not seriously demean or undermine pupils, their parents or carers, or colleagues.

Staff should not demonstrate behaviours that may be perceived as making jokes at the expense of pupils, embarrassing or humiliating pupils, or discriminating against or favouring pupils.

Staff must take reasonable care of pupils under their supervision with the aim of ensuring their safety and welfare.



Low-level Concerns

The term 'low-level' concern is any concern – no matter how small – that an adult 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 Local Authority Designated Officer (LADO).

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

- Being overly friendly with children
- Having favourites
- Taking photographs or recordings of children on a personal device contrary to the Trust's policy
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Using inappropriate sexualised, intimidating or offensive language

Sharing low-level concerns

This Code of Conduct sets out professional boundaries and how staff are expected to act within these boundaries. It should help staff to distinguish expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others.

If you have a safeguarding or low-level concern about another member of staff, supply staff member, volunteer or contractor, this must be reported promptly to the Head of School. If the Head of School is unavailable, the concern should be reported to the CEO. Concerns about the Head of School must be reported to the CEO. Concerns about the CEO must be reported to the Chair of Trustees. Concerns should be recorded and managed in accordance with the Trust's Low-Level Concerns Policy.

Staff are encouraged and should feel confident to self-refer where, for example, they have found themselves in a situation which could be misinterpreted or might appear compromising to others, or where, on reflection, they believe their behaviour may have fallen below expected professional standards.



Leaders are responsible for ensuring a culture of openness, trust and transparency, where staff feel confident to report concerns without fear. The low-level concerns process supports early identification of inappropriate behaviour and promotes a safer environment for children.

Relationships and contact with pupils, parents and the public

School staff should always act in a courteous, professional and impartial manner towards pupils, colleagues, parents, carers and members of the public. Staff must always observe proper, professional boundaries appropriate to their position.

Employees must help create a positive working environment and behave in a manner which ensures and promotes acceptable behaviour.

Staff must declare any relationships that they may have with pupils outside of school; this may include mutual membership of social groups, tutoring, or family connections. Staff should not assume that the school is aware of any such connections. Staff must not show favouritism.

Staff must not initiate or maintain private online communication with pupils through personal social media, messaging, gaming or other personal accounts.

Relationships with pupils must be professional at all times. Sexual or otherwise inappropriate relationships with pupils are strictly prohibited. Staff must maintain appropriate professional boundaries at all times. Staff should only use reasonable force or other restrictive interventions where necessary and proportionate, and in accordance with the Trust's Safe Touch and Physical Intervention Policy.

Staff working within EYFS provision should recognise that appropriate physical contact, comfort and personal care can be a normal and necessary part of supporting young children. Staff must follow the Trust's Safe Touch and Physical Intervention Policy and Intimate Care Policy and ensure that all physical contact is responsive to the child's age, development, individual needs and preferences and maintains appropriate professional boundaries.

Contact with pupils must be via school-authorised mechanisms (school emails are monitored and are considered to be an acceptable means of communication if there is a learning focus). At no time should personal telephone numbers, email addresses or communication routes via personal accounts on social media platforms be used to communicate with pupils.



If contacted by a pupil by an inappropriate route, staff should report it as an online safety concern to the Designated Safeguarding Lead.

Internet, Social Media, Mobile and Gaming Technology

Staff must not engage in inappropriate use of social networks or gaming sites, which may bring themselves, the school, school community or employer into disrepute. **Staff should ensure that they adopt suitably high security settings on any personal profiles they may have.**

Staff should exercise caution in their use of social media, gaming platforms and any other web-based presence that they may have, including written content, videos or photographs, and views expressed either directly or by 'liking' certain pages or posts established by others. This may also include the use of dating websites: it is unlikely that staff will encounter pupils in this way, but could encounter ex-pupils, parents, trainee teachers, or volunteers.

Staff must raise concerns about online risks, including misinformation, disinformation, and conspiracy theories promptly via the Designated Safeguarding Lead (DSL).

In line with the Trust's statutory duty, appropriate filtering and monitoring systems are in place to safeguard pupils online whilst in school. Staff should familiarise themselves with the Trust's procedures and report any concerns immediately.

Any use of artificial intelligence (AI) tools for school purposes must comply with Department for Education guidance, the Trust's data protection requirements and the Trust's filtering and monitoring standards. Staff must not enter personal, special category, confidential or safeguarding information into an AI system unless the system has been specifically approved by the Trust for that purpose.

Contact with pupils should only be made via the use of school email accounts or telephone equipment when appropriate.

Photographs or video recordings of pupils should be taken using school equipment for purposes authorised by the school. Any such use should always be transparent and only occur where parental consent has been given. The resultant files from such recording or taking of photographs must be stored in accordance with the school's procedures on school equipment.



Personal mobile phones may only be used to photograph or record pupils in exceptional circumstances. This must be for the purpose of making an official record of a recognised school activity and only with prior authorisation from a member of SLT. This exception does not extend to Early Years, where personal mobile phones must not be used to photograph or record pupils under any circumstances. Any images or recordings must be transferred to the appropriate school system as soon as possible and permanently deleted from the personal device and any associated personal cloud storage (such as iCloud) at the earliest opportunity. They must not be retained, shared or used for any personal purpose.

The personal use of mobile phones during working hours should be undertaken with discretion and be primarily restricted to dealing with emergencies. Employees should not make or receive calls or texts during work time where pupils are present. Mobile phones should be on silent at all times whilst in school and should not be left on display, with the exception of places determined by the school. For full details, please refer to the 'Acceptable Use' section of the Online Safety Policy.

Confidentiality

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 legitimate professional need to know the information. Staff and governors should be mindful that data protection requirements in relation to maintaining the confidentiality of pupils, their families, colleagues and any matters relating to the school itself apply to all forms of communication, including emails and social networking sites.

Staff may become aware of information or incidents which must be treated confidentially. For example, where a pupil is bullied by another pupil (or by a member of staff), this needs to be reported and dealt with in accordance with the appropriate school procedure. It must not be discussed outside the school nor with colleagues in the school, except with a senior member of staff with the appropriate authority to deal with the matter.

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

Staff must ensure that confidential information is only shared through secure and approved school systems. Confidential or sensitive information must not be shared via



unsecured platforms (e.g., WhatsApp, personal email, or other messaging apps), as this may breach GDPR and the Trust's Data Protection Policy.

Dress and Appearance

As a Trust, we expect all staff to dress appropriately for their professional role and to maintain a professional image. As such, we do not feel it is necessary to advise on what constitutes a professional image. Staff should consider health and safety implications when selecting appropriate footwear for school. If a staff member would like additional guidance on what constitutes a professional image, they are encouraged to speak to their line manager or to the HR team for further advice.

Gifts and Hospitality

It is reasonable for a member of staff to accept modest gifts from pupils, especially at the end of a school year or at Christmas. Any gifts given to pupils should be modest and given fairly and consistently. The Trust has a separate policy on gifts/hospitality for gifts not of this nature.

Protocol for reporting Incidents

All staff must:

- Report to the Head of School or line manager any inappropriate behaviour that they witness from members of staff or members of the public on school grounds
- Report any behaviour by a member of staff which may breach this Code of Conduct or give rise to a safeguarding, professional conduct or safety concern
- Report any situations in which they are made to feel uncomfortable
- Preserve any evidence from such situations as may add to an investigation of inappropriate conduct

Compliance and Disciplinary Action

Staff should be aware that a failure to comply with the Code of Conduct could result in disciplinary action, including, but not limited to, dismissal.

All staff are required to complete the designated Google Form to confirm that they have read and understood the Code of Conduct and understand their responsibility to comply with it. Completion of the form will provide the Trust with a formal record of acknowledgement.



Key policies and guidance which staff must read, or be familiar with as relevant to their role, include:

- School Aims and Values
- Staff Handbook
- Child Protection and Safeguarding Policy
- Keeping Children Safe in Education – current version (relevant sections according to role)
- Health and Safety Policy
- Online Safety Policy (Acceptable Use Policies in appendices 1 – 6)
- SEND Policy
- Safe Touch and Physical Intervention Policy
- Professional Growth Policy
- Whistleblowing Policy
- Managing Stress and Absence Policy
- Pay and Conditions Policy
- Guidance for safer working practice for those working with children and young people in education settings
- Acceptable Behaviour in the Workplace Policy
- Low-Level Concerns Policy & Guidance

All relevant Trust and school policies and guidance can be found on the Shared Drive. Staff should speak to their line manager or HR if they are unable to locate a policy or require further guidance.



DETAILS OF AMENDMENTS

September 2018

- Updated to include Shiphay Learning Academy

July 2019

- Updated to make reference to Keeping Children Safe in Education (2019)
- Key personnel updated
- Summary page added

January 2020

- Reference to Chris O'Connor removed. Claire Hepher replaced as Head of School, Vicky McCaig Designated Safeguarding Lead and Rebecca Goddard Deputy Designated Safeguarding Lead.

February 2020

- Update to Leadership and Management within the Trust.

September 2020

- Update to Leadership and Management within the Trust.
- Addition to allow use of personal devices in line with trust acceptable use policy and with prior permission of Head of School

October 2020

- Update Link Governor roles

January 2021

- Updated SENDCOs

July 2021

- Update of policies to include Safer Working Practice for Adults who Work with Children in Education
- Amended the advised dress code
- Addition of the word 'gaming' in the social media paragraph

October 2021

- Adding reference to Low-Level Concerns policy.

April 2022

- Updating Head of School and governance changes.



May 2022

- Annual review without change.

September 2022

- Updated staff changes.

September 2023

- Added low-level concerns detail
- Updated staff changes
- Signature acknowledgement sheet removed, as this has been replaced by completion of Google form.
- Policies amended to reflect Trust policy titles

November 2023

- Updated Chair of Governors and Safeguarding Governor for Shiphay Learning Academy.

January 2024

- Update Working Together to Safeguard Children 2023

July 2024

- Update to Leadership and Management
- Update around mobile usage

July 2025

- Strengthened the opening statement to better reflect the Trust's commitment to safeguarding and our whole-Trust approach to creating a safe, inclusive culture.
- Included greater clarity around leadership responsibility in promoting a transparent, open culture in relation to low-level concerns.
- Added information about the Trust's approach to online filtering and monitoring, in line with statutory guidance.
- Clarified expectations around staff use of social media, including the prohibition of sharing personal accounts or accepting friend/follow requests from current or former pupils under the age of 18.
- Introduced staff responsibilities relating to the identification and reporting of online risks, including misinformation, disinformation, and conspiracy theories.
- Any use of AI tools must comply with the DfE's Generative AI product safety expectations and Trust's filtering/monitoring standards.



- Confidentiality section updated to reflect that confidential data must only be shared via approved school systems.

August 2026

- Updated references to current statutory safeguarding guidance, including Keeping Children Safe in Education, with relevant sections to be read according to staff role.
- Added a Duty to Disclose section, clarifying staff responsibilities to report relevant changes in circumstances that may affect their suitability to work with children, ability to undertake their role safely or the Trust's safeguarding responsibilities.
- Strengthened safeguarding and low-level concerns provisions, including reporting and escalation routes for concerns about staff, Heads of School and the CEO in alignment with Low-level concerns policy.
- Clarified expectations around professional relationships, boundaries and private online communication with pupils.
- Updated requirements relating to the use of reasonable force with reference to the Trust's Safe Touch and Physical Intervention Policy.
- Strengthened expectations around social media, online safety and personal accounts.
- Added specific requirements relating to the appropriate use of artificial intelligence (AI), including restrictions on entering personal, confidential or safeguarding information into unapproved AI systems.
- Clarified the exceptional circumstances in which personal mobile devices may be used to photograph or record pupils and the requirements for transferring and deleting images or recordings.
- Added a standalone Gifts and Hospitality section.
- Clarified staff responsibilities for reporting inappropriate behaviour, professional conduct and safeguarding concerns.
- Updated the list of key Trust policies and guidance that staff must read or be familiar with according to their role.
- Following the EYFS review, wording has been added to clarify expectations around appropriate physical contact and caring touch within EYFS, with reference to the Trust's Safe Touch and Intimate Care policies. The policy has also been strengthened to prohibit the use of personal devices to photograph or record children in EYFS, with no exception for prior SLT authorisation.



- Updated terminology, grammar and sentence structure throughout to improve clarity, consistency and readability.

