



Code of Conduct

Quest Learning Trust

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Author	Head of People
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This document sets out the regulations for the MAT and member academies and remains in force until superseded

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1. Introduction

- 1.1 This policy aims to set out the standards of conduct expected of all staff and to provide further information for employees. Many of the principles in this code of conduct are based on the Teachers' Standards guidance and therefore should be read in conjunction with this document, along with our Trust Disciplinary Procedure and the statutory guidance Keeping Children Safe in Education (KCSIE) [Keeping children safe in education 2026](#).
- 1.2 This policy should make it clear to employees the expectations the trust has of them. Employees should note that this policy is not exhaustive in defining acceptable and unacceptable standards of conduct, and employees must use common sense. If any employee is ever unsure of what the expectations are in any given circumstance, they should speak to their line manager or Headteacher.
- 1.3 Contravening or failing to act within the spirit of the policy or behaving in a manner which could bring the good name of the trust into disrepute, whether or not within the workplace or working time, might be seen as a breach of discipline and could lead to action being taken against you under the appropriate procedure.

2. Definitions

- 2.1 For ease of reading, references will be made to 'adults' and 'staff' this term encompasses all those who work with children and young people, in either a paid or unpaid capacity. This would also include, for example, those who are not directly employed by the school or setting, e.g. local authority staff, sports coaches, governors, or trustees.
- 2.2 The term '**allegation**' means where it is alleged that a person who works with children has
 - a. behaved in a way that has harmed a child, or may have harmed a child;
 - b. possibly committed a criminal offence against or related to a child;
 - c. behaved towards a child or children in a way that indicates they may pose a risk of harm to children; or
 - d. behaved or may have behaved in a way that indicates that they may not be suitable to work with children.
- 2.3 References are made in this document to legislation and statutory guidance which differ depending on the setting and alter over time. However, the behavioural principles contained within the document remain consistent; hence, wherever possible, such references have been removed in order that the document does not appear to become quickly out of date or to apply only to certain staff or settings.

3. Scope

- 3.1 This policy applies to all employees regardless of length of service, including those in their probationary period.

- 3.2 This policy also applies to all non-school staff, contractors and agency workers and self-employed contractors although, unlike employees, breaches of the policy will not be managed through the Trust Disciplinary Procedure.
- 3.3 As recognisable figures in the local community, the behaviour and conduct of trust employees outside of work can impact on their employment and therefore, inappropriate behaviour and conduct outside work may be treated as a disciplinary matter under the Trust Disciplinary Policy and Procedures if it is considered that it is relevant to the employee's employment.
- 3.4 This policy does not form part of any employee's contract of employment, and it may be amended at any time with reasonable consultation with Trade Unions and employees.

4. Overview and purpose

- 4.1 This policy is based on a document produced by the Safer Recruitment Consortium. It was initially issued as those working with children had expressed concern about their vulnerability and requested clearer advice about what constitutes illegal behaviour and what might be considered as misconduct.
- 4.2 Education staff asked for practical guidance about which behaviours constitute safe practice and which behaviours should be avoided.
- 4.3 This policy seeks to ensure that the responsibilities of trust Senior Leaders towards children and young people and staff are discharged by raising awareness of illegal, unsafe, unprofessional and unwise behaviour.
- 4.4 It should assist staff to monitor their own standards and practice and reduce the risk of allegations being made against them. It is also recognised that not all people who work with children and young people work as paid or contracted employees. The principles and guidance outlined in this document still apply and should be followed by any person whose work brings them into contact with our children and young people.
- 4.5 This policy will also support the trust in giving a clear message that unacceptable behaviour will not be tolerated and that, where appropriate, legal or disciplinary action is likely to follow.
- 4.6 Whilst every attempt has been made to cover a wide range of situations, it is recognised that any policy guidance cannot cover all eventualities. There may be times when professional judgements are made in situations not covered by this document. It is expected that in these circumstances staff will always speak to senior colleagues to discuss the appropriateness of any actions or explain why they happened.
- 4.7 All staff have a responsibility to be aware of systems within their school which support safeguarding; these will be explained to them as part of their new staff induction and in regular staff training sessions. This includes the school's Safeguarding Policy.
- 4.8 It is critical to create a culture in which all concerns about adults, including allegations that do not meet the harms threshold - see KCSiE, are shared responsibly and with the right person, recorded and dealt with appropriately. If implemented correctly, this should encourage an open and transparent culture; enable our schools to identify concerning, problematic or inappropriate behaviour early and minimise the risk of abuse. A culture of vigilance will help to ensure that adults working in or on behalf of the Trust are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.

- 4.9 Any behaviours that fall short of the guiding principles outlined in this document must be shared responsibly and with the Headteacher (concerns about the Headteacher should be reported to the Senior Executive Team). All concerns that do not meet the harm threshold must be recorded and dealt with appropriately as a low-level concern; details can be found in the school's Safeguarding Policy.
- 4.10 It is recognised that the vast majority of adults who work with children act professionally and aim to provide a safe and supportive environment which secures the well-being and very best outcomes for children in their care. Achieving these aims is not always straightforward, as much relies on child and staff interactions where tensions and misunderstandings can occur. This document aims to reduce the risk of these.
- 4.11 It must be recognised that some allegations will be genuine as there are people who seek out, create or exploit opportunities to harm children. However, allegations may also be false or misplaced and may arise from differing perceptions of the same event. When they occur, they are inevitably distressing and difficult for all concerned. It is therefore essential that all possible steps are taken to safeguard our children and young people and ensure that the adults working with them do so safely.

5. How to use this document

- 5.1 Each section provides general guidance about a particular aspect of work and, below in italics specific guidance about which behaviours should be avoided and which are recommended.
- 5.2 Some of our schools will have additional responsibilities arising from their regulations (e.g. Early Years Foundation Stage [EYFS], Quality Standards). Not all sections of the guidance will, therefore, be relevant to all our schools and staff.

6. Underpinning principles

Safeguarding and Welfare

- a) The welfare of the child is paramount.
- b) Staff should understand their responsibilities to safeguard and promote the welfare of children and young people. As an employee of this trust, you should put the well-being, development and progress of children and young people first. You should recognise that you are in a position to influence children and young people through your actions, comments or behaviour.

Professional Conduct

- c) All employees are expected to demonstrate consistently high standards of personal and professional conduct and behaviour, honesty and integrity, inside and outside of work
- d) 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
- e) Staff should work, and be seen to work, in an open and transparent way including self-reporting if their conduct or behaviour falls short of these guiding principles
- f) Staff should discuss and/or take advice promptly from their line manager if they have acted in a way which may give rise to concern
- g) Staff should acknowledge that deliberately invented/malicious allegations are extremely rare and that all concerns should be reported and recorded.
- h) Staff should not consume or be under the influence of alcohol or any substance, including prescribed medication, which may affect their ability to care for children

Representation of the Trust

- i) To the public, you are a representative of the trust both inside and outside of work, during and outside of work hours. You are expected to maintain the highest standards of professional competence, knowledge, integrity, confidentiality, financial propriety, and personal conduct. Contact with all members of the community, including parents/carers and outside visitors, should be courteous, efficient, and impartial to all groups and individuals.

Ethical Behaviour

- j) All employees must uphold public trust and high standards of ethics and behaviour, through our required standards, within and outside school/work, by:
- Treating our children and young people and colleagues with dignity, building relationships rooted in mutual respect, and always observing proper boundaries appropriate to their professional position
 - Never using inappropriate or offensive language in school
 - Having regard for the need to safeguard children and young peoples' wellbeing, in accordance with statutory provisions
 - Showing tolerance of and respect for the rights of others
 - Not undermining fundamental British values, including democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths, beliefs, and political views
 - Ensuring that personal beliefs are not expressed in ways which exploit a young person's vulnerability or might lead them to break the law

Relationships and Communication

- k) You should ensure that your relationships with your fellow employees and with children and young people are always conducted professionally and courteously; you should not censure other colleagues or criticise their work in the hearing of a young person or parent/carer. It is not acceptable to use sarcasm or make jokes at the expense of children and young people or staff, embarrass, or humiliate children and young people or staff, or discriminate against or favour children and young people or staff. It is also not acceptable to discuss personal or sexual issues with children and young people outside of agreed curriculum parameters. See sections 8, 12, and 18 for further detail.

Trust Loyalty and Public Image

- l) It is not appropriate for you, when working within your role as an employee, to oppose the stated aims and policies of the trust or to undermine the performance of its duties and responsibilities. All employees need to present a unified image to the public. It is not acceptable for you to publicly criticise or blame the leadership team, colleagues or the trust through any medium including internet 'blogs', websites, or social networks such as Facebook or X, and you must be aware that the laws governing defamation, breach of copyright, etc. apply equally to 'blogging' as to other forms of communications. Offensive, defamatory, discriminatory, or otherwise inappropriate comments will not be tolerated and may constitute a disciplinary and/or criminal offence, as could the disclosure/publication of any confidential or personal information about the trust, its staff, children and young people, or other members of the community.

Equality and Inclusion

- m) Staff should apply the same professional standards regardless of culture, disability, gender, language, racial origin, religious belief and sexual orientation

Legal and Disciplinary Awareness

- n) Staff should be aware that breaches of the law and other professional guidelines could result in disciplinary action being taken against them, criminal action and/or other proceedings including barring by the Disclosure & Barring Service (DBS) from working in regulated activity, or for acts of serious misconduct prohibition from teaching by the Teaching Regulation Agency (TRA).

Staff should also be aware of and understand their school's Safeguarding Policy, Allegations Against Staff and Low-level Concerns Policy and Whistleblowing Policy. It is incumbent on you to ensure that you are aware of and comply with any relevant rules and instructions which pertain to your job, including the Teachers' Standards, Keeping Children Safe in Education, and financial instructions.

7. Responsibilities

- 7.1 Staff are accountable for the way in which they: exercise authority; manage risk; use resources; and safeguard children.
- 7.2 All staff have a responsibility to keep children and young people safe and to protect them from abuse (sexual, physical and emotional), neglect and extra-familial harm.
- 7.3 Children and young people have a right to be safe and to be treated with respect and dignity. It follows that trusted adults are expected to take reasonable steps to ensure their safety and well-being. Failure to do so may be regarded as professional misconduct.
- 7.4 The safeguarding culture in our schools is, in part, exercised through the development of respectful, caring and professional relationships between adults and children and young people and behaviour by the adult that demonstrates integrity, maturity and good judgement.
- 7.5 When individuals accept a role working in an education setting they should understand and acknowledge the responsibilities and trust involved in that role.
- 7.6 Staff are required to understand the types of discrimination and bullying that children and young people and colleagues may be subject to. Employees are required to have read and understood our Equality and Diversity and Inclusion in Work Policy and Fairness and Dignity Policy.
- 7.7 Staff must not ignore any form of discrimination. This includes inappropriate jokes and banter. Employees must positively always promote equality and diversity and inclusion.

This means that staff should:

- *understand the responsibilities which are part of their employment or role and be aware that sanctions will be applied if these responsibilities are breached*
- *understand how to raise a concern and contact designated staff if they have a concern about a child*
- *always act, and be seen to act, in the child's best interests.*
- *avoid any conduct which would lead any reasonable person to question their motivation and intentions*
- *take responsibility for their own actions and behaviour*
- *act as a role model by consistently demonstrating high standards of behaviour*
- *treat children and young people and colleagues with dignity and respect*
- *be able to reassure victims of discrimination that they are being taken seriously and that they will be supported and kept safe*

8. Honesty, personal integrity and standards of behaviour

- 8.1 All staff are expected to uphold public trust and confidence in their ability to safeguard the welfare and best interests of children and young people. They should demonstrate the highest standards of ethics and behaviour, both within and outside the school environment, during and outside of school hours.
- 8.2 There may be times where an individual's actions in their personal life come under scrutiny. Staff should be aware that their behaviour could compromise their position within the work setting in relation to the protection of children, loss of trust and confidence, or bringing the employer into disrepute. Such behaviour may also result in prohibition from teaching by the

Teaching Regulation Agency (TRA) a bar from engaging in regulated activity, or action by another relevant regulatory body.

- 8.3 This commitment to honesty and personal integrity is fundamental to fostering a safe, respectful, and inclusive learning community.

This means that staff should:

- *treat children and young people and colleagues with dignity and respect, building relationships rooted in mutual trust and professionalism.*
- *use language that is always respectful and appropriate*
- *uphold fundamental British values including democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs*

*This means that staff should **not**:*

- *behave in a manner which would lead any reasonable person to question their suitability to work with children or to act as an appropriate role model*
- *make, or encourage others to make sexual remarks to, or about, a young person*
- *use inappropriate language to or in the presence of children and young people*
- *discuss their personal or sexual relationships with or in the presence of children and young people*
- *make (or encourage others to make) unprofessional personal comments which scapegoat, demean, discriminate or humiliate, or might be interpreted as such*

9. Making professional judgements

- 9.1 This policy cannot provide a complete checklist of what is, or is not, appropriate behaviour for staff. It does highlight, however, behaviour which is illegal, inappropriate or inadvisable. There will be rare occasions and circumstances in which staff must make decisions or take action in the best interest of a young person which could contravene this guidance or where no guidance exists.
- 9.2 Staff are expected to make judgements about their behaviour in order to secure the best interests and welfare of the children and young people in their charge and, in so doing, will be seen to be acting reasonably. These judgements should always be recorded and shared with a line manager.
- 9.3 Staff should always consider whether their actions are warranted, proportionate, safe and applied equitably.

This means that where no specific guidance exists staff should:

- *discuss the circumstances that informed their action, or their proposed action, with their line manager or, where appropriate, the school's designated safeguarding lead. This will help to ensure that the safest practices are employed and reduce the risk of actions being misinterpreted.*
- *always discuss any misunderstanding, accidents or threats with your Headteacher or Designated Safeguarding Lead.*
- *always record discussions and actions taken with their justifications.*
- *record any areas of disagreement and, if necessary, refer to another agency / the LA / Ofsted / TRA / other regulatory body.*

10. Power and positions of trust and authority

- 10.1 As a result of their knowledge, position and/or the authority invested in their role, all those working with children and young people in our schools are in a position of trust in relation to all children and young people on the roll.
- 10.2 The relationship between a person working with children and young people is one in which the staff member has a position of power or influence. It is vital for staff to understand this power; that the relationship cannot be one between equals and the responsibility they must exercise as a consequence.
- 10.3 The potential for exploitation and harm of children and young people means that staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.
- 10.4 Staff are expected to treat children and young people with dignity and fairness, building relationships always rooted in mutual respect and observing proper boundaries appropriate to a person in a position of trust. This is as relevant in the online world as it is in the classroom; staff engaging with children and young people and/or parents online have a responsibility to always model safe practice.
- 10.5 Where a person aged 18 or over is in a position of trust with a child under 18, it is an offence for that person to engage in any sexual activity (physical and non-physical) with or in the presence of that child, or to cause or incite that child to engage in or watch sexual activity.

This means that staff should:

- *comply with safe working practices, outlined in the guidance document 'Safe Working Practice for Staff Working in Education (Sept 2022)*
- *treat families and members of the school community with dignity and respect, building relationships rooted in mutual trust and professionalism, and always observing proper boundaries appropriate to a person in a position of trust.*
- *always maintain appropriate professional boundaries, avoiding behaviour which could be misinterpreted by others*

*This means that staff should **not**:*

- *use their position to gain access to information for their own advantage and/or a child's or family's detriment*
- *use their power to intimidate, threaten, coerce or undermine children and young people*
- *use their status and standing to form or promote relationships with children and young people which are of a sexual nature, or which may become so.*

11. Confidentiality

- 11.1 The storing and processing of personal information is governed by the General Data Protection Regulations UK (GDPR) and Data Protection Act 2018. The trust provides clear advice to staff about their responsibilities under this legislation so that, when considering sharing confidential information, those principles should apply.
- 11.2 Staff may have access to special category personal data about children and young people and their families which must be always kept confidential and only shared when legally permissible to do so and in the interest of the child. Records should only be shared with those who have a legitimate professional need to see them.
- 11.3 Staff should never use confidential or personal information about a young person or their family for their own, or others advantage (including that of partners, friends, relatives or other organisations).

- 11.4 Information must never be used to intimidate, humiliate, or embarrass the child or young person.
- 11.5 Confidential information should never be used casually in conversation or shared with any person other than on a need-to-know basis.
- 11.6 In circumstances where the young person's identity does not need to be disclosed the information should be used anonymously.
- 11.7 There are some circumstances in which a member of staff may be expected to share information about a child or young person, for example when abuse is alleged or suspected. In such cases, individuals have a responsibility to pass information on without delay, but only to those with designated safeguarding responsibilities or to statutory services.
- 11.8 Safeguarding overrides Data Protection, but this should be checked with the DPO and the DSL
- 11.9 If a member of staff is in any doubt about whether to share information or keep it confidential, they should seek guidance from the Designated Safeguarding Lead.

11.10 Contact with the media and legal enquiries

Unless you are properly authorised to speak with, write or give interviews to the media or respond to legal enquiries, you should refer any media or legal enquiries on work related matters to the relevant Headteacher/Senior Executive Team.

This means that the Headteacher and Senior Executive Team should:

- *ensure that all staff who need to share 'special category personal data' are aware that the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent, if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent or if to gain consent would place a child at risk.*

This means that staff should:

- *know the name of their Designated Safeguarding Lead and be familiar with trust safeguarding procedures and guidance*
- *be familiar with Trust Data Protection Policy and who to contact about data protection matters*
- *are expected to treat information they receive about children and young people and families in a discreet and confidential manner:*
- *seek advice from the DPO if they are in any doubt about sharing information they hold or which has been requested of them*
- *be clear about when information can/must be shared and in what circumstances*
- *need to know the procedures for responding to allegations against staff and to whom any concerns or allegations should be reported*
- *need to ensure that where personal information is recorded electronically that systems and devices are kept secure*

12. Personal relationships within the workplace and social contact outside of work

- 12.1 Whilst most social and personal relationships need not present a difficulty, it is recognised that there will be particular circumstances where staff members concerned will need to withdraw from certain situations in order to protect themselves, the school, and its children and young people from any possible criticism of unfair bias, or allegations of coercion in safeguarding matters.
- 12.2 Staff should maintain professional boundaries and declare to their Headteacher/line manager any existing or new personal relationships they have with other members of staff, parents/carers of children and young people or contractors or suppliers which may give rise to an actual or potential conflict of interest, trust, or breach of confidentiality. It is also appropriate that staff declare any personal or professional e.g. tutoring relationships they have with children and young people at one of our schools. Any potential conflicts of interest can then be avoided. Any declaration made will be treated in confidence so far as reasonably practicable.
- 12.3 Staff should not be directly involved in the appointment, promotion, discipline, or other employment decision relating to another staff member to whom they are related, or with whom they have a close personal relationship. They should seek the advice of their Headteacher/line manager if necessary.
- 12.4 Staff should also be aware that if any relationship has a detrimental impact in the workplace, or leads to unacceptable conduct or performance, or situations involving undue favouritism or detriment, action will be taken under the appropriate procedure that could result in you being redeployed or your contract being terminated.
- 12.5 It is acknowledged that staff may have genuine friendships and social contact with parents/carers of children and young people, independent of the professional relationship. Staff should, however, also be aware that professionals who sexually harm children often seek to establish relationships and contact outside of the workplace with both the child and their parents, in order to 'groom' the adult and the child and/or create opportunities for sexual abuse.
- 12.6 It is important to recognise that social contact may provide opportunities for other types of grooming such as for the purpose of sexual exploitation or radicalisation.
- 12.7 Staff should recognise that some types of social contact with children and young people or their families could be perceived as harmful or exerting inappropriate influence on children and may bring the setting into disrepute (e.g. attending a political protest, circulating propaganda).
- 12.8 If a young person or parent/carer seeks to establish social contact, or if this occurs coincidentally, the member of staff should exercise their professional judgement in that moment and then inform their Headteacher/senior manager as soon as possible. This applies to social contacts made through outside interests or the staff member's own family also.

This means that staff should:

- *discuss with their Headteacher/line manager any new or existing relationship/association (in or out of school or online) with other staff members, parents of children and young people, contractors or suppliers*
- *should maintain professional conduct when working in close proximity with other employees/children and young people with whom they have a close personal connection ensuring that the personal connection does not lead to any detrimental impact in the workplace/to others, or potential allegations of favouritism.*

- *seek guidance when they are unsure if the situation could be seen as biased or inappropriate*
- *always approve any planned social contact with children and young people or parents/carers with senior colleagues, for example when it is part of a reward scheme*
- *advise their Headteacher/line manager of any regular social contact they have with a child which could give rise to concern*
- *refrain from sending personal communication to children and young people or parents/carers unless agreed with senior managers*
- *inform the Headteacher of any relationship with a parent where this extends beyond the usual parent/professional relationship*
- *inform their Headteacher/line manager of any requests or arrangements where parents wish to use their services outside of the workplace e.g., babysitting, tutoring*

13. Personal interests and private work

- 13.1 The interests of the trust or the way you do your job must not be influenced by personal interests or those of relatives, friends or membership of external organisations or societies. There should be no grounds for suspicion that you are using your position with or knowledge of the trust for personal gain or that you could be influenced by improper motives. School premises, equipment, working time or other resources must not be used to undertake private work.
- 13.2 The trust needs to be aware if its staff undertake private work or voluntary activities in their own time to ensure that there is no actual or perceived conflict of interest with the trust, to protect the trust and you from potential criticism and to meet its obligations under health and safety legislation. Also, you should be aware that outside work or activity, whether or not you receive payment, could reduce your ability to safely and effectively carry out your employment with the trust, e.g. through tiredness, and would be considered unacceptable
- 13.3 You must not undertake private work when on sick leave without the express knowledge and prior written approval of your headteacher and subject to appropriate medical advice. You must not undertake private work for any school or establishment during a period of paid leave or suspension.
- 13.4 You must advise your Headteacher/line manager before engaging in any other work especially if it could reasonably be seen to conflict with your employment with the trust or lead to misunderstanding or criticism (for example, private tutoring of children and young people from the trust).
- 13.5 You must not undertake private work for any individual, organisation, department, or establishment which otherwise would be undertaken as part of your normal duties. Any charge raised as a result of undertaking work within another school or other establishment whilst in your normal working hours should be paid to the trust.
- 13.6 You should be aware that 'intellectual property' such as software, ideas, documents, etc. created during your employment belongs to the trust.
- 13.7 All files, materials, the media upon which they are located and all software programmes or packages which are utilised or developed solely for or in connection with your job remain the property of the trust.

This means that staff should:

- *avoid conflicts of interest*
- *declare any external memberships, roles or relationships that could potentially conflict with your duties or the Trusts interests*
- *avoid situations where impartiality could be questioned*

14. Dress and appearance

14.1.1 A person's dress and appearance are matters of personal choice and self-expression and some individuals will wish to exercise their own cultural customs. However, staff should select a manner of dress and appearance appropriate to their professional role, and which may be necessarily different to that adopted in their personal life. Staff should ensure they are dressed decently, safely and appropriately for the tasks they undertake; this also applies to online or virtual teaching. Staff are expected to be positive role models for children and young people in terms of dress and personal presentation. Those who dress or appear in a manner which could be viewed as offensive or inappropriate will render themselves vulnerable to criticism or allegation.

14.2 Where uniform or protective clothing is issued, it must be worn as required when at work or representing the trust. When wearing uniform or other items which identify you as an employee of the trust you must maintain appropriate standards of conduct whether or not on duty e.g. when travelling to and from work.

This means that staff should:

- *cover tattoos where reasonably practicable*
- *limit visible piercings whilst at work*
- *wear appropriate footwear; no flip-flops*

15. Substance Misuse

15.1 Staff are expected to arrive at work fit to carry out their job and to be able to perform their duties safely without any limitations due to the use or aftereffects of alcohol or drugs. In this policy, drug use includes the use of controlled drugs, psychoactive (or mind- altering) substances formerly known as "legal highs", and the misuse of prescribed or over-the-counter medication.

15.2 Alcohol and drug-related problems may develop for a variety of reasons and over a considerable period. The trust will seek, where appropriate, to treat these problems in the first instance, in a similar way to other health issues.

15.3 If staff are not co-operative, engaging with appropriate treatment, or are under the influence of alcohol/other substances at work, these are potential disciplinary matters.

15.4 Staff should familiarise themselves with the trust's Wellbeing Policy.

*This means that staff should **not**:*

- *consume any substance that means they are not in a fit and safe condition to undertake their duties*
- *consume any substance at events (including after school events), or on school trips and residential activities as they will be responsible for supervising children and young people and therefore need to ensure full attentiveness and responsibility*

16. Gifts, rewards, favouritism and exclusion

- 16.1 Staff need to take care that they do not accept any gift that might be construed as a bribe by others or lead the giver to expect preferential treatment.
- 16.2 There are occasions when children and young people or parents/carers wish to pass small tokens of appreciation to staff; e.g., at Christmas or as a thank-you and this is usually acceptable. However, it is unacceptable to receive gifts on a frequent basis, or of any significant value, please follow guidance in the trust's Gifts and Hospitality Policy
- 16.3 Similarly, it is inadvisable to give such personal gifts to children and young people or their families. This could be interpreted as a gesture either to bribe or groom. It might also be perceived that a 'favour' of some kind is expected in return.
- 16.4 Any reward given to a young person should be in accordance with agreed practice, consistent with the school's behaviour policy, recorded and not based on favouritism.
- 16.5 Staff should exercise care when selecting children and young people for specific activities, jobs or privileges to avoid perceptions of favouritism or injustice. Similar care should be exercised when children and young people are excluded from an activity. Methods of selection and exclusion should always be subject to clear, fair, agreed criteria.

This means that staff should:

- *be aware of and understand their schools relevant policies, e.g Behaviour Policy and Gifts and Hospitality Policy*
- *ensure that gifts received or given in situations which may be misconstrued are declared and recorded*
- *only give gifts to a young person as part of an agreed reward system*
- *where giving gifts other than as above, ensure that these are of insignificant value and given to all children and young people equally*
- *ensure that all selection processes of children and young people are fair, and these are undertaken and agreed by more than one member of staff*
- *ensure that they do not behave in a manner which is either favourable or unfavourable to individual children and young people*

17. Infatuations and 'crushes'

- 17.1 All staff need to recognise that it is not uncommon for children and young people to be strongly attracted to a member of staff and/or develop a 'crush' or infatuation. They should make every effort to ensure that their own behaviour cannot be brought into question, does not appear to encourage this and be aware that such infatuations may carry a risk of their words or actions being misinterpreted.
- 17.2 Any member of staff who receives a report, overhears something, or otherwise notices any sign, however small or seemingly insignificant, that a young person has become or may be becoming infatuated with either themselves or a colleague, should immediately report this to the Headteacher or most senior manager. In this way appropriate early intervention can be taken, which can prevent escalation and avoid hurt, embarrassment or distress for those concerned.

- 17.3 The Headteacher (or senior manager) should give careful thought to those circumstances where the staff member, young person and their parents/carers should be spoken to and should ensure a plan to manage the situation is put in place. This plan should respond sensitively to the child or young person and staff member and maintain the dignity of all. This plan should involve all parties, be robust and regularly monitored and reviewed.

This means that staff should:

- *report to the Headteacher any indications (verbal, written or physical) that suggest a young person may be infatuated with a member of staff*
- *always maintain professional boundaries*

18. Communication with children (including the use of technology)

- 18.1 In order to make best use of the many educational and social benefits of new and emerging technologies, children and young people need opportunities to use and explore the digital world. Online risks are posed more by behaviours and values than the technology itself.
- 18.2 Staff should therefore ensure that they establish safe and responsible online behaviours, working to local and national guidelines and acceptable use policies which detail how new and emerging technologies may be used
- 18.3 Communication with children both in the 'real' world and through web-based and telecommunication interactions, such as when virtual or remote teaching, should take place within explicit professional boundaries.
- 18.4 You should not use social media in any way that might bring your professional status or the trust into disrepute or undermine the policies or ethos of the trust, this includes the use of computers, tablets, phones, texts, e-mails, instant messages, social media such as Facebook and Twitter, chat-rooms, forums, blogs, websites, gaming sites, digital cameras, videos, web-cams and other hand-held devices. (Given the ever-changing world of technology, it should be noted that this list gives examples only and is not exhaustive.)
- 18.5 Staff should not request or respond to any personal information from children and young people other than that which may be necessary in their professional role. They should ensure that their communications are open and transparent and avoid any communication which could be interpreted as 'grooming behaviour'
- 18.6 Staff should not give their personal contact details to children and young people, for example, e-mail address, home or mobile telephone numbers, details of web-based identities. If children and young people locate these by any other means and attempt to contact or correspond with the staff member, the adult should not respond and must report the matter to their manager. The young person should be firmly and politely informed that this is not acceptable.
- 18.7 Staff should adhere to their school's policies, including those regarding communication with parents and carers and the information they share when using the internet.

Use of images and virtual teaching

- 18.8 Many educational activities involve recording images. These may be taken for displays, publicity, to celebrate achievement and to provide records of evidence of the activity. Staff should follow their school's specific policy for taking photos of children and young people.

- 18.9 Whilst images are regularly used for very positive purposes, staff need to be aware of the potential for these to be taken and/or misused or manipulated for pornographic or 'grooming' purposes. Regard needs to be given when images are taken of young or vulnerable children who may be unable to question why or how the activities are taking place.
- 18.10 All staff involved in virtual teaching or the use of technology to contact children and young people must adhere to their IT Acceptable Use Policy.
- 18.11 Virtual lessons should be timetabled, and senior staff, DSL and / or heads of department should be able to drop in to any virtual lesson at any time – the online version of entering a classroom.
- 18.12 Staff engaging in online learning should display the same standards of dress and conduct that they would in the real world; they should also role model this to children and young people and parents.

This means that staff should:

- *not seek to communicate/make contact or respond to contact with children and young people outside of the purposes of their work*
- *not give out their personal details*
- *use only the equipment and internet services provided by the school or trust, unless school policies state otherwise*
- *only use internet-enabled personal devices in line with school acceptable use policies*
- *follow their school's Acceptable Use Policy and online safety guidance*
- *ensure that their use of technologies could not bring the trust into disrepute*
- *not discuss or share data relating to children/ parents / carers in staff social media groups*
- *only publish images of children and young people where they have explicit consent to do so*
- *only retain images where there is a clear purpose agreed with senior leader and store appropriately*
- *avoid making images in one-to-one situations*
- *ensure that a senior leader is aware that an online lesson / meeting is taking place and for what purpose*
- *avoid one to one situations on-line – request that a parent is present in the room for the duration, or ask a colleague or member of the leadership team to join the session*
- *only record a lesson or online meeting with a young person where this has been agreed with the headteacher or other senior staff, and the child and/or their parent / carer have given appropriate consent to do so*
- *be able to justify images of children and young people in their possession*
- *ensure that children and young people cannot be exposed to indecent or inappropriate images*
- *ensure that any films or material shown to children are age appropriate*

19. Physical contact

- 19.1 There are occasions when it is entirely appropriate and proper for staff to have physical contact with children and young people; however, it is crucial that they only do so in ways appropriate to their professional role and in relation to the child's individual needs and any agreed care plan.

- 19.2 Not all children and young people feel comfortable about certain types of physical contact; this should be recognised and, wherever possible, staff should seek the young person's permission before initiating contact and be sensitive to any signs that they may be uncomfortable or embarrassed. Staff should acknowledge that some children and young people are more comfortable with touch than others and/or may be more comfortable with touch from some adults than others. Staff should listen, observe and take note of the child's reaction or feelings and, so far as is possible, use a level of contact and/or form of communication which is acceptable to the young person.
- 19.3 It is not possible to be specific about the appropriateness of each physical contact, since an action that is appropriate with one child in one set of circumstances, may be inappropriate in another, or with a different child.
- 19.4 Any physical contact should be in response to the child's needs at the time, of limited duration and appropriate to their age, stage of development, gender, ethnicity and background.
- 19.5 Adults should therefore use their professional judgement at all times.
- 19.6 Physical contact should never be secretive, or for the gratification of the staff member, or represent a misuse of authority. If a member of staff believes that an action by them or a colleague could be misinterpreted, or if an action is observed which is possibly abusive, the incident and circumstances should be immediately reported and recorded.
- 19.7 Extra caution may be required where it is known that a child has suffered previous abuse or neglect. Staff need to be aware that the child may associate physical contact with such experiences. They also should recognise that these children and young people may seek out inappropriate physical contact. In such circumstances staff should deter the child sensitively and help them to understand the importance of personal boundaries.
- 19.8 A general culture of 'safe touch' should be adopted, where appropriate, to the individual requirements of each child. Children and young people with special educational needs or disabilities may require more physical contact to assist their everyday learning. The arrangements should be understood and agreed by all concerned, justified in terms of the young person's needs, consistently applied and open to scrutiny.

This means that staff should:

- *be aware that even well-intentioned physical contact may be misconstrued by the young person, an observer or any person to whom this action is described*
- *never touch a child in a way which may be considered indecent*
- *always be prepared to explain actions and accept that all physical contact be open to scrutiny*
- *never indulge in horseplay or fun fights*
- *always allow/encourage children and young people, where able, to undertake self-care tasks independently*
- *ensure the way they offer comfort to a distressed young person is age appropriate*
- *always tell a colleague when and how they offered comfort to a distressed young person*
- *establish the preferences of children and young people*
- *consider alternatives, where it is anticipated that a child might misinterpret or be uncomfortable with physical contact*
- *always explain to the young person the reason why contact is necessary and what form that contact will take*

- *report and record situations which may give rise to concern*
- *be aware of cultural or religious views about touching and be sensitive to issues of gender*

20. Other activities that require physical contact

- 20.1 In certain curriculum areas, such as PE, drama or music, staff may need to initiate some physical contact with children and young people, for example, to demonstrate technique in the use of a piece of equipment, adjust posture, or support a child so they can perform an activity safely or prevent injury.
- 20.2 Physical contact should take place only when it is necessary in relation to a particular activity. It should take place in a safe and open environment, i.e., one easily observed by others and last for the minimum time necessary. The extent of the contact should be made clear and undertaken with the permission of the young person. Contact should be relevant to their age/understanding and staff should remain sensitive to any discomfort expressed verbally or non-verbally by the child.
- 20.3 Guidance and protocols around safe and appropriate physical contact may be provided, for example, by sports governing bodies and should be understood and applied consistently.
- 20.4 Any incidents of physical contact that cause concern or fall outside of these protocols and guidance should be reported to the Headteacher/DSL.
- 20.5 It is good practice that all parties clearly understand at the outset, what physical contact is necessary and appropriate in undertaking specific activities. Keeping parents/carers and children and young people informed of the extent and nature of any physical contact may also prevent allegations of misconduct or abuse arising.

This means that staff should:

- *treat children and young people with dignity and respect and avoid contact with intimate parts of the body*
- *always explain to a young person the reason why contact is necessary and what form that contact will take*
- *seek consent of parents where a child is unable to give this; e.g., because of age or disability*
- *consider alternatives, where it is anticipated that a young person might misinterpret any such contact*
- *be familiar with and follow recommended guidance and protocols*
- *conduct activities where they can be seen by others*
- *be aware of gender, cultural and religious issues that may need to be considered prior to initiating physical contact*

21. Intimate/personal care

- 21.1 Schools have clear nappy or pad changing and intimate/personal care policies which ensure that the health, safety, independence and welfare of children is promoted and their dignity and privacy are respected. Staff should familiarize themselves with the schools intimate/personal care policy.

- 21.2 Arrangements for intimate and personal care should be open and transparent and accompanied by robust recording systems.
- 21.3 Children and young people should be encouraged to act as independently as possible and to undertake as much of their own personal care as is possible and practicable. When assistance is required, this should normally be undertaken by one member of staff; **however, they should try to ensure that another appropriate adult is in the vicinity who is aware of the task to be undertaken and that, wherever possible, they are visible and/or audible**. Intimate or personal care procedures should not involve more than one member of staff unless the child's intimate care plan specifies the reason for this.
- 21.3 A signed record should be kept of all intimate and personal care tasks undertaken and, where these have been carried out in another room, should include times left and returned.
- 21.4 Any vulnerability, including those that may arise from a physical or learning difficulty, should be considered when formulating the individual young person's care plan. The views of parents, carers and the child, regardless of their age and understanding, should be actively sought in formulating the plan and in the necessary regular reviews of these arrangements. Any changes to the intimate care plan should be made in writing and without delay, even if the change in arrangements is temporary; e.g. staff shortages, changes to staff rotas.
- 21.5 Intimate and personal care should not be carried out by an adult that the child does not know. Anyone undertaking intimate / personal care in an education setting is in regulated activity and must have been checked against the relevant DBS barred list, even if the activity only happens once; this includes volunteers. Volunteers and visiting staff from other schools/agencies should not undertake care procedures without appropriate training.
- 21.6 Children and young people are always entitled to respect and privacy and especially when in a state of undress, including, for example, when changing, toileting and showering. However, there needs to be an appropriate level of supervision to safeguard children and young people, satisfy health and safety considerations and ensure that bullying or teasing does not occur. This supervision should be appropriate to the needs and age of the children concerned and sensitive to the potential for embarrassment.

This means that schools should:

- *have written care plans in place for any young person who could be expected to require intimate care*
- *update intimate/personal care plans in writing where appropriate; e.g. because there are changes to staff rotas, etc.*
- *ensure that children and young people are actively consulted about their own care plan*
- *ensure that intimate/personal care is provided by staff known to the child*
- *ensure that only individuals that have been checked against the relevant DBS barred list are permitted to engage in intimate or personal care*
- *ensure that temporary or visiting staff have been trained in intimate and personal care procedures if it will be necessary to involve them in such activity*

This means that staff should:

- *adhere to their school's intimate and personal care and nappy changing policies*
- *make other staff aware of the task being undertaken*
- *always explain to the child what is happening before a care procedure begins*
- *consult with colleagues where any variation from agreed procedure/care plan is*

necessary

- *record the justification for any variations to the agreed procedure/care plan and share this information with the young person and their parents/carers*
- *avoid any visually intrusive behaviour*
- *where there are changing rooms announce their intention of entering*
- *always consider the supervision needs of the children and young people and only remain in the room where their needs require this*

*This means that staff should **not**:*

- *change or toilet in the presence or sight of children and young people*
- *shower with children and young people*
- *allow any adult to assist with intimate or personal care without confirmation from senior leaders that the individual is not barred from working in regulated activity*
- *assist with intimate or personal care tasks which the young person can undertake independently*

22. The use of control and physical intervention

- 22.1 Early years providers must take all reasonable steps to ensure that corporal punishment is not given by any person who cares for or is in regular contact with a child, or by any person living or working in the premises where care is provided. A person will not be taken to have used corporal punishment if the action was taken for reasons that include averting an immediate danger of personal injury to, or an immediate danger of death of, any person including the child (Statutory framework for the early years foundation stage).
- 22.2 The law and guidance for schools states that adults may reasonably intervene to prevent a child from:
- committing a criminal offence
 - injuring themselves or others
 - causing damage to property
 - engaging in behaviour prejudicial to good order and to maintain good order and discipline.
- 22.3 Great care must be exercised in order that adults do not physically intervene in a manner which could be considered unlawful. Staff should also be mindful of the significant impact that a physical intervention may have on a child with special educational needs or disabilities.
- 22.4 Under no circumstances should physical force be used as a form of punishment. The use of unwarranted or disproportionate physical force is likely to constitute a criminal offence. Where the school or setting judges that a child's behaviour presents a serious risk to themselves or others, they must always put in place a robust risk assessment which is reviewed regularly and, where relevant, a physical intervention plan.
- 22.5 In all cases where physical intervention has taken place, it is essential to record the incident and subsequent actions and report these to the Headteacher/DSL and the child's parents.
- 22.6 Similarly, where it can be anticipated that physical intervention is likely to be required, a plan should be put in place which the young person and parents/carers are aware of and have agreed to.
- 22.7 Parental consent does not permit settings to use unlawful physical intervention or deprive a child of their liberty.

Full details can be found in our Use of Restrictive Interventions Policy.

This means that schools should:

- *ensure that they have a lawful restrictive interventions policy consistent with local and national guidance*
- *regularly acquaint staff with policy and guidance*
- *ensure that staff are provided with appropriate training and support*
- *have an agreed policy for when and how physical interventions should be recorded and reported*

This means that staff should:

- *adhere to the school's restrictive interventions policy*
- *always seek to defuse situations and avoid the use of physical intervention wherever possible*
- *where physical intervention is necessary, only use minimum force and for the shortest time needed*

*This means that staff should **not**:*

- *use physical intervention as a form of punishment.*

23. One to one situations and home visits

- 23.1 Staff working in one-to-one situations with children and young people at the school, including visiting staff from external organisations, can be more vulnerable to allegations or complaints.
- 23.2 Arranging to meet with children and young people from the school is not permitted unless the necessity for this is clear and approval is obtained from the Headteacher, the child and their parents/carers.
- 23.3 Where staff are expected to work one to one with a young person on a virtual platform, clear expectations should be set out for all of those involved that are reflective of the trust's safeguarding policies and procedures.
- 23.4 All work with children and young people and parents should usually be undertaken in the school. There are, however, occasions, in response to an urgent, planned or specific situation or job role, where it is necessary to make one-off or regular home visits; e.g. to undertake a welfare visit during school closures or provide invigilation for external exams. It is essential that appropriate policies and related risk assessments are in place to safeguard both staff and young people who can be more vulnerable in these situations.

For further details see Lone Working Policy and other relevant protocols on undertaking home visits and transporting children and young people.

This means that staff should:

- *work one to one with a child only when absolutely necessary (both in person or online) and with the knowledge and consent of the Headteacher/DSL and parents/carers*
- *be aware of relevant risk assessments, policies and procedures, including child protection, acceptable use and behaviour management*

- *avoid use of ‘engaged’ or equivalent signs wherever possible. Such signs may create an opportunity for secrecy or the interpretation of secrecy*
- *ensure that wherever possible there is visual access and/or an open door in one-to-one situations and in a home situation, if it is necessary to enter a child’s personal space, this should be in the presence of the parent/carer; avoid unannounced visits wherever possible*
- *never enter a home without the parent or carer’s consent or when the parent is absent, except in an emergency*
- *always make detailed records including times of arrival and departure*
- *ensure any behaviour or situation which gives rise to concern is discussed with the Headteacher/DSL.*
- *ensure that children are seen in open and observable spaces; for example, living rooms.*

24. Educational visits

- 24.1 Staff responsible for organising educational visits and participating in educational visits should be familiar with the trust’s Educational Visits Policy
- 24.2 Staff should take particular care when supervising children and young people in the less formal atmosphere of an educational visit. Staff remain in a position of trust and need to ensure that their behaviour cannot be interpreted as seeking to establish an inappropriate relationship or friendship.
- 24.3 Where out of school activities include overnight stays, careful consideration needs to be given to sleeping arrangements.
- 24.4 Staff must not consume drugs or alcohol on school trips and residential activities as they will be responsible for supervising children and young people– see section 15.

This means that staff should:

- *adhere to their school’s specific educational visits guidance*
- *always have another adult present on visits, unless otherwise agreed with the Headteacher*
- *ensure that their behaviour remains professional at all times*
- *never share beds with a young person*
- *never share bedrooms unless it involves a dormitory situation and the arrangements have been previously discussed with Headteacher, parents/carers and the young person*
- *refer to local and national guidance for educational visits, including exchange visits (both to the UK and abroad)*

25. Duty to report concerns about an individual’s suitability to work with children.

- 25.1 There is a duty to report (including self-reporting) any incident in which an adult has or may have behaved in a way that is inconsistent with the organisation’s staff code of conduct, including inappropriate behaviours inside, outside of work or online.

- 25.2 Staff should recognise their individual responsibility to raise any concerns regarding behaviour or conduct (including low level concerns) that falls short of the principles outlined in this document. It is crucial that any such concerns, including those which do not meet the harm threshold (see KCSiE), are shared responsibly and with the right person, and recorded and dealt with appropriately.
- 25.3 Failure to report or respond to such concerns would constitute a failure in professional responsibilities to safeguard children and promote welfare.
- 25.4 Whistleblowing is a mechanism by which staff can voice their concerns, made in good faith, without fear of repercussion in circumstances where their concerns have not been dealt with or they do not feel able to follow usual reporting lines for some reason.
- 25.5 Education settings should have a clear and accessible whistleblowing policy that meets the terms of the Public Interest Disclosure Act 1998. Staff who use whistleblowing procedures should have their employment rights protected.
- 25.6 The NSPCC ‘what you can do to report abuse’ dedicated helpline is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by their school. Staff can call 0800 800 5000 – line is available from 10:00 AM to 16:00 PM, Monday to Friday or can email: help@nspcc.org.uk.

This means that schools should:

- *have clear systems in place for reporting behaviour causing concern of adults*
- *Have clear systems in place for whistleblowing that are promoted to all staff*
- *promote an open and transparent culture where staff feel valued and are confident to report any concerns*
- *ensure all concerns about adult conduct are listened to, received sensitively, taken seriously, actioned, recorded with clear outcomes*
- *ensure all concerns that do meet the harm threshold are reported to the Headteacher/DSL within 24 hours*

This means that staff should:

- *escalate their concerns if they believe a child or children are not being protected*
- *report any behaviour by colleagues that raises concern*
- *report allegations against staff and volunteers to the Headteacher, or where they have concerns about the Headteacher’s response, report these directly to the CEO or to the LADO*
- *follow the trust’s Whistleblowing Procedures as appropriate.*
- *where a staff member feels unable to raise an issue with their employer or feels that their genuine concerns are not being addressed, they should utilise other whistleblowing channels that are open to them as outlined in KCSiE*

26. Sharing concerns and recording incidents

- 26.1 All staff should be aware of their school's safeguarding procedures, including the procedures for dealing with allegations against staff, including agency staff and volunteers, and for reporting low-level concerns.

- 26.2 In the event of an allegation being made, by any person, or incident being witnessed, the relevant information should be immediately recorded and reported to the headteacher, or Designated Safeguarding Lead as appropriate.
- 26.3 Members of staff should feel able to discuss with their line manager any difficulties or problems that may affect their relationship with or behaviour towards children and young people, so that appropriate support can be provided and/or action can be taken.
- 26.4 In order to safeguard and protect children and young people and colleagues, where staff have any concerns about someone who works with children they should immediately report this to the Headteacher in line with the setting's procedures.

This means that schools should:

- *have an effective, confidential system for recording and managing concerns raised by an individual regarding an adult's conduct or allegations against staff and volunteers*

This means that staff should:

- *be familiar with their school's arrangements for reporting and recording concerns and allegations*
- *know how to contact the LADO and Ofsted directly if required*
- *take responsibility for recording any incident, and passing on that information where they have concerns about any matter pertaining to the welfare of an individual in the school*

27. Health and Safety

- 27.1 All staff must familiarise themselves with, and follow, the Health and Safety Policy and guidelines for their particular workplace.

28. Essential Training

- 28.1 All staff must comply with reasonable requests to attend training which is a statutory requirement or essential for their role.

29. Criminal charges, cautions and convictions

- 29.1 Staff must advise their Headteacher and the trust's HR department immediately if they are charged with, cautioned or convicted of any criminal offence whilst an employee of the trust. While such proceedings will not necessarily affect their employment, the trust needs to be satisfied that there are no implications for the safety of children, its reputation or in relation to the role undertaken.
- 29.2 Staff must advise their Headteacher and the trust's HR department immediately if they have been arrested, appeared in court or released on bail where conditions could have consequences for their work. If there is any doubt about whether bail conditions should be reported, especially where safeguarding could be an issue, the member of staff must discuss it with their Headteacher or CEO so that any concerns can be addressed from the outset. Failure to report such conditions would be considered as serious misconduct and could potentially lead to breach of bail.

30. Specific standards for staff with responsibility for expenditure

Personal interests:

- 30.1 The interests of the trust must not be undermined by personal interests. The way staff undertake their role must not be influenced by personal interests or those of relatives, friends or membership of external organisations or societies. There should be no grounds for suspicion that staff are using their position with or knowledge of the trust for personal gain or that they could be influenced by improper motives. If staff belong to outside organisations, including voluntary organisations, there must be no conflict with their role in the trust.
- 30.2 All orders, contracts and grants must be awarded on merit following fair competition. No favour should be shown because of personal interests and no part of the community should be discriminated against.
- 30.3 Staff must advise the CFOO in writing about anything which could give the impression that they may be acting for personal gain, financial or otherwise, or in the interests of another person or organisation; or they are involved as an employee in matters which might reasonably be regarded as affecting the wellbeing or financial position of themselves, their spouse, partner, relative, a close friend or any person with whom they have a close association, e.g. if any of those persons
- hold an office or employment with
 - have any connection or influence with
 - have any financial interest in any company or organisation doing or seeking to do business with, or requesting grants or other funding from the trust
- 23.4 Staff should avoid being involved in matters which might reasonably be regarded as affecting the well-being or financial position of themselves (or the persons, companies or organisations referred to above) so significant that it is likely to prejudice their judgment of the trust or public interest.
- 23.5 Staff must advise the CFOO of any personal dealings of a business or private nature with existing or potential suppliers, consultants or contractors who they know (or could reasonably be expected to know) to have dealings with the trust.
- 23.6 If staff engage or supervise contractors or consultants on behalf of the trust or have any other official relationship with them they must advise the CFOO, prior to any contractual relationship beginning or work being undertaken, if they have or intend to have any private or domestic relationship with them or any of their employees.

Personal purchases:

- 24.1 Staff must be aware of potential conflicts of interest when buying goods or use the services of firms which have dealings with the trust and not seek preferential rates, reductions or any other favourable treatment in the purchase of goods and services.

Procurement of goods and services and disposal of property:

- 25.1 Staff must not accept any inducement or preferential treatment when procuring goods or services for the trust or disposing of surplus property.
- Under the Bribery Act 2010 it is a criminal offence if a person fails to prevent bribery, bribes another person with the intention of obtaining or retaining a business or a business advantage, or receives a bribe, whether or not unwittingly.