



Trust Employee Code of Conduct Policy

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1. Aims, scope and principles

This policy aims to set and maintain the highest possible standards of conduct that Veritas Multi Academy Trust employees are required to follow.

By creating this policy, we aim to ensure that Veritas Trust schools' are environments where everyone is safe, happy and treated with respect. All Trust employees have an influential position in the Trust and school within they work and will act as role models for pupils by consistently demonstrating high standards of behaviour.

The principles in this code of conduct are based on the [Teachers' Standards](#). These apply to anyone working in our schools, in whatever capacity (including, all Trust employees, supply teachers, volunteers and visitors).

Failure to follow the Code of Conduct Policy may result in disciplinary action being taken, as set out in our staff disciplinary procedures (See [the Discipline and Conduct Policy](#)).

Please note that this code of conduct is not exhaustive. If situations arise that are not covered by this code, Trust employees will use their professional judgement and act in the best interests of the Trust/school and its pupils.

2. Legislation and guidance

In line with the statutory safeguarding guidance '[Keeping Children Safe in Education](#)', we are required to have a Trust employees code of conduct, which includes use of technologies, staff/pupil relationships and communications, including the use of social media. This policy also complies with our funding agreement and Articles of Association.

3. General obligations

The Trust's Conduct Policy is predicated on our mission; to make Veritas MAT an irresistible place to learn and work. The enactment of this policy will always be to ensure that all individuals' safety and wellbeing are paramount, whilst working within a culture of care, concern and empathy. HYPERLINK "<https://veritasmat.sharepoint.com/sites/veritasmat>" [Veritas Trust website](#)
Trust employees set an example to pupils and will:

- Maintain high standards in their attendance and punctuality

- Never use inappropriate or offensive language in school
- Treat pupils and others with dignity and respect
- Show tolerance and respect for the rights of others
- Not undermine fundamental British values, including democracy, the rule of law, individual liberty and mutual respect, and acceptance of those with different faiths and beliefs
- Express personal beliefs in a way that will not overly influence pupils, and will not exploit pupils' vulnerability or might lead them to break the law
- Understand the statutory frameworks they must act within
- All Trust employees, volunteers, Governors, Trustees, visitors adhere to the Teachers' and TA Standards

4. Safeguarding, Prevent, Health and Safety

All Trust employees have a duty to safeguard pupils from harm, and to report any concerns they have. This includes physical, emotional and sexual abuse, or neglect.

All Trust employees undertake annual statutory training in;

- Safeguarding and Child Protection Policy & KCSIE
- Prevent Duty
- Health and Safety (including asbestos awareness)
- NCSC Cyber Security
- Data Protection and GDPR
- FGM
- Online Safety
- Sexual Harassment (safeguarding of staff)

This is also a requirement of our Induction for new staff to the Trust. The Trust is committed to making the environment safe for all. For further details regarding Veritas Trust policies, please visit the [Veritas Trust website](#).

4.1 Allegations that may meet the harm threshold

This section is based on 'Section 1: Allegations that may meet the harm threshold' in part 4 of Keeping Children Safe in Education.

This section applies to all cases in which it is alleged that anyone working in the school, including a supply teacher, volunteer or contractor, has:

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place inside or outside of school

We will deal with any allegation of abuse quickly and in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation. This is detailed in our Safeguarding and Child Protection Policy.

A 'case manager' will lead any investigation. This will be the Headteacher, or the Chair of the Trust Board, where the Headteacher is the subject of the allegation.

4.2 Low-level concerns about members of staff

A low-level concern is a behaviour towards a child by anyone working in the school or Trust that does not meet the harm threshold, is inconsistent with the staff code of conduct, and may be as simple as causing a sense of unease or a 'nagging doubt'. For example, this may include:

- Being over-friendly with children
- Having favourites
- Taking photographs of children on a personal device

- Engaging in 1-to-1 activities where they can't easily be seen
- Humiliating pupils

Low-level concerns can include inappropriate conduct inside and outside of work.

Trust employees should share any low-level concerns they have using the reporting procedures set out in our [Child Protection and Safeguarding Policy](#). We also encourage Trust employees to self-refer if they find themselves in a situation that could be misinterpreted. If Trust employees are not sure whether behaviour would be deemed a low-level concern, we encourage Trust employees to report it to their line manager. All reports will be handled in a responsive, sensitive and proportionate way.

Unprofessional behaviour will be addressed, and the Trust employee supported to correct it, at an early stage. This creates and embeds a culture of openness, trust and transparency in which our Trust values and expected behaviour are constantly lived, monitored and reinforced by all Trust employees, while minimising the risk of abuse.

Reporting and responding to low-level concerns is covered in more detail in our Safeguarding and Child Protection Policy.

Our procedures for dealing with allegations will be applied with common sense and judgement.

4.3 Whistleblowing

Veritas Multi Academy Trust is committed to the highest possible standards of openness, probity and accountability and we encourage employees and others working with us to raise any concerns about any aspect of our work, to come forward and voice those concerns.

Whistleblowing is when a person reports certain types of wrongdoing or malpractice, usually within an organisation, to someone in authority. In the context of schools, this often means staff reporting concerns about:

- Safeguarding issues
- Fraud or financial mismanagement
- Unsafe or unethical conduct
- Breaches of legal or professional standards

The wrongdoing must typically be in the public interest – this means it affects others, such as pupils, staff, or the wider community.

In exceptional circumstances where a Trust employee may feel that a situation warrants, employees are encouraged to report suspected wrongdoing as soon as possible. Whistle blowing could be an appropriate action. For our Trust detailed whistle-blowing process, please refer to the HYPERLINK "https://www.veritasmat.co.uk/_site/data/files/documents/B0452AE57F8A561FF865ABA58599CF3C.pdf" [Whistle Blowing Policy](#).

5. Sexual Harassment

Sexual harassment is any unwanted physical, verbal or non-verbal conduct of a sexual nature that has a purpose or effect of violating a person's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. It also includes treating someone less favourably because they've submitted or refused to submit to unwanted conduct of a sexual nature in the past, or harassment related to sex or gender reassignment. When this behaviour is unwanted, it includes (but isn't limited to):

- Unwanted physical conduct or 'horseplay' including touching, pinching, pushing and grabbing
- Continued suggestions for sexual activity after it has been made clear that such suggestions are unwelcome
- Sending or displaying material that is pornographic, or that some people might find offensive

- o Unwelcome sexual advances or suggestive behaviour (which the harasser may perceive as harmless)
- o Offensive emails, text messages or social media content
- o Comments and jokes of a sexual nature
- o Sexually suggestive looks and staring
- o Sexual propositions and advances
- o Promising things in return for sexual favours
- o Physical contact such as massaging, hugging or kissing
- o Sexual contact on social media

Staff will help create a positive environment that works to prevent sexual harassment. This includes calling out sexual harassment that they witness. All witnesses will be provided with appropriate support and will be protected from victimisation.

If a Trust employee is concerned at any point about incidents of sexual harassment (either directed at them or someone else), they should report their concern to the Headteacher or designated member of the Trust Central team. If the concern is about the Headteacher or designated member of the Trust Central team, or it is believed they may be involved in the wrongdoing in some way, the staff member should report their concern to Trust Governance Professional (governance.professional@veritasmat.co.uk). The Trust will investigate any complaints in a timely, respectful and confidential manner.

All Trust employees will receive annual training on recognising and responding to incidents of sexual harassment. The Trust will monitor the treatment and outcomes of any complaints of sexual harassment or victimisation received to make sure that they are properly investigated and resolved, those who report or act as witnesses are not victimised, repeat offenders are dealt with appropriately, cultural clashes are identified and resolved and workforce training is targeted where needed.

6. Staff/pupil relationships

Trust employees should observe proper boundaries with pupils that are appropriate to their professional position. They will act in a fair and transparent way that would not lead anyone to reasonably assume they are not doing so.

Trust employees and pupils may spend time on a one-to-one basis, Trust employees will ensure that:

- This takes place in a public place that others can access
- Others can see into the room
- A colleague or line manager knows this is taking place

Trust employees should avoid contact with pupils outside of school hours if possible.

Personal contact details should not be exchanged between Trust employees and pupils. This includes social media profiles.

While we are aware many pupils and their parents may wish to give gifts to staff, for example, at the end of the school year, gifts from Trust employees to pupils are not acceptable.

If a Trust employee is concerned at any point that an interaction between themselves and a pupil may be misinterpreted, or if a Trust employee is concerned at any point about a fellow Trust employee member and a pupil, this should be reported in line with the procedures set out in Veritas MAT Safeguarding and Child Protection Policy.

7. Communication and social media

Trust employees' social media profiles should not be available to pupils. If they have a personal profile on social media sites, they should not use their full name, as pupils may be able to find them. Trust employees should consider using a first and middle name instead and set public profiles to private.

Trust employees should not comment on any posts, or exchange comments in discussion regarding posts, linked to either the Veritas Trust, pupil, parent or carer, or any school within the Trust.

Trust employees should not attempt to contact pupils or their parents/carers via personal social media, or any other means outside school, to develop any sort of relationship. They will not make any efforts to find pupils' or parents'/carers' social media profiles. It is noted that this is particularly difficult where

Trust employees are also parents at the school and may have existing social groups. Trust employees are encouraged to discuss such issues with their line manager/Headteacher, to ensure they adhere to this policy.

A social media check will be undertaken, for all new Trust employees, as part of the Veritas MAT Safer Recruitment process.

Trust employees should also be aware of the Trust's Online Safety Policy and must adhere to the Trust's Acceptable Use Agreement. Trust employees must ensure that they do not post any images of school / Trust activities online that identify children who are pupils at the school and will adhere to the General Data Protection Requirements outlined in the Trust's Online Safety Policy.

8. Acceptable use of technology

Trust employees should not use technology in school to view material that is illegal, inappropriate, or likely to be deemed offensive. This includes, but is not limited to, sending obscene emails, gambling and viewing pornography or other inappropriate content.

Trust employees should not use personal mobile phones and laptops, or school equipment for personal use, in school hours or in front of pupils. Additionally, they should not use personal mobile phones or cameras to take pictures of pupils.

All Veritas Trust employees are required to agree to the Trust Acceptable Use of Technology Policy as part of their induction and where this is reviewed and updated by the Trust to reflect the use of new technologies.

Veritas Trust regularly monitor emails and internet use on the Veritas Trust/school's IT system, in line with guidance from [Keeping Children Safe In Education](#).

9. Confidentiality

Within their role, Trust employees are often privy to sensitive and confidential information about the school-Trust employees, pupils and their parents.

This information should never be:

- Disclosed to anyone without the relevant authority
- Used to humiliate, embarrass or blackmail others
- Used for a purpose other than what it was collected and intended for

This does not overrule Veritas Trust employees' duty to report child protection concerns to the appropriate channel where Trust employees believe a child is at risk of harm, as detailed in above sections and within the Trust's Safeguarding and Child Protection Policy.

Anyone regularly breaching confidentiality, under this Trust Employee Code of Conduct Policy, Acceptable Use and/or [HYPERLINK "https://www.veritasmat.co.uk/_site/data/files/documents/ss/A7BB8E9CD25F57B38624BBA5B3949555.pdf"](https://www.veritasmat.co.uk/_site/data/files/documents/ss/A7BB8E9CD25F57B38624BBA5B3949555.pdf) [Privacy notice for parents and carers – use of your child's personal data](#), would be managed in line with the Veritas Trust Discipline and Conduct Policy.

Trust employees are not permitted to access systems outside of work to access confidential information regarding pupils, parents/carers or other staff members, unless there is specific reason to access this information to complete essential tasks for reporting or safeguarding of pupils.

10. Honesty and integrity

Trust employees should maintain high standards of honesty and integrity in their role. This includes dealing with pupils, handling money, claiming expenses, claiming overtime payments and using school property and facilities. Trust employees must not accept bribes.

Trust employees will ensure that all information given to the school/Trust about their qualifications and professional experience is correct. This should include:

- Background information (including any past or current investigations/cautions related to conduct outside of school)
- Qualifications
- Professional experience

Where there are any updates to the information provided to the Trust, the Trust employee will advise the Trust as such as soon as reasonably practicable. Consideration will then be given to the nature and circumstances of the matter and whether this may have an impact on the member of staff's employment.

11. Dress code

Trust employees should dress in a professional, appropriate manner. Trust employees are seen as role models and, as such, should always consider how they dress and act.

To ensure consistency across the Veritas Trust schools it is important that the message given to pupils about expectations for clothing is reflected in the professional clothing choices of all Trust employees. Trust employees should always dress appropriately. Underwear should not be visible through clothing and clothes should not display any offensive or political slogans.

12. Physical Contact

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. Therefore, Trust employees should always use professional judgement.

Physical contact should never be secretive, or for personal gratification, or represent a misuse of authority.

This means that Trust employees should:

- be aware that even well-intentioned physical contact may be misconstrued by the child, an observer or anyone to whom this action is described.
- never touch a child in a way which may be considered indecent. (Trust employees who are required to provide personal care of an intimate nature are fully trained and should follow clear protocols).
- always be prepared to explain actions and accept that all physical contact be open to scrutiny.

Considerations should be made of children for whom touching is particularly unwelcome.

For example:

- Some children may be particularly sensitive to physical contact because of their cultural background, special educational need, or because they have been abused. Touching children, including well-intentioned gestures such as putting a hand on a shoulder, can, if repeated regularly, lead to serious questions being raised. As a general principle, Trust employees must not make gratuitous physical contact with their pupils. It is particularly unwise to attribute touch to their teaching style or as a way of relating to pupils. Teachers and other staff do, however, have the right to use reasonable physical force to restrain pupils, in certain circumstances, to protect themselves and others.

Use of reasonable force is detailed within our Use of Reasonable Force Policy, please refer to this for full details.

Any form of physical punishment of pupils is unlawful, as is any form of physical response to misbehaviour, unless it is by way of restraint. It is particularly important that Trust employees understand this both to protect their own position and the overall reputation of the school/Trust.

Some Trust employees are likely to come into physical contact with children from time to time in the course of their duties. Trust employees should be aware of the limits within which such contact should properly take place and the possibility of such contact being misinterpreted.

Children in distress:

There may be occasions when a distressed child needs comfort and reassurance. Trust employees should always remain self-aware in order that contact is not threatening, intrusive or subject to misinterpretation. Any concerns about the need to provide this type of care and reassurance Trust employees should seek further advice from their line manager or DSL.

Trust employees should:

- Consider the way in which comfort to a distressed child is offered
- Ensure that physical contact is what the child wants. It might be appropriate to hold a child's hand if he/she is distressed – ask them first.
- Always tell a colleague when and how you offered comfort to a distressed child.
- Use the school's **My Concern** process to raise concerns
- Don't give someone a hug because it would make you feel better if you did.

13. Conduct outside of work

Trust employees will not act in a way that would bring the school, Trust or the teaching profession into disrepute. This covers relevant criminal offences, such as violence or sexual misconduct, as well as negative comments about the Trust/school on social media. Trust employees should not make statements or comments to the Press regarding any situation involving the Trust/school, Trust employees or its pupils. Any requests as such should be referred to the Headteacher, Trust CEO or Trust Marketing Lead without further comment.

Trust employees must not engage in conduct that is inappropriate, radicalised, extremist or discriminatory in any way.

Trust employees are not to engage in bullying or harassment.

Trust employees must not breach Trust/School policies and procedures outside of the workplace. This includes using IT systems or internet to breach confidentiality or GDPR or share confidential information about the school, staff, pupils or parents/carers. Trust employees causing a data breach by accessing, modifying, or sharing data (including personal data), without authorisation, will be subject to Trust disciplinary action.

14. Monitoring arrangements

This policy will be reviewed every 2 years but can be revised as needed.

The Trust DSL will ensure this Code of Conduct Policy is implemented effectively, and along with the Trust Board and Headteacher, will ensure appropriate action is taken, in a timely manner, to safeguard children and deal with any concerns.

15. Links with other policies & guidance

This policy links with our policies on:

- [Discipline and Conduct Policy](#) - these procedures will be used if Trust employees breach the Code of Conduct Policy it also sets out examples of what we will deem as misconduct and gross misconduct
- Fairness At Work Policy
- Acceptable Use Policy for Staff
- Data Protection and GDPR Policy
- Safeguarding and Child Protection Policy
- Online Safety Policy
- Intimate Care Policy
- Keeping Children Safe In Education
- Privacy notice for parents and carers – use of your child's personal data
- Positive Handling Policy
- Health and Safety, including risk assessment Policy
- Use of Reasonable Force