

Code of Conduct Policy

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Approving Body	Trust Board
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Owner	Director of People & Culture
Applies to	All Trust Schools, all Trust staff

Version	Date	Reason
1.0	October 2020	To establish a Trust wide policy
1.1	October 2023	Amendments to sections
1.2	September 2026	Amendments to sections 1, 3, 7, 12, and new sections, 11, 18, 19, 20, 21, Appendix 1

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1. Purpose & Trust Values

- 1.1. The aim of this Code of Conduct for employees is to set out the standards of conduct expected of all staff and to provide further information for employees. This should be read in conjunction with our disciplinary policy, Teachers' Standards and the statutory guidance Keeping Children Safe in Education.
- 1.2. This Code should make it clear to employees the expectations the Trust has of them. Employees should note that this Code is not exhaustive in defining acceptable and unacceptable standards of conduct and employees must use common sense in adhering to the underpinning principles. If any employee is ever unsure what the expectations are in any given circumstance they should speak to their line manager or headteacher.
- 1.3. This Code does not form part of any employee's contract of employment and it may be amended at any time.
- 1.4 The Trust has three key values for our staff and volunteers to live out in supporting our culture ("the way we do things here"); collaboration, ambition and respect. We ask you to live these values every day with our pupils, members of our community and each other.

The Trust also has an additional set of [leadership principles](#), applicable to anyone who holds a leadership position or responsibility at Initio Learning Trust.

We also expect our teaching staff to adhere to the Department for Education's Teachers' Standards and our governance volunteers to adhere to our Code of Conduct for Members, Trustees and Local Governors (which they sign at the start of their term of office).

- 1.5 Defining Standard Professionalism: Standard Professionalism refers to the baseline behaviors, ethics, and attitudes expected of all employees to maintain a productive and respectful learning environment. It is characterised by:

1. Dignity and Respect: Treating all pupils, parents, and colleagues with courtesy and building relationships rooted in mutual respect.
2. Adherence to Values: Actively living the Trust values of collaboration, ambition, and respect.
3. Professional Boundaries: Maintaining clear and appropriate boundaries with pupils, including responsible use of social media and avoiding favouritism.
4. Personal Integrity: Demonstrating honesty in all work-related duties, including attendance, punctuality, and the handling of Trust property.
5. Duty of Care: Taking responsibility for one's own actions and always acting in the best interests of our pupils.

Failure to maintain these standards will be managed through the Disciplinary Policy rather than the Whistleblowing procedure, unless the conduct represents a systemic risk to the public interest.

2. Scope

- 2.1. The Code applies to all employees regardless of length of service including those in their probationary period. It also applies to agency workers and self-employed contractors although, unlike employees, breaches of the Code will not be managed through the disciplinary procedure.
- 2.2. As recognisable figures in the local community the behaviour and conduct of staff of the Trust outside of work can impact on their employment. Therefore conduct outside work may be treated as a disciplinary matter if it is considered that it is relevant to the employee's

employment. See Disciplinary Policy.

If the issue is...	Use this Policy:	Primary Focus
A personal matter affecting only you (e.g., pay, promotion, or how you are personally treated).	Grievance Procedure	Individual Resolution
Interpersonal conduct between colleagues (e.g., bullying, offensive jokes, or "witnessed" rude behavior).	Dignity at Work (Anti-Bullying & Harassment)	Professional Conduct
Sexual Harassment or unwanted conduct of a sexual nature.	Preventing Sexual Harassment at Work Policy	Specialised Protection
A "Public Interest" risk (e.g., financial fraud, danger to health/safety, or systemic safeguarding failures).	Whistleblowing Policy	Public Duty & Safety

3. Safeguarding and promoting the welfare of children

- 3.1. All employees are responsible for safeguarding children and promoting their welfare. You must have a secure understanding of, and commitment to, safeguarding and child protection (even if you don't regularly work closely with our pupils) because we all have a duty to keep our pupils safe and protected from harm. This means that employees are required to take action to protect children from maltreatment, prevent impairment of children's health or development and ensure that children grow up in circumstances consistent with the provision of safe and effective care. This will enable all children to have the best outcomes.
- 3.2. We expect you to participate in safeguarding and child protection induction training and regular refresher training/updates. All employees must be aware of the signs of abuse and neglect including low level concerns and know what action to take if these are identified.
- 3.3. To do this employees must have fully read and understood our Trust's child protection and safeguarding policies, be aware of our systems for keeping children safe in education and must follow the guidance in these policies at all times.
- 3.4. All employees must cooperate with colleagues and with external agencies where necessary.

4. Duty of care

Staff must:

- Understand the responsibilities, which are part of their employment or role, and be aware that sanctions will be applied if these provisions are breached
- Always act, and be seen to act, in our pupils' best interests
- Avoid any conduct which would lead any reasonable person to question their motivation and/or intentions
- Avoid any conduct that could amount to discrimination or harassment;
- Take responsibility for their own actions and behaviour
- During an employee's tenure of employment with Initio Learning Trust, they must disclose to their Headteacher / Line Manager any instances of personal social services involvement, which in turn should be consulted with the Trust's Safeguarding Officer.

5. Health & Safety

All employees must ensure that they:

- Read and understand the Trust's Health and Safety Policies

- Comply with Health and Safety Regulations or instructions and use any safety equipment and protective clothing which is supplied to you by the school or Trust
- Comply with any hygiene requirements
- Comply with any accident reporting requirements
- Never act in a way which might cause risk or damage to any other members of the Trust community or visitors.

6. Professional Conduct, Honesty and Personal Integrity

6.1. Employees are expected to demonstrate consistently high standards of personal and professional conduct. The following statements define the behaviour and attitudes which set the required standard for conduct at our Trust.

6.2. Employees must comply with any lawful or reasonable management instructions issued by managers.

6.3. Employees uphold public trust in our Trust and maintain high standards of ethics and behaviour, within and outside school, by:

- Treating pupils with dignity, building relationships rooted in mutual respect, and at all times observing proper boundaries appropriate to their professional position
- Having regard for the need to safeguard pupils' well-being, 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 and beliefs
- Ensuring that personal beliefs are not expressed in ways which exploit pupils' vulnerability or might lead them to break the law.

6.4. Employees must have proper and professional regard for the ethos, policies and practices of our Trust and maintain high standards in their own attendance and punctuality.

6.5. Employees must treat all colleagues with respect, dignity, fairness, and courtesy. If you witness a colleague failing to meet these professional standards, you should report it to your Headteacher or Line Manager under the Dignity at Work policy to ensure our professional culture is maintained.

Examples of professional behaviour are listed below but the list is not exhaustive:

- Standard professionalism
- Addressing any issues with colleagues in a professional manner
- Responding via e-mail or group chats in a professional manner
- Displaying tolerance and acceptance of differences
- Displaying an inclusive attitude towards all colleagues
- Ensuring we act with kindness and respect towards each other

Employees must not ignore behavior by colleagues that falls below these standards. Reporting such behavior promptly via the appropriate internal manager (rather than external whistleblowing routes) allows the Trust to maintain its internal culture and dignity at work.

6.6. Staff must maintain high standards of honesty and integrity in their work. This includes the handling and claiming of money and the use of Trust property and facilities.

7. Tackling discrimination and harassment

7.1. Employees are required to understand the types of discrimination, harassment, and bullying that pupils and colleagues may be subject to. Employees are required to have read and understood our equality and diversity policy and preventing sexual harassment at work policy.

7.2. The law protects employees, workers, contractors, self-employed staff, apprentices, those undertaking vocational training, volunteers, former workers and job applicants from sexual harassment and the Trust has a duty to take reasonable steps to prevent sexual harassment of its staff at work.

Examples of sexual harassment include, but are not limited to:

- Flirting, gesturing, making sexual remarks about someone's appearance in any means of communication.
- Asking questions about someone's sex life.
- Telling sexually offensive jokes/pranks and or sharing pornographic or sexual images.
- Unwanted touching, kissing or assault.

To report an incident of sexual harassment or to raise a concern please refer to the Preventing Sexual Harassment at Work Policy for details of how the Trust responds to a report of sexual harassment.

7.3. Employees must not ignore any form of discrimination or harassment. Employees must positively promote equality and diversity and inclusion at all times and not display any behaviour that constitutes any form of discrimination, bullying or harassment.

8. Professional boundaries and relationships

8.1. Employees in our Trust are in a position of trust in relation to our pupils which means that the relationship between an employee and a pupil is not one of equals. It is a specific offence for a person aged 18 or over (e.g. teacher, youth worker) to have a sexual relationship with a child under 18 where that person is in a position of trust in respect of that child, even if the relationship is consensual.

8.2. Employees must ensure that they avoid behaviour which might be misinterpreted by others. This includes any type of communication that they may have with pupils.

8.3. Employees must not make sexual remarks to any pupil or discuss their own sexual relationships with, or in the presence of pupils. Employees must not discuss a pupil's sexual relationships in inappropriate settings or contexts. Any sexual behaviour by a member of staff towards any pupil is unacceptable and illegal.

8.4. Employees must ensure that professional boundaries are maintained at all times. This means that employees should not show favouritism to any pupil and should not allow pupils to engage in any type of behaviour that could be seen to be inappropriate.

8.5. For employees who are in a relationship with a colleague, parent or carer, or any other person associated with the school or Trust we expect that they will identify this to their line manager or Headteacher and ensure that this does not create a conflict of interest or affect their professional judgement or responsibilities in any way. Where an employee has managerial authority over another employee with whom they are in a close personal relationship, the Trust reserves the right to transfer one or both employees to another role in the Trust following appropriate consultation with both employees in order to seek agreement to the transfer.

9. Confidentiality and data protection

9.1. Members of staff may have access to confidential information about pupils, colleagues or other matters relating to the Trust. This could include personal and sensitive data, for example information about a pupil's home life. Employees should never use this information to their own personal advantage, or to humiliate, intimidate or embarrass others. Employees should

never disclose this information unless this is in the proper circumstances and with the proper authority.

9.2. We will comply with the requirements of **Data Protection Legislation** (being (i) unless and until the GDPR is no longer directly applicable in the UK, the General Data Protection Regulation ((EU) 2016/679) and any national implementing laws, regulations and secondary legislation, as amended or updated from time to time, in the UK and then (ii) any successor legislation to the GDPR or the Data Protection Act 1998). Employees are expected to comply with the Trust's systems as set out in our Data Protection Policy. If any employee becomes aware that data is at risk of compromise or loss, or has been compromised or lost they must report it immediately to the Data Protection Officer.

10. Physical contact with pupils

10.1. There are occasions when it is entirely appropriate and proper for staff to have physical contact with pupils. Employees must ensure that they only do so in ways that are appropriate to their professional role and in response to the pupil's needs at the time. This should be of limited duration and appropriate to the age, stage of development, gender and background of the pupil. Employees should always be able to explain why they have made physical contact with a pupil.

10.2. Staff may legally physically intervene with pupils to prevent them from committing a crime, injuring themselves or others, causing damage to property, engaging in behaviour prejudicial to good order and to maintain good order and discipline. Physical force should never be used as a form of punishment.

10.3. Sexual contact, including grooming patterns of behaviour, with pupils is unlawful and unacceptable in all circumstances.

11. Behaviour management

11.1 Employees should not use any form of degrading or humiliating treatment to punish a student. The use of sarcasm, demeaning or insensitive comments towards students is completely unacceptable.

11.2 Where students display difficult or challenging behaviour, employees should follow the trust's behaviour policy using strategies appropriate to the circumstance and situation.

12. Social contact with pupils / Social Media

12.1. Employees should not establish or seek to establish social contact, via any channels (including social media), with pupils for the purposes of securing a friendship or to pursue or strengthen a relationship.

12.2. Our Trust is part of our community and we recognise that, as members of the community, employees will come into contact with pupils outside of the school. We expect staff to use their professional judgement in such situations and to report to their line manager or Headteacher any contact that they have had with a pupil, outside of school, that they are concerned about or that could be misinterpreted by others.

12.3 Social Media

Staff must not post disparaging or defamatory statements about our Trust, our students or their parents or carers; our governors or staff; suppliers and vendors; and other affiliates and stakeholders. Staff should avoid social media communications that might be misconstrued in a way that could damage our Trust's reputation, even indirectly.

If you see content in social media that disparages or reflects poorly on our Trust or our stakeholders, you should print out the content and contact the Head Teacher or a member of the senior leadership team. All staff are responsible for protecting our Trust's reputation.

13. Working one to one with pupils

13.1. There will be times where an employee is working one to one with a pupil and this is acceptable. Employees need to understand that this means that they may be more vulnerable to allegations being made against them. Therefore it is important that employees:

- Avoid meeting on a one to one basis in secluded areas
- Ensure that the door to the room is open or that there is visual access into the room
- Inform a colleague or line manager of the meeting, preferably beforehand
- Reports to their line manager if the pupil becomes distressed or angry.

14. Dress and appearance

Working in our Trust, employees are role models to our pupils and how they present themselves is important. Our expectation is that staff are decently, appropriately and professionally dressed in work at all times and in line with Health and Safety requirements. We do not permit the wearing of clothes that are revealing, allow underwear to be seen, have offensive logos or writing, or are ripped or torn at any time. If an employee is unsure whether any item of clothing is inappropriate then they should not wear it to work. Employees can always speak to their line manager or Headteacher if they are unsure. Where we identify that an employee is wearing clothing that we do not find acceptable they will be informed.

15. Gifts and hospitality

For many of our employees there will be a limited opportunity to accept gifts and hospitality, but all staff must be aware that it is not acceptable for staff to accept bribes. Therefore any gift, promotional offer or hospitality, intended either for the employee or for the school or Trust that exceeds a nominal value of £25 must be declared to the Director of Resources and permission must be obtained before accepting. If an employee is ever unsure, then the best course of action is to politely decline the offer.

It is traditional for pupils and their parents or carers to give gifts as a small token of appreciation or as a thank you to members of staff at certain times throughout the academic year. This Code of Conduct is not designed to stop that practice. Staff may accept gifts from pupils and their parents or carers provided that they meet this definition. Any member of staff receiving a gift with a value of greater than £25 should inform their line manager. Staff must make their line manager or Headteacher aware of any pupil who is giving them gifts on a regular basis, or any pupil or parent or carer who expects something in return for a gift.

Staff should not give gifts to pupils unless this is part of a recognised practice in line with the behaviour policy.

16. Keeping within the law

16.1. Staff are expected to operate within the law. Unlawful or criminal behaviour, at work or outside work, may lead to disciplinary action, including dismissal, being taken. However, being investigated by the police, receiving a caution or being charged will not automatically mean that an employee's employment is at risk.

16.2. Employees must ensure that they:

- Uphold the law at work
- Never commit a crime away from work which could damage public confidence in them or the Trust, or which makes them unsuitable for the work they do. This includes, for

example:

- submitting false or fraudulent claims to public bodies (for example, income support, housing or other benefit claims)
- breaching copyright on computer software or published documents
- sexual offences which will render them unfit to work with children or vulnerable adults
- crimes of dishonesty which render them unfit to hold a position of trust.

Write and tell the Headteacher (CEO if they are the Headteacher, Chair of Trustees if they are the CEO) immediately if they are questioned by the police, charged with, or convicted of, any crime whilst they are employed at the Trust (this includes outside of their working hours).

17. Conduct outside of work and at work related functions

- 17.1 Unlike some other forms of employment, working at our Trust means that an employee's conduct outside of work could have an impact on their role.
- 17.2 Staff must not engage in conduct outside work which could seriously damage the reputation and standing of the Trust or the employee's own reputation or the reputation of other members of the Trust community. Employees should be aware that any conduct that we become aware of that could impact on their role within or affect the Trust's reputation will be addressed under our disciplinary procedure.
- 17.3 We therefore expect employees to make us aware immediately of any such situations that have happened outside of work.
- 17.4 Employees are required to demonstrate responsible behaviour at work-related functions and work-related social events that take place outside normal work hours and to act in a way that will not have a detrimental effect on our reputation.

18. Curriculum

- 18.1 Many areas of the curriculum can include or raise subject matter which is sexually explicit or of a political or sensitive nature. Care should be taken to ensure that resource materials cannot be misinterpreted and clearly relate to the learning outcomes identified by the lesson plan. This can be supported by developing ground rules with students to ensure sensitive topics can be discussed in a safe learning environment. This plan should highlight particular areas of risk and sensitivity and care should especially be taken in those areas of the curriculum where usual boundaries or rules are less rigorously applied e.g., Health and Social Care, PSHE, Drama.
- 18.2 The curriculum can sometimes include or lead to unplanned discussion about subject matter of a sexually explicit, political or otherwise sensitive nature. Responding to children's questions requires careful judgement and employees should take guidance in these circumstances from the Designated Safeguarding Lead (DSL).

19. Agency workers

- 19.1 We will investigate allegations made against agency workers with the cooperation of the agency. Whilst we may decide to cease using the services of an agency worker, this will not prevent us from investigating allegations and liaising with the Local Authority Designated Officer (LADO) to determine a suitable outcome. We expect agency workers and agencies to cooperate with our investigations and with external agencies where applicable.
- 19.2 We will discuss with the agency whether it may be appropriate for them to consider suspending an agency worker, or whether we are prepared to redeploy an agency worker during an investigation.

20. Press and Media Relations

- 20.1 You must not communicate with the media/press without the express advance permission of either your Headteacher or CEO. If you are asked questions about the Trust (for example, anything relating to a school, staff member or pupil), but have not been cleared to speak to the media, you must avoid giving comment.
- 20.2 If you have any news you would like to share with the media, you should discuss this with your Headteacher or CEO, who will set out an appropriate media engagement plan (which must then be followed).
- 20.3 Where a member of staff is cleared to speak to the media alone, this will be done on a case-by-case basis, meaning that this permission does not automatically extend to other circumstances. You must seek permission each time you wish to speak to the media. Before being permitted to speak on behalf of the Trust/school, staff will be supported to prepare, as necessary.
- 20.4 If you have spoken to the media/press without authorisation (or witnessed a colleague doing so), you must inform your Headteacher or CEO without delay, including the following details:
- The name of the person who spoke to the media
 - The approximate date and time the staff member spoke to the media
 - The name of the media representative spoken to, if known, and/or the name of the media platform or outlet they represent
 - Details of exactly what was said to the media
 - Any follow-up actions needed for damage control
- 20.5 If you are approached to speak to the media in a personal capacity that is unrelated to the Trust, you are free to do so, provided that you do not make any comments about the Trust.

21. Breaches of this Policy

- 21.1 If we establish that you have breached this code of conduct (or any of our other policies and procedures), or you have acted unlawfully, we will take all action that we consider to be necessary under the circumstances, which may include:
- Taking action under our Trust Discipline Policy and Procedure—which may involve you being given a formal disciplinary warning or losing your job (this is not applicable to volunteers)
 - Referring the matter to the Police or bringing legal proceedings
 - Referring you to the Disclosure and Barring Service (DBS) with a recommendation that you are barred from working with children/vulnerable adults
 - Referring you to the Teaching Regulation Agency to recommend that you are prohibited from teaching (applies to teaching staff only)
 - Referring you to the Secretary of State to recommend that you are prohibited from participating in the management of an independent educational institution.

While staff are encouraged to report breaches of this Code, they should distinguish between individual professional failings (handled under this Code and the Disciplinary Policy) and systemic wrongdoing that affects the wider public (handled under the Whistleblowing Policy).

22. Policy Review

This Code of Conduct is reviewed and amended every 3 years by the Trust. We will monitor the application and outcomes of this code of conduct to ensure it is working effectively.

APPENDIX 1

Equality Impact Assessment/ Analysis (EIA)

Step 1: Scoping and Identifying the Aims

School/Service	People Department
Title of Change:	Code of Conduct Policy
What are you completing this EIA for?	Policy
Is this a new or existing activity or change?	Existing
What are the main aims / objectives of the changes?	Ensure policy is still relevant and the most current legislation is being adhered to.
What is the context for this EIA? e.g., policy, practice, service, curriculum proposal or project?	
Why is the activity/change needed? E.g., The policy or practice affect different “protected groups” differently?, enhancing of services, education	
Name/s of people/Date undertaking analysis:	Shani Davies, Director People & Culture
Who will be affected by this activity/change? eg pupils/students, service users, employees, wider community	All Staff in scope of this policy
Does it relate to an area with known inequalities? E.g., access to service for disabled people, pupils/students, vulnerable pupils/students, SEND, racist bullying etc.	
EIA Schedule: When will the EIA be reviewed?	

Step 2: Assessing the Impact

Detail any positive or negative impacts of this document /policy on pupils/students and staff in the box below. If there is no impact, please select “not applicable”

Protected Characteristic	Positive Impact(s)	Negative Impact(s)	NA	Action to address negative impact: (e.g. adjustment to the policy)
Sex consider issues for: men and women, non-binary.	Y			
Gender reassignment E.g. privacy of data and harassment	Y			
Disability e.g., attitudes, physical, social barriers, visible and non-immediately visible disabilities, neurodivergence, learning disability	Y			
Age e.g., consider all ages but there may be some issues that relate for example to older people/younger people	Y			
Sexual Orientation consider heterosexual as well as lesbian, gay and bisexual (and other sexual orientations)	Y			
Pregnancy and maternity	Y			

e.g., childcare, working arrangements, part time working				
Marriage and civil partnership	Y			
Religion or belief consider religions, beliefs, or no belief	Y			
Ethnicity / Race e.g., language barriers, different ethnic groups/nationalities	Y			
Socio-economic factors e.g., resident status – socio economic/low-income groups, migrants, carers, impacts on children and families (please state)	Y			
Mental health e.g. short term, long term, acute, fluctuating mental health conditions, impacts	Y			

If you answer yes to any of the following, you MUST complete the evidence column explaining what information you have considered which has led you to reach this decision.

Assessment Questions	Yes / No	Please document evidence / any mitigations
In consideration of your document development, did you consult with others, for example, external organisations, employees, pupils/students, carers or community groups?	Yes	Staff and Trade Unions
Have you taken into consideration any regulations, professional standards?	Yes	Equality Act 2010, Protection from Harassment Act 1997, Worker protection Act 2023, Health and Safety at Work Act 1974, KCSIE, ACAS, CIPD

Step 3: Review, Risk and Action Plans

Low – No major change	Medium - Adjust the policy	High – Stop and remove
The activity is robust and there is no potential for discrimination, and you have taken all appropriate opportunities to advance and foster relations between groups.	This involves taking steps to remove barriers or to better advance equality. It can mean introducing measures to mitigate the potential effect.	If there are adverse effects that are not justified and cannot be mitigated, you will want to consider stopping the policy/project altogether. If the activity shows unlawful discrimination, it must be removed or changed.

How would you rate the overall level of impact / risk to the school / service / Trust if no action was taken?	Low x ☐	Medium ☐	High ☐
What action needs to be taken to reduce or eliminate the negative impact?	N/A		
Who will be responsible for monitoring and regular review of the document / policy / change?	Director People & Culture		

Step 4: Authorisation and sign off

I am satisfied that all available evidence has been accurately assessed for any potential impact on pupils/students and employees with protected characteristics in the scope of this project / change / policy / procedure / practice / activity. Mitigation, where appropriate has been identified and dealt with accordingly.

Equality Assessor:	Shani Davies	Date:	19/2/26
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