

## Staff Code of Conduct

### Aim of the Trust

‘One community. Many ideas. Everyone’s future.’

We aim to provide an exceptional education for every child in the Trust through an ethos of collaboration and high aspirations and through the principles of quality learning using curiosity, exploration and discovery.

This policy is linked to the following policies:

- Child Protection Policy
- Discipline Policy
- Staff Dress Code Policy
- E-Safety Policy
- Behaviour for Learning Policy (Titled Behaviour Policy in Primaries)
- Trips and Visits Policy
- Whistle Blowing Policy
- Sex and Relationship Policy

### 1 Introduction

- 1.1 This Code of Conduct (‘the Code’) sets out the professional standards expected and the duty upon staff and volunteers to abide by it. All staff, and volunteers have a duty to keep students/pupils/children safe, promote their welfare and to protect them from sexual, physical and emotional harm. This duty is exercised, in part, through the development of respectful, caring and professional relationships between adults and students/children and behaviour by adults that demonstrate integrity, maturity and good judgement. Following this code will help to safeguard staff and volunteers from being maliciously, falsely or mistakenly suspected or accused of misconduct in relation to students/pupils and the required Professional Standards.
- 1.2 Staff and volunteers must feel able to raise issues of concern and everyone must fully recognise the duty to do so particularly in terms of child protection. These adults have a duty to report any child protection or welfare concerns to the designated member of staff in school. A member of staff who, in good faith, “whistle blows” or makes a public interest disclosure will have the protection of the relevant legislation.
- 1.3 This Code cannot provide an exhaustive list of what is, or is not, appropriate behaviour for staff, trustees, governors or volunteers. However, it does highlight behaviour that is illegal, inappropriate or inadvisable in relation to the required Professional Standards. There will be occasions and circumstances in which staff or volunteers have to make decisions or take action in the best interests of the student/pupil where no specific guidance has been given. Adults are expected to make responsible and informed judgements about their own behaviour in order to secure the best interests and welfare of the students/children for which that individual is responsible.

- 1.4 Any member of staff who is found to have committed a breach of this code will be subject to disciplinary action. Such behaviour may constitute gross misconduct and, as such is linked to the discipline policy and may result in summary dismissal. The trustees and governing body for each academy will take a strict approach to serious breaches of this code.
- 1.5 Where an allegation of abuse is made against a member of staff the governing body will follow the staff discipline policy, complaints policy and whistleblowing policy and the guidance set out in [Keeping Children Safe In Education DfE](#) September 2019 where it is alleged that a member of staff or volunteer has:
- behaved in a way that has harmed a child, or may have harmed a child;
  - possibly committed a criminal offence against or related to a child; or,
  - behaved towards a child or children in a way that indicates s/he is unsuitable to work with children.

## **2 Expected Professional Standards**

- 2.1 All staff and volunteers as appropriate to the role and/or job description of the individual, must:
- place the well-being and learning of students/children at the centre of their professional practice.
  - have high expectations for all students/children, be committed to addressing underachievement, and work to help students/pupils progress regardless of their background and personal circumstances.
  - treat students/children fairly and with respect, take their knowledge, views, opinions and feelings seriously, and value diversity and individuality. Model the characteristics they are trying to inspire in students/children, including enthusiasm for learning, a spirit of enquiry, honesty, tolerance, social responsibility, patience, and a genuine concern for other people.
  - respond sensitively to the differences in the home backgrounds and circumstances of students/children, recognising the key role that parents and carers play in students'/children' education.
  - seek to work in partnership with parents and carers, respecting their views and promoting understanding and co-operation to support the young person's learning and well-being in and out of the academy.
  - reflect on their own practice, develop their skills, knowledge and expertise, and adapt appropriately to learn with and from colleagues.
  - the same professional standards should always be applied regardless of culture, disability, gender, language, racial origin, religious belief and/or sexual identity. Particular care will be taken to vet the visiting speakers and check that the views they hold are consistent with the Trust aims and values whilst reviewing the benefits to the learning experience and promotion of British Values. The content and style of delivery must also be agreed beforehand. Visiting speakers will be professional and represent information in an unbiased manner with nonpartisan views, when discussing sensitive issues, particularly those of a political nature.

- 2.2 Teachers are required to comply with the Teachers' Standards in force in particular Part 2 Personal and Professional Standards.
- 2.3 All staff and volunteers must be familiar with and act in accordance with Part 1 of [Keeping Children Safe In Education DfE](#) September 2019.

### **3 Confidentiality**

- 3.1 As data controllers, all schools are subject to the Data Protection Act 1998, and the General Data Protection Regulation (GDPR) 2018. In addition, teachers owe a common law duty of care to safeguard the welfare of their students/children. This duty is acknowledged in the provisions governing disclosure of information about students/pupils.
- 3.2 Members of staff may have access to confidential information about students/children's in order to undertake their responsibilities. In some circumstances, the information may be sensitive and/or confidential. Confidential or personal information about a student's/children or her/his family must never be disclosed to anyone other than on a need to know basis. In circumstances where the student's/child's identity does not need to be disclosed the information should be used anonymously. Information must never be used to intimidate, humiliate, or embarrass the student/child.
- 3.3 There are some circumstances in which a member of staff may be expected to share information about a student/child, for example, when abuse is alleged or suspected. In such cases, individuals have a duty to pass information on without delay to those with designated pupil protection responsibilities.
- 3.4 Confidential information about students/children must be held securely. Confidential information about students/children must not be held off the academy site other than on security protected academy equipment. Information must only be stored for the length of time necessary to discharge the task for which it is required.
- 3.5 If a member of staff is in any doubt about the storage or sharing of information s/he must seek guidance from a senior member of staff. Any media or legal enquiries must be passed to senior leaders.

### **4 Propriety, Behaviour and Appearance**

- 4.1 All adults working with children have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of students/children. They should adopt high standards of personal conduct in order to maintain the confidence and respect of their colleagues, students/children and the public in general. An individual's behaviour or actions, either in or out of the workplace, should not compromise her/his position within the work setting or bring the school into disrepute. The misuse of drugs, alcohol or acts of violence would be examples of such behaviour.
- 4.2 A person's dress and appearance are matters of personal choice and self-expression. However staff and volunteers must ensure they are dressed in ways which are appropriate to their role, in line with the Trust Staff Dress Code, and not likely to be viewed as offensive, revealing or sexually provocative and specifically should not distract, cause embarrassment

or give rise to misunderstanding, should be culturally sensitive and free of any political or otherwise contentious slogans, and not considered to be discriminatory. Those who dress or appear in a manner, which may be considered as inappropriate, could render themselves vulnerable to criticism or allegations of misconduct.

- 4.3 Personal property of a sexually explicit nature such as books, magazines, CDs, DVDs or such material on any electronic media must not be brought onto or stored on the academy premises or on any academy equipment. A common sense approach needs to be required and staff are asked to make their professional judgement.

## **5 Sexual Contact with Children and Young People and Abuse of Trust**

- 5.1 A relationship between an adult and a child or young person is not a relationship between equals. There is potential for exploitation and harm of vulnerable young people. Adults should maintain appropriate professional boundaries and avoid behaviour, which might be misinterpreted by others. They should report any incident with this potential.
- 5.2 Any sexual behaviour or activity, whether homosexual or heterosexual, by a member of staff, governor or volunteer with or towards a child or young person is illegal. Children and young people are protected by the same laws as adults in relation to non-consensual sexual behaviour. They are additionally protected by specific legal provisions regardless of whether there is consent or not. Where a person aged 18 or over is in a specified position of trust with a child or young person under 18 years, the Sexual Offences Act 2003 makes it an offence for that person to engage in sexual activity with or in the presence of that child or to cause or incite that child to engage in or watch sexual activity.
- 5.3 Sexual behaviour includes non-contact activities, such as causing a child or young person to engage in or watch sexual activity or the production of indecent images of children. 'Working Together to Safeguard Children' defines sexual abuse as "forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening".
- 5.4 Staff and volunteers must not have sexual relationships with students/pupils, have any form of communication with a child or young person which could be interpreted as sexually suggestive or provocative i.e. verbal comments, letters, notes, texts, electronic mail, phone calls, social networking contact or physical contact. The adult should not make sexual remarks to, or about, a child or young person or discuss their own sexual relationships with or in the presence of students/children. Staff and volunteers should take care that their language or conduct does not give rise to comment or speculations. Attitudes, demeanour and language all require care and thought.
- 5.5 There are occasions when adults embark on a course of behaviour known as 'grooming' where the sole purpose is to gain the trust of a child or young person, and manipulate that relationship so that sexual abuse can take place. Staff and volunteers should be aware that conferring special attention without good reason or favouring a pupil has the potential to be construed as being part of a 'grooming' process, which is a criminal offence.

## **6 Infatuations and Crushes**

6.1 A child or young person may develop an infatuation with an adult who works with them. A member of staff or volunteer, who becomes aware that a student/pupil may be infatuated with him/herself or a colleague, must report this without delay to a senior colleague so that appropriate action can be taken to avoid any hurt, distress or embarrassment. The situation will be taken seriously and the adult should be careful to ensure that no encouragement of any kind is given to the student/pupil. It

should also be recognised that careless and insensitive reactions may provoke false accusations.

6.2 Examples of situations that must be reported are given below:

- Where a member of staff or volunteer is concerned that he or she might be developing a relationship with a student/pupil which could have the potential to represent an abuse of trust,
- Where a member of staff or volunteer is concerned that a student/child is becoming attracted to him or her or that there is a developing attachment or dependency.
- Where a member of staff or volunteer is concerned that actions or words have been misunderstood or misconstrued by a student/pupil such that an abuse of trust might be wrongly suspected by others.
- Where a member of staff or volunteer is concerned about the apparent development of a relationship by another member of staff or volunteer, or receives information about such a relationship.

## **7 Gifts**

7.1 It is against the law for public servants to take bribes. Staff and volunteers need to take care that they do not accept any gift that might be construed by others as a bribe, or lead the giver to expect preferential treatment. There are occasions when children or parents wish to pass small tokens of appreciation to staff e.g. at Christmas or as a thank-you and this is acceptable, such gift should not be above the value of £25. However, it is unacceptable to receive gifts on a regular basis.

7.2 Personal gifts must not be given to students/children. This could be misinterpreted as a gesture either to bribe, or to single out the young person. It might be perceived that a 'favour' of some kind is expected in return. Any reward given to a pupil should be consistent with the school's behaviour or rewards policy, recorded, and not based on favouritism.

## 8 Declaration of interests

8.1 Staff members are required to declare their interests, both personal and financial, where the group or organisation they are affiliated with would be considered to be in conflict with the ethos of the Trust.

8.2 For the purpose of this policy, a financial conflict of interest is one where there is, or appears to be, opportunity for personal financial gain, financial gain for close relatives or friends, or where it may be reasonable for a third party to take the view that financial benefits may affect an individual's actions.

8.3 The term 'financial interest' means anything of monetary value, including:

- Payments for services
- Equity interests
- Intellectual property rights
- Hospitality or gifts

Examples of financial interests that must be declared include, but are not limited to, equity interests in services considered for use by the Trust.

8.4 Non-financial conflicts of interest can also come into conflict, or be perceived to come into conflict, with an individual's obligations or commitments to the school. These interests may include any benefit or advantage, including but not limited to, direct or indirect enhancement of an individual's career, or gain for immediate family or someone with whom the individual has a close relationship.

Examples of situations that could give rise to non-financial conflicts of interest include the following:

- Pressure or temptation to accept gifts, inducements or hospitality
- Participating in the appointment, hiring, promotion, supervision or evaluation of a person with whom the individual has a close personal relationship
- Where a member of staff has or develops a close personal relationship with a colleague

8.5 Staff members will also carefully consider whether they need to declare their relationship with any individual where this might cause a conflict with academy activities:

- Any employment or business that is conducted in addition to work at the academy.
- Any close involvement with companies
- Involvement in contracts
- If they are a governor or trustee of an educational establishment.
- Any beneficial interests of land or property

8.6 Failure to make a relevant declaration of interests is a very serious breach of trust and, therefore, if employees are in doubt about a declaration, they are advised to contact the Trust or trade union.

## **9 Social Contact and Social Networking**

- 9.1 Communication between students/children and adults, by whatever method, should take place within clear and explicit professional boundaries. This includes the wider use of technology such as mobile phones, text messaging, emails, digital cameras, videos, web-cams, websites and blogs. Staff and volunteers should not share any personal information with students/children. They should not request, or respond to, any personal information from the student/child, other than that which might be appropriate as part of their professional role. If a student/child seeks to establish social contact, or if this occurs coincidentally, the adult should exercise his or her professional judgment in making a response and should ensure that all communications are transparent and open to scrutiny.
- 9.2 Staff and volunteers must not give their personal contact details such as home/mobile phone number; home or personal e-mail address or social networking details to students/children unless the need to do so is agreed in writing with senior management.
- 9.3 It is recommended that staff ensure that all possible privacy settings are activated to prevent children from making contact on personal profiles and to prevent students/children from accessing photo albums or other personal information which may appear on social networking sites.
- 9.4 Staff must not have any students/children or any ex-students/pupils under the age of 18 as friends on their social networking sites. Staff are advised not to have any online friendships with any young people under the age of 18, unless they are family members or close family friends. Staff are advised not to have online friendships with parents or carers of students/children, or members of the governing body/trustees. Where such on line friendships exist, staff must ensure that appropriate professional boundaries are maintained.
- 9.5 Staff are personally responsible for what they communicate in social media and must bear in mind that what is published might be read by us, students/children, the general public, future employers and friends and family for a long time. Staff must ensure that their on-line profiles are consistent with the professional image expected by us and should not post material which damages the reputation of the school or any school within the Trust or which causes concern about their suitability to work with children and young people. Those who post material (including material posted prior to appointment) which may be considered as inappropriate could render themselves vulnerable to criticism or allegations of misconduct which may be dealt with under the school's disciplinary procedure. Even where it is made clear that the writer's views on such topics do not represent those of the Trust, such comments are inappropriate.

## **10 Physical Contact and Personal Privacy**

- 10.1 There are occasions when it is entirely appropriate and proper for staff to have physical contact with students/children, but it is crucial that they only do so in ways appropriate to their professional role. When physical contact is made with students/children this should be in response to their needs at the time, of limited duration and appropriate given their age, stage of development, gender, ethnicity, culture and background. It is not possible to be specific about the appropriateness of each physical contact, since an action that is

appropriate with one student/pupil in one set of circumstances may be inappropriate in another, or with a different student/child.

- 10.2 Physical contact should never be secretive or casual, or for the gratification of the adult, or represent a misuse of authority. If a member of staff or volunteer believes that an action could be misinterpreted, the incident and circumstances should be reported as soon as possible using the school's internal reporting system and, if appropriate, a copy placed on the student'/child's file and the member of staff' personnel file.
- 10.3 Physical contact, which occurs regularly with a student/child or students/children, is likely to raise questions unless the justification for this is part of a formally agreed plan (for example in relation to students/pupils with SEN or physical disabilities). Any such contact should be the subject of an agreed and open school policy and subject to review. Where feasible, staff should seek the student's/child's permission before initiating contact. Staff should listen, observe and take note of the student's/child's reaction or feelings and – so far as is possible - use a level of contact which is acceptable to the student/child for the minimum time necessary.
- 10.4 There may be occasions when a distressed student/child needs comfort and reassurance. This may include age-appropriate physical contact. Staff should remain self-aware at all times in order that their contact is not threatening, intrusive or subject to misinterpretation.
- 10.5 Where a member of staff has a particular concern about the need to provide this type of care and reassurance s/he should seek further advice from a senior manager.
- 10.6 Some staff, for example, those who teach PE and games, or who provide music tuition will on occasions have to initiate physical contact with students/children in order to support a student/child so they can perform a task safely, to demonstrate the use of a particular piece of equipment/instrument or assist them with an exercise. This should be done with the student's/child's agreement. Contact under these circumstances should be for the minimum time necessary to complete the activity and take place in an open environment. Staff should remain sensitive to any discomfort expressed verbally or non-verbally by the student/child.
- 10.7 Students/children are entitled to respect and privacy when changing clothes or taking a shower. However, there needs to be an appropriate level of supervision in order to safeguard students/children, 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 students/children concerned and sensitive to the potential for embarrassment.
- 10.8 Staff with a job description which includes intimate care duties will have appropriate training and written guidance. No other member of staff or volunteer should be involved in intimate care duties except in an emergency.

## **11 Behaviour Management and Physical Intervention**

- 11.1 All students/children have a right to be treated with respect and dignity. Corporal punishment is unlawful in all schools. Staff and volunteers must not use any form of degrading treatment to punish a student/child. The use of sarcasm, demeaning or insensitive comments towards students/children is not acceptable in any situation. Deliberately intimidating students/children by shouting aggressively, hectoring or

overbearing physical presence is not acceptable in any situation. Any sanctions or rewards used should be part of the appropriate Behaviour for Learning Policy/Behaviour Policy (primaries).

- 11.2 Physical intervention can only be justified in exceptional circumstances. Non-statutory guidance is available from the Department of Education website. See 'Guide for Heads and School Staff on behaviour and discipline (including reasonable force) for maintained schools' and 'Use of reasonable force advice for Head Teachers, Staff and Governing Bodies for all Schools and Academies'. Staff may legitimately intervene to prevent a student/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. Staff should have regard to the health and safety of themselves and others. Under no circumstances should physical force be used as a form of punishment. The use of unwarranted physical force is likely to constitute a criminal offence. Physical intervention training is given to appropriate staff.
- 11.3 All schools must have trained first aiders/appointed persons. Staff must have had the appropriate training before administering first aid or medication except in an emergency.

## **12 One to One Situations and Meetings with Students/Children**

- 12.1 One to one situations have the potential to make students/children more vulnerable to harm by those who seek to exploit their position of trust. Adults working in one to one settings with students/children may also be more vulnerable to unjust or unfounded allegations being made against them. Staff must recognise this possibility and plan and conduct such meetings accordingly. Every attempt should be made to ensure that the safety and security needs of both staff and students/children are met. Managers should undertake a risk assessment in relation to the specific nature and implications of one to one work for each worker and student/child. Where such a meeting is demonstrably unavoidable it is advisable to avoid remote or secluded areas of the school and to ensure that the door of the room is left open and/or visual/auditory contact with others is maintained. Any arrangements should be reviewed on a regular basis.
- 12.2 Pre-arranged meetings with students/children away from any of the academy premises or on one of the academy sites when the academy is not in session are not permitted unless written approval is obtained from their parent/carer and the Headteacher or other senior colleague with delegated authority.
- 12.3 No child or young person should be in or invited into, the home of an adult who works with them, unless the reason for this has been established and agreed with parents/carers and a senior manager/ Headteacher.

## **13 Transporting Students/children**

- 13.1 In certain situations e.g. out of school activities, staff, governors or volunteers may agree to transport students/children. Transport arrangements should be made in advance by a designated member of staff. Wherever possible and practicable transport should be provided other than in private vehicles, with at least one adult additional to the driver acting as an escort.

- 13.2 Adults should ensure that their behaviour is safe and that the transport arrangements and the vehicle meet all legal requirements. They must ensure that the vehicle is roadworthy and appropriately insured and that the maximum capacity is not exceeded.
- 13.3 It is inappropriate for staff to offer lifts to a student/child outside their normal working duties, unless this has been brought to the attention of the line manager and has been agreed with parents/carers, unless it is to secure the student/child from immediate harm.
- 13.4 There may be occasions where a student/child requires transport in an emergency situation or where not to give a lift may place a student/child at risk. Such circumstances must always be recorded and reported to a senior manager and parents/carers.

## **14 Educational Visits and Academy Clubs**

- 14.1 Staff, and volunteers should take particular care when supervising students/children in the less formal atmosphere of an educational visit, particularly in a residential setting, or after-school activity. Staff and volunteers remain in a position of trust and the same standards of conduct apply. Please refer to the appropriate Trust's Trips & Visits Policy.

## **15 Curriculum**

- 15.1 Many areas of the curriculum can include or raise subject matter which is sexually explicit, or of an otherwise 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 plan should highlight particular areas of risk and sensitivity.
- 15.2 The curriculum can sometimes include or lead to unplanned discussion about subject matter of a sexually explicit or otherwise sensitive nature. Responding to students'/children's' questions can require careful judgement and staff must take guidance in these circumstances from a senior member of staff. Staff and volunteers must not enter into or encourage inappropriate discussion about sexual activity or behaviour.
- 15.3 Please refer to the appropriate academy's sex and relationships policy.

## **16 Photography, Videos and other Creative Arts**

- 16.1 Please refer to the guidance on the use of images and the consent forms therein.
- 16.2 Many Trust activities involve the taking or recording of images. This may be undertaken as part of the curriculum, extra academy activities, for publicity, or to celebrate achievement. The Data Protection Act 1998 and General Data Protection Regulations (GDPR) 2018 affect the use of photography. An image of a child is personal data and it is, therefore, a requirement under the legislation that consent is obtained from the parent of a child before any images are made such as those used for school web sites, notice boards, productions or other purposes. The children for whom we have consent to use images are listed in SIMS.

- 16.3 Staff need to be aware of the potential for such images to be misused to create indecent images of children and/or for 'grooming' purposes. Careful consideration should be given as to how these activities are organised and undertaken. There should be an agreement as to whether the images will be destroyed or retained for further use, where these will be stored and who will have access to them.
- 16.4 Staff should remain sensitive to any student/child who appears uncomfortable and should recognise the potential for misinterpretation. It is also important to take into account the wishes of the child, remembering that some children do not wish to have their photograph taken.
- 16.5 Adults should only use equipment provided or authorised by the academy to make/take images and should not use mobile telephones or any other similar devices to make/take images.
- 16.6 The following guidance must be followed:
- if a photograph is used, avoid naming the student/child if the student/child is named, avoid using the photograph
  - photographs/images must be securely stored and used only by those authorised to do so.
  - be clear about the purpose of the activity and about what will happen to the photographs/images when the lesson/activity is concluded
  - ensure that a senior member of staff is aware that the photography/image equipment is being used and for what purpose.
  - ensure that all photographs/images are available for scrutiny in order to screen for acceptability
  - be able to justify the photographs/images made do not take photographs in one to one situations.
  - do not take, display or distribute photographs/images of students/children unless there is consent to do so.

## **17 Whistleblowing and Cyber-Bullying**

- 17.1 Staff who have concerns about any alleged abuse or inappropriate use of ICT resources, virtual learning environments, camera/recording equipment, telephony, social networking sites, email or internet facilities or inappropriate communications, whether by students/children, parents, carers or staff, or others should alert the designated safeguarding lead person. Where a concern relates to the designated safeguarding lead, this should be reported to the deputy safeguarding lead.
- 17.2 Cyber-bullying can be experienced by staff as well as students/children. Staff should notify the designated safeguarding lead if they are subject to cyber-bullying. The Trust will endeavour to protect staff and stop any inappropriate conduct.

## **18 Unacceptable Use of ICT Facilities and Monitoring**

- 18.1 Posting, creating, accessing, transmitting, downloading, uploading or storing any of the following material (unless it is part of an authorised investigation) is likely to amount to gross misconduct and result in summary dismissal (this list is not exhaustive):
- a. pornographic or sexually suggestive material or images of children or adults which may be construed as such in the circumstances (that is, writing, texting, pictures, films and video clips of a sexually explicit or arousing nature),
  - b. any other type of offensive, obscene or discriminatory material or criminal material or material which is liable to cause distress or embarrassment to any school within the Trust or others such as materials which promote extremism or terrorism.
- 18.2 The contents of Trust ICT resources and communications systems are Trust property. Therefore, staff should have no expectation of privacy in any message, files, data, document, facsimile, telephone conversation, social media post, conversation or message, or any other kind of information or communications transmitted to, received or printed from, or stored or recorded on our electronic information and communications systems.
- 18.3 The Trust reserves the right to monitor, intercept and review, without further notice, staff usage of Trust IT resources and communications systems, including but not limited to telephone, e-mail, messaging, voicemail, CCTV, internet and social media postings and activities, to ensure that Trust rules are being complied with and for the following purposes:
- to monitor whether the use of the e-mail system or the internet is legitimate and in accordance with this Code:
- a) to assist in the investigation of alleged wrongful acts; or
  - b) to comply with any legal obligation
- 18.4 Staff consent to monitoring by acknowledgement of this code and the use of Trust resources and systems. The Trust may store copies of data or communications for a period of time, in line with GDPR, after they are created, and may delete such copies from time to time without notice. Access to data or communications may be shared with appropriate third parties, which are required to show adequate grounds for disclosure in accordance with the criteria laid down in legislation. These third parties may include, but is not limited to, the police. Information, data and/or communications will only be disclosed to third parties where it is permitted to do so in accordance with the Data Protection legislation. If there are any concerns as to disclosure then the Data Protection Officer should be contacted in the first instance and appropriate legal advice may be required.
- 18.5 A CCTV system monitors each Academy 24 hours a day. This data is recorded and may be used as evidence of any alleged wrong-doing.
- 18.6 All use of data must be compliant with the Data Protection Act 1998 and GDPR 2018, and all staff should be familiar with the Trust Data Protection and Privacy Notice Policy.

## **19 Reporting Concerns and Recording Incidents**

- 19.1 All staff and volunteers must report concerns and incidents in accordance with the academy whistleblowing policy and complaints policy. The following is a non-exhaustive list of behaviours, which would be a cause for concern:

An adult who:

- Allows a student/child to be treated badly; pretends not to know it is happening gossips/shares information inappropriately
- Demonstrates inappropriate discriminatory behaviour and/or uses inappropriate language
- Dresses in a way which is inappropriate for the job role
- Does not treat students/children fairly - demonstrates favouritism
- Demonstrates a lack of understanding about personal and professional boundaries
- Uses his/her position of trust to intimidate, threaten, coerce or undermine
- Appears to have an inappropriate social relationship with a student/child or children
- Appears to have special or different relationships with a student/child or students/children
- Seems to seek out unnecessary opportunities to be alone with a student/child

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