Prior Park Schools

STAFF CODE OF CONDUCT

Policy Owner	**Applies to**	**Superseded documents**
Chief Operating Officer	Prior Park Schools (Trust Wide)	Staff Code of Conduct v6
Associated documents All PPS and School Specific Policies and Procedures	**Review frequency** Every year (unless the legislation/regulations update before this time) **Implementation date** 14 September 2026	**Legal Framework** KCSIE 2026 Working Together to Safeguard Children 2026 Data Protection Act 2018 Data (Use and Access) Act 2025 Employment Rights Act 1996 Equality Act 2010 The Education (Independent School Standards) Regulations 2014 as amended by the Independent Education Provisions in England (Inspection Fees) and Independent School Standards (Amendments) 2018 (ISS Regulations) National Minimum Standards Boarding September 2026 The Early Years Foundation Stage: Statutory Framework September 2026 Crime and Policing Act 2026 Online Act 2023

This policy is reviewed annually, or more regularly as required, prior to approval by Trustees (if applicable)

Last reviewed by:	Head of HR (Miss K Niec) and Head of Compliance (Miss E Wickham)
Date last reviewed:	August 2026
Approved by Trustees:	Approved by COO and BOT
Date last approved:	9 September 2026
Date for next approval:	September 2027

Table of Contents

1. *Introduction* 4
2. *Scope* 4
3. *Safeguarding* 4
3.1. *Sharing a concern* 5
3.2. *Physical Contact and Restraint* 6
3.3. *Physical Education and other activities requiring physical contact* 7
3.4. *Contact with Students outside of school* 8
All work and contact with students and parents should be undertaken in the school. 8
3.5. *Communication with Students incl. the use of social media and other electronic means of interaction* 8
3.6. *Transporting students* 8
3.7. *Tuition* 9
3.8. *Conducting Interviews with students* 9
3.9. *Confidentiality* 9
3.11 *Staff living in Boarding (PPC Only)* 9
4. *Staff conduct expectations* 9
4.1. *Staff Behaviour* 9
4.2. *Conduct Around Private and Commercial Events* 10
4.3. *Equal treatment* 10
4.4. *Dignity at Work* 10
4.5. *Complaints* 11
4.6. *Whistleblowing* 11
4.7. *Training* 11
4.8. *Policies* ..... ***Error! Bookmark not defined.***
4.9. *Acceptable Use of ICT* 12
4.9.1. *Use of IT systems.* 12
4.9.2. *Prohibited use of our systems* 13
4.9.3. *Email/Teams and MIS* 13
4.9.4. *Equipment Security and Passwords* 14
4.10. *Participation in investigations* 14

4.11. Data Protection 15
4.11.1. Person responsible for Data Protection at the School 15
4.11.2. Record-keeping 15
4.11.3. Care and data security 15
4.12. Attendance and Timekeeping 15
4.13. Resignations and Notice 16
4.14. Signing in and out 16
4.15. Smoking 16
4.16. Alcohol and Illegal Drugs 16
4.17. Security 17
4.18. Representing the School 18
4.19. Personal Appearance 18
4.20. Mobility and Flexibility 18
4.21. Use of Personal Mobile Devices 18
4.22. Professional Language and Conduct 19
4.23. Social Media and Personal Reputation 19
4.24. Environment 19
4.25. Handling Money 19
4.26. Bribery 20
4.27. Health and Safety 20
4.28. School Property and Equipment 20
4.29. Passing on information and updated data 20
4.30. Reference requests 20
4.31. Non-employees of PPS 21
4.32. Conflict of Interest 21
4.33. Staff Wellbeing 21
4.34. Links with other Policies 21

Appendix A- PPC Staff Dress Code

1. Introduction

Prior Park Schools (PPS) is a family of Christian schools based in Bath and Gibraltar. Prior Park College (PPC) and Prior Park Paragon (PPP) are incorporated in England as Prior Park Educational Trust Ltd. Prior Park Gibraltar (PPG), is incorporated in Gibraltar as Prior Park School Ltd. Both are companies limited by guarantee and registered charities.

The Prior Park Schools mission, underpinned by shared values, is to steward a thriving family of communities with love for the young people they serve at their heart. These vibrant communities cultivate creativity, foster integrity, and transform lives.

Prior Park Schools Values:

Curiosity – Generosity – Courage

Safeguarding and child protection are at the forefront of all that we do and underpin all relevant aspects of process and policy development. Ultimately, all systems, processes and policies should operate with the best interests of the child at their heart. Staff must maintain an attitude of "it could happen here" when considering safeguarding concerns.

2. Scope

At PPS we maintain a culture of courtesy and professionalism. This Code of Conduct sets out the expectations around actions and behaviours in our schools.

The aim of this Code of Conduct is also to provide clear guidance on behaviour and actions so as not to place children or Staff at risk of harm or of allegations of harm to a child.

Staff are responsible for their own actions and behaviour. Failure to observe this Code of Conduct and the associated policies may result in a disciplinary action including, in cases of gross misconduct, summary termination to employment. In some cases, misconduct could be reported to the police or other external agencies.

3. Safeguarding

Prior Park Schools recognise the duty to safeguard the welfare of children: protecting them from maltreatment; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care and taking action to enable all children to have the best possible outcome. This policy outlines the Trust's approach to safeguarding.

All staff, volunteers and Trustees have a role to play in safeguarding children, including the promotion of each child's welfare. Prior Park Schools will work with all relevant agencies to promote the welfare of children and protect them from harm as a fundamental part of our intent to provide excellent pastoral care to all students.

The purpose of a Safeguarding Policy is to inform the school community- staff, volunteers, parents, Trustees and students about the school's responsibilities for safeguarding children and to enable everyone to know how these responsibilities should be carried out. This is part of an environment where children and staff feel secure, are encouraged to talk, and all are listened to when they have a worry or concern.

All Staff must be aware of and adhere to the Safeguarding Policy, including the procedures for reporting concerns. They must avoid any conduct which would lead any reasonable person to question their motivation and intentions. Staff should be particularly mindful of their responsibilities under KCSIE and all statutory guidance and regulations, and any subsequent updates.

In respect of the safeguarding, Staff must always behave in a formal and professional manner.

The following standards of behaviour and rules must be observed:

- Relationships between students and Staff must be conducted on a professional basis.
- Anticipation of risks and prevention of misunderstandings and false allegations must inform our behaviour.
- All Staff must be mindful of safe working practice.
- All Staff must ensure a sense of accountability between Staff to ensure that poor practice does not go unchallenged.
- Staff must be made aware of their duty under the Prior Park Schools' Raising a Concern at Work 'Whistleblowing' Policy and Low-Level Concerns Policy.
- Aim to empower children to discuss their rights and responsibilities and understand what they can do if there is a problem.
- Always avoid behaviour which could be interpreted as poor practice.
- Never promote partisan political views.

Staff are reminded that it is a criminal offence for a person aged 18 or over 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.

Staff must never:

- Hit or physically assault children.
- Develop any relationship that could be considered to be exploitative. This entails the prohibition of any sexual relationship between any member of Staff with any student. This is regardless of, in the case of those students aged 16 and over, whether or not the relationship is consensual.
- Discriminate against a student.
- Inappropriately touch any student.
- Staff should avoid showing favouritism and should strive at all times to treat all students equally.
- Take images of students on any personal device.
- Use corporal punishment.

3.1. Sharing a concern

Any concerns relating to a student, or a group of students must be passed onto the DSL immediately. Each Prior School has its own procedure in place for reporting a concern. All Staff must read the **Safeguarding Policy,** which will detail the appropriate process.

Arrangements for dealing with allegations of abuse by teachers or other Staff, including supply Staff, volunteers, and contractors:

Allegations that may meet the harms threshold: these should be reported to the Head immediately.

**If the Head is the subject of an allegation, it must be reported to the Chair of Trustees. Where an allegation is against the Head, the Head must not be informed of the allegation prior to contact with the chair and LADO/GDO.*

These are allegations that might indicate that a person could pose a risk of harm if they continue to work in their present position, or in any capacity with children in a school or college.

Where it is alleged that anyone working in the school or a college that provides education for children under 18 years of age, including supply teachers, volunteers and contractors 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 he or she 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 (including because of transferable risk).

Concerns that do not meet the threshold (Low Level Concerns): These should be reported to the Head and/or the DSL.

All concerns about adults must be shared responsibly and with the right person, recorded and dealt with appropriately. This enables PPS to have an open and transparent culture, enable the early identification of concerning, problematic or inappropriate behaviour, minimise the risk of abuse, ensure that adults working in schools are clear about and act within professional boundaries in accordance with the values and ethos of the Trust, and protect those working in or on behalf of our schools from potential false allegations or misunderstandings.

A low-level concern is 'any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult working in or on behalf of the Trust may have acted inappropriately. For example:

- Being over-friendly with children
- Having favourites
- Taking photographs of children on a personal device (without the approved apps)
- 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.

All staff should share any low-level concerns they have using the reporting procedures set out in our child protection and safeguarding policy. We also encourage staff to self-refer if they find themselves in a situation that could be misinterpreted. If staff are not sure whether behaviour would be deemed a low-level concern, we encourage staff to report it.

Further information, and a concern form, can be found in the Low-Level Concerns Policy

All Staff must have read the following Policies: Safeguarding Policy, Low-level Concern Policy, Child-on-Child Abuse Policy and Prevent Duty Policy. LINK

3.2. Physical Contact and Restraint

There are occasions when it is entirely appropriate and proper for Staff to have physical contact with students, for example, to avert 'an immediate danger of personal injury to, or an immediate danger to the property of, a person' (including the child), but it is crucial that they only do so in ways appropriate to their professional role. In the EYFS setting, physical intervention may be used to avert immediate

danger of personal injury. Any occasion on which physical intervention is used it must be recorded and parents informed on the same day or as soon as reasonably practicable.
Staff should always use their professional judgement. Staff should not have unnecessary physical contact with students and should be alert to the fact that minor forms of friendly physical contact can be misconstrued by students or onlookers.

A member of Staff can never take the place of a parent in providing physical comfort and should be cautious of any demonstration of affection. It is recognised, however, that those Staff working with students in the Boarding community or the EYFS provision may need to comfort an upset child, but they are reminded to do so in a professional manner.

Physical contact should never be secretive, or for the gratification of the adult, or represent a misuse of authority. If a member of Staff believes that an action could be misinterpreted, the incident and circumstances should be recorded as soon as possible, the DSL informed and, if appropriate, a copy placed on the student's file.

Staff need to ensure that their behaviour does not inadvertently lay them open to allegations of abuse. They need to treat all students with respect and try, as far as possible, not to be alone with a child or young person. Where this is not possible, for example, in an instrumental music lesson, or sports coaching lesson, it is good practice to ensure that others are within earshot. Where possible, Staff should try to avoid any physical contact when coaching children. Seek to describe or demonstrate, rather than touch. If physical contact is required in order to convey how to perform a particular skill, the teacher should ask the student if they can position their arm, etc, before touching them.

Be alert for student infatuation and always maintain professional boundaries. Alert your line manager or Deputy Head/Assistant Head Pastoral if you have any specific concerns about any student infatuation.

Any physical restraint is only permissible when a child is in imminent danger of inflicting an injury on themselves or others, and only as a last resort when all efforts to diffuse the situation have failed. Another member of Staff should, if possible, be present to act as a witness. All incidents of the use of physical restraint should be recorded in writing and reported immediately to the DSL/Head who will decide what to do next.

Staff must never use or threaten to use corporal punishment.

For further information and guidance please ensure you are familiar with the Behaviour Policy, Conducting a Student Search Policy and Restrictive Interventions Policy.

3.3. Physical Education and other activities requiring physical contact

Where exercises or procedures need to be demonstrated, extreme caution should be used if the demonstration involves contact with students and, wherever possible, contact should be avoided. It is acknowledged that some Staff, for example, those who teach PE, Games and/or Sport, or who offer music tuition, will, on occasions, have to initiate physical contact with students in order to support a student 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 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 child.

If students are required to get changed for PE and Games, then Staff are reminded to exercise caution and should only be present if there is a direct need and should always inform the students before entering the changing rooms.

3.4. Contact with Students outside of school

All work and contact with students and parents should be undertaken wherever possible in the School during school hours. However, it is inevitable that some contact with students and parents will need to be managed via other routes, but these should only ever be using School approved systems, e.g. Teams or iSAMS.

Teams chat with individual students should be limited and if a member of staff has any concerns about this, they should talk to a member of the safeguarding team.

3.5. Communication with Students including the use of social media and other electronic means of interaction

Staff must not give their personal mobile phone numbers or personal email addresses to current or ex-students (or parents), nor must they communicate with them by text message, WhatsApp messenger (or other mobile apps) or personal email. If they need to speak to a student by telephone, they should use one of the school's telephones and email using the school system (iSAMS).

For communicating with students on trips and visits the Group Leader should discuss the approved method with IT during the planning of the trip or visit.

Staff should be aware that it is not appropriate to use social media to communicate with students. Staff will undertake regular training on the internet and safety online as part of the annual Safeguarding training. For further information and guidance please ensure that you are familiar with the Social Media Policy and the E-Safety Policy.

Staff must not accept any student initiated 'friend' requests and not issue 'friend' requests to students nor communicate with students on any social network site or similar website or forum. Staff must **not** accept any **current student, of any age,** as a friend, follower, subscriber or similar on any personal social media account

Staff must not accept any ex- student initiated 'friend' requests and not issue 'friend' requests to ex-students nor communicate with ex- students on any social network site or similar website or forum until **3 years have passed** since the student left, and then only if the ex-student is **over the age of 18.**

In line with our Staff welfare procedure, Staff are discouraged from sending work emails before 7.00am and after 7.00pm, this applies to communication with students and their parents. (It is recognised that Boarding Staff will need to communicate with parents and students whilst they are working in the evenings).

3.6. Transporting students

It is inadvisable for a teacher to give a lift in a car to a student alone. Wherever possible and practicable it is advisable that transport is undertaken other than in private vehicles, with at least one adult additional to the driver acting as an escort. If there are exceptional circumstances that make unaccompanied transportation of students unavoidable, the journey should be made known to the DSL.

Additionally, unless in an emergency, staff will need to have completed the approved procedure in place. Further information can be found in the Transport Policy.

3.7. Tuition

When giving one-to-one tuition, inform a colleague and do so in a venue that is seen by other Staff. If one-to-one sessions become a regular arrangement, the student's parents and relevant HsM at PPC or Deputy Head at TP and PPSG, should be informed. Staff should use a room with a window in the door/room which allows for visibility, or when not possible, keep the door open.

Any staff wishing to offer private tutoring to students, must seek permission from the Head and/or the COO in the first instance.

3.8. Conducting Interviews with students

Staff should always try to be accompanied by a colleague or interview with the door open and a colleague nearby if intending to interview a student alone. Remember that visual access safeguards all.

3.9. Confidentiality

Staff members should never give absolute guarantees of confidentiality to students or adults wishing to tell them about something serious. They should guarantee only that they will pass on information to the minimum number of people who must be told in order to ensure that the proper action is taken to sort out the problem and that they will not tell anyone who does not have a clear need to know. They will also take whatever steps they can to protect the informing student or adult from any retaliation or unnecessary stress that might be feared after a disclosure has been made.

All information gained during the course of your employment is considered confidential, for the duration of your employment and post-employment. Staff are expected to keep this information confidential, unless required by law not to do so.

Further information is contained within your contract of employment.

3.10 Visitors and Volunteers

It is the member of staff responsible for organising the visitor/volunteer to ensure that all appropriate policies, procedures and processes have been followed before the visitor/volunteers arrives at site. Staff responsible for volunteers must ensure they understand safeguarding expectations, reporting procedures and professional boundaries.
Please see the Visiting Speakers Policy, Safer Recruitment Policy and Visitors and Overnight Guests in Boarding Policy for further information.

3.11 Staff living in Boarding (PPC Only)

All staff (and members, including guests, of their household) must follow the terms and conditions, at all times, as laid out in the following policies and documents:

- Service Occupancy Agreement
- Guests in Resident Boarding Accommodation
- Non-employees Boarding Accommodation Agreement

4. Staff conduct expectations

4.1. Staff Behaviour

The following general standards are required by all PPS Staff:

- Staff should behave in a respectful, professional and polite manner and ensure their behaviour does not breach the Equality Act 2010
- Staff should model good behaviour and set an example for students and colleagues
- Staff should comply with all reasonable management instructions
- Staff should cooperate fully with colleagues and management

- Staff should always uphold and further PPS's positive public image
- Satisfactory standards of performance should be always maintained
- PPS's policies and procedures should be always adhered to
- Staff should always wear their lanyard when on the school site (including during school holidays).

4.2. Conduct Around Private and Commercial Events

PPS premises may be used for private, commercial or other events outside normal School activities. Staff must respect the privacy and proper operation of such events and must not interfere with, disrupt or otherwise adversely affect them.
Staff who live on site should be particularly mindful of the distinction between their private residential arrangements and areas being used for an event. Living on site does not give Staff any entitlement to enter, attend or participate in a private or commercial event, or to use facilities, refreshments or other provisions associated with it, unless they have been invited, authorised to do so or are attending in an official capacity.
Staff must maintain appropriate standards of conduct and professional boundaries when in the vicinity of such events and must not cause nuisance, disturbance, embarrassment or inconvenience to event organisers, attendees, contractors or other users of the site.
These expectations apply whether or not the member of Staff is on duty at the time.

4.3. Equal treatment

We promote and are committed to equality of opportunity for all members of the PPS and each school's community regardless of their protected characteristics as defined by the Equality Act 2010. We aim to create a friendly, caring and perceptive environment in which every individual is valued. We keep a record of discriminatory incidents.

In respect of students, we endeavour to contribute positively towards the growing autonomy, self-esteem and safety of each child. Our Staff undertake regular consultation activities with our students e.g. through safety questionnaires, participation in anti-bullying week and speaking to students about their experiences at House Assemblies and Tutor time etc.

For further guidance please refer to the Equity, Diversity and Inclusivity Policy.

4.4. Dignity at Work

At PPS we are committed to creating a work environment free from hostility, where everyone is valued, treated with dignity and respect and is enabled to develop to their full potential.

We treat all our Staff, Trustees, visitors, students and their parents fairly and with consideration and we expect them to reciprocate towards each other, the Staff and the school.

We will not tolerate behaviour which may have the effect of belittling another person. Examples of these behaviours include bullying, harassment, derogatory comments, unwanted physical contact and any other act which creates an intimidating work environment.

Staff must be able to carry out their work duties without fear of unfair treatment. Any kind of hostile behaviour is unacceptable, and the school will keep a record of any incidents of which it will become aware.

Please see our Dignity at Work and Equity, Diversity and Inclusivity Policy for staff policy for further details.

4.5. Complaints

At PPS we foster a culture in which you can raise any workplace problems, complaints or concerns in a supportive framework, and we will aim to deal with all genuine grievances quickly and fairly.

Should workplace issues arise, our policy is to always try to resolve them informally, with the assistance of your line manager or HR, if appropriate or necessary. Many issues can be solved by having curated conversations, which often result in the parties involved reaching a better understanding of the reasons why the situation arose.
There may be occasions when attempting to resolve matters informally is not appropriate. In such circumstances, or in the unlikely event that the informal route does not produce satisfactory resolution, please refer to the Grievance Policy.

4.6. Whistleblowing

PPS is committed to fostering a culture of openness, safety and transparency. The PPS Raising a Concern at Work 'Whistleblowing' Policy reflects this commitment. Should any member of Staff have any concerns about the behaviour of another member of Staff towards a student, they should report it at once to the Head (or to the Chair of Trustees where the concern relates to the Head or a Trustee). A non-exclusive list of legitimate concerns classed as whistleblowing is as follows:

- harm or risk of harm to children
- possible fraud, financial irregularities, corruption or bribery
- malpractice
- danger to health and safety
- criminal offences or breach of any legal obligations
- miscarriages of justice
- damage to the environment
- inappropriate behaviour or acting contrary to the Staff code of conduct
- dishonesty, unethical conduct
- the deliberate concealing of information about any of the above.

Any concern will be thoroughly investigated under the PPS whistleblowing procedures. Such reporting will be without prejudice to the member of Staff's position in the school. Where there are allegations of criminal activity, in the UK the LADO will always be informed, and in Gibraltar the Care Agency will be informed, and advice taken, before the school undertakes any investigation of its own and, if appropriate, contacts the police.

Wherever possible, and subject to the rights of the student, the member of Staff will be informed of the outcome of the investigation. No member of Staff who raises a genuine concern, with a reasonable belief that the disclosure is in the public interest, should fear retaliation or detrimental treatment as a result.

Under the Public Interest Disclosure Act 1998 the member of Staff may be entitled to raise a concern directly with an external body where the circumstances justify it.

For further details please see the PPS Raising a Concern at Work 'Whistleblowing' Policy.

4.7. Training

PPS has a responsibility to ensure that its staff are trained and informed appropriately, for areas where there is a legal or statutory requirement to do so.

- All staff are required to read and understand Part One of KCSIE 2026 and complete any safeguarding training and attend safeguarding briefings when required

- All staff are required to complete mandatory training, applicable for their position.
- Areas of training and development will be deemed to be mandatory from a legal or statutory requirement or from an organisational perspective (a requirement imposed by the Trust).
- Mandatory training will be set as per the Training Matrix schedule.
- Core mandatory training will be identified as needing to be completed at induction or on an annual, biennially or triennially basis.
- All staff, irrespective of role, will be required to complete specific compliance mandatory training in certain areas. Examples of training in this category include for example, Safeguarding, Prevent, Health and Safety, and Fire Safety.
- As well as 'All Staff' mandatory training, some training will be specific to the member of staff's position, the department they work in or their role within the Trust. Examples of this training include for example, COSHH, Safer Recruitment, First Aid and Risk Assessments.
- Mandatory training may relate to a specific activity or duty which an individual is required to carry out as an additional responsibility outside of their job description. Examples of this type of training include Fire Marshalls and Administration of Medication.

4.8. Acceptable Use of ICT

Any property belonging to PPS should be treated with respect and care and used only in accordance with any training and policies provided. Staff must report any faults or breakages without delay to the ICT Department. The provision of PPS email accounts, Wi-Fi and internet access is for official school business, administration and education. Staff should keep their personal, family and social lives separate from their school IT use and limit as far as possible any personal use of these accounts. The Trust has a right to monitor and access web history and email use.

Staff must not give their log in credentials to other staff members, for example, when on annual leave. An 'out of office' should be used directing contacts to available personnel.

When staff work remotely the same policies and procedures apply. (For more information, please read the Remote Working Policy).

Staff must not create, possess, share, request or distribute AI-generated, digitally altered or synthetic images, audio or video involving students, colleagues or members of the school community where such content could be harmful, misleading, sexualised, defamatory, bullying, discriminatory or otherwise inappropriate.

Staff must immediately report any concerns regarding AI-generated content, deepfakes, online impersonation, manipulated imagery or synthetic media involving students.

Staff must only use Generative AI tools in accordance with Trust guidance, ensuring that confidential, safeguarding, staff or student personal data is not entered into unauthorised AI systems. More information can be found in the Artificial Intelligence (AI) Policy for Staff.

4.8.1. Use of IT systems.

Our IT and communication systems are intended to promote effective communication and professional working practices within the school. Below includes standards you must observe when using these systems, the circumstances in which we will monitor your use, and the action we will take in respect of breaches of these standards.

Misuse of IT and communication systems can damage the school and its reputation and may result in legal and financial liability. You must familiarise yourself with ICT policies and comply with their terms. You should also refer to the school's Data Protection Policy and Privacy Notice and, where appropriate,

to our other relevant policies including in relation to Acceptable Use of ICT for Staff, Social Media, E-Safety, Taking, Storing and Using Images policy and Staff Laptop Loan agreement.

4.8.2. Prohibited use of our systems

You must not interfere with the work of others or the system itself. The facilities must be used in a responsible manner - in particular, you must not:

- create, transmit or cause to be transmitted material which is designed or likely to cause annoyance, inconvenience, needless anxiety, or offence, and you must not create, transmit or cause to be transmitted offensive, obscene, or indecent material.
- create, transmit or cause to be transmitted defamatory material.
- create, transmit or cause to be transmitted material such that the copyright of another person is infringed.
- download any files unless virus scanned.
- use networked computing equipment for playing computer games, online gambling etc.
- install additional software without first consulting the IT Services Manager.
- gain deliberate unauthorised access to facilities or services accessible via local or national networks.
- transmit by e-mail any confidential information of the school otherwise than in the normal course of your duties
- send any message internally or externally which is abusive, humiliating, hostile or intimidating
- gain unauthorised access to or violate the privacy of other people's files, corrupt or destroy other people's data or disrupt the work of other people
- disclose passwords to third parties without the consent of the school.
- provide confidential staff or student data to third parties without the consent of the school.

Misuse of the internet can in some circumstances be a criminal offence. It will usually amount to gross misconduct to misuse our systems by creating, viewing, accessing, transmitting, or downloading any of the following material (this list is not exhaustive): pornographic material, offensive, obscene, or criminal material, or material which is liable to cause embarrassment; material which is discriminatory, or material which is or may be offensive.

4.8.3. Email/Teams and MIS

You must:

- ensure that you use the school standard e-mail sign off and disclaimer for all external e-mail.
- produce and write e-mails with the care normally given to any form of written communication.
- appreciate that electronic mail is relatively insecure and consider security needs and confidentiality before transmission.
- be vigilant when using our systems and particularly cautious in relation to unsolicited emails from unknown sources.
- not send messages from another person’s account (unless authorised in the proper performance of their duties), or under an assumed name.
- inform the sender if you receive an email in error.
- You should be mindful that email messages may be disclosed in legal proceedings in the same way as paper documents. Deletion from a user's inbox or archives does not mean that an email cannot be recovered for the purposes of disclosure. All email messages should be treated as potentially retrievable, either from the main server or using specialist software.
- Communications to parents, carers and guardians should be sent via the MIS (iSAMS) wherever possible.

4.8.4. Equipment Security and Passwords

You are responsible for the security of the equipment allocated to or used by you and must not allow it to be used by anyone other than in accordance with this policy.

You are responsible for the security of any device used by you. You should lock your device or log off when leaving it unattended or on leaving the school, to prevent unauthorised users accessing the system in your absence.

Desktop PCs, cabling or digital teaching equipment should not be moved or tampered with without first consulting ICT.

You must use, where applicable, passwords and 2 Factor Authentication on all IT systems and devices, particularly items that you take out of School. You must keep your passwords confidential. You must not use another person's username and password or make available or allow anyone else to log on using your username and password unless authorised by the Head of IT.

If you have been issued with a laptop, tablet computer, or other mobile device, you must ensure that it is always kept secure, especially when travelling. Passwords must be used to secure access to data kept on such equipment to ensure that confidential data is protected in the event of loss or theft. You should also be aware that when using equipment away from the workplace, documents may be read by third parties, for example, passengers on public transport.

4.8.5 Filtering and Monitoring of IT

All staff should understand their roles and responsibilities in relation to filtering and monitoring systems as part of safeguarding training.

All staff are responsible for understanding filtering and monitoring arrangements and reporting any safeguarding concerns identified through online activity.

Staff must not attempt to bypass, disable or undermine filtering and monitoring systems.
Any concerns relating to online safety, inappropriate access, harmful content or system weaknesses must be reported immediately.

PPS has a right to access web history and email use without staff agreement, if a significant safeguarding concern has been identified.

4.9. Participation in investigations

All staff are required to participate fully in investigations in a timely, constructive and honest manner, whether this concerns them personally or others.

All matters relating to investigations are considered strictly private and confidential. Employees should not discuss the details of the investigation with anyone, with the exception of their representative/work colleague, the Investigating Officer, the Commissioning Manager and members of the HR Team. Failing to maintain confidentiality may result in disciplinary action.

There is no right to be accompanied during an investigation. However, where this is granted, the employee will be responsible for contacting their support and arranging their attendance at investigation meetings.

4.10. Data Protection

Data protection is an important legal compliance issue for the school. During the school's activities it collects, stores and processes personal data (sometimes sensitive in nature) about staff, students, their parents, its contractors and other third parties (in a manner more fully detailed in the School's Data Protection Policy and Privacy Notice(s)).

4.10.1. Person responsible for Data Protection at the School

The school has appointed the Chief Operating Officer as the 'Data Protection Controller', along with the Head of Compliance, who will work together to ensure that all personal data is processed in compliance with the Data Protection Policy and the principles of the GDPR. Any questions about the operation of the policy or any concerns that the policy has not been followed should be referred in the first instance to the Head of Compliance.

4.10.2. Record-keeping

It is important that personal data held by the school is accurate, fair and adequate. Staff are required to inform the school if they believe that any personal data is inaccurate or untrue or if you are dissatisfied with how it is recorded. This applies to how staff record their own data, and the personal data of others – in particular colleagues, students, and their parents – in a way that is professional and appropriate.

Staff should be aware of the rights of individuals, whereby any individuals about whom they record information on School business (notably in emails and notes) digitally or in hard copy files may have the right to see that information. This absolutely must not discourage staff from recording necessary and sometimes difficult records of incidents or conversations involving colleagues or students, in accordance with the school's other policies, and grounds may sometimes exist to withhold these from such requests. However, the starting position for staff is to record every document or email in a form they would be prepared to stand by should the person about whom it was recorded ask to see it.

4.10.3. Care and data security

More generally, we require all school staff (and expect all our contractors) to remain mindful of the data protection principles stated in the Data Protection Policy and to use their best efforts to comply with those principles whenever they process personal information. Data security is not simply an online or digital issue but one that effects daily processes: filing and sending correspondence, notably hard copy documents. Data handlers should always consider what they most assured and secure means of delivery is, and what the consequences would be of loss or unauthorised access.

We expect all those with management / leadership responsibilities to be champions of these principles and to oversee the swift reporting of any concerns about how personal information is used by the school to Head of Compliance, and to identity the need for (and implement) regular staff training. Staff must attend any training we require them to.

4.11. Attendance and Timekeeping

Staff are expected to attend work punctually and reliably. If a Staff member is unable to attend work, or if they anticipate being late for any reason, they should, where possible, inform or seek approval from their line manager in advance. If this is not feasible, staff should use the appropriate school procedure for reporting absence. Please observe the terms of your contract of employment as these may provide specific protocol which should be followed.

Persistent or repeated issues with attendance or punctuality may, where appropriate, be addressed under the PPS Disciplinary Policy.

4.12. Resignations and Notice

PPS recognises that staff may decide to move on to other opportunities. Whilst contracts of employment set out the formal notice periods that must be observed, staff are encouraged, as a matter of professional courtesy, to discuss their intention to resign with their line manager or HR as early as possible, ideally well in advance of the formal notice date.

Early conversations enable the organisation to plan effectively for recruitment and handover, and to support the departing colleague through their transition. Any such discussions will be treated sensitively and confidentially until formal resignation is submitted.

4.13. Signing in and out

During the school holidays we operate a sign in/sign out policy with which all Staff are expected to comply. Upon arrival to work, you must immediately personally sign in the time you entered the premises. Upon leaving the premises you must ensure that you personally sign out using the same system. Some departments operate signing in and out protocol throughout the year. The employee will be informed by their line manager is this applies to them.

4.14. Smoking

Prior Park Schools operates a policy under which smoking, including e-cigarettes, vaping and/or any tobacco based products, are not permitted to be used anywhere onsite.

4.15. Alcohol and Illegal Drugs

PPS is committed to ensuring the health, safety and welfare of its Staff and those affected by its activities. It will take all reasonable steps to reduce, if not eliminate, the risk of injuries or incidents occurring due to individuals suffering from the effects of alcohol or substance abuse.

The organisation prohibits the drinking of alcohol by Staff during their working day/hours, unless alcohol is provided or permitted at an organised event e.g. New Parents event, House Dinners. Where alcohol is permitted, Staff may consume alcohol in moderation provided that they remain fit to fulfil their responsibilities and maintain appropriate professional standards of behaviour. Staff must remain mindful of their safeguarding responsibilities and professional boundaries, particularly where students are present.

PPS regards unacceptable level of drinking as any of the following situations:

- the individual is over the legal limit stipulated for driving (i.e. 35mcg/100ml of breath alcohol concentration);
- in the opinion of management, the individual's performance is impaired. This may be at less than the legal limit stipulated for driving;
- in the opinion of management, the individual's behaviour may cause embarrassment, distress or offence to others;
- Staff' conduct, judgement and performance is adversely impacted by alcohol; or
- the individual continues to drink when instructed to stop by a manager.

Staff must not be intoxicated or behave in a manner affected by alcohol or drugs in communal areas of the School, around students, or at or in the vicinity of School, commercial or private events taking place on site, where this could compromise safeguarding, safety, professional boundaries, security, the proper operation of the School or event, or reasonably bring PPS into disrepute.

Boarding and Residential Staff

Staff that reside on site may consume alcohol in their private accommodation, when they are not on duty, but should remain mindful of the boarding community and continue to behaviour appropriately and professionally if, at any point, they come into contact with students.

PPS will take all reasonable steps to prevent Staff carrying out work-related activities if they are considered, in the reasonable opinion of the management, to be unfit/unsafe to undertake the work as a result of alcohol consumption or substance abuse.

PPS expressly prohibits the use of any illegal drugs (including psychoactive substances, including those formerly known as "legal highs") or any prescription drugs that have not been prescribed for the user. It is a criminal offence to be in possession of, use or distribute an illicit substance and to produce, supply or possess with intent to supply psychoactive substances. If any such incidents take place on organisation premises, in organisation vehicles or at a company function, they will be regarded as serious, will be investigated by the organisation, and may lead to disciplinary action and possible reporting to the police.

No employee or other person under the organisation's control shall, in connection with any work-related activity:

- report, or endeavour to report, for duty having consumed drugs or alcohol likely to render them unfit and/or unsafe for work
- consume or be under the influence of drugs or alcohol while on duty
- store drugs or alcohol in personal areas such as desk drawers; or
- attempt to sell or give drugs or alcohol to any other employee or other person on the school premises.

Staff must inform the line manager and/or HR of any prescribed medication, or changes in medication prescribed to them, which may influence their ability to carry out their work safely and must follow any instructions subsequently given. Staff have a responsibility to ensure that all medication brought into work are stored safely and securely, and out of the reach of students.

Care should be taken when using prescribed drugs as some can cause drowsiness and should not be used while at work.

Any employee suffering from drug or alcohol dependency should declare such dependency, and PPS will subsequently provide reasonable assistance, treating absences for treatment and/or rehabilitation as any other sickness absence. Failure to accept help or continue with treatment will render the employee liable to normal disciplinary procedures.

4.16. Security

In the interests of security, Staff must carry their identity card whilst on any of the school sites and produce it on request.

Staff must take responsibility for the security of their own working areas. Upon leaving they should ensure all door and windows are secure.

All IT equipment should be kept secure. Staff should lock their laptops/computers when they are not working on them, not leave them in unsafe places e.g. their car, classrooms where students can access them. All mobile devices should be password protected. Staff should refer to the Social Media Policy for more information.

4.17. Representing the School

PPS recognises the importance of work life balance. Whilst we do not intend to restrict outside activities, it is important to remember that activities whether during or outside of working hours which result in adverse publicity to the Trust, or which cause us to lose faith in your integrity, or to question the trust and confidence we expect, may give us grounds for your dismissal.

When attending any work-related social function an appropriate standard of conduct is expected from all Staff.

Work-related social functions can be a great opportunity to celebrate our community. However, it is important to remember that our policies on anti-harassment and bullying, personal harassment, disciplinary and equal opportunities apply fully at these events.

4.18. Personal Appearance

Each school regularly receives visits from parents, potential parents and others, and naturally wishes to convey an impression of efficiency and organisation. Therefore, whilst not wishing to impose unreasonable obligations on Staff they are, nonetheless, required to look smart and professional in appearance.

All staff are reminded that if they wear branded clothing out in the community, outside of school operating times, their behaviour must still reflect the staff code of conduct. By wearing the branded clothing staff are still very much representing the school and trust.

Further information as to the specifics of staff dress requirements at different schools withing the Trust can be found in Appendix A.

4.19. Mobility and Flexibility

Due to the demands and nature of the schools, Staff should be prepared to transfer upon request within departments temporarily (e.g. to provide lesson cover/attend a school trip), to undertake work of a different nature, providing it is reasonable and safe to do so and the Staff member is adequately trained.

4.20. Use of Personal Mobile Devices

All staff are expected to set an example to students and not use their personal mobile device around the school site. **Mobile phones should not be seen.**

Under no circumstances should staff take any images of students on their personal mobile devices without using the approved apps for taking and storing images of students. Please familiarise yourself with the Taking, Storing and Using Student Images Policy.

Taking account of the Trust's expectation that some aspects of work will be carried out using personal mobiles (e.g. Teams calls), discretion should be exercised when using such devices for personal purposes whilst working and should be made in a staff work area. Personal use of personal mobile devices during working hours should be limited.

There may be circumstances in which it's appropriate for a member of staff to have use of their phone during the day, for personal reasons. For instance (this list is non-exhaustive):

- For emergency contact by their child, or their child's school
- In the case of acutely ill dependents or family members

Staff must comply with all school mobile phone and smart device procedures, including those relating to wearable technology, recording devices and AI-enabled devices.

Personal Mobile Devices and cameras are **not permitted** to be used in the EYFS setting.

4.21. Professional Language and Conduct

Staff are encouraged to be polite and friendly towards others, but it is important that professional boundaries are not crossed. Language and conduct should be polite, measured and considered. Staff should always maintain professionalism and under no circumstances should become overfamiliar with others in a way that may be seen to disrupt the operations or reputation of PPS.

Staff should avoid any communication that could be seen as inappropriate, notably remarks that may be seen as sexually suggestive or provocative.

Staff must actively challenge misogynistic, sexist, discriminatory or degrading language, attitudes and behaviours whenever encountered.

Staff must model respectful relationships and contribute to a culture which prevents harassment, sexual harassment, abuse and violence against women and girls.

Staff are role models for our students and should always act with this in mind.

4.22. Social Media and Personal Reputation

Staff should ensure that their personal use of social media and online platforms does not compromise their professional role or bring PPS into disrepute. This includes avoiding public posts, images or comments that could be considered discriminatory, offensive, inappropriate, or inconsistent with the values of PPS.

Staff must not identify themselves as representatives of PPS on personal accounts without permission, nor should they use the school's name, logo, or branding in personal online activity. Caution should be exercised when listing PPS as an employer on professional networking sites (e.g. LinkedIn), ensuring that profiles remain accurate and professional.

Staff are reminded that material shared online is often public and permanent, and that conduct outside school, including online behaviour, may be considered under the PPS Disciplinary Policy if it impacts the school community or reputation.

4.23. Environment

PPS aims to keep use of consumables to a minimum by promoting the effective and efficient usage of equipment, facilities, supplies and services.

Staff should make every effort to reduce wastage, turn off excessive lights or heating/cooling equipment, use water resources appropriately and switch off any electronic equipment which is not in use.

4.24. Handling Money

Staff that have been authorised to handle monetary transactions on behalf of PPS are responsible for those transactions they carry out as detailed in the Financial Procedures Manual, which they must read and confirm understanding before being permitted to carry out transactions.

For transparency and to avoid any confusion, Staff who collect money in any form must ensure that a clear record is kept regarding the collection. All purchases must be authorised and agreed and Staff who purchase products must ensure that receipts are kept.

4.25. Bribery

Bribery is, in the conduct of the PPS business, the offering or accepting of any gift, loan, payment, reward or advantage for personal gain as an encouragement to do something which is dishonest, illegal or a breach of trust. Bribery is a criminal offence. No gift should be given nor hospitality offered by Staff to any party in connection with the PPS's business without receiving prior written approval from the employee's line manager.

Staff will face disciplinary action if it is discovered that they have accepted, offered or given any bribe, which could include dismissal for gross misconduct. Accepting a bribe also carries separate criminal liabilities for the employee personally and for the school.

The PPS Anti-Bribery and Corruption, Anti-Money Laundering and Financial Crime and the Staff Gift Acceptance policies contain more information on this topic.

4.26. Health and Safety

Staff are responsible for their own Health and Safety (H&S) and that of others and for ensuring that they are familiar with and that they follow PPS Health and Safety policies and procedures.

Breaching any rules surrounding health and safety may lead to disciplinary action. A breach may be considered gross misconduct which can result in summary termination of employment.

4.27. School Property and Equipment

Staff who cause any damage to the school property through misuse, recklessness or carelessness may be required to repay to the school the cost of repair or replacement. The school reserves the right to recover this cost by way of a deduction from your next salary payment. Separate agreement may be in force between the employee and the school in respect of the equipment issued to them.

When an employee's employment is terminated, Staff should return all school property, including all IT equipment, keys, ID card, credit card, stationery, company mobile devices and any other items belonging to the school. Failure to do so could result in you being charged.

Property or equipment may not be removed from the school premises unless this has been approved by their line manager.

4.28. Passing on information and updated data

Staff must ensure they pass on any information relating to students, parents and/or guardians. For example, changes of contact details will most likely be sent to the Tutor in the first instance, but to ensure that PPS has the correct and most up to date information, it is imperative that this information is passed onto the school office, who care then ensure all systems are amended as appropriate.

4.29. Reference requests

If staff receive a reference request for a colleague or previous employee, they should pass this onto the Head or COO for completion.

If staff receive a reference for a student, these should be passed onto the Head immediately.

4.30. Non-employees of PPS

Once a member of staff leaves any one of the schools, they should refrain from having any contact with existing, enrolled, students. If current staff become aware that an ex-member of staff is still communicating with a current student, they should inform the DSL immediately.

4.31. Conflict of Interest

Staff must avoid situations where personal interests conflict, or could be perceived to conflict, with the interests of PPS. This includes, but is not limited to, outside employment, private tutoring, relationships with suppliers, or any financial dealings. Any potential conflict should be declared to HR, the COO or the Head.

4.32. Staff Wellbeing

Prior Park Schools is committed to supporting the wellbeing and mental health of all staff. We recognise that a healthy, engaged and resilient workforce benefits both individuals and our wider school communities.

Staff are encouraged to speak to their line manager or HR if they are experiencing difficulties that may be impacting their wellbeing, work, or home life. Any such discussions will be treated with sensitivity and confidentiality, and appropriate support will be offered.

In the UK, PPS provides access to a confidential Employee Assistance Programme (EAP – Help@Hand), which offers independent counselling, wellbeing advice, and practical guidance. We encourage staff to make use of this service whenever they feel it may be of benefit. Details of how to access the EAP, including contact numbers and online resources, are available from HR and on the Staff Portal.

While this service is not currently available to staff in Gibraltar, PPS remains committed to supporting the wellbeing of colleagues at PPSG. Staff there are encouraged to speak with their line manager or HR, who will help identify appropriate local sources of support.

4.33. Policies

Staff are responsible for ensuring they familiarise themselves with the latest version of each policy, as and when they are circulated by the Head of Compliance. The most recent version of all policies can be found in the Prior Park Schools Staff Portal. (Prior Park Schools Staff Portal - Home)

This Code of Conduct should be read in conjunction with the organisation's policies and procedures, which provide further detail and guidance

Appendix A

PPC Staff Dress Code

We expect that all those staff who regularly come into contact with students, parents, and members of the public, will wear clothes associated with working in a professional office. It is then appropriate that adults model the expectation put on students; smart, appropriate, workwear in their day-to-day interactions with students.

No dress code can be entirely prescriptive, so staff are expected to use their common sense. The dress code applies on all occasions when staff are in school, in term time, and students are on site. It is worth stating that under all circumstances, all staff should consider their lanyards to be essential - in line with our Safeguarding policies and procedures.

All codes are open to interpretation, so the following guidelines are offered to assist staff:

Smart professional wear, consisting of:

- Tailored suits or separate jacket and trouser combinations along with a tailored shirt with collar and tie – both of which should be done up. Trousers should typically be full length.
- Tailored suits or dresses, or separate smart/styled skirt or trousers with blouse or smart top combinations. The neckline should be appropriate; skirts should be no shorter than just above the knee.
- When jumpers are worn with a shirt as part of smart professional wear, they should typically by V-neck or quarter zip in style. This is in line with the expectations that we have for our students and it is important that we all model those standards.
- Shoes, sandals, or boots should be smart and formal. In particular, white, 'fashion' trainers should not be worn with any variation of smart, professional, wear. Trainers should only ever be worn as part of Games Kit for those staff involved in coaching.
- Jewellery should be discreet and suitable for the professional environment.
- Hair, including facial hair, should be clean, neat, and tidy and kept in an appropriate style.

Summer Dress

- In the summer, when the Headmaster has given notice that students may wear 'Summer Uniform' the staff should dress as above, but jackets and ties need not be worn.

The following should not be worn:

- Trainers, as mentioned above.
- Skin-tight clothing
- Denim
- Hoodies
- Polo shirts or T-Shirts
- Leather or canvas trousers or skirts
- Leggings or shorts
- Any clothing which compromises the health and safety of pupils or the teacher

Guidance

Those staff who are involved in the teaching of practical or sporting subjects are expected to wear appropriate (and branded wherever possible) clothing for the teaching of those subjects. This should follow the guidance for students (for example, tracksuit bottoms should be worn by staff whenever Summer Uniform is not in operation) However, they should change into smart, professional clothing when and where appropriate, such as at Parents' Evenings and other functions.

- Those adults coaching games within the school day can wear such, branded, kit as might be deemed appropriate for that activity when teaching their classes. If involved in coaching a games session after school, then staff should change into their coaching attire only after lessons have ended.
- All departments within the school who have a uniform associated with their roles (e.g. the Estates Teams, Maintenance Teams, and Catering Teams) should wear the uniform provided for them in these roles.
- Teachers accompanying teams away from the school for a sports fixture should follow the dress code – this may be adjusted if the weather is inclement, for example with more robust footwear than might be considered normal in the working week.
- On the school's more formal occasions, such Leavers' Day, gowns may be worn.
- On 'Mufti' Days and Staff 'INSET' Days staff may, if they wish, wear smart and appropriate, casual wear.
- On School Trips where our students are not in uniform, adults may choose to wear smart, appropriate, casual clothing. When students are in uniform on a trip, then adults should dress as if they were in school.
- As we are a phone free school, it is important that personal mobile phones should, wherever possible, not be seen in and around the school site. It is important that we model our phone free status to our students, and phones should be kept away from view. Ideally, they would only be used when staff are **not** in the presence of students.
- Wherever there are medical reasons for any deviation from the above guidance, for example trainers needing to be worn due to an injury, operation, or medical condition, then this should be discussed with your line manager in the first instance. Line managers should inform a member of the SLT whenever such an arrangement may be required.

All staff are reminded that if they wear branded clothing out in the community, outside of school operating times, their behaviour must still reflect the staff code of conduct. By wearing the branded clothing staff are still very much representing the school and trust.