



inspiring the journey for  
independence together

# Staff Code of Conduct Policy

Non Statutory

Reviewed Annually

Signed by:  (Chair of the Trust)

Review Date: October 2024

Date of Next Review: October 2025

## 1. Purpose and Aims

The aim of this Code of Conduct for employees is to set out the standards of conduct expected of all staff and to provide further information for employees. This should be read in conjunction with the Rivermead Inclusive Trust Staff handbook, Disciplinary Policy, associated policies and the [Teachers' Standards](#).

Employees should note that this Code is not exhaustive in defining acceptable and unacceptable standards of conduct and employees must use common sense in adhering to the underpinning principles. If any employee is unsure what the expectations are in any given circumstance, they should speak to their line manager (or a member of the Senior Leadership Team). *For any questions in relation to the Trust Staff Handbook should be addressed to Karen Watkin (Trust HR manager).*

This Code does not form part of any employee's contract of employment, and it may be amended at any time, but should be seen as supplementing our employees' terms and conditions of service as laid out in their conditions of service.

Rivermead Inclusive Trust appreciates the hard work and commitment to the provision of public services of all its employees and will continue to promote a positive working environment in which employees are both supported and developed. Essential to creating a positive and constructive working environment is a mutual understanding of standards of behaviour that are acceptable to each other and the public for whom we provide services.

These guidelines will help promote the image of Rivermead Inclusive Trust working for, and on behalf of, the local community's best interests; all of which will ultimately assist in the work done.

The guidelines apply to all staff in their capacity as employees of Rivermead Inclusive Trust including those in their probationary period. However, where staff are acting as an accredited representative, on behalf of a trade union recognised by Rivermead Inclusive Trust, they will be covered by the conduct guidelines of that union and should refer to them for further guidance.

This document applies to staff members who are:

- Employed by the Rivermead Inclusive Trust, including all staff and volunteers.
- Employed in units or bases that are attached to the Rivermead Inclusive Trust.

This document does not apply to:

- Peripatetic staff members who are centrally employed by the LA.
- School catering staff employed by The Contract Dining Company
- School Counsellors employed externally by the school(s)
- Employees of external contractors.

These employees are governed by their employment contracts and any relevant laws pertaining to their activities within the school, for example, the UK GDPR and the Data Protection Act 2018.

## **2. Scope Of The Guidelines**

The guidelines have been designed to provide an outline of the way in which Rivermead Inclusive Trust expects all its employees to act. It is not meant to be an exhaustive list of all aspects of working for Rivermead and some of the areas mentioned may also appear in other Trust or School based policies and procedures, such as the Health & Safety Policy and Disciplinary Policy. Where that is the case, these documents will be referred to within this guidance.

Copies of all the Trust and Individual School policies and procedures are available from the Executive Head / Head-teacher/Head of School, in the Rivermead Inclusive Trust Staff Handbook or available on the Rivermead Inclusive Trust website ([Trust Policies - Rivermead Inclusive Trust](#)). If there are any sections of the guidelines, you think may affect you and you are unsure about the guidance given you should seek the advice of the Head-teacher/Head of School or Senior Leadership Team in the first instance.

## **3. Safeguarding and Promoting the Welfare of Children**

In accordance with 'Keeping children safe in education 2024' (KCSIE), staff members have a responsibility to safeguard pupils, and protect and promote their welfare.

Staff members have a responsibility to ensure that they provide a learning environment in which pupils feel safe, secure, and respected.

To effectively safeguard pupils, staff members are required to follow the procedures outlined in this Staff Code of Conduct, the Behavioural Policy and the Child Protection and Safeguarding Policy, ensuring that they do not act in a way that may put pupils at risk of harm, or lead others to question their actions.

In accordance with the school's Behavioural Policy and Child Protection and Safeguarding Policy, staff members will be prepared to identify pupils who may be subject to, or at risk of, various types of abuse and neglect, including, but not limited to, the following:

- Physical abuse
- Emotional abuse
- Sexual abuse
- Neglect
- Child-on-child abuse
- Serious violence

- FGM
- Child sexual exploitation (CSE)
- Child criminal exploitation (CCE)
- Bullying: this includes cyberbullying, and prejudice-based and discriminatory bullying

Copies of policies and a copy of Part one (or Annex A for staff members not working directly with children) of KCSIE will be provided to staff at induction. Staff will have a clear understanding of the school's policies and procedures with regards to safeguarding issues, e.g. abuse, and the important role they play in preventing harm against pupils.

In accordance with the school's Child Protection and Safeguarding Policy, staff will also be aware of the factors that could increase a pupil's risk of being subject to safeguarding issues, including but not limited to:

- Pupils who need a social worker (Child in Need and Child Protection Plans).
- Pupils requiring mental health support.
- LAC and previously LAC.
- Pupils with SEND.
- Pupils who identify as LGBTQ+.
- Pupils perceived to be LGBTQ+.
- Pupils struggling with mental health needs.
- Pupils who have a family member in prison, or who are affected by parental offending.
- Pupils that are frequently absent or permanently excluded from school.

If a staff member identifies a pupil who is subject to, or at risk of, abuse and neglect, they will follow the necessary reporting and referral procedures outlined in the Child Protection and Safeguarding Policy. Staff will be aware of the procedures to follow if a pupil tells them they are experiencing abuse, exploitation, or neglect.

In all cases, if a staff member feels unsure as to whether an incident or pupil would be classed as a safeguarding concern, they will speak directly to the DSL. Staff will not assume a colleague will act and share information that might be critical in keeping children safe.

Staff will understand that even if there are no reports of peer-on-peer abuse in the school, this does not mean it is not happening. Staff will report any concerns regarding any form of abuse to the DSL without undue delay. Staff will understand the importance of challenging inappropriate behaviours between peers that are abusive in nature.

Any staff member that has concerns about another staff member's (including volunteers and supply staff) actions or intent, or believes these actions may lead to a pupil being put at risk of harm, will report this in line with the Allegations of Abuse Against Staff Policy or Whistleblowing Policy immediately so appropriate action can be taken.

Upskirting is not tolerated by the school and any incidents of upskirting must be reported to the DSL who will decide on the next steps to take, which may include involving the police.

If a staff member feels unable to raise an issue with the school, they will use other whistleblowing channels, including contacting the NSPCC's helpline on 0800 028 0285 (between the hours of 8:00am and 8:00pm Monday to Friday) or email address [help@nspcc.org.uk](mailto:help@nspcc.org.uk). Staff members can also access guidance at [www.gov.uk/whistleblowing](http://www.gov.uk/whistleblowing). Fear about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare of pupils.

If the concern is regarding the headteacher, staff will report this to the Executive Head and or the chair of the governing board.

Staff will partake in the appropriate safeguarding and child protection training, which will include online safety; additionally, staff will receive regular safeguarding and child protection updates at least annually (Face 2 face and via The National College).

Staff will recognise that, when teaching pupils about safeguarding and online safety, a one-size-fits-all approach may not be appropriate for every pupil, and a more personalised or contextualised approach may be needed for pupils who are vulnerable, victims of abuse and/or have SEND.

Staff will be aware of their local early help process and understand their role in it. Staff will also be aware of the process for making referrals to children's social care service (CSCS) and for statutory assessments under the Children Act 1989, along with the role they may be expected to play in such assessments.

Staff will reassure victims that they are being taken seriously and that they will be supported and kept safe by the school. Staff will never give the impression that pupils are creating a problem by reporting abuse, sexual violence, or sexual harassment, nor should a pupil ever be made to feel ashamed for reporting an incident.

Staff will be aware that confidentiality must never be promised to a pupil – staff will understand the procedure for if a pupil discloses a potential safeguarding issue, in accordance with the school's Child Protection and Safeguarding Policy.

Staff will be aware of the school's legal duty to refer anyone who has harmed, or poses a risk of harm to, a child or vulnerable adult to the DBS – this includes where:

- The harm test is satisfied in respect of that individual.
- The individual has received a caution or conviction for a relevant offence, or if there is reason to believe that the individual has committed a listed relevant offence.
- The individual has been removed from working in regulated activity or would have been removed if they had not left their post.

## 4. Duty of Care

Staff must:

- understand the responsibilities, which are part of their employment or role, and be aware that sanctions will be applied if these provisions are breached
- always act, and be seen to act, in the learners' best interests
- avoid any conduct which would lead any reasonable person to question their motivation and/or intentions
- take responsibility for their own actions and behaviour and be aware of the importance of respecting equality and diversity especially in relation to the protected characteristics of:
  - Disability
  - Gender reassignment
  - Marriage or civil partnership
  - Pregnancy and maternity
  - Race
  - Religion or belief
  - Sexual orientation
  - Sex (gender)
  - Age

## 5. Breaches of the Guidelines

Whilst the aim of the guidelines are to promote professional, ethical and considerate working practices, there may be occasions where the actions or behaviour of an individual or individuals is not acceptable, either because it is explicitly against the guidance given or is contrary to its spirit. Any such actions may, potentially, bring the individual(s) or Rivermead Inclusive Trust into disrepute. If that is the case, and dependent on the nature of the act, the individual(s) may be subject to disciplinary action, including dismissal.

## 6. Whistleblowing

Part of working towards an effective and successful working environment means asking for help in encouraging others to also follow the guidance given. If you become aware of any conduct that is, or potentially may be, a breach of the guidelines or that could bring Rivermead Inclusive Trust into disrepute, it must be reported rather than ignored or overlooked. This may not be an easy decision to take so to support you in raising a concern Rivermead Inclusive Trust has produced a Whistleblowing Policy.

## 7. General Conduct Guidelines

As employees of the Rivermead Inclusive Trust, our behaviour continuously reflects on the public's perception of us as individuals, our colleagues, and Rivermead Inclusive Trust as a whole. By acting in a helpful and courteous manner when dealing with service users, the public, Councillors, and colleagues, we promote a positive view of ourselves and Rivermead Inclusive Trust. But we can do as much to promote the image of Rivermead Inclusive Trust by ensuring that we do not act in any way that brings us into disrepute, damaging the public's confidence in ourselves, our colleagues and/or Rivermead Inclusive Trust, hence this guide.

It is impossible to provide a definitive list of what is or is not acceptable conduct or behaviour but below are a few examples of what is unacceptable.

- 7.1 Discriminating against others in relation to the services we provide.
- 7.2 Employees are to treat their colleagues and others with dignity and respect at all times. Employees should respect managerial authority and undertake reasonable instructions.
- 7.3 Acts of fraud or corruption or the use of School resources for personal gain or the gain of others.
- 7.4 Disclosing information of a personal nature about another person without their permission.
- 7.5 Any behaviour that may demean, distress or offend others, behaviour of a sexist or racist nature, or the use of sexual or suggestive remarks.
- 7.6 Any conduct or behaviour which is unethical and/or brings Rivermead Inclusive Trust or its employees into disrepute.
- 7.7 All employees are expected, through agreed procedures, to bring to the attention of the appropriate level of management any deficiency in the provision of the service which will include any impropriety, breach of procedure or standing orders..

The rest of the Guidelines for Staff provides specific guidance on a wide range of issues but is not intended to cover all aspects of work in Rivermead Inclusive Trust. It will provide a clear indication of what standards of behaviour the public can expect from you as an employee.

## 8. Applications for Posts and Other Employment Matters

Decisions relating to new appointments or promotion, or any decision that affects someone's employment status (for example pay adjustments, access to training, matters relating to discipline or capability), should be made on merit and not on the basis of any other consideration.

Having a close personal or professional relationship with an applicant (internal or external) or with someone whose employment status is being reviewed could lead to accusations of bias, especially if you could be involved in any discussions relating to their application or review. If you find yourself in such a situation you should make the relationship known. In this way we can be seen to be as open as possible in our decision making process and free from any bias or unwarranted outside influence.

**Declarations** - Similarly if a decision is to be made on its merits alone, we need to be confident that any information provided is correct and honestly given. When applying for a new post you may be asked to provide specific information about your prior work, personal health and/or criminal convictions and you will be asked to make a declaration that the information is complete, truthful, and accurate.

**Criminal Records** - Having an existing criminal conviction need not affect you successfully applying for a post within Rivermead Inclusive Trust or your promotion prospects. When initially applying for a post, you must declare any convictions you have which are not “spent” as defined by the Rehabilitation of Offenders Act. Some posts are exempt from the Act in which case all convictions must be declared, and this will be made clear when you apply for the post.

Similarly, being arrested or convicted in relation to a criminal offence whilst employed by Rivermead Inclusive Trust need not affect your employment status. However, if for any reason you received any conviction, caution, reprimand, or final warning resulting from police action or you are arrested or convicted in relation to a criminal offence, be it in or outside work, you must inform the Executive Head /Head-teacher/Head of School immediately.

**Attendance and Absence from Work** - Hours of work will vary depending on your job and are designed to ensure we meet our service requirements. If someone fails to attend work, or leaves early, without informing their Executive Head /Head-teacher/Head of School then additional workloads fall on colleagues and Rivermead Inclusive Trust may not be able to meet its service obligations. You should therefore attend and leave work within the times agreed, although they may be varied in agreement with the Executive Head /Headteacher/Head of School.

There may be occasions when it may not be possible to attend work on time, for example, when you or a dependent are sick. In these circumstances Rivermead Inclusive Trust has established procedures for you to follow, for example Rivermead Inclusive Trust’s Staff Absence Policy. These ensure that the people who need to know are informed as soon as possible.

**Appointments During Work Hours** - Occasionally you may need to arrange an appointment with a doctor or dentist and wherever possible you should arrange for appointments to take place outside of normal working hours or failing that at the beginning or end of the day. Where this is not possible, you should arrange appointments so your

time away from work is kept to a minimum. Managers need to ensure that this is not abused. Absence for half or more than half of your normal working day should be recorded as sickness absence.

**Dress Code** - The way in which you present yourself can have an impact on how people view you and Rivermead Inclusive Trust. Some School jobs have a formal uniform, but where no uniform is required, you should dress in a manner that is appropriate to your working environment and maintains a professional image. Please see the Trust Staff Handbook for further clarification.

**Identification** - Whilst on Rivermead Inclusive Trust business, those you come into contact with have the right to know that you are working for Rivermead Inclusive Trust. Employees are issued with identification badges and dependent on your work, these should be worn at all times or be available to anyone who requests confirmation of who you are.

**Political Neutrality** - Whilst most employees are entitled to undertake whatever political activities, they wish outside working hours, the public, your colleagues, and Councilors will expect you to undertake your work without political bias and treat every decision on its merits and not on any other basis. This is not intended to restrict your political freedom but to ensure that we can all be seen to be working for the benefit of the local community.

## 9. Confidentiality

Information held by Rivermead Inclusive Trust, such as names and addresses, business information etc., whether on paper or electronic systems, is covered by the Data Protection Act of 1998. As a School we have a duty to ensure that all personal information we use is lawfully and fairly obtained and relevant for the specific purposes for which it is held. The release of information to an unauthorised person or the use of information for an unauthorised purpose can constitute a criminal offence under Data Protection legislation.

**Protecting Confidentiality** - As part of your day-to-day work you may have access to confidential information of either a personal or business nature. When accessing or using this information you should take care not to release it to anyone who is not properly authorised to see or use it. Often this will mean ensuring that unauthorised people cannot gain access to confidential information, for example, by not giving away passwords to computer systems, leaving keys to confidential drawers, cupboards, offices unattended etc. However, it also means that you should not use passwords or keys etc. that come into your possession to access information you are not authorised to view.

Most importantly you should not use information, which comes to you through the course of your work for personal gain or benefit, or pass it on to others for the express purpose of gaining benefits as this could be interpreted as fraud.

## 10. Health and Safety

All employees must ensure that they:

- read and understand the School's [Health and Safety Policy](#) for the establishment they are working within.
- comply with health and safety regulations and use any safety equipment and protective clothing which is supplied to you by the school
- comply with any hygiene requirements
- comply with any accident reporting requirements
- never act in a way which might cause risk or damage to any other members of the school community or visitors
- inform the line manager of any paid work undertaken elsewhere. This is to comply with the [Working Time Regulations](#), which are a health and safety initiative.

## 11. Personal/Business Activities – Conflicts of Interest

Rivermead Inclusive Trust respects the choice of employees to undertake whatever interests or activities (paid or unpaid) they wish outside their conditioned hours of work. In the vast majority of cases these will have nothing to do with your work for Rivermead Inclusive Trust. However, on occasions there may be a more direct link, for example, if you own or work for a business, which contracts with Rivermead Inclusive Trust. If you have any direct or indirect financial interest in a contract (or potential contract) you must make your interest known to the Head-teacher/Head of School in writing.

If there is a potential conflict of interest it is in everyone's interest to ensure it is fully declared thus helping to protect individuals and Rivermead Inclusive Trust from accusations of bias or possible accusations of fraud/corruption. If you are in any doubt about whether an interest exists, it is best to be as open as possible in declaring (in confidence) a personal or business interest to the Executive Head/Head-teacher/Head of School.

Staff will not engage in inappropriate use of social network sites which may bring themselves, the school, school community or employer into disrepute. This is explored further in the [Acceptable use of technology section of this policy](#).

**Membership of Professional/Voluntary Bodies & Conflicts Of Interest** - You should declare membership of any professional body or organisation where your membership may appear to represent a conflict of interest or attract accusations of bias. This includes any private organisations whose membership is not totally open to the public

**Secondary Employment** - Some employees may have other jobs outside Rivermead Inclusive Trust and although Rivermead Inclusive Trust will not unreasonably prevent you

from taking up additional paid employment there are a number of guidelines that must be followed. This is not only to ensure that any potential conflicts of interest are known but also so that we can advise staff about Health and Safety issues relating to the number of hours they work etc. If you want to take up secondary employment (or are already employed in a second job you should ensure that: -

- There is no conflict of interest which could lead to accusations of bias
- The work will not adversely affect your performance in your duties for Rivermead Inclusive Trust
- That the Head-teacher/Head of School has confirmed in writing that the secondary employment does not fall into category 1 and /or 2 above and Rivermead would therefore have no objection to it.

## **12. Professional Boundaries and Relationships**

### **Relationship protocol**

Employees in our school are in a position of trust in relation to our students which means that the relationship between an employee and a student is not one of equals. Therefore, employees must ensure that they avoid behaviour which might be misinterpreted by others. This includes any type of communication that they may have with students. Employees must not make sexual remarks to any student or discuss their own sexual relationships with, or in the presence of, students. Employees must not discuss a student's sexual relationships in inappropriate settings or contexts. Any sexual behaviour by a member of staff towards any student is unacceptable and illegal.

Employees must ensure that professional boundaries are maintained at all times. This means that employees should not show favouritism to any student and should not allow students to engage in any type of behaviour that could be seen to be inappropriate. Students are not employees' friends and should not be treated as such.

Employees should be aware that it is not uncommon for students to become strongly attracted to a member of staff or to develop an infatuation. If any member of staff becomes aware of an infatuation they should discuss it with school's safeguarding officer immediately so that they can receive support on the most appropriate way to manage the situation.

For employees who are in a relationship with a colleague, parent or carer, or any other person associated with the school, we expect that they identify this to the Headteacher/Head of School and ensure that this does not create a conflict of interest or affect their professional judgement or responsibilities in any way.

### **Relationships with pupils**

The Trust expects that staff will:

- Maintain professional boundaries and relationships with pupils at all times, and will consider whether their actions are warranted, proportionate, safe and necessary.
- Act in an open and transparent way that would not lead to others questioning their actions.
- Ensure that they do not establish social contact with pupils for the purpose of securing a friendship, or to pursue or strengthen a relationship.
- Ensure that they do not develop personal or sexual relationships with pupils: this includes sexual remarks and discussing their own sexual relationships with, or in the presence of, pupils.
- Only contact pupils via the school's established mechanisms: personal phone numbers, email addresses or social media platforms will not be used to contact pupils.

Under the Sexual Offences Act 2003, it is an 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 to that child, even if the relationship is consensual.

### **13. Physical Contact with Students**

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

When physical contact is made with pupils, it is imperative that it is conducted in a way which is responsive to the pupil's needs, is of limited duration and is appropriate to their age, stage of development, gender, ethnicity, and background.

Staff will seek the pupil's permission, where possible, before initiating contact. Staff will always use their professional judgement when determining what physical contact is appropriate, as this may differ between pupils. As such, the pupil's feelings and wishes will always be considered.

Staff will never touch a pupil in a way which is indecent and will always be prepared to explain their actions. Staff will be aware that even well-intentioned physical contact may be misconstrued by a pupil, an observer or by anyone to whom this action is described and, therefore, will be prepared to justify their actions. Staff will not engage in rough play, tickling or play fights with pupils.

Extra caution will be taken where it is known that a pupil has previously suffered from abuse or neglect.

Physical contact will never be secretive; if a member of staff believes an action could be misinterpreted, this will be reported to the headteacher, or the chair of governors if the concern is about the headteacher, and appropriate procedures will be followed.

Where it is necessary in PE classes for teachers to demonstrate the use of equipment, this will be conducted with another member of staff if possible. If a pupil is required to participate, their consent will be given before doing so. If a child is in distress and in need of comfort as reassurance, staff may use age-appropriate physical contact, such as placing their hand on the pupil's shoulder. Staff will remain self-aware of their actions at all times and ensure that their contact is not threatening, intrusive or subject to misinterpretation and is always reported to the school's safeguarding officer.

Staff may also use reasonable force as a means of physical contact with pupils for restraint purposes, such instances will always be in accordance with the school's Positive Handling Policy.

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

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

## **14. Social Contact with Students**

Employees should not establish or seek to establish social contact, via any channels (including social media), with students for the purposes of securing a friendship or to pursue or strengthen a relationship. Employees should use their work provided equipment only for communicating electronically with students. If there are any circumstances in which an employee has had to provide their personal contact details, including phone numbers, email address etc., to any student then they should report this to the Headteacher/Head of School.

The school's advice to staff is not to connect to students via social media or other communication channels unless this is for professional purposes and that the employee can demonstrate that this is the case.<sup>1</sup>

Rivermead Inclusive Trust is part of our community, and we recognise that, as members of the community, employees will encounter students outside of the school. We expect staff to use their professional judgement in such situations and to report to the head of school

<sup>1</sup> Please refer to Rivermead Inclusive Trust's Social Media Policy for further clarification

any contact that they have had with a student, outside of school, that they are concerned about or that could be misinterpreted by others.

## **15. Violence and Abuse (including Bullying)**

Unfortunately, it is possible that, whilst carrying out your work, you may be subject to an act of either verbal or physical violence. “Violence” is the use of physical force or verbal intimidation, which causes an individual(s) to fear for their personal safety. “Abuse” is the use of foul, demeaning or insulting language towards another or group of others or the misuse of personal or professional authority which causes them distress.

Rivermead Inclusive Trust is committed to taking steps, wherever possible, to prevent such acts and to act against those who show violence in any form to School employees in the course of their duties. Employees should report any instances of abuse or violence to the Headteacher/Head of School and ensure it is recorded in an accident or incident log so that further action may be taken. However, Rivermead Inclusive Trust is equally committed to take action against any employee who shows violence in any form to another person be they a colleague, member of the public or client, including what is sometimes referred to as workplace bullying.

Employees can take an active part in addressing violence where and when it occurs. If you witness or believe that violence or abuse has, is or may be taking place it should be reported to the Headteacher/Head of School. If for any reason you do not feel able to talk to the Headteacher/Head of School, the Whistleblowing Policy should be followed.

## **16. Transporting Pupils**

When it is necessary to transport pupils off-site, staff will ensure that the transport arrangements of the vehicle meet all legal requirements, they have an appropriate licence and the vehicle is roadworthy, has a valid MOT certificate and is insured.

Staff will gain consent from parents before transporting pupils and will be aware that the welfare of all pupils in the vehicle is their responsibility. Two or more staff will be present in the vehicle to avoid any discrepancy regarding safeguarding concerns.

## **17. Acceptable Use of Technology**

Staff will adhere to the procedures outlined in the Online Safety Policy and Social Media Policy

Staff will be aware of how the use of technology can impact safeguarding and wellbeing issues, e.g., online abuse. Staff will be vigilant to ensure their own behaviour is respectful and that pupils are using technology appropriately while under their care.

Staff are required to employ the highest security settings on any personal profiles they may have.

Staff will not engage in inappropriate use of social networking sites including contacting pupils or their family members, accepting or inviting friend requests from pupils or their family members, or following pupils or their family members on social media.

The school understands that some staff members are also parents of pupils at the school and, therefore, may wish to contact other parents. When doing so, staff will exercise their professional judgement and will not contact family members on social media if this leads to a conflict of interest.

Staff will remain mindful of their use of social media and their web-based presence including written content, videos or photographs, and views expressed directly or indirectly which may bring themselves, the school, or the school community into disrepute.

## **18. Photography and Videos**

Photographs and videos will only be taken using school equipment – using personal mobile phones for this purpose is prohibited. Consent for taking photographs will be obtained from parents, or the pupil themselves, if they are deemed old enough and able to make the decision for themselves.

The age of consent that is legislated is 13 and above; however, this is only applicable for online services provided directly to children. For everything else, an appropriate age of consent is considered on a case-by-case basis by the DPO, headteacher and a pupil's parents (where appropriate).

Pupils who have not provided consent, either personally or via their parents, to have their photograph taken or be filmed will have their wishes respected, in line with the Photography Policy.

The headteacher will be notified of the proposed use of the imagery or video and the equipment and ensure that the use of such is included in lesson plans where this is necessary.

All photographs and videos will be available for scrutiny, and staff will be prepared to justify the images or footage taken. Careful consideration will always be given to the activities which are being filmed or photographed, to ensure that images or videos are not indecent and cannot be misused

## 19. Harassment and Discrimination

Rivermead Inclusive Trust's Equal Opportunities Policy clearly sets out our commitment to "Combating discrimination in all its forms and working actively to ensure equal access to jobs, services and active citizenship". Acts of harassment or discrimination are not only potentially a criminal offence but are also divisive and can bring individuals, their work colleagues and Rivermead Inclusive Trust as a whole into disrepute and will not be tolerated.

**Discrimination** - Discrimination happens when a person, or a group of people treat others less favourably in any area of employment or service delivery on grounds of gender, race, colour, ethnic or national origin, disability, marital status, family commitments, sexual orientation, age, Gender reassignment, HIV status, religious or political beliefs, social class, trade union activity or any other grounds.

**Harassment** - Acts of harassment are often, but not always, discriminatory. Harassment is any action (verbal or non-verbal), which adversely affects a persons' privacy, dignity or self-respect in the workplace and includes acts of bullying. Examples of harassment and/or discrimination. These examples are not exhaustive but give a clear indication of the types of behaviours that are not acceptable.

- The use of threatening or intimidating behaviour,
- Excessive and unfounded personal or work criticism,
- Humiliating, patronising or sexually explicit comments,
- Unnecessary and unwanted bodily contact,
- Comment, malicious or otherwise, that causes personal embarrassment,
- Sending of offensive or obscene images through e-mail or via the Internet,
- Victimisation or discrimination of a person who has exercised a right under a statutory duty.

## 20. Employee Concerns and Members

It is not appropriate for Rivermead Inclusive Trust employees to lobby councilors on matters of individual concern about their employment and members should discourage employees from making such approaches. A member of staff who is unhappy about a matter affecting them personally should be encouraged to take this up with the Headteacher/Head of School. If they are not happy with the response the next step is to talk to their trade union or staff representative. Rivermead Inclusive Trust's grievance procedure is available if informal methods have not resolved the issue.

**Relationships with Contractors** - The award of work or contracts on behalf of Rivermead Inclusive Trust should be made on merit alone and should be free from any implications of

favour or external influence. You must therefore declare to the Headteacher/Head of School any relationship, be it business or personal with a current or possible future outside contractor/supplier. This is especially true if you are involved in any way with a tendering process. If you discover a conflict of interest, declared or otherwise, you should not take part in that process and declare your reasons to your manager.

## 21. Corruption & Fraud

Because we are funded from the “public purse” we are continually under scrutiny from a number of sources about how we spend the money allocated to us. Rivermead Inclusive Trust has developed comprehensive financial practices and procedures to help ensure that acts of fraud or corruption are not committed against Rivermead Inclusive Trust. If you have responsibility for managing or dealing with Rivermead Inclusive Trust finance the content of the policy should be familiarised with, as you should be aware that decisions you make will always be open to scrutiny especially where they could be seen to benefit yourself or others (e.g., family or friends).

Anyone committing an act of fraud or corruption will damage the integrity of Rivermead Inclusive Trust and of those they work with. If you suspect or see actions which may lead to an accusation of fraud or corruption it is in everyone’s best interests for you to tell the Headteacher/Head of School immediately. If for any reason you feel unable to talk to the Headteacher/Head of School, you may wish to use Rivermead Inclusive Trust’s Whistleblowing Policy.

**Corruption** - Corruption is the receipt or giving of any gift, loan, fee, reward or advantage for doing or not doing anything that shows favour or disfavour to another person whilst working in an official capacity, and could be a serious criminal offence. Anyone offered an inducement (in whatever form) to undertake an action or decide in favour of another person, regardless of whether the same decision would have been made without the inducement, could be deemed as committing a corrupt act. If an allegation of corruption is made against an employee, it will be up to the individual to demonstrate that any rewards or favours received have not been received corruptly. Remember, the best course of action is always to be as open as possible and to seek advice if you are unsure.

**Fraud** - is the obtaining of some benefit (monetary or otherwise) through false representation and is also a criminal offence. Examples of fraud could be:-

- Receiving funds from Rivermead Inclusive Trust for a specific purpose e.g., a car loan, and using the money for other purposes.
- Being party, directly, or indirectly, to claims for benefits to which you or another party is not entitled.
- Falsely obtaining expenses, allowances, or sick pay to which you are not entitled.

**Debts to Rivermead Inclusive Trust** - One way in which fraud or corruption can be inferred is if you or a close relation (spouse, partner, relative or a close personal friend),

have substantial outstanding debts to Rivermead Inclusive Trust (unless authorised i.e., car or relocation loans). In order to ensure that you are protected from potential accusations you should declare to your manager any such debts, especially if you have access to information or the opportunity to exploit procedures which relate to those debts.

Acts of alleged corruption or fraud by employees will be subject to an audit investigation, which may involve police involvement. This will also involve a disciplinary investigation which may lead to disciplinary action and in some cases, dismissal.

## 22. Use of Council/School Resources

Rivermead Inclusive Trust has a responsibility to ensure that all its resources are used in the service of the public and the local community and not for the personal use of employees. We all have a duty to ensure that care is taken in using Rivermead Inclusive Trust resources and that public funds are spent efficiently.

The occasional use of Rivermead Inclusive Trust Resource for a private purpose, for example a short local telephone call, is acceptable. In some areas there are arrangements in place for any private use of Rivermead Inclusive Trust resources to be paid for and these must be used where applicable. However, Rivermead Inclusive Trust resources must not be used for private work or for personal gain. If you use any Rivermead Inclusive Trust resource for an agreed private purpose it should be done outside your paid hours of work.

The permanent or temporary loan of some forms of equipment, in particular laptop computers, could be deemed as a taxable personal "benefit" under Inland Revenue regulations. All School equipment on loan to an employee must be used solely for business purposes. The private use of this equipment may mean you incur personal tax liability for the "benefit" gained.

**Internet** - The Internet is available to provide individuals or departments with significant advantages in both gaining and providing information relevant to the work or services provided by Rivermead Inclusive Trust. Internet access is not provided for personal entertainment. The use of the Internet to conduct personal business and in particular the viewing or downloading of material, which is obscene or could offend others, regardless of whether it is seen by others, is not acceptable. Access to gaming, gambling, internet chatrooms is also considered unacceptable. Rivermead Inclusive Trust will not accept any responsibility for monies lost through internet transactions.

**E-Mail** - E-mail systems can greatly speed up communication inside and outside Rivermead Inclusive Trust, however communications by e-mail can be legally binding and it should be used in a responsible and professional manner. You should not use the system to send messages which are defamatory or divulge confidential information.

Messages that could be seen as offensive or obscene could be deemed as harassment or discrimination.

**Internet personal webspace (blogs/social networking sites)** - Employees should be clear that the use of the internet to comment on Rivermead Inclusive Trust or members of staff or volunteers may result in disciplinary action and potentially legal action on a collective or individual basis.

**Use of Personal Credit Cards** - On occasions you may be required to purchase goods or services for Rivermead Inclusive Trust. In order to protect individuals from accusations of fraud in collecting of benefits such as air miles or “points”, payment for such goods and services should be made by Rivermead Inclusive Trust through invoicing or obtaining a travel warrant etc. Rivermead Inclusive Trust recognises that this may not always be possible. However, you should use caution when using a personal payment card to buy goods or services for Rivermead Inclusive Trust or its clients.

**Use of “Loyalty” Cards** - Where you can reasonably be expected to pay for goods or services on behalf of Rivermead Inclusive Trust or its clients you should not use “loyalty” cards to gain benefits in cash or kind from those purchases as this may be treated as defrauding Rivermead Inclusive Trust or client of that benefit.

## 23. Contact with the Media

Dealing with the media requires specific skills and an in-depth knowledge of the workings of Rivermead Inclusive Trust and the press. It is not always possible to know exactly how the press will represent individuals and so to protect you from potential embarrassment or misrepresentation, and Rivermead Inclusive Trust from potentially bad press coverage only authorised staff can speak, write or give an interview or information to the media.

If you receive a request for information or comment from any form of media, from local papers to national television, it must be referred to the Media and Communications department. They will then authorise and brief nominated individuals to provide a response.

Only authorised persons should have contact with the media in relation to the business of Rivermead Inclusive Trust. As a school we are sometimes required to make hard decisions that are unpopular with sections of the local community and may even conflict with what you personally believe to be right. Such decisions are taken after lengthy consideration and in light of all the available facts. Whatever your personal feelings about the decisions made by Rivermead Inclusive Trust you must not leak information to the media either directly or by careless comment. Any such leaks to the media will be considered a disciplinary offence. If employees have any cause for concern over a Rivermead Inclusive Trust matter, they should use the Whistleblowing Policy so that the

concern can be dealt with appropriately and the employee “blowing the whistle” remains protected under the Public Interest Disclosure Act (1998).

The Rivermead Inclusive Trust expects the highest standard of professionalism and professional behaviour at all times. Some of these are highlighted above, however, the list is not exhaustive. If any members falls below the very highest standards expected by the Trust, then they will be subject to the Trust Disciplinary Policy which can be found on the Rivermead Inclusive Trust website.

## **24. Data Protection**

Regarding personal and sensitive data, staff members are required, under the UK GDPR and the Data Protection Act 2018, to:

- Consider the legal basis for collecting the data, ensuring that this is documented.
- Ensure that the data is stored on a GDPR-compliant server, and that the data is not held for any longer than necessary.
- Securely dispose of the data when the relevant retention period ends.

Staff members will not disclose sensitive information about the school, its employees or the LA to other parties.

The only exception whereby it is acceptable for a staff member to disclose information that would otherwise be considered confidential is when the confidential information gives rise to concerns about the safety or welfare of a pupil.

Staff members have the right to request access to data that is held about them. Such requests will be made to the headteacher in writing in accordance with the school’s Data Protection Policy.

## **25. Equality Impact Assessment**

Under the Equality Act 2010 we have a duty not to discriminate against people on the basis of their age, disability, gender, gender identity, pregnancy or maternity, race, religion or belief and sexual orientation.

This policy has been equality impact assessed and we believe that it is in line with the Equality Act 2010 as it is fair, it does not prioritise or disadvantage any pupil and it helps to promote equality at this school.