



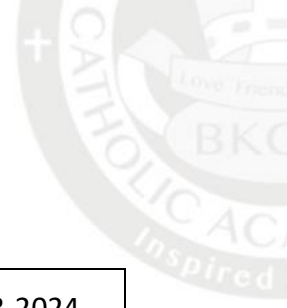
The Bishop Konstant Catholic Academy Trust

Learning Communities, Inspired by Faith

Trust Staff Code of Conduct 2023-2024



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POLICY DOCUMENT	Trust Staff Code of Conduct 2023-2024
Legislation/Category: School Schools	Legally Required
Lead Member of Staff:	Trust Head of HR
Approved by:	BKCAT Trust Board
Date Approved:	March 2023
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All policies are written in line with our Mission:

With Jesus Christ at the centre of the life of the Trust, we seek to provide learning communities offering the highest possible standards of education. We are committed to working in partnership and trust for the common good. We strive to encourage and empower children and young people to recognise and realise their God-given potential and to discern their vocation in life. As learning communities inspired by faith, we celebrate achievement, offering each other challenge and support, as together we follow Christ in self-giving love and service.



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1. Legislation

In line with the statutory safeguarding guidance [Keeping Children Safe in Education](#), we should have a staff code of conduct, which should cover low-level concerns, allegations against staff and whistle-blowing, as well as acceptable use of technologies (including the use of mobile devices), staff/pupil relationships and communications, including the use of social media.

2. Scope of the Code of Conduct

This Code of Conduct applies to all staff of the Bishop Konstant Catholic School Trust. This Code is aimed at ensuring all staff are aware of the standards of conduct and behaviour expected of them by the Trust and Academy councils¹.

By creating this Code of Conduct we aim to ensure our Trust schools and offices are environments where everyone is safe, happy and treated with respect. Whilst this Code refers to employees of the Trust reporting actions to the Headteacher, where an employee is the Headteacher of an School, this should be read as the Headteacher reporting actions to the Chair of Trust Board and / or Chair of Academy council.

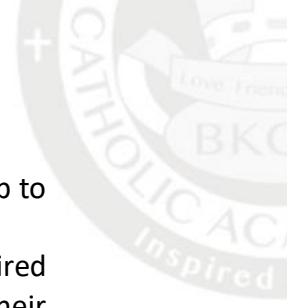
Where the Code refers to Academy council, this should be read as Rapid Improvement Group (RIG) or Trust Intervention Board (TIB) where the school does not have an Academy council.

3. Key Principles

- a. The public are entitled to expect the highest standards of conduct from all employees who work in the Trust and its schools.
- b. The Trust and Academy councils are committed to ensuring children and young people are supported and safe. The Trust and Academy councils have a commitment to the safeguarding of children and young people and promoting their welfare and expects all staff to share this commitment.
- c. The Trust, Academy councils and Headteachers will ensure that this Code is followed by all employees in the Trust and its schools and will deal with any breaches of this Code.
- d. Failure to follow the standards set out in this Code should be regarded as a serious issue, and any breach could lead to management action being taken against an employee under the Trust Disciplinary Policy and Procedure. Any disciplinary

¹ This Code does not override any provisions within the following, if the Code is inconsistent with them:

- School Teachers' Pay and Conditions Document;
- Conditions of Service for School Teachers in England and Wales;
- Any other applicable legislation affecting or regulating a teacher's employment.



action will be that considered appropriate in the circumstances of a breach, up to and including summary dismissal.

- e. The Trust and Academy councils recognise that some employees will be required to work to their own Professional Code(s) of Conduct when carrying out their duties. In exceptional circumstances there could be a conflict between this Code and the requirements of a Professional Code of Conduct. In such circumstances employees must discuss the conflict with the Headteacher or CEO in the case of Trust central team staff before taking any action(s) which could be contrary to this Code.

NOTE: This Code of Conduct is not exhaustive. If situations arise that are not covered by this code, staff will use their professional judgement and act in the best interests of the school and its pupils.

4. Core Values, Conduct and Standards

BKCAT has the presence and power of Jesus Christ at its centre. It is a community of academies which is governed by Gospel Values and where Christ's command for us to love God, and to love one another, is central to all we do.

Through the clear, visual Catholic identity, our vision for Catholic education is fulfilled through the educational experiences and personal curriculum we provide for our children.

Prayer and Worship are at the heart of day to day life within our School and it is our desire for each child's journey of faith to celebrate their unique gifts and talents, made in the image and likeness of God.

BKCAT and its academies have strong and positive relationships with the wider community. Links between our academies, home and our parish communities, are also significant and central to our mission to serve the Church and create the family feeling of 'belonging'.

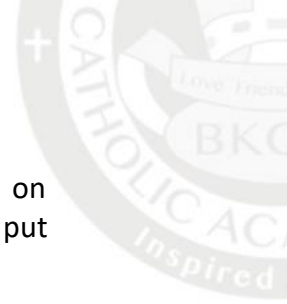
This Code reflects the Trust and Academy councils' core values and behavioural expectations of employees, which are as follows:

4.1 Core Values

Respect for All

Every employee will be polite and supportive to each other. Everyone's contributions will be valued and employees will listen to other and be sensitive to their position.

Ambition



Every employee will set high standards and aim to continually improve. Feedback on performance will be sought and acted upon and employees will be encouraged to put forward new ideas to support further improvements to School development.

Integrity

Every employee will, in acting as an ambassador for the Trust and its schools, maintain high standards of personal conduct demonstrated through an honest, open, impartial and tolerant approach when dealing with pupils, colleagues, parents, members of the public and other organisations.

4.2 Standards

- a. Employees are expected to give the highest possible standard of service to the community which the Trust and academies serves. This includes maintaining high standards in their attendance and punctuality.
- b. Employees are expected to make the appropriate level of management aware of any deficiency in the provision of service. This will be through agreed procedures and without fear of recrimination.
- c. Employees must be aware of this Code of Conduct and ensure they adhere to the principles when dealing with all stakeholders, including pupils, parents, staff, Governors, outside agencies and other members of the community that the School serves.
- d. It is the duty of each employee to report to an appropriate senior member of staff or the Trust, any impropriety, breach of procedure, unlawfulness or maladministration.
- e. Employees must be aware of the Trust Whistleblowing Policy which gives support and protection for any employee who reports any wrongdoing, including impropriety, breach of procedure, unlawfulness or maladministration.

5. Disclosure of Information

- a. The law requires that certain types of information must be available to members, auditors, government services, pupils and the public. The Trust Board and Academy councils may decide to be open about other types of information. Employees must be aware of which information the Trust Board and Academy council are not open about, and act accordingly. If an employee is not sure they should ask for guidance from the Trust or Headteacher.
- b. Employees must not use any information obtained in the course of their employment for personal gain or benefit, nor must they pass it on to others who might use this information in such a way.
- c. Employees must adhere to the Data Protection Act 2018 and the EU General Data Protection Regulation 2018 (GDPR) at all times and specifically not disclose personal information about other employees or a member of the public, including pupils and parents, to a third party without their agreement to do so (unless exempt under the Act).



6. Political Neutrality

- a. Employees have responsibility to the School and Trust as a whole. It follows that they have responsibilities to the Academy council and must ensure their individual rights are respected.
- b. Where employees are required to advise the Trust or Academy council, they must do so in ways which meet the ethos of the Trust, and which are balanced to reflect their political neutrality.
- c. Employees, regardless of political restrictions, must follow every policy the Trust and School has adopted and must not allow their own personal or political opinions to interfere with their work.

7. Relationships, Employment and Other Employee Matters

7.1 Relationships

For the purpose of this section, a personal relationship includes, but is not limited to:

- A personal friend or mentee / mentor or similar;
- A former / current business associate;
- A current or previous non co-habiting partner, partner by marriage, civil partnership, or co-habiting arrangement;
- Immediate family members including those not related through blood;
- Extended family members including those not related by blood.

Academy council

School based employees are responsible to the Trust via their Headteacher and Academy Council. Trust based employees are responsible to the Trust via the CEO. The role of some employees is to give advice to the Trust or Academy Council.

The Local Community

Employees must always remember their responsibilities to pupils and the communities that the Trust and School serve and must at all times ensure courteous, efficient and impartial service delivery to all groups and individuals within those communities as defined by the policies of the Trust and Academy council.

Pupils

Where a pupil is a member of an employee's family, immediate or extended, including those not related through blood, or the child of a close personal friend of the employee, the employee must inform the Headteacher/CEO of this personal relationship. The Headteacher will then determine the most appropriate arrangements regarding that employee's professional relationship with the pupil.



Contractors

Employees must inform the Headteacher of all personal relationships of a business or private nature with external contractors, or potential external contractors. The Headteacher will then determine the most appropriate arrangements regarding that employee's professional relationship with the contractor or potential contractor. Orders and contracts must be awarded on merit, by fair competition, against other tenders. Special favours must not be shown in the tendering process to businesses run by, for example friends, partners or relatives of employees. No part of the local community should be discriminated against.

Employees who engage with, supervise or have any professional relationship with external contractors, or potential external contractors, and have previously had or currently have a personal relationship with the contractor must declare that relationship to the Headteacher. The Headteacher will then determine the most appropriate arrangements regarding that employee's professional relationship with the contractor or potential contractor.

Employees must not engage the relatives or friends of any school employee to undertake paid remedial, or other minor, work within the School without completing an auditable tendering process.

Other Employees

Employees must declare any personal relationship with other employees of the Trust or School to the Trust or Headteacher to enable early consideration about whether such a relationship could cause, or be perceived to cause a conflict of interest. Should a conflict of interest be identified, there may be a need to consider the possibility of alternative employment or a change of duties.

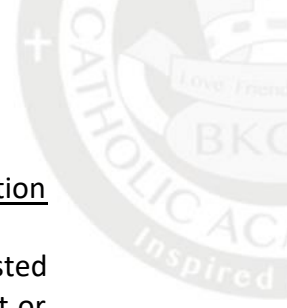
Employees must treat colleagues with courtesy and respect. Verbal or physical abuse, bullying and insubordination to colleagues will not be tolerated.

Academy council

Where a member of Academy council, including the Chair of Academy council, is a member of an employee's family, immediate or extended including those not related by blood, employees must inform the Headteacher/CEO of this personal relationship. The Headteacher will then determine the most appropriate arrangements regarding that employee's professional relationship with Academy council.

Headteacher

The Headteacher must inform an appropriate committee of the Trust or Academy council of any personal relationship they have with any pupil, other employee or member of Academy council. Academy council should consider any declaration and potential conflict of interest to take appropriate action(s) to mitigate any perceived conflicts.



Her Majesty's Inspectorate of Education (HMIE) / Office for Standards in Education Inspectorate (Ofsted)

Employees, who are in a personal relationship with any member of the HMIE / Ofsted Inspectorate, must declare a conflict of interest if that person is involved in an audit or inspection of the school within which they are employed.

7.2 Appointment and Other Employment Matters

- a. All employees involved in the appointment of staff must make sure that appointments are made on the basis of merit. It would be unlawful for an employee to make an appointment based on anything other than the ability of the candidate to do the role. To avoid any possible accusation of bias, employees must not be involved in an appointment where they have a personal relationship with the applicant. All instances where an employee has to withdraw from a recruitment process due to a personal relationship must be reported to the Headteacher, where this is the Headteacher, this must be reported to the Head of HR before proceeding with the recruitment process.
- b. Similarly, employees must not be involved in decisions relating to discipline, appraisal, promotion or pay adjustments for any other employee with whom they are in a personal relationship.

8. Outside Commitments

- a. Support staff employed on NJC Terms and Conditions above Grade 7 (spinal column point 23) are required to obtain written consent from the Headteacher to take any additional employment and / or unpaid / voluntary work and / or self-employment such as consultancy work. Such consent should not be withheld without a good reason e.g. would have a negative impact on the interests of the School.
- b. Employees, regardless of grade and / or position, should be clear about their contractual obligations and should not take any additional employment and / or unpaid / voluntary work and / or self-employment which conflicts with the Trust or School or those of the Academy council.
- c. Employees taking additional employment and / or unpaid / voluntary work and / or self-employment must notify the Headteacher and ensure that the total number of hours worked in a week is not, or is not perceived to be, a risk to their own or their colleagues' health and safety. Specifically, the Trust Board and Academy council expect employees to notify the Headteacher of any additional employment and / or self-employment which may result in their total working time going above an average of 48 hours a week. The Headteacher will notify the Academy council of such additional employment and / or unpaid / voluntary work and / or self-employment.



- d. An employee's declaration of additional employment does not remove the right of the Academy council to take action against any employee if that additional employment and / or unpaid / voluntary and / or self-employment is deemed to be, or has been, detrimental to the Trust or School interest or reputation or where it affects the employee's work performance at the school.
- e. The use of Trust or School employees and resources (e.g. computers, telephone, photocopier, etc.) for non-work related purposes is forbidden unless appropriate arrangements are made and approval is given by the Headteacher of the School. Communication relating to additional employment is not permitted during contractual hours.
- f. Employees must seek permission and negotiate with the Headteacher/CEO before taking ownership of intellectual property or copyright. Employees must follow the Trust and Academy council's rules on ownership of intellectual property or copyright created during the course of their employment. Intellectual property is a generic term that includes inventions and patents, creative writing and drawing, teaching materials including hand-outs, PowerPoint presentations on-line resources etc. and pupils work including progress and achievement records. Intellectual property or copyright are the sole and exclusive property of the Trust and Academy council as appropriate in the circumstances. Employees are advised to consult the Headteacher if they have any doubts as to whether their materials are exempt from these provisions prior to their leaving the School.
- g. Employees are sometimes requested to give presentations / advice using their professional skills and expertise, for organisations other than the Trust or School. If the work is done as an official work duty, the employee must ensure the Trust or Academy council receives any fee paid.
- h. If the work is not done as an official work duty, the employee may keep any fee paid, provided that the preparation and the presentation / advice is done in the employee's own time and the employee is not acting as a representative of the Trust or Academy council.

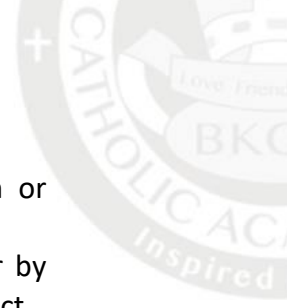
9. Personal Interests

- a. Employees who influence or are responsible for funding, contracting, procurement or purchasing decisions within the School or Trust must declare to the Trust or Headteacher, any personal financial or non-financial interests that may be deemed to conflict with the Trust or Academy council's interests.
- b. Personal interests are defined within the Trust Declarations of Interest Policy and include, for example, an involvement in a professional capacity with an outside organisation which has dealing with the Trust or School interests, e.g. grant



requests. Please refer to the Trust Declarations of Interest Policy for further details and registration form. This document must be completed by employees on an annual basis in the autumn term. Any new appointees who join the Trust or School during the academic year must complete the document at the time of their appointment.

- c. Where an employee has declared an interest the Trust or Headteacher will convey details of that interest on the Register of Business Interest under the authority of the Board or Academy council to ensure that the interest is fully considered and any necessary action taken to avoid a situation of potential conflict.
- d. Where an employee is involved, directly or indirectly, in any procurement process (formal or informal), a Registration of Interest must be completed if one of the companies / individuals submitting a quote is connected in any way to that employee. This should also apply to any employee who may not be directly or indirectly involved in the procurement process but who may be able to influence the outcome of that process.
- e. The Trust and Academy council respect the rights of employees to a life outside work but do require employees to clearly separate their employment from activities in their private life. Employees must only present their views or act on issues outside work (e.g. communications with the media or as a member of a pressure group) as a private individual. Employees must ensure that when engaging in such activities it is clear that they are not seen as a representative of the Trust or School but as private individuals.
- f. Employees are expected to raise concerns about work-related issues through the Trust or Academy council's appropriate procedures (including via trade unions). It is not acceptable for employees to pursue work-related issues which affect them as a private individual, where there is a conflict between their private interest and their contractual duties as a Trust employee.
- g. All activities undertaken by employees during working hours must assist and / or support, not conflict with, the work of the Trust, School and Academy council. For example, during contractual hours employees must not persuade community groups to come to a view which is contradictory to the accepted Trust or Academy council view. This paragraph does not restrict employees having the right to legitimate protest on issues relating to their security of employment or changes to their conditions of service.
- h. Employees should declare membership of any secret societies to the Trust or Academy council, via the Headteacher. The definition of secret society is as follows: "Any lodge, chapter, society, trust or regular gathering or meeting" which:
 - i. is not open to members of the public who are not members;



- ii. includes a requirement to make a commitment (whether by oath or otherwise) of allegiance in order to gain membership;
- iii. includes, whether initially or subsequently, a commitment (whether by oath or otherwise) of secrecy in regard to rules, membership or conduct.

10. Equality Issues

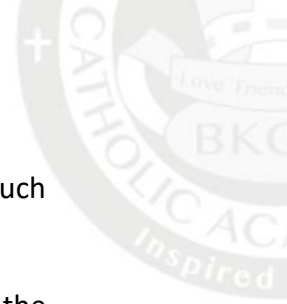
- a. The Trust is an equal opportunities employer and employees must ensure they are aware of, and comply with, all workplace policies relating to equality issues.
- b. All members of the community that the Trust and School serves, pupils and colleagues have a right to be treated with fairness and equality.
- c. Employees must be familiar with the Trust and / or Academy council policy on discrimination and harassment and ensure they treat all members of the community that the School serves, pupils and colleagues with dignity and respect.
- d. If employees consider that they have been subject to discrimination and / or harassment in the course of their employment, they must report this to their appropriate manager or Headteacher, at the earliest opportunity so the concerns can be investigated and responded to as appropriate.

11. Tendering, Corruption and Financial Information

(Refer to the Trust Financial Handbook for further detail which can be found on the Trust website)

11.1 Separation of Roles during Tendering

- a. Employees involved in the tendering process and dealing with external contractors must be clear on the separation of client and contractor roles within the Trust or School. Where tendering involves an in-house contractor, employees must be mindful of the need for accountability and be aware of the Trust's commitment to providing best value at all times. Employees who have both client and contractor roles must be aware of the need for equality.
- b. Employees must exercise fairness and impartiality when dealing with all customers, suppliers, other contractors and sub-contractors.
- c. Employees who have access to confidential information on tenders or costs for internal or external contractors must not disclose that information to any unauthorised party or organisation.
- d. Employees must ensure that no special favour is shown to current or recent former employees or anyone with whom they are in a personal relationship with



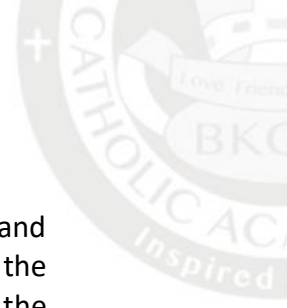
when awarding contracts to businesses run by such persons or in which such persons are employed in a senior or relevant managerial capacity.

- e. Employees must not purchase items and / or services for personal use through the Trust or Academy council's contracts with external contractors.

11.2 Corruption, Fraud and Theft

- a. It could be a disciplinary and maybe a criminal offence for employees, in their professional capacity, to corruptly receive or give any gift, loan, fee, reward or advantage for doing, or not doing, something or showing favour or disfavour to any person. If an allegation is made the employee must be able to show that any benefit has not been dishonestly gained and such conduct will be considered under the Trust's Disciplinary Policy and Procedure.
- b. The deliberate falsification of documents is not acceptable. If an employee does this for money or other financial benefit for themselves or others it may be regarded as a criminal offence requiring police investigation as well as being deemed a serious breach of this Code of Conduct which will be given appropriate consideration in accordance with the Trust Disciplinary Policy and Procedure. If this is done for a non-financial benefit (e.g. failure to record contractual hours not worked) it will be regarded as a serious breach of this Code of Conduct which again will result in the matter being considered in accordance with the Trust Disciplinary Policy and Procedure.
- c. Theft of the Trust or School's funds or property is considered gross misconduct under the Trust Disciplinary Policy and Procedure and may be reported to the Police. Borrowing Trust, Academy council or School money, even when the employee has every intention of returning it within a very short space of time, is also considered as theft.
- d. Any employee committing a fraudulent act against the Trust or School or found to be involved with bribery in the performance of their duties will be subjected to the Trust Disciplinary Policy and may be reported to the Police (whether or not the act is outside of their direct employee role). For instance Benefit fraud, the misuse of a Blue Badge, submitting a false Insurance Claim against the Trust, Council Tax evasion, Council Tax Support fraud, falsely claiming Single Person's Discount, misuse of a Personal Budget, or other care services financially supported by the Local Authority, are all offences against the Trust that can be committed by employees outside of their direct role and which are likely to be subject to investigation under the Trust Disciplinary Policy. The action taken by the School's managers in relation to such conduct from employees will be entirely separate to any criminal sanction which may be pursued by the police.

11.3 Use of Financial Information



- a. Employees must ensure that they use these public funds in a responsible and lawful manner at all times. They must strive to ensure value for money to the community that the Trust and School serves and to avoid legal challenge to the Trust or Academy council.
- b. The application of financial regulations safeguard the Trust and / or the School's assets and use of financial and other resources. Employees must comply with these regulations when using and collecting public funds. When placing orders for goods and services employees must ensure that all rules are complied with, in particular the ESFA Financial Handbook for financial and contractual procedures rules.

12. Safeguarding of Children

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

Staff will familiarise themselves with our child protection and safeguarding policy and procedures, and the Prevent initiative, and ensure they are aware of the processes to follow if they have concerns about a child.

Each of our schools has a child protection and safeguarding policy and procedure which are available in each school and on each school website. New staff will also be given copies on arrival.

Safeguarding of children must always be a priority. Within this document there are references to 'pupils'. This is a generic term which applies to any child under 18 years of age, current and ex-pupils. The Trust and School are wholly committed to ensuring that the statutory guidance contained in 'Keeping Children Safe in Education' is fully implemented.

12.1 Position of Trust

Under section 16 of Sexual Offences Act 2003 it is an offence for a person aged 18 or over (e.g. teacher) 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. A situation where a person is in a position of trust could arise where the child is in full-time education and the person looks after children under 18 in the same establishment as the child, even if they do not teach the child.

12.2 Responsibilities

It is important to highlight the responsibilities of the School and its employees in safeguarding pupils who depend on the School's services. All staff must be aware of and understand the School's Safeguarding Policy.



Employees and managers in the School have a responsibility to create and maintain a culture that will help deter, prevent and detect inappropriate or abusive behaviour. These responsibilities include:

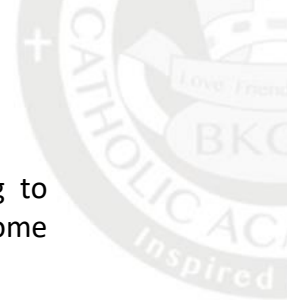
- ensuring effective policies and procedures are in place;
- following the Trust Safer Recruitment Policy with regard to the recruitment of staff;
- setting acceptable standards of behaviour;
- taking concerns seriously;
- increasing awareness / commitment to safeguarding;
- adherence to the guidance included within the document 'Guidance for safer working practice for professional working in education settings' (which can be found at www.saferrecruitmentconsortium.org)
- reporting all safeguarding issues resulting in the termination of an employee's contract of employment to the DBS (and where appropriate the National College for Teaching and Leadership, or other professional body)

All behaviour or action on the part of employees will be open to scrutiny. This will include any conduct, behaviour, and / or relationships that may occur outside of the work role / place where it is felt that it conflicts with their role in the School. Any behaviour or action between employees and children which involves secrecy is almost certainly inappropriate and is likely to constitute a serious breach of this Code of Conduct which will be given appropriate consideration in accordance with the Trust Disciplinary Policy.

Employees are expected to report any incidences that suggest a child may be infatuated with another member of staff, in accordance with 'Keeping Children Safe in Education'.

12.3 Boundaries between Personal and Professional Relationships with Pupils

- a. The School's duty of care towards its pupils must always be placed above all other interests and all employees must act in this duty.
- b. An employee must not compromise their relationship with pupils by pursuing conflicts of interest such as unprofessional, emotional or physical interaction and / or sexual interaction.
- c. Employees must ensure appropriate boundaries in terms of relationships with pupils are maintained. If an employee has difficulty enforcing or maintaining appropriate boundaries in terms of their professional relationship with a pupil because of the actions or responses of the pupil themselves, the issue must be referred to the Headteacher immediately to allow appropriate action to be taken and recorded.



- d. Employees must understand the importance of establishing and adhering to boundaries to avoid being open to allegations of favouritism towards, or in some cases abuse of a pupil.
- e. The following examples of prohibited behaviour which fall outside the boundary of what is acceptable behaviour with regard to maintaining a professional relationship with pupils. This list is not exhaustive but indicative of behaviour deemed to be unacceptable:
- Sexual relationships;
 - Kissing and intimate touching;
 - Other types of inappropriate physical contact (e.g. tickling and 'rough play');
 - Indicating affection or love for a pupil;
 - Planned or pre-arranged social meetings in public or in private which are not directly related to the duties and responsibilities of the employee e.g. employees accompanying pupils on an outing;
 - Using illegal drugs with a pupil;
 - On-line (internet) contact with pupils which is of a social nature, such as becoming 'friends' on social networking sites;
 - Contact with pupils of a social nature using electronic communication systems such as email, text messaging, web cameras or mobile phones;
 - Inviting pupils into an employee's home;
 - Transporting pupils in their private vehicle (other than in circumstances described in 9.4 below).
- f. Employees assisting pupils to break the laws in relation to the use of cigarettes, alcohol and / or illegal drugs will be deemed to have committed a serious breach of this Code of Conduct which will be given appropriate consideration in accordance with the Trust's Disciplinary Policy.
- g. If an employee reasonably suspects another employee is acting contrary to the provisions set out above they must report this to the appropriate person in school as referred to in the School's Safeguarding Policy immediately. Employees may also refer to the Trust Whistleblowing Policy.
- h. Employees will be expected to report any serious or ongoing issues linked to safeguarding responsibilities to the appropriate Trust authority for their consideration including matters arising from an individuals' domestic circumstances e.g. if an immediate member of their household is subject to an investigation of alleged child harm. Similarly, all employees are expected to remain vigilant and where appropriate report any concerns as required under the Prevent Duty with regard to the potential radicalisation of children.



12.4 Allegations that may meet the harm threshold

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

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

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

We will deal with any such allegation quickly and in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

The Trust or School must report such concerns to the Local Authority Designated Officer (LADO) within Children and Young Peoples Service of the relevant Local Authority for the school, in order that the matter be considered and action taken where required.

This is in line with the current statutory guidance 'Working Together to Safeguard Children' 2018

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779401/Working_Together_to_Safeguard-Children.pdf

We have schools within four local authorities and safeguarding information applicable to each authority is available as outlined below:

Wakefield: www.wakefieldscp.org.uk

North Yorkshire: www.safeguardingchildren.co.uk

Leeds: Keeping children safe: www.leedsscp.org.uk

East Riding: www.erscp.co.uk

The Trust Allegations Against Staff Policy and Procedure provides more detail.

12.5 Low-level concerns about members of staff

A low-level concern is a behaviour towards a child by a member of staff that does not meet the harm threshold explained in 11.4 above, is inconsistent with the staff code of conduct, and may be as simple as causing a sense of unease or a 'nagging doubt'. For example, this may include:



- Being over-friendly with children
- Having favourites
- Taking photographs of children on a personal device
- Engaging in 1-to-1 activities where they can't easily be seen
- Humiliating pupils

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

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.

All reports will be handled in a responsive, sensitive and proportionate way.

Unprofessional behaviour will be addressed, and the staff member supported to correct it, at an early stage.

This creates and embeds a culture of openness, trust and transparency in which our values and expected behaviour are constantly lived, monitored and reinforced by all staff, while minimising the risk of abuse.

Reporting and responding to low-level concerns is covered in more detail in our Trust Allegations Against Staff Policy and Procedure available from school and Trust central team offices.

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

12.6 Whistle-blowing

Whistle-blowing reports wrongdoing that it is “in the public interest” to report. Examples linked to safeguarding include:

- Pupils’ or staff’s health and safety being put in danger
- Failure to comply with a legal obligation or statutory requirement
- Attempts to cover up the above, or any other wrongdoing in the public interest

Staff are encouraged to report suspected wrongdoing as soon as possible. Their concerns will be taken seriously and investigated, and their confidentiality will be respected.

Staff should consider the examples above when deciding whether their concern is of a whistle-blowing nature. Consider whether the incident(s) was illegal, breached statutory or school procedures, put people in danger or was an attempt to cover any such activity up.

Our Trust Whistleblowing Policy and Procedure can be found on the Trust website.



12.7 Transporting children

- a. Employees should not ordinarily transport children outside of the regular requirements of their role. The exception to this would be if a child were at risk or danger of harm, or, by not doing so would put the child at risk of danger or harm.
- b. Approved journeys should not be undertaken without prior agreement and a plan in place to do so safely which has been subject to an appropriate risk assessment.
- c. Where the circumstances of the occasion / incident involve transporting a child alone, the journey should be for the minimum time possible, and employees are expected to notify their manager of the circumstances of the incidence including the nature, route and time of journey.
- d. The child's welfare remains the responsibility of the employee during any such journey and all applicable professional standards and procedures apply until the child can be safely handed over to a responsible adult and the child's welfare is safely discharged. See also 14.2 Driving at Work.

12.8 Childcare (Disqualification) Regulations

All employees providing early years childcare, or later years childcare (up to the age of 8) in before school or after school settings (or other non-classroom settings), or who are directly responsible for managing such childcare as defined by the **The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018** must make an affirmation, every 5 years, that they are not disqualified from working in these settings.

Employees must bring to the attention of their manager any criminal convictions, cautions, police enquiry or pending prosecution during the course of their employment. An assessment will then be made as to whether the employee is disqualified from working with children in these specific settings. Any decision taken to disqualify an employee can be subject to a waiver being sought from Ofsted albeit the disqualification will remain in force pending Ofsted's decision. Employees will be reminded of this requirement on a regular basis. Further information about the disqualification criteria is available from the Headteacher.

Whilst the reference (within the Regulations) to disqualification by association to another person living in the employee's household no longer applies in the School, before school and after school settings, employees will still have a duty to declare any such relationship in order that appropriate safeguarding measures can be put in place to ensure that such persons do not have access to children in these settings.



13. Gifts, Hospitality and Sponsorship (Refer to the Trust Gifts and Hospitality Policy and Trust Financial Handbook for further detail) which can be found at the Trust central team offices.

13.1 Gifts and Hospitality

- a. It is against the law for public servants to take bribes. Employees need to take care that they do not accept any gift that might be construed by others as a bribe, or lead the giver to expect.
- b. Employees must only accept offers of hospitality if there is a genuine need to pass on information, or represent the Trust and / or Academy council within the community. Similarly, they may attend events hosted by organisations with which the Trust and / or the Academy council and / or School has formal partnership working arrangements if this is seen to be helping to strengthen the partnership. Offers to attend purely social or sporting functions must only be accepted when these are part of the life of the community or where the Trust and / or Academy council and / or School should be seen to be represented. If accepted on this basis, the same must be properly authorised and recorded by the Headteacher prior to the event taking place.
- c. When hospitality has to be declined those making the offer must be politely informed of the Trust and / or Academy council's procedures and standards.
- d. Employees must not accept significant personal gifts from contractors and outside suppliers. Keeping insignificant items of token value, such as pens or diaries, is acceptable. Accepting personal gifts valued up to £25 from outside suppliers or private individuals may be allowed if it is provided for under the Trust's policy, which may supplement the framework set out in this Code.
- e. If an employee receives a gift with more than a value of £25 without warning, it must be reported immediately to the Trust or Headteacher, who will decide in consultation with the Board or Academy council whether the gift should be returned.
- f. When receiving authorised hospitality employees must be particularly sensitive to timing in relation to any decision which the Trust and / or Academy council may be taking affecting those providing the hospitality.
- g. Accepting hospitality by attending relevant conferences and courses is acceptable where it is clear the hospitality is corporate rather than personal and where the Trust and/or Academy council is satisfied that any purchasing decisions are not compromised. Where visits to inspect equipment etc. are required, employees must ensure the Trust or School meets the cost of such visits to avoid risking the integrity of future purchasing decisions.



- h. Employees accepting offers of hospitality are acting as ambassadors for the Trust and / or School. They must act appropriately at all times, including acting responsibly when drinking alcohol.
- i. Care must be taken to ensure that any hospitality provided by the Trust and / or School is seen to be appropriate and justifiable in terms of the costs and value for money. Any spending relating to providing hospitality must be authorised by the appropriate budget holder, who will keep a record of the spending and the justification for it, in a way which allows for an open and transparent audit of such expenditure.

13.2 Gifts from pupils, parents or legal guardians

- a. Under no circumstances must an employee accept a gift of money of any value from pupils, parent or legal guardian.
- b. Under no circumstances must an employee solicit gifts from pupils, parents or legal guardians.
- c. Employees must not have any financial dealings with any pupils, parents or legal guardians except where it is a specific requirement of their post, and then only within the boundaries of their duties.
- d. Employees must not borrow money or other property from pupils, parents or legal guardians.
- e. Employees must not give personal gifts to individual pupils, parents or legal guardians. This could be misinterpreted as a gesture either to bribe, or single out the pupil. It might be perceived that a 'favour' of some kind is expected in return. Any reward given to a pupil must be consistent with the School's Behaviour Policy, recorded and not based on favouritism.
- f. There are occasions when pupils or parents / legal guardians wish to pass small tokens of appreciation to staff (e.g. at Christmas or as a thank you gift) and this is acceptable. Such gifts must be of a very small cash value (below the £25 limit) where it would be difficult to avoid causing offence. It is unacceptable to receive gifts on a regular basis or of any significant value. Where an employee is in any doubt, they must refer the matter to the Trust or Headteacher.

13.3 Sponsorship

- a. When an outside organisation wants to sponsor an School activity, whether by invitation, tender, negotiation or voluntarily, the basic rules about accepting gifts



or hospitality apply. Particular care must be taken when dealing with contractors or potential contractors.

- b. Where the School wishes to sponsor an event, employees or a person with whom an employee is in a personal relationship (as defined in section 4 of this Code), must not benefit in any way without there being full disclosure to the Headteacher of any such interest prior to the event. Similarly, where the Trust and / or School and / or School gives support to the community through sponsorship, grant aid, financial or other means, employees' must ensure that impartial advice is given and there is not a conflict of interest.

14. Contact with the Press and Media (Refer to Trust Media Handling Policy and follow the procedures therein).

- a. Unless specifically nominated and authorised by the Trust or Academy council, employees must not give reports or speak to the press and media on matters relating to employment with the School or the business and / or decisions of the Trust and / or Academy council.
- b. The Trust are responsible for dealing with the press and media. They may specifically nominate other employees. Employees with this responsibility must not give views which are contrary to a position taken by the Trust and / or Academy council or which may be deemed to be critical of such decisions. In the case of incidents at the School which may reach the public domain (e.g. court cases) then the Headteacher is advised to follow the process outlined in the Trust Media Handling Policy.
- c. Nothing in this Code is intended to inhibit or restrict the reasonable and legitimate role of Trade Union representatives but they are bound, in carrying out their role, to honour the intent of the Code. No representative should use unauthorised information in their union roles.

15. Social Media

The Trust and School recognises that many employees make use of social media in a personal and work capacity. While a large amount of activity on social media may be entirely harmless and / or non-work related, concern can arise where postings made by employees in a personal capacity express views which the School would not wish to be associated with.

Staff should not attempt to contact pupils or their parents via social media, or any other means outside school, in order to develop any sort of relationship. They will not make any efforts to find pupils' or parents' social media profiles.



Staff will ensure that they do not post any images online that identify children who are pupils at the school without their consent. Employees should ensure that they are familiar with the Trust Social Media Policy which provides more detailed guidance on the behaviour expected when engaging with social media.

16. Use of Electronic Equipment

16.1 Context

All electronic equipment provided by the Trust or School is for the use of employees in relation to their work or for users not directly employed by the Trust or School but authorised to use the equipment by the Trust or School. Employees should be encouraged to use electronic equipment at work for personal learning and development. All use must, however, comply with the expected standards and restrictions as stated below.

16.2 Standards Expected

- a. The Trust or Academy council require employees to use electronic equipment in a responsible and legal manner. The use of offensive, abusive or inappropriate language in emails or other communications is forbidden.
- b. All material stored on the Trust or School system is confidential and subject to the provisions of the Data Protection Act 2018 and the EU General Data Protection Regulation 2018. The Trust or Academy council expect the highest standards of confidentiality to be observed. Employees must refer to the Trust Records Management Policy and Procedures and clarify any queries about storage and the use of information with the School's Data Protection Co-ordinator or Headteacher, who may refer to the Trust DPO.
- c. User codes and passwords are allocated to allow individuals' access to only those parts of the system that they need to access. User codes or passwords must not be disclosed by employees to any other user, including colleagues.

16.3 Restriction on Use

Use of the Trust or School electronic equipment is strictly forbidden for any of the following purposes:

- Knowingly sending, receiving, accessing, downloading or posting any material that is illegal, obscene, indecent, abusive, racist, sexist, homophobic or libellous, in breach of copyright, defamatory or otherwise inappropriate;
- Pursuing personal business interests;
- Engaging in gambling;
- Knowingly engaging in any activity which threatens the integrity or availability of the Trust or School's systems;



- Using automated internet based information services which push information to the desktop, e.g. news ticker tape services (except for legitimate business use);
- Attempting to breach security systems (hack) whether inside or outside the Trust or School;
- Transmitting, receiving, copying or storing digital media (including software, music, video etc.) except for legitimate purposes in a way that complies with the copyright or licensing regulations;
- Playing computer games, accessing chat rooms or similar entertainment.

Staff will not use personal mobile phones and laptops, or school equipment for personal use, in school hours or in front of pupils. They will also not use personal mobile phones or cameras to take pictures of pupils unless in exceptional circumstances with prior consent of the Headteacher who will then oversee its deletion.

We have the right to monitor emails and internet use on the school IT system.

If employees are in any doubt of usage, they must clarify this with the Trust or their Headteacher.

16.4 Security Clearance for Data Usage

- a. Some posts may require an employee to undertake specific security checks where access to specific electronic channels is a requirement of the post.
- b. If any such employee becomes subject to a criminal conviction, caution, pending prosecution or police enquiry, they must notify the Trust or Headteacher immediately.
- c. Any information provided will be considered within the context of the duties of the post and is essential in helping to safeguard the Trust or School for general safeguarding.

16.5 Personal Use

- a. Internet and information systems are provided for work purposes and their use for work will always take precedence. Some personal use will be allowed but any personal use must be in the employee's own time (before or after working hours or during unpaid lunch breaks). All personal use must comply with the standards and restrictions set out in this Code.
- b. The Trust and / or School's messaging systems (e-mail, SMS etc.) are primarily for business use. Occasional and reasonable personal use is allowed and must, wherever possible, be carried out in the employee's own time (before or after working hours or during unpaid lunch breaks) and must not interfere with the



performance of their duties. All personal use must comply with the standards and restrictions set out in this Code.

16.6 Mobile phones / devices

Personal mobile phones should not be used in the presence of children and therefore should be limited to non-contact time. Calls may only be taken during staff breaks and in the staff member's own time.

Staff should not, under any circumstances have illicit / illegal content on any equipment or personal device they bring into the School.

Emergency contact of employees should be made via the School office, and employees should ensure that their family members, childcare providers etc. have the correct School contact number to use.

The use of cameras on personal mobile devices is strictly prohibited at all times on school premises or educational visits.

An employee may seek *prior approval* from the Headteacher to keep their device available to them during contact time (where a genuine and short term requirement arises, and where the circumstances of the employee mean contact arrangements cannot be handled as per the normal arrangements via school office).

16.7 Photography and images of children

Providing the consent of parents or guardians are obtained, images of children are allowed to be captured in School or during official School trips / outings strictly for professional purposes and use within the School setting only e.g. displays, events, to provide a record of activities or achievement. Such images must only be captured using School devices. All images must be stored securely on Trust and / or School servers.

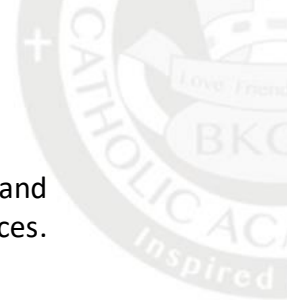
Under no circumstances should images be taken of children on personal devices for personal use, and images must never be circulated / distributed outside of School.

For additional information please refer to the School's Model Safeguarding Policy for further information.

17. Health and Safety

17.1 General

Employees must not act either wilfully or unintentionally in a way which could put pupils, members of the public, colleagues and / or themselves at risk. Employees must adhere to



the duty of care set out within the School's and the Trust Health and Safety policies and associated procedures and guidance, available in the school or Trust central team offices.

17.2 Driving at Work

Employees required to drive a vehicle as part of their contractual duties (hire vehicle or private vehicle) must observe all aspects of the Trust Driving at Work Policy and Procedure, available in the Trust central team offices.

17.3 Smoking

- a. Smoking (or vaping) is prohibited on Trust or School premises and employees must observe all aspects of the Trust No Smoking Policy.
- b. If employees are found smoking in contravention to this Code or the Trust No Smoking Policy could lead to disciplinary action being taken against them under the Trust Disciplinary Policy and Procedure. Any disciplinary action will be that considered appropriate in the circumstances, up to and including summary dismissal for persistent contravention.

17.4 Alcohol and Drugs

- a. Employees are required to attend work without being under the influence of alcohol or drugs and required to not have their work performance impaired by alcohol or drugs.
- b. For all roles in the Trust and School, due to the nature of the job, drinking alcohol immediately before, or during the working day, will not be allowed under any circumstances.
- c. Where an employee's involvement with illegal drugs or excessive use of alcohol takes place outside working hours, the Trust or Academy council will consider the impact this may have on their employment. This will include consideration of any impact on the Trust or School's reputation and / or public confidence.
- d. Any behaviour contrary to 14.4 a), b) or c) above will be deemed to be a serious breach of this Code of Conduct which will be given appropriate consideration in accordance with the Trust Disciplinary Policy and Procedure.
- e. The Trust and Academy council will seek to provide appropriate support to any employee who recognises they have an alcohol / drug dependency problem.



18. Conduct and Standards

18.1 Conduct outside Working Hours

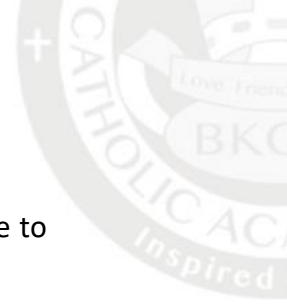
- a. Serious misconduct or criminal offences committed outside working hours, which bring the individual as a Trust or School employee and / or the Trust or School into disrepute, could lead to disciplinary action being taken against the employee under the Trust Disciplinary Policy and Procedure. Any disciplinary action will be that considered appropriate in the circumstances, up to and including summary dismissal.
- b. Employees must inform the Headteacher immediately of any issue of this nature to enable early consideration of their situation. This will be considered within the context of the duties of the post held and is essential in helping to safeguard the safety of pupils.
- c. Where employees are acting in other capacities e.g. Trust Board and / or Governors, they must be mindful of maintaining the reputation of the Trust and School at all times.
- d. Employees must not 'post' sensitive, confidential or critical information relating to work on social networking sites such as 'blogs', Facebook and Twitter or by other electronic means, or information from which any individual or piece of work can be identified or identity inferred. Please refer to the Trust Social Media Policy. See also section 12. Social Media.

18.2 Professional standards

- a. Employees must conduct themselves in a professional manner when at work. As such, all actions undertaken must be made in good faith with no detriment to the reputation of the Trust or School or to the welfare of the children and / or employees.
- b. Conduct within or outside working hours, which in the opinion of the Trust or Academy council, falls outside of the standards of behaviour stated within the employee's professional code of conduct may also be subject to the application of the Trust Disciplinary Policy and Procedure.

18.3 Standards of Dress and Appearance

- a. Employees must ensure their standard of dress i.e. the type and style of clothing, accessories, body art etc. is appropriate to the nature of their duties. Inappropriate dress can create the view that the Trust or School is inefficient, create offence or be interpreted as disrespectful by parents and the public generally.



- b. It is for the Trust or Academy council to determine an appropriate dress code to parental and public expectations.
- c. The Trust and Academy council values and welcomes the ethnic diversity of its workforce. Dress codes will be sensitive to and take account of cultural and religious dress requirements where this does not negatively impact on School delivery.
- d. In all cases employees will be required to conform to requirements for dress codes which apply for health and safety reasons.

18.3 Language

- a. The use of swear words, offensive language and / or gestures in conversation and communication with pupils, parents, colleagues, visitors or members of the community which the Trust or School serves is unacceptable at all times.
- b. Language which is perceived as patronising or overly familiar by pupils, parents, colleagues, visitors or members of the community which the School serves is also unacceptable. Examples of this type of language will include calling a service user “dear” or “love” and the suggestion that such terms are widely used within the geographical area is not an argument for professional staff being permitted to use them in the course of their employment.

19. Associated Documents

This policy should be read in conjunction with the following documents which can be requested from the school or Trust central team offices:

- Trust Whistleblowing Policy
- Trust Social Media Policy
- School Acceptable User Agreement and Use of Electronic Equipment
- Trust Data Protection Policy (GDPR)
- Trust Declarations of Interest Policy
- Trust Disciplinary Policy and Procedure
- Trust Driving at Work Policy
- Trust Financial Handbook
- Trust Gifts & Hospitality Policy
- Trust Media Handling Policy
- Trust Records Management Policy and Procedure
- Trust Safer Recruitment Policy
- Trust Managing Allegations against Staff Policy and Procedure
- Trust Health & Safety Policy
- School Behaviour Policy



Monitoring and Review of this Document

The Trust shall be responsible for reviewing this document from time to time to ensure that it meets legal requirements and reflects best practice.

The Bishop Konstant Catholic School Trust is an exempt charity regulated by the Secretary of State for Education. It is a company limited by guarantee registered in England and Wales, company number 08253770, whose registered office is at St Wilfrid's Catholic Secondary School & 6th Form College, Cutsyke Road, Featherstone, Wakefield, WF7 6BD.