

Staff Code of Conduct Policy

Policy Number:	EDU.POL.039	Policy Owner Job Role	Quality Manager
Issue Number:		Ratified By	Quality Director
Issue Date:	01.07.26	Service Type:	Schools
		Applicable Services:	Education
Contributors	Rob Arrowsmith		
Mandatory Policy	No		
Note	This policy must not be amended without prior approval of the Education Director		

Table of Contents

Section

- 1 **Supporting Documents**
- 2 **Introduction**
- 3 **Aim & Scope**
- 4 **Abbreviations/Definitions**
- 5 **Policy Content**
- 6 **Responsibilities**
- 7 **Training Requirements**
- 8 **Equality Impact Statement**
- 9 **Sources of Information / References**
- 10 **Version Control (where else is this policy located, ie. Circle, Radar)**
- 11 **Appendices**

1. Supporting Documents

- Safeguarding Policy (EDE.POL.002)
- Low-Level Concerns arrangements
- Whistleblowing Policy
- Positive Handling and Physical Intervention Policy (EDU.POL.020), and Restrictive Interventions Recording and Reporting Policy
- Mobile Phone Policy (EDU.POL.040) and Online Safety Policy (EDU.POL.009)
- Educational Visits Policy (EDU.POL.028)
- Data Protection Policy
- Staff Disciplinary and Grievance procedures, held by the central HR team

Related policies are held within RADAR in the School's policy folder.

2. Introduction

At New Ways School, every adult is a role model. Many of our pupils have experienced trauma or have found earlier settings hard to manage, and they rely on the adults around them to be consistent, safe and trustworthy. This code sets out

Keys

the standards of conduct we expect of everyone who works in our school, so pupils learn and grow in a safe, respectful and nurturing environment.

This code is not exhaustive. We expect staff to use professional judgement and to act in the best interests of pupils and the school. The guiding question behind every decision is simple: how will this help our children.

3. Aim & Scope

This code applies to everyone working at New Ways School, including teachers, trainee teachers, support staff, leaders, governors, volunteers, agency staff and contractors. It aims to:

- set clear standards of professional and personal conduct
- keep pupils safe and uphold their dignity, wellbeing and rights
- protect staff by being clear about what is expected of them
- support a trauma-informed, therapeutic culture in everything we do
- make clear how concerns about conduct are raised and handled

4. Abbreviations and Definitions

Allegation that meets the harm threshold: A concern that an adult has behaved in a way that has harmed, or may have harmed, a child, possibly committed a criminal offence against a child, behaved towards a child in a way that indicates they may pose a risk, or behaved in a way that indicates they may not be suitable to work with children.

Low-level concern: Any concern, however small, that an adult has acted in a way that is inconsistent with this Code of Conduct. Low-level concerns will often relate to behaviour that does not meet the harm threshold but may still give rise to a sense of unease, discomfort, or doubt about an adult's conduct. Reporting low-level concerns helps keep everyone safe and supports an open culture. Staff can also refer themselves if they feel they may have inadvertently acted in a way that might appear to be a low-level concern to others.

5. Policy Content

5.1 Principles and Approach

Our approach rests on the following principles. Children first. Pupil safety and wellbeing come before all other considerations. Role models. We model the behaviour, language and attitudes we want pupils to learn. Trauma-informed and relational. We understand behaviour as communication and respond with calm, consistent, respectful relationships, in line with the Keys Connect model. Professional integrity. We act honestly, maintain professional boundaries, and use sound judgement. Open culture. We raise concerns, including about colleagues, knowing we will be supported.

5.2 Standards of Conduct in Practice

Professional conduct and relationships

Keys

All staff must :

- maintain high standards of attendance, punctuality and reliability
- build trusting, professional relationships, but always maintain clear boundaries with pupils
- treat pupils, families and colleagues with respect; and actively include those who may appear or feel isolated
- not use their position to promote personal beliefs to pupils or encourage unlawful conduct. All staff must be mindful that they do not take advantage of pupils' vulnerability when discussing complex ideas around personal belief and values.

Professional boundaries, positions of trust and personal relationships

Staff hold a position of trust and must always keep clear professional boundaries with pupils and families.

Staff must:

- not form or pursue a romantic or sexual relationship with a pupil, and understand that this is an abuse of trust and, under the Sexual Offences Act 2003, is likely to be a criminal offence
- declare to their headteacher any existing relationship of any kind with a pupil or their family (including friendships, family relationships, pre-existing social or community relationships).
- declare to their headteacher any personal relationship between them and another member of staff (including friendships, family relationships, pre-existing social or community relationships) as they might cause a conflict of interest.
- not give pupils (or families) their personal contact details, and do not befriend or follow pupils on personal social media accounts
- treat all pupils with equity and avoid favouritism

Physical contact

Physical contact can be a normal and caring part of working with our pupils, for example to comfort a distressed pupil, to keep a pupil or others safe, or to support care and learning. Staff make sure any contact is appropriate to the pupil's age, needs and dignity, and is welcomed by the pupil.

Staff must:

- keep physical contact open and appropriate, never secretive, and stop if a pupil does not want it
- always seek consent before touch in the form most appropriate to the pupil's communication profile
- always be mindful that physical contact should be in line with a pupil's risk assessment
- ensure physical contact is in an appropriate 'safe' area of the body (for example – always using 'side hugs')

Keys

- never use physical contact to meet their own needs, and report any contact that has been, or could be, misread

Personal or intimate care is not covered by this code and is not part of the role. It is only provided where the school has a separate intimate and personal care policy that the headteacher has agreed, and staff then follow that policy in full. Staff must not provide intimate or personal care otherwise, and should check with the headteacher if they are unsure.

Physical intervention to manage risk is different from caring contact and is covered at 7.6 and in the Positive Handling and Restrictive Interventions policies.

One-to-one working, lone working and transporting pupils

Some work with pupils is one-to-one. Staff manage the extra risk this brings.

Staff:

- work where they can be seen by others wherever possible, for example in a room with a window or with the door open, and let a colleague know where they are
- follow the school's arrangements for lone working and for any out-of-hours or off-site work
- only transport a pupil with the agreement of a senior leader and with the right insurance and risk assessment in place, and avoid being alone with a pupil in a vehicle where this can reasonably be avoided

Safeguarding and the duty to report

- know and follow the safeguarding policy, child protection procedures and the Prevent duty
- report any safeguarding concern about a child immediately, in line with the safeguarding policy
- report any low-level concern about an adult, following the school's procedures

Behaviour, physical intervention and the language staff use

We support behaviour through relational, neuro-affirming, trauma-informed practice and through each pupil's personal profile. We focus on deescalation and physical intervention is only ever used as a last resort, by trained staff, using authorised techniques, and always in line with the Positive Handling and Restrictive Interventions policies.

Staff must:

- use only the techniques in which they are trained and authorised, and never as a punishment
- use calm, respectful and de-escalating language before, during and after any intervention,
- never use language or actions that shame, threaten or provoke a pupil

Keys

- support the pupil and take part in a debrief after any incident, engaging in effective and meaningful reflection; and make sure the incident is recorded in line with the Restrictive Interventions policy

Communication, technology and social media

All staff must:

- follow the school's acceptable use and online safety policies
- keep all contact with pupils professional, and not use personal accounts or devices to contact pupils
- not post anything online that could harm a pupil, a colleague or the reputation of the school or wider company

Personal phones and cameras

Staff must use personal phones and other personal devices with cameras only away from pupils and during non-contact time.

Staff should use school equipment, not personal devices, to take any photographs or recordings of pupils and only with awareness of the appropriate consents being in place.

In any early years setting, staff personal phones and cameras are not used when children are present, in line with the Early Years Foundation Stage framework and the Mobile Phone policy (EDU.POL.040).

Dress, footwear and language

Staff must:

- dress professionally and modestly, in clothing appropriate for working with pupils with complex needs
- wear clothing and footwear that let them move quickly and safely and take part in a physical intervention if needed, for example secure, flat or low footwear rather than open, backless or high-heeled shoes
- avoid clothing, footwear, jewellery or accessories that could cause injury, be grabbed, or get in the way of keeping pupils safe
- avoid slogans or images that could cause offence
- follow any additional dress, footwear or protective equipment requirements for specific activities, for example PE, practical lessons, food preparation or off-site work
- use clear, respectful and professional language at all times, and avoid language that could cause offence or be misunderstood

Gifts and hospitality

Staff do not accept gifts, hospitality or favours that could be seen as a reward, as buying influence, or as part of grooming.

Staff should:

- politely decline gifts of more than token value, and tell a senior leader about any gift they are unsure about
- not give personal gifts to individual pupils
- record gifts and hospitality where the school requires it

Drugs, alcohol and fitness for work

Staff come to work fit to carry out their role and to keep pupils safe.

Staff:

- do not attend work under the influence of alcohol or illegal drugs, and do not drink alcohol during the working day or while responsible for pupils
- do not bring illegal drugs onto the site
- tell a senior leader if a health condition or its treatment could affect their fitness for work, which links to staff personal medication at 7.12

Staff personal medication

Some staff need to bring their own medication into school. We handle this in a way that keeps pupils safe and respects staff privacy.

Staff must:

- store any personal medication securely and out of pupils' reach at all times, in a lockable drawer, locker or other place pupils cannot access, and never in a coat pocket, an open bag or an unlocked desk
- tell a senior leader if they are taking medication that could affect their ability to work safely, for example by causing drowsiness or affecting judgement, reaction time or the ability to take part in a physical intervention, so that any adjustment can be agreed
- tell a senior leader if their medication could harm a child who found or took it, for example a controlled drug or a strong painkiller, so that storage and handling can be checked and risk assessed
- share only what the senior leader needs in order to manage the risk, as staff are not required to disclose private health information beyond that

The senior leader treats this sensitively and in confidence, and records only what is needed to manage the risk.

Smoking and vaping

At New Ways School, the site is smoke-free and vape-free. Staff do not smoke or vape on the school site or in front of pupils, including in vehicles used to transport pupils.

Confidentiality and data

Keys

- protect the confidentiality of pupils, families and colleagues, and only share information on a need-to-know basis
- handle personal data in line with the Data Protection policy

Conduct outside school

Staff are accountable for their conduct outside school where it could affect their suitability to work with children or the reputation of the school. We expect the same integrity online, and in the community, as we do in the classroom.

Allegations and low-level concerns about adults

Concerns about an adult are handled under Part 4 of Keeping Children Safe in Education and apply to trainee teachers, volunteers, agency staff and contractors as well as employed staff. Allegations that meet the harm threshold are managed promptly and fairly by the case manager, working with the local authority designated officer. Low-level concerns are recorded and reviewed to spot any pattern. Detailed procedures sit in the Safeguarding policy (EDE.POL.002) and the Low-Level Concerns arrangements. Any formal action follows the staff disciplinary procedure, which is held by the central HR team.

Whistleblowing

Staff who have concerns about wrongdoing or unsafe practice can must raise them and will be supported and protected. The route for doing so is set out in the Whistleblowing policy.

5.3 Recording, Monitoring and Reporting

Signed acknowledgements, low-level concern records and allegation records are held securely on Radar and on the School IT Gateway. Leaders monitor conduct themes and report to the Proprietor and Governors, so the school can act early on any emerging pattern.

5.4 Equality and Inclusion

At New Ways School, this code is applied fairly and without discrimination, in line with the Equality Act 2010. We expect all staff to promote equality, respect diversity, and challenge discrimination. Any concern that this code is being applied unfairly should be raised with the headteacher.

6. Responsibilities

6.1 All staff

- uphold this code, act with integrity, and treat pupils and colleagues with dignity, respect and fairness
- maintain professional boundaries and report any concern about a child or about an adult promptly
- work within the Teachers' Standards or the relevant professional standards for their role.

Keys

- Staff are expected to maintain professional curiosity and challenge poor practice respectfully where pupil welfare may be affected.

6.2 Leadership

Leadership at New Ways School models and upholds this code, supports staff to meet it, and makes sure conduct concerns are handled fairly and promptly. The Headteacher is the case manager for allegations against staff, working with the local authority designated officer, except where the allegation concerns the Headteacher, in which case it is referred to the Regional Director and/or the Chair of Governors.

6.3 Governance

The Proprietor and Governors at New Ways School oversee the school's culture and the handling of conduct and safeguarding concerns and provide challenge and support.

6.4 Named leads

The designated safeguarding lead at New Ways School is Louise Reeks with support from Violet Watson at the school site and Vicki Jones at Corbett House site. The people who manage allegations and low-level concerns about staff are Sarah Gould (Headteacher – school site) and Louise Reeks (Executive Headteacher – Corbett House)

7. Training Requirements

This code is covered at induction at New Ways School and revisited through ongoing professional development. All staff sign to confirm they have read, understood and will follow this code, and sign again when it is materially updated.

8. Equality Impact Statement

All policies will be developed and implemented in a manner that promotes equality, diversity, and inclusion, ensuring fair and equitable treatment for all individuals. Policies must align with relevant equality legislation and reflect the expectations and standards set by our regulatory bodies. They will demonstrate a commitment to eliminating discrimination, advancing equality of opportunity, and fostering an inclusive environment that respects and values the diverse needs, backgrounds, and experiences of those we support, as well as our workforce.

9. Sources of Information / References

This policy reflects current statutory guidance and legislation, including:

- Keeping Children Safe in Education (DfE, 2025, and 2026 from 1 September 2026), in particular the staff behaviour expectations and the Part 4 procedures for managing allegations and concerns about adults, which apply to trainee teachers as well as employed staff

Keys

- Guidance for safer working practice for those working with children and young people in education settings (Safer Recruitment Consortium, 2022)
- Teachers' Standards (DfE, 2011, updated 2021), including the standards on personal and professional conduct
- The Initial Teacher Training and Early Career Framework (DfE, 2024)
- Behaviour in schools (DfE, 2024)
- The Sexual Offences Act 2003, including the offences relating to abuse of a position of trust
- The Equality Act 2010
- The Early Years Foundation Stage statutory framework, where the school has an early years setting

10. Version Control

This policy is held centrally in Radar and will be amended as required. All schools will ensure they are using the most up-to-date version and will amend any locally held copies accordingly.

This policy is reviewed annually, or sooner if legislation or statutory guidance changes. The next review date and version history are recorded in the control table above. The named owner for review at New Ways School is the headteacher.

Appendices (please see next page)

10.1 Appendix A: School-Specific Annex

The Head completes this annex with local detail so the policy is true for this school. Everything in this annex is school personalisation.

At New Ways School, the following local arrangements apply:

- Case manager for allegations against staff:

Sarah Gould and Louise Reeks

- Local staff wellbeing and Employee Assistance Programme details:

Updated contacts found in Reception, staff areas and on Workvivo

- Senior leader to notify about staff personal medication, and where it is stored:

Sarah Gould and Louise Reeks