Staff Code of Conduct

St Edward's Cheltenham

Document control

Field	Details
School	St Edward's Cheltenham
Policy owner	Headteacher – A Sandford-Squires
Approved by	Proprietor – Mr A. Khan
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Contents

1. Purpose and status
2. Scope
3. Core principles
4. Safeguarding responsibilities
5. Professional boundaries and positions of trust
6. Communication with pupils
7. Physical contact, intimate care and one-to-one working
8. Digital conduct, online safety and artificial intelligence
9. Images, recordings and personal devices
10. Confidentiality, information sharing and records
11. Equality, dignity and respectful conduct
12. Gifts, favouritism, transport and social contact
13. Conduct outside work and duty to disclose
14. Alcohol, drugs, smoking, vaping and medication
15. Health, safety, security and use of School property
16. Raising concerns, low-level concerns and whistleblowing
17. Allegations and disciplinary action
18. Additional expectations for EYFS and boarding
19. Training, monitoring and review
20. Policies and procedures to be read in conjunction
21. Source register

1. Purpose and status

This Code sets the standards of personal and professional conduct expected of all adults working in or on behalf of the School. Its purpose is to protect pupils, maintain public confidence, support safe professional practice and help staff recognise situations that may place a pupil or an adult at risk.

The Code reflects the School's duties under Keeping Children Safe in Education 2026, Working Together to Safeguard Children 2026, the Independent School Standards, the applicable Early Years Foundation Stage statutory framework, the Teachers' Standards and relevant employment, equality, data-protection, health-and-safety and criminal law.

> **Key expectation**
> Safeguarding is everyone's responsibility. Staff must act in the best interests of children, maintain appropriate boundaries, report concerns without delay and never assume that somebody else will act.

A breach of this Code may lead to action under the School's disciplinary procedure or another applicable employment, contractual, governance, volunteer or safeguarding process. Where statutory or regulatory criteria are met, the School will make any required referral or notification to the Local Authority Designated Officer, children's social care, the police, the Disclosure and Barring Service, the Teaching Regulation Agency, Ofsted, the relevant inspectorate, regulator or professional body, as applicable.

2. Scope

This Code applies to employees, governors, proprietors, agency and supply staff, contractors, consultants, coaches, peripatetic teachers, trainee teachers, students, volunteers, work-experience placements and any other adult working in or on behalf of the School.

The expectations apply during the working day and whenever a person is acting in connection with the School, including educational visits, residentials, boarding, transport, fixtures, performances, online learning, social media, remote working and School events.

3. Core principles

- put pupils' welfare, safety and dignity first;
- behave with integrity, honesty, fairness and good judgement;
- maintain clear professional boundaries and avoid conduct that could be misunderstood;
- treat all pupils and colleagues with respect and without discrimination;
- exercise authority and influence responsibly;
- follow the School's policies, lawful instructions and local safeguarding arrangements;
- remain alert to the possibility that a colleague's conduct may create risk;
- record and report concerns promptly, factually and through the correct route;
- co-operate with safeguarding, disciplinary and regulatory processes; and
- seek advice before acting where a situation is uncertain.

4. Safeguarding responsibilities

All staff must read and understand Part One of Keeping Children Safe in Education 2026, the School's Safeguarding and Child Protection Policy, the Behaviour and Discipline Policy, this Code and the pupil behaviour and reporting systems relevant to their role. School leaders and staff who work directly with children must also read Annex A: Further information of Keeping Children Safe in Education 2026.

The Designated Safeguarding Lead and any deputies must also be familiar with Annex B: Role of the Designated Safeguarding Lead and with the sections of Keeping Children Safe in Education relevant to their responsibilities.

Staff must know the identity and contact arrangements of the Designated Safeguarding Lead and deputies:

> **School safeguarding contacts**
> DSL: Alex McGowan, Deputy Head Pastoral a.mcgowan@stedwards.co.uk
> Deputy DSL(s):Leanne Huxtable, Student Care Lead, l.huxtable@stedwards.co.uk
> Headteacher: A Sandford-Squires, headteacher@stedwards.co.uk
> Proprietor / Chair: Mr A. Khan ali.khan@alphaschools.co.uk, 01494 535857

Local Authority Designated Officer: 01452 426994

- respond calmly and listen if a pupil shares a concern;
- avoid leading questions, investigating or promising confidentiality;
- make an accurate written record using the pupil's own words where possible;
- report the concern immediately to the DSL or a deputy;
- contact children's social care or the police directly where required and the DSL is unavailable, or where delay would place a child at risk; and
- take immediate action to protect life or prevent serious harm, including calling 999 where necessary.

Staff must not use personal or professional relationships, seniority, status or access to information to silence, discourage or disadvantage a pupil or another adult who raises a concern.

5. Professional boundaries and positions of trust

Adults working with children hold a position of trust. They must understand the power imbalance between adults and pupils and must not pursue, encourage or permit any relationship that is sexual, romantic, exploitative, secretive, dependent or otherwise inappropriate.

Absolute prohibition
Where the statutory position-of-trust provisions apply, sexual activity or a sexual relationship between an adult and a pupil under 18 is a criminal offence even where the relationship appears consensual.
Regardless of whether particular conduct constitutes a criminal offence, staff must never pursue or engage in a sexual or romantic relationship with a pupil, engage in sexual or grooming communication, make sexualised remarks, request or share sexual images, or engage in any other sexualised conduct towards a pupil.

- do not seek or establish friendships with pupils that blur professional boundaries;
- do not share personal secrets, burdens or intimate information with pupils;
- do not use pet names, sexualised language, humiliating humour or comments about a pupil's body or appearance;
- do not create private arrangements, favours or exceptions that cannot be openly justified;
- do not meet a pupil away from School or invite a pupil to a private home unless formally authorised for a legitimate School purpose; and
- inform the Headteacher or DSL promptly if a pupil develops an attachment, makes an advance or behaves in a way that could place either party at risk.

6. Communication with pupils

Communication must be professional, transparent, proportionate and capable of being reviewed by the School. Staff must use School-approved accounts, systems and devices for School business unless an emergency or expressly authorised arrangement applies.

- do not communicate with current pupils through personal email accounts, personal social-media accounts, private messaging, disappearing-message services or gaming platforms;
- do not exchange personal telephone numbers with pupils unless formally authorised and recorded;
- do not communicate late at night or at other unusual times unless the communication is necessary, proportionate and connected with an authorised activity;
- copy or make accessible to the School another appropriate adult where the subject matter is sensitive or likely to create risk;
- keep language, tone, images, emojis and attachments suitable for a professional educational relationship; and
- report accidental or inappropriate contact immediately and preserve the communication.

7. Physical contact, intimate care and one-to-one working

Physical contact must be necessary, proportionate, age-appropriate and responsive to the pupil's needs. Staff should explain what they intend to do, seek consent where appropriate and remain sensitive to a pupil's communication, culture, SEND, medical needs and prior experiences.

- physical contact must never be secretive, sexual, punitive, humiliating or for the adult's gratification;
- comforting contact should be pupil-led where possible and limited to what is appropriate;
- sports, drama, music, first aid and personal-care activities must follow role-specific guidance and risk assessments;
- searches and restrictive intervention must only be undertaken in accordance with the relevant School policy and law;

- intimate care must follow the pupil's agreed care plan and the School's Intimate Care procedures; and
- any contact that could be questioned, accidental contact with an intimate area, or a pupil's distress or complaint must be reported and recorded promptly.

One-to-one work should be planned so that the environment is observable or interruptible. Staff should use rooms with vision panels where available, avoid unnecessary isolation, follow sign-in or booking arrangements and record any situation that departs from normal practice.

8. Digital conduct, online safety and artificial intelligence

Staff must model safe, lawful and responsible use of technology. School systems may be monitored in accordance with law and School policy. Staff must not attempt to bypass filtering, monitoring, access controls or cyber-security measures.

- never access, create, store, request, manipulate or share illegal or inappropriate material;
- never use generative artificial intelligence to create sexualised, degrading, discriminatory or deceptive content involving a pupil or colleague;
- do not upload personal data, safeguarding information, confidential School information or identifiable pupil work to an unapproved AI system;
- verify AI-generated material for accuracy, bias, suitability, intellectual-property risk and fabricated content before use;
- do not use AI to make a final safeguarding, disciplinary, admissions, assessment or employment decision without authorised human oversight;
- report cyber incidents, accidental disclosures, deepfakes, impersonation or suspected misuse immediately; and
- follow the School's Acceptable Use, Online Safety, Data Protection and Artificial Intelligence procedures.

9. Images, recordings and personal devices

Images or recordings of pupils may only be made for an authorised School purpose, using approved equipment, systems and storage. Staff must follow consent, retention, publication and data-protection arrangements.

- personal phones, cameras, smart watches and other devices with imaging or sharing capability must not be used to photograph, film or record pupils;
- devices must not be used in toilets, changing rooms, bedrooms, medical rooms or intimate-care areas except under an authorised safeguarding or emergency protocol;
- images must not be stored on personal devices, personal cloud accounts or personal messaging services;
- staff must not share images of pupils through personal social media; and
- a lost device, accidental image, unauthorised recording or suspected misuse must be reported immediately.

10. Confidentiality, information sharing and records

Confidential information must be handled lawfully and only for a legitimate purpose. Safeguarding information is not absolutely confidential and must be shared on a relevant, necessary and proportionate basis where this is required to protect a child or another person.

- do not promise secrecy to a pupil;
- do not discuss pupils, families or colleagues in public places or with people who do not need the information;
- use secure School systems and approved disposal arrangements;
- keep records factual, dated, attributable, timely and free from speculation or personal commentary;
- do not alter, conceal, destroy or remove a record relevant to a safeguarding, disciplinary, complaint or regulatory process; and
- refer media enquiries and requests for information to the authorised person.

11. Equality, dignity and respectful conduct

Staff must promote equality, inclusion and mutual respect. They must not discriminate, harass, victimise, bully or tolerate conduct based on a protected characteristic, perceived characteristic, vulnerability or difference.

- challenge prejudicial, sexualised, degrading or discriminatory language and conduct;
- avoid stereotyping pupils or lowering expectations;
- respect names, pronunciation and reasonable individual needs;
- maintain political impartiality and do not promote partisan political views to pupils;
- ensure personal beliefs do not interfere with pupils' rights, safety or access to education; and
- report conduct that creates a hostile, intimidating, humiliating or unsafe environment.

- Staff must maintain standards of dress and appearance appropriate to their role, activity and professional setting, taking account of health and safety, safeguarding, equality, religion or belief, disability and reasonable adjustments.

12. Gifts, favouritism, transport and social contact

Staff must avoid actual or perceived favouritism. Rewards, sanctions, opportunities and support must be fair, transparent and consistent with School policy.

- do not give or receive significant or secret gifts;
- declare gifts, hospitality or benefits where required by School rules;
- do not lend money to or borrow money from pupils;
- do not provide private transport to a pupil unless authorised, insured, risk assessed and recorded, except where immediate action is necessary to protect safety;
- do not arrange private tutoring, babysitting, coaching, employment or other paid work for a pupil or family without prior written approval; and
- report any existing family, social, financial or other relationship that may create a conflict of interest.

13. Conduct outside work and duty to disclose

Conduct outside work may affect suitability to work with children or confidence in the School. Staff must uphold professional standards in public, online and private settings where their conduct could reasonably be connected with their role.

- maintain appropriate privacy and security settings but do not assume online activity is private;
- do not publish content that is abusive, discriminatory, sexually explicit, threatening, unlawful or likely to undermine professional trust;
- do not identify or discuss pupils, families, colleagues or confidential School matters online;
- notify the Headteacher promptly of any arrest, charge, caution, conviction, investigation, restraining order, professional restriction or other matter that may affect suitability, safeguarding or the role; and
- notify the School of any change in circumstances relevant to disqualification, DBS status, immigration permission, driving duties or another required check.
- Staff should seek confidential advice from the HR / People Lead or Headteacher where unsure.

14. Alcohol, drugs, smoking, vaping and medication

Staff must be fit to work safely and must not attend work or undertake duties while impaired by alcohol, illegal drugs, misuse of medication or any other substance. Prescribed medication that may affect safe performance should be discussed confidentially with the appropriate manager or occupational-health adviser.

- alcohol may only be consumed at an authorised event and in accordance with the School's arrangements;
- illegal drugs and unauthorised controlled substances are prohibited;
- smoking and vaping are prohibited on School premises and around pupils except in any expressly designated staff area not visible or accessible to pupils; and
- concerns about a colleague's fitness for duty must be reported immediately.

15. Health, safety, security and use of School property

Staff must take reasonable care for their own health and safety and that of pupils, colleagues and visitors. They must follow risk assessments, supervision arrangements, emergency procedures, security controls and instructions relevant to their role.

- wear or display identification as required;
- challenge or report unknown or unauthorised persons appropriately;
- keep keys, access cards, passwords and security information secure;
- report hazards, accidents, near misses, injuries, missing pupils and security incidents promptly;
- use School money, property, vehicles, systems and supplies only for authorised purposes; and
- do not remove School or pupil property or confidential records without permission.

16. Raising concerns, low-level concerns and whistleblowing

The School promotes a culture in which concerns about adult conduct are shared responsibly, recorded and addressed. A low-level concern is any concern, however small, that an adult may have acted in a way that is inconsistent with this Code,

including inappropriate conduct outside work, but which does not meet the harm threshold or is not otherwise serious enough to consider a referral to the LADO.

> **Report, do not privately manage**
> Staff must report low-level concerns, safeguarding concerns, boundary concerns and allegations through the School's stated route. They must not confront the person, investigate, agree secrecy, delete evidence or decide that a concern is too minor to share.

Low-level concerns about staff must be reported to the Headteacher. Concerns about the Headteacher must be reported to the Proprietor. Where the Headteacher is also the sole proprietor, or another conflict of interest exists, the concern must be reported directly to the LADO. Concerns that may meet the harm threshold must be handled under the Safeguarding and Child Protection Policy and KCSIE procedures

If a low-level concern is shared initially with the DSL or another nominated recipient, the Headteacher will be informed in a timely way according to the nature of the concern. Except where the concern relates to the Headteacher or another conflict requires an alternative case manager, the Headteacher is the ultimate decision-maker in respect of low-level concerns, although the Headteacher may consult the DSL and take a collaborative approach where appropriate.

Low-level concerns will be recorded confidentially and securely, reviewed for patterns and retained at least until the individual leaves employment, and for longer where justified by safeguarding, employment, legal or records-retention requirements.

Staff must also self-refer where they have acted in a way that could be misinterpreted, fallen below this Code or placed themselves in a situation that may create concern. Prompt self-reporting will be considered when the School determines an appropriate response.

Where a staff member feels unable to raise a concern internally, believes it has not been addressed, or is concerned about unsafe practice, they should use the School's Whistleblowing Policy and may contact the NSPCC Whistleblowing Advice Line or the appropriate regulator.

17. Allegations and disciplinary action

A safeguarding concern or allegation may meet the harm threshold where it is alleged that a person working in or on behalf of the School has:

• behaved in a way that has harmed a child, or may have harmed a child;

• possibly committed a criminal offence against or related to a child;

• behaved towards a child or children in a way that indicates they may pose a risk of harm to children; or

• behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Such concerns or allegations will be managed under the School's Safeguarding and Child Protection Policy and Keeping Children Safe in Education 2026.

The School may take immediate protective and management action, including changing duties, increasing supervision, restricting access or suspending an employee where this is a neutral and proportionate step. Decisions will take account of safeguarding, fairness, confidentiality and relevant external-agency advice.

A breach of this Code may be treated as misconduct or gross misconduct. The School may also make statutory or regulatory referrals where the relevant criteria are met.

18. Training, monitoring and review

The School will provide induction and regular training so that staff understand this Code, safeguarding reporting routes, low-level concerns, allegations, whistleblowing, online safety, data protection, equality and role-specific risks.

The Headteacher will ensure that the Code is implemented consistently. The Proprietor or Governing Body will receive appropriate assurance about compliance, themes arising from concerns and any action needed, without receiving unnecessary identifying information.

This Code will be reviewed at least annually and sooner following changes to law or statutory guidance, a safeguarding incident, inspection findings, identified patterns of concern or significant operational change.

20. Policies and procedures to be read in conjunction

- Safeguarding and Child Protection Policy
- Safer Recruitment Policy

- Behaviour and Discipline Policy
- Anti-Bullying Policy
- Internet Policy
- Data Protection Policy
- Data Protection Privacy Notice
- Non-Discrimination and Inclusion Policy
- Health and Safety Policy
- First Aid Policy
- Restrictive Interventions Policy
- Educational Visits and Transport procedures
- Staff Disciplinary and Grievance procedures
- EYFS and boarding policies and procedures, where applicable

21. Source register

Source	Application
Keeping Children Safe in Education 2026	Staff behaviour policy, positions of trust, technology and communications, low-level concerns, allegations, whistleblowing and safeguarding reporting.
Working Together to Safeguard Children 2026	Multi-agency safeguarding, Family Help and child-centred practice.
Education (Independent School Standards) Regulations 2014 and DfE guidance, April 2026	Independent-school safeguarding, welfare, leadership and staff-suitability expectations.
Early Years Foundation Stage statutory framework for group and school-based providers, September 2026	Safeguarding, staff suitability and disclosure, mobile-device, whistleblowing and welfare requirements where EYFS is provided.
Boarding schools: national minimum standards, May 2026	Professional boundaries, privacy, supervision, complaints and safeguarding in residential provision.
Sexual Offences Act 2003, including position-of-trust offences	Absolute prohibition on sexual activity or sexual relationships with pupils under 18 where the adult is in a position of trust.
Teachers' Standards	Expected personal and professional conduct for teachers.
Equality Act 2010 and Human Rights Act 1998	Non-discrimination, dignity, reasonable adjustments, privacy and proportionality.
UK GDPR, Data Protection Act 2018 and Data (Use and Access) Act 2025	Confidentiality, lawful information sharing, monitoring, recording and use of digital systems.
Health and Safety at Work etc. Act 1974	Duties concerning safe practice, supervision, reporting and use of premises and equipment.