# The LETTA Trust

## Staff Code of Conduct

| | | | |
|---|---|---|---|
| **Approved and adopted on:** | Autumn 2026 | **To be reviewed:** | Autumn 2027 |
| **Reviewed by:** | Trust Board | **Signed:** | |

# Contents


1. Introduction 3

2. Expected professional standards 6

3. Confidentiality 8

4. Propriety, behaviour, and appearance 9

5. Sexual contact with children and young people and abuse of trust 11

6. Infatuations and crushes 12

7. Gifts, rewards, favouritism, and exclusion 13

8. Fraud and theft 14

9. Social contact and social networking 15

10. Physical contact, personal privacy, and personal care 18

11. Behaviour management and physical intervention 22

12. First aid and medication 23

13. One-to-one situations and meetings with pupils 24

14. Transporting pupils 25

15. Educational visits and school clubs 26

16. Curriculum 26

17. Photography, videos, and other creative arts 27

18. Unacceptable use of IT facilities and monitoring 29

19. Reporting concerns and recording incidents 31

20. Disclosure of information, confidentiality, and references 32

21. Recruitment and other employment matters 33

22. Equality, diversity, and inclusion 34

23. Health and Safety 35

24. Monitoring and review 35

25. Related policies: 35

Appendix A - Preventing and Addressing Sexual Harassment and Victimisation 37

## 1. Introduction

**Why do we have a staff code of conduct, and what does it do?**

All adults have a duty to keep pupils safe, promote their welfare, and protect them from abuse, neglect, radicalisation, and other safeguarding risks. This duty is, in part, exercised through the development of caring, respectful and professional relationships between adults and pupils and through behaviour by adults that demonstrates integrity, maturity and good judgment. This code outlines the professional standards expected and the duty of adults to abide by them. Following this code will help to safeguard adults from being maliciously or mistakenly suspected or accused of misconduct concerning pupils.

**What do the terms used mean?**

For the purposes of this code, the term 'adult' means: any local governing board or Trust board member, all staff, external contractors, trainee teachers, apprentices, volunteers, and anyone who works for or provides services on behalf of the school.

For the purposes of this code, 'young person/people', 'pupils', and 'child/ren' includes all those for whom a school provides education or other services.

**Guidance**

This code takes account of the most recent versions of the following guidance:

- 'Keeping Children Safe in Education 2025' DfE (statutory)
- 'Working together to safeguard children 2023' HM Government (statutory)
- 'Guidance for safer working practice for those working with children and young people in education settings' (non-statutory)

From 1 September 2026, references to 'Keeping Children Safe in Education' should be read as references to the 2026 edition once it comes into force, and this code will be applied consistently with that guidance.

This code does not provide an exhaustive list of what is, or is not, appropriate behaviour for adults. It highlights behaviour that is illegal, inappropriate, or inadvisable in relation to the required professional standards.

There will be occasions and circumstances in which adults have to make decisions or take action in the best interests of a pupil where no specific guidance has been given. Adults are expected to make responsible and informed judgements about their behaviour to secure the best interests and welfare of pupils.

Any behaviour in breach of this code by employees may result in action under the Trust's Disciplinary Procedure. Such behaviour may constitute gross misconduct and may result in summary dismissal. The Trust Board will take a strict approach to serious breaches of this code.

**Safeguarding and child protection**

Adults must act in accordance with the Safeguarding and Child Protection Policy, which is available on the school's network, and report any safeguarding, child protection, welfare, or radicalisation concerns about a pupil to the Designated Safeguarding Lead (DSL).

**Whistleblowing**

Adults must raise concerns they have about safeguarding or child protection practices by following the Whistleblowing Policy, which is available on the school's network. An adult who 'whistleblows' or makes a public interest disclosure will have the protection of the relevant legislation.

**Allegations of abuse against teachers, including supply teachers, other staff, volunteers, and contractors**

Where it is alleged that an adult 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 s/he would pose a risk of harm to them
- behaved or may have behaved in a way that indicates they may not be suitable to work with children

Trustees will follow the Trust's procedure for Dealing with Allegations of Abuse Against Teachers, Other Staff and Volunteers. The guidance relating to this is set out in the LETTA Trust's Child Protection and Safeguarding Policy.

**Criminal convictions**

Under the terms of the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (as amended), colleagues must disclose details of any unspent convictions, cautions, reprimands, bind-overs, and final warnings they may have. This includes any criminal proceedings pending against them with the exception of any criminal history that is protected or "filtered. Failure to disclose such convictions and to comply with any of the above constitutes possible gross misconduct and may result in disciplinary action, including the possibility of summary dismissal without notice.

Colleagues whose work involves driving must declare any motoring offenses to their headteacher.

**Drugs and alcohol**

School colleagues must attend work in a condition to undertake their duties in a safe manner.

The consumption of alcohol, illegal drugs, or "legal highs" impairs performance and may constitute a health and safety risk and interfere with that person's work performance. Where it is evident during working time that a person is under the influence or has detectably taken these substances, or there is other substantial reason to believe this to be the case, this will be regarded as potential gross misconduct. If the person has an underlying substance-related problem, it will be addressed under the relevant policy.

Any consumption of legal drugs (i.e., prescription or over-the-counter drugs) that impair performance must be discussed with the headteacher.

Consuming alcohol at any time when supervising young people or during the school day is inappropriate and may be regarded as an act of gross misconduct. Exceptions to this will be agreed in advance and notified to colleagues by the headteacher for events such as colleague end-of-term gatherings and other functions.

Zero alcohol is the expectation when driving on school business.

The use of illegal substances will not be tolerated and will result in the headteacher or CEO reporting the matter to the police.

Smoking by colleagues is prohibited on any school site. If colleagues find it necessary to smoke, they must do so away from school boundaries and out of sight of pupils and, wherever possible, parents and the public. This includes the use of electronic smoking devices (vaping).

## 2. Expected professional standards

All adults employed by The LETTA Trust must:

- place the well-being and learning of pupils at the centre of their professional practice
- have high expectations for all pupils, be committed to addressing underachievement, and work to help pupils progress regardless of their background and personal circumstances
- treat pupils fairly and with respect, take their knowledge, opinions, and feelings seriously, and value diversity and individuality
- model the characteristics they are trying to inspire in pupils, including enthusiasm for learning, honesty, tolerance, social responsibility, and a genuine concern for others

- respond sensitively to the differences in the home backgrounds and circumstances of pupils, recognising the key role that parents and carers play in their child's education
- seek to work in partnership with parents and carers, respecting their views and promoting cooperation to support the young person's learning and well-being
- reflect on their practice, develop their skills, knowledge, and expertise, and learn with and from colleagues
- ensure that the same professional standards are always applied regardless of culture, disability, gender, language, racial origin, religious belief, and/or sexual identity

Teachers are required to comply with the Teachers' Standards, including Part 2: Personal and Professional Standards.

All adults must be familiar with and act in accordance with the most recent versions of the following documents:

- Part 1 of the most recent 'Keeping Children Safe in Education' DfE document (statutory)
- 'Working Together to Safeguard Children HM Government (statutory)
- Prevent Duty Guidance' HM Government (statutory)
- 'The Prevent duty departmental advice for schools and childcare providers' DfE
- 'Guidance for safer working practice for those working with children and young people in education settings' (non-statutory)

An employee who fails to bring a matter of concern to the attention of a senior leader or the relevant agencies is likely to be subject to disciplinary action.

## 3. Confidentiality

As data controllers, all schools are subject to the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. In addition, teachers owe a common law duty of care to safeguard the welfare of pupils. This duty is acknowledged in the provisions governing disclosure of information about pupils.

Adults may need access to confidential information about pupils in order to undertake their responsibilities. In some circumstances, the information may be sensitive or confidential. Confidential information about a pupil or their family must be disclosed on a need-to-know basis, and advice should be sought prior to disclosure to ensure it is in accordance with the following:

- UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018
- The Trust's Information Governance Policy (GDPR & FOI)
- The DfE's 'Data protection in schools' guidance
- The ICO's Guide to Data Protection'
- The ICO guide on 'How to Disclose Information Safely'

In circumstances where the pupil's identity does not need to be disclosed, the information should be used anonymously. Information must never be used to intimidate or embarrass the pupil. Information must never be used by anyone for their own or others' advantage.

There are some circumstances in which an adult may be expected to share information about a pupil, for example, when abuse is alleged or suspected. In such cases, adults have a duty to pass information on without delay to those with designated safeguarding responsibilities.

Confidential information about pupils must be held securely. Confidential information about pupils must not be held off the school site other than on security-protected school equipment. Information must only be stored for the length of time necessary to discharge

the task for which it is required.

If a pupil or parent/carer makes a disclosure regarding abuse or neglect, the adult must follow the school's procedures and the guidance as set out in 'Keeping Children Safe in Education'. Confidentiality must not be promised to the pupil or parent/carer. Reassurance should be given that the information will be treated sensitively.

If an adult is in any doubt about the storage or sharing of information, s/he must seek guidance from the Designated Safeguarding Lead. Any media or legal enquiries must be referred to senior leaders.

## 4. Propriety, behaviour, and appearance

All adults working with children have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of pupils. We do this by adopting high standards of personal conduct in order to maintain the confidence and respect of colleagues, pupils, and the public. An adult's behaviour or actions, in or out of the workplace, must not compromise her/his position within the work setting and bring the school into disrepute. Non-exhaustive examples of unacceptable behaviour are contained in the Disciplinary Procedure.

Adults are required to notify the school immediately of:

- any allegations of safeguarding-related misconduct made against them
- any allegation of misconduct implicating them
- any arrest or criminal charge, whether child-related or not

Where employees fail to do so, this will be treated as a serious breach of this code and dealt with under our Disciplinary Procedure.

Employees must not:

- behave in a manner that would lead any reasonable person to question their

suitability to work with children

- make, or encourage others to make, sexual remarks to, or about, a pupil
- use inappropriate language to or in the presence of pupils
- discuss their personal or sexual relationships with or in the presence of pupils
- make, or encourage others to make, unprofessional personal comments which scapegoat, demean, or humiliate, or might be interpreted as such

Behaving in an unsuitable way towards children may result in disqualification from childcare under the Childcare Act 2006, prohibition from teaching by the TRA, a bar from engaging in regulated activity, or action by another relevant regulatory body.

A person's dress and appearance are matters of personal choice, self-expression, and religious and cultural customs. However, at school, adults must maintain an appropriate standard of dress and personal appearance, which promotes a positive and professional image.

Clothing and footwear must be safe and clean, and take into account health and safety. Adults must ensure they are dressed in ways that are appropriate to their role and not likely to be viewed as offensive, revealing, or sexually provocative. Clothing should not distract, cause embarrassment, or give rise to misunderstanding. It should be culturally sensitive and free of political or otherwise contentious slogans, and not considered to be discriminatory.

Adults who dress or appear in a manner that may be considered inappropriate could render themselves vulnerable to allegations of misconduct that may lead to action under the Disciplinary Procedure.

Where particular clothing is provided for health, safety, and hygiene and/or uniform purposes, it must be worn, including name badges.

All employees must demonstrate excellent behaviour whilst in the trust uniform, and behaviour that could bring disrepute to the organisation could lead to disciplinary action as per the policy against the employee.

The following items must not be brought onto or stored on school premises or school

equipment:

- personal property of a sexually explicit nature
- property that might be regarded as promoting radicalisation
- other inappropriate books, magazines, CDs, DVDs, or electronic media (including links to inappropriate material)

The LETTA Trust has a legal duty to take proactive steps to prevent sexual harassment in the workplace under the Worker Protection (Amendment of Equality Act 2010) Act 2023. From October 2026, under the Employment Rights Act 2025, this duty is strengthened to a requirement to take all reasonable steps to prevent sexual harassment, and the Trust may also be liable for harassment of employees by third parties. Employees must adhere to the highest professional standards and avoid behaviour that could be perceived as harassment, including unwelcome advances, inappropriate comments, or creating an intimidating work environment. Any reports of sexual harassment will be taken seriously and addressed following the Trust's safeguarding and disciplinary procedures. Refer to Appendix A, Preventing and Addressing Sexual Harassment and Victimisation.

**5. Sexual contact with children and young people and abuse of trust**

A relationship between an adult and a child or young person is not a relationship between equals; the adult has a position of power or influence. There is potential for exploitation and harm to children or vulnerable young people.

All adults have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification. Adults must not use their position to form or promote relationships with children (whether current pupils or not) that are of a sexual nature.

Adults should maintain professional boundaries and avoid behaviour that might be misinterpreted by others. Adults must report any incident with this potential.

Any sexual behaviour or activity, whether homosexual or heterosexual, by an adult with or towards a child or young person is illegal. Children and young people are protected by the same laws as adults in relation to non-consensual sexual behaviour. They are additionally protected by specific legal provisions regardless of whether there is consent or not.

Where a person aged 18 or over is in a specified position of trust with a child or young person under 18 years, the Sexual Offences Act 2003 makes it an offence for that person to engage in sexual activity with or in the presence of that child or to cause or incite that child to engage in or watch sexual activity. The Police, Crime, Sentencing and Courts Act 2022 extended the positions of trust covered by the 2003 Act to include adults who coach, teach, train, supervise, or instruct children in a sport or a religion.

Sexual behaviour includes non-contact activities, such as causing a child or young person to engage in or watch sexual activity or the production of indecent images of children. 'Working Together to Safeguard Children', *Appendix A* defines sexual abuse as "…forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening…"

Adults must not have sexual relationships with pupils or have any form of communication with a child, which could be interpreted as sexually suggestive or provocative i.e., verbal comments, letters, notes, texts, email, phone calls, social networking contact, or physical contact.

An adult should not make sexual remarks to or about a child or discuss their sexual relationships with or in the presence of pupils. Adults should take care that their language or conduct does not give rise to comment or speculation. Attitudes, demeanour, and language all require care and thought.

There are occasions when adults embark on a course of behaviour known as 'grooming' where the sole purpose is to gain the trust of a child or young person, and manipulate that relationship so that sexual abuse can take place. Adults should be aware that conferring special attention without good reason or favouring a pupil has the potential to be construed as being part of a 'grooming' process, which is a criminal offence.

## 6. Infatuations and crushes

A child or young person may develop an infatuation with an adult who works with them. If an adult becomes aware that a pupil has become or may be becoming infatuated with them or a colleague, they must report this without delay to the headteacher or a senior

leader so that appropriate action can be taken and to avoid any hurt or embarrassment. An adult may become aware of an infatuation through a report, something overheard, or other signs (no matter how small or seemingly insignificant).

The situation will be taken seriously, and the adult should be careful to ensure that no encouragement of any kind is given to the pupil. It should also be recognised that careless and insensitive reactions may provoke false accusations.

Examples of situations that must be reported are given below:

- Where an adult is concerned that he or she might be developing a relationship with a pupil, which could have the potential to represent an abuse of trust
- Where an adult is concerned that a pupil is becoming attracted to him or her, or that there is a developing attachment or dependency
- Where an adult is concerned that actions or words have been misunderstood by a pupil, such that an abuse of trust might be wrongly suspected by others
- Where an adult is concerned about the apparent development of a relationship by another adult, or receives information about such a relationship

## 7. Gifts, rewards, favouritism, and exclusion

It is against the law for public servants to take bribes. Adults 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 preferential treatment.

There are occasions when pupils or parents/carers wish to pass small tokens of appreciation to adults, e.g., at Christmas or as a thank you, and this is acceptable. However, it is unacceptable to receive gifts regularly or of any significant value. Colleagues must also comply with the Trust's Gifts and Hospitality Policy, including the requirements for declaring and recording gifts and hospitality.

Personal gifts must not be given to pupils or their families. This could be misinterpreted as a gesture either to bribe or groom. It might be perceived that a 'favour' of some kind is expected in return. Any reward given to a pupil should be consistent with the school's behaviour policy and not based on favouritism.

Care should be taken when selecting children for specific activities, jobs, privileges, and when pupils are excluded from an activity in order to avoid perceptions of favouritism or injustice. Methods of selection and exclusion should be subject to clear, fair, and agreed-upon criteria.

A colleague's school duties and private interests must not conflict. Colleagues must declare any private interests relating to their school duties. This may include, but is not limited to, membership of organisations which would be generally considered to conflict with their school duties

## 8. Fraud and theft

The Trust acknowledges its responsibility for the administration of public funds and the importance placed on probity, financial control, selflessness, and honest administration. We are committed to the fight against fraud (see Anti-Fraud Policy), whether perpetrated by colleagues, contractors, or the public. School colleagues must not use their position to obtain gain for themselves, business associates, friends, or family, either directly or indirectly.

Colleagues must use public funds responsibly and lawfully. They must work to ensure that the school uses their resources prudently and within the law and that the local community gets value for money. The Trust's Financial Code of Practice must be observed.

Defrauding and stealing (or attempting to do so) from the school will not be tolerated. This includes deliberate falsification of claims, e.g., time sheets, mileage, and travel/subsistence allowances to obtain payment.

The Trust Board requires colleagues to report concerns relating to potential fraud, theft, or unethical behaviour to the headteacher or CEO. Further details are contained in the Trust's Whistleblowing Policy.

We recognise that colleagues may not find it easy to 'blow the whistle' or report irregularities, and trustees will give you full support in raising such concerns. Every effort will be made to respect a colleague's request for anonymity. However, colleagues are expected to demonstrate accountability and to cooperate fully with any scrutiny appropriate to their position. There are two sides to every story, and the Trust Board will undertake to give people a fair hearing. Some allegations may turn out to be mistaken. If, however, you make malicious or deliberately false allegations, disciplinary action may be taken against you.

## 9. Social contact and social networking

Communication between pupils and adults, by whatever method, should take place within clear and explicit professional boundaries. This includes the wider use of technology such as mobile phones, tablets, text messages, emails, instant messages, websites, social media such as Facebook, X, Instagram, TikTok, Snapchat, chat-rooms, forums, blogs, apps such as WhatsApp, gaming sites, digital cameras, videos, web-cams, and other handheld devices. It also includes the use of artificial intelligence (AI) tools, including AI chatbots and companion apps.

Adults should not share any personal information with pupils, and they should not request, or respond to, any personal information from the child, other than that which might be appropriate as part of their professional role. They should ensure that all communications are transparent and avoid any communication that could be interpreted as 'grooming behaviour'.

Adults must not give their personal contact details such as phone numbers, e-mail addresses, or social networking details, to pupils unless the need to do so is agreed in writing with senior leaders.

If a pupil attempts to locate an adult's personal contact details and attempts to contact or correspond with him/her, the adult should not respond and must report the matter to his/her line manager or a senior leader.

It is recommended that adults ensure that all possible privacy settings are activated to prevent pupils from making contact on personal profiles and to prevent pupils from accessing photo albums or other personal information that may appear on social networking sites.

Adults are personally responsible for what they communicate on social media and must bear in mind that what is published might be read by employers, pupils, parents and carers, the general public, future employers, and friends and family for a long time.

Adults must ensure that their online profiles are consistent with the professional image expected by the school and must not post material that damages the reputation of the school or which causes concern about their suitability to work with children and young people.

Those who post material that may be considered inappropriate could render themselves vulnerable to allegations of misconduct, which may be dealt with under the Disciplinary Procedure. Even where it is made clear that the writer's views on such topics do not represent those of the school, such comments are inappropriate.

Adults are advised not to have any online friendships with any young people under the age of 18, unless they are family members or close family friends. Adults are advised not to have online friendships with parents or carers of pupils, or members of the Local Governing Board or Board of Trustees. Where such online friendships exist, adults must ensure that appropriate professional boundaries are maintained.

It is acknowledged that adults may have genuine friendships and social contact with parents or carers of pupils, independent of the professional relationship. Adults should, however, inform senior leaders of any relationship with a parent/carer where this extends beyond the usual parent/carer/professional relationship. They should advise senior leaders of any regular social contact they have with a pupil or parent/carer, which could give rise to concern. They should also inform senior leaders of any requests or arrangements where parents/carers wish to use their services outside of the workplace, e.g., babysitting, tutoring.

Adults should always approve any planned social contact with pupils or parents/carers with senior colleagues, for example, when it is part of a reward scheme. If a parent/carer seeks to establish social contact, or if this occurs coincidentally, the adult should exercise his or her professional judgment and should ensure that all communications are transparent and open to scrutiny.

Some employees may, as part of their professional role, be required to support a parent or carer. If that person comes to depend upon the employee or seeks support outside of their professional role, this should be discussed with senior leaders and, where necessary, referrals made to the appropriate support agency.

Social Media should be used responsibly, and colleagues should ensure that anything published does not bring their school into disrepute or constitute bullying or harassment of a colleague. Failure to do so may result in disciplinary action, including the possibility of dismissal.

It is important that colleagues maintain a professional digital footprint and be aware that what they endorse on social media could be seen as bringing the school into disrepute if they can be identified as a member of staff and the content is in serious conflict with the school's values. If a colleague sees something on social media posted by a colleague which they are uncomfortable with because it breaches this Code of Conduct, for example which they believe could bring the school into disrepute or which could constitute bullying or

harassment of a work colleague, they are encouraged to pass evidence of this to their Headteacher, or another member of their senior leadership team.

For additional guidance, see further advice which has been published by our recognised trade unions for their members. For example:

https://neu.org.uk/advice/social-media-and-online-safety

https://www.nasuwt.org.uk/advice/health-safety/social-media-the-abuseof-technology.html

**10. Physical contact, personal privacy, and personal care**

There are occasions when it is entirely appropriate and proper for employees to have physical contact with pupils, but it is crucial that they only do so in ways appropriate to their professional role and in relation to the pupil's individual needs and any agreed care plan.

When physical contact is made with pupils, this should be in response to their needs at the time, of limited duration and appropriate given their age, stage of development, gender, ethnicity, culture, and background. Employees must use their professional judgment at all times. It is not possible to be specific about the appropriateness of each physical contact, since an action that is appropriate with one pupil in one set of circumstances may be inappropriate in another, or with a different pupil.

Physical contact should never be secretive or casual, or for the gratification of the adult, or represent a misuse of authority. Adults should never touch a pupil in a way that may be considered indecent. If an adult believes that an action could be misinterpreted, the incident and circumstances should be reported as soon as possible to a senior leader.

Physical contact, which occurs regularly with a pupil or pupils, is likely to raise questions unless the justification for this is part of a formally agreed plan (for example, concerning pupils with SEND). Any such contact should be the subject of an agreed and open school policy and subject to review. Where feasible, staff should seek the pupil's permission before initiating

contact. Adults should listen, observe, and take note of the pupil's reaction or feelings and, so far as is possible, use a level of contact which is acceptable to the pupil for the minimum time necessary.

There may be occasions when a distressed pupil needs comfort and reassurance. This may include age-appropriate physical contact. Adults should remain self-aware at all times in order that their contact is not threatening, intrusive, or subject to misinterpretation. Adults should tell a colleague when and how they offered comfort to a distressed pupil.

Where an adult has a particular concern about the need to provide this type of care and reassurance, s/he should seek further advice from a senior leader.

Some employees, for example, those who teach PE or music, will on occasions have to initiate physical contact with pupils in order to support them so they can perform a task safely or to demonstrate the use of a piece of equipment/instrument. This should be done with the pupil's agreement. Contact under these circumstances should be for the minimum time necessary to complete the activity and take place in a safe and open environment. Adults should remain sensitive to any discomfort expressed verbally or non-verbally by the pupil.

All parties should clearly understand from the outset what physical contact is necessary and appropriate in undertaking specific activities. Keeping parents/carers informed of the extent and nature of any physical contact may also prevent allegations of misconduct from arising. Any incidents of physical contact that cause concern or fall outside of these protocols and guidance should be reported to a senior leader and the parent/carer.

Pupils are entitled to respect and privacy when changing clothes or taking a shower. However, there needs to be an appropriate level of supervision to safeguard pupils, satisfy health and safety considerations, and ensure that bullying or teasing does not occur. This supervision should be appropriate to the needs and age of the pupils concerned and sensitive to the potential for embarrassment.

Adults who are required to attend changing rooms should announce their intention of entering any pupil changing rooms and only remain in the room where the pupil/s require this.

Employees with a role that includes intimate care duties will have appropriate training and written guidance, including a care plan for any pupil who could be expected to require intimate care. Staff should adhere to the school's changing clothes policy, and the Trust's Medical Needs Policy (including Asthma & Intimate Care).

A signed record should be kept of all intimate and personal care tasks undertaken, and, where these have been carried out in another room, include the times left and returned. Employees should not assist with personal or intimate care tasks that the pupil can undertake independently.

Colleagues must be aware that a personal relationship with another colleague could lead to a potential conflict of interest, particularly where there is an involvement in recruitment or a line management relationship. Colleagues should seek advice from their headteacher, as applicable, where there is a potential conflict of interest of this nature.

All colleagues have a statutory duty to declare any financial or other interest in any existing or proposed contract or an interest in, or association with, any organisation, services, activity, or person that may cause a direct or indirect conflict of interest with their School employment. Private interests may preclude colleagues from participation in any such activities, depending on the circumstances, such as their ability to affect critical decisions concerning the contract, organisation, or individual, and the reasonableness of any perception of conflict of interest. All colleagues must abide by these regulations.

Any secondary employment (including voluntary work) undertaken must not conflict with the school's interests or bring it into disrepute, must not interfere with the proper performance of a colleague's duties, and must only be undertaken outside the colleague's working hours. In such a case, it is the responsibility of the individual to ensure that they meet with all the

appropriate taxation, insurance, and Working Time Regulations associated with being self-employed or an employee of another organisation.

Colleagues are expected to discuss any other paid work with their Headteacher prior to taking it up. Where voluntary work will take up a substantial amount of time, this should also be discussed. It is strongly recommended that a written record of this discussion be kept.

Where the work takes place during normal working hours, any payments should be made to the school through an invoicing system. The individual will be entitled to claim reasonable travel expenses for providing the service, though no additional remuneration will be possible. Where the work takes place outside the school day – evenings or weekends – this is viewed as 'secondary employment'.

Where a colleague makes representations or applies for services in which they have significant influence by virtue of their employment position, on behalf of a relative, colleague, friend, or some other person with whom they have a close relationship, they must declare a personal interest.

Colleagues with such a conflict of interest must tell their headteacher in writing. That person will then make alternative arrangements so that a colleague is not involved, or, where the colleague's skills are required, ensure appropriate supervision is provided so that undue influence or bias to their advantage is prevented. They will also review any such declarations annually.

Colleagues in key roles may be asked to complete a 'declaration of interest form', even if they have not declared an interest.

Colleagues are entitled to use all the services of their employing school as appropriate, but in doing so they will receive neither favour nor suffer discrimination or disadvantage. Colleagues must be aware at all times that members of the public expect the highest standards of fairness and equality to be upheld in the administration of services, regardless of the recipient. They have a responsibility to ensure that they conduct themselves in a manner

that does not bring into question either their integrity or their motivation. At no time should they attempt to exert any pressure to obtain services because of their position or to access services other than through those channels available to members of the public. It is for these reasons that they should ensure that personal interests are declared.

If colleagues engage or supervise contractors, have an official relationship with contractors or a potential contractor, and/or have previously had or currently have a relationship in a private or domestic capacity with a contractor, they must declare that relationship to their Headteacher.

All orders and contracts must be awarded on merit, by fair competition against other tenders in accordance with the Trust's Tendering Policy. Colleagues must exercise impartiality, and no favouritism must be shown to businesses run for example, by friends, partners, relatives, or business associates. No section of the community should be discriminated against in the tendering, evaluation, and award processes. Colleagues who are privy to confidential information on contracts for tender, or costs for either internal or external contractors, must not disclose that information to any unauthorised party or organisation

## 11. Behaviour management and physical intervention

All pupils have a right to be treated with respect and dignity. Adults must not use any form of degrading treatment to punish a pupil. The use of sarcasm, demeaning, or insensitive comments towards pupils is not acceptable in any situation. Deliberately intimidating pupils by shouting aggressively, hectoring, or an overbearing physical presence is not acceptable in any situation. Any sanctions or rewards used should be part of the school's Behaviour Policy.

Physical intervention can only be justified in exceptional circumstances. Non-statutory guidance is available from the DfE website. See 'Use of reasonable force - advice for Head Teachers, Staff and Governing Bodies'.

Adults may legitimately intervene to prevent a pupil from committing a criminal offence, injuring themselves or others, causing damage to property, engaging in behaviour prejudicial to good order, and to maintain good order and discipline. Adults should have regard for the health and safety of themselves and others.

It is always unlawful to use force as a punishment. The use of unwarranted physical force is likely to constitute a criminal offense.

Where a pupil has specific needs in respect of particularly challenging behaviour, a positive handling plan, including a risk assessment, should be put in place and agreed by all parties.

Where it is judged that a pupil's behaviour presents a serious risk to themselves or others, a robust risk assessment that is regularly reviewed and a physical intervention plan, where relevant, must be put in place. All incidents and subsequent actions should be recorded and reported to a senior leader and the pupil's parents/carers.

Where it can be anticipated that physical intervention is likely to be required, a plan should be put in place that the pupil and parents/carers are aware of and have agreed to. Parental consent does not permit the use of unlawful physical intervention or deprive a pupil of their liberty.

The school has separate policies on behaviour and for staff on positive handling. See the Trust's Behaviour & Anti-bullying Policy (Inc. Using Reasonable Force).

## 12. First aid and medication

The school has separate policies on first aid and on supporting pupils with medical needs (see the Trust's First Aid Policy and Medical Needs Policy, including Asthma & Intimate Care). Employees should have regard to the statutory DfE guidance 'Supporting pupils at school with medical conditions', December 2015, which includes advice on managing medicines.

All settings must have an adequate number of qualified first aiders/appointed persons. Employees must have had the appropriate training and achieved the necessary level of competency before administering first aid or medication, or taking on responsibility to support pupils with medical conditions. If an adult is concerned or uncertain about the amount or type of medication being given to a pupil, this should be discussed with the DSL.

Adults taking medication that may affect their ability to care for children should seek medical advice regarding their suitability to do so and should not work with pupils whilst taking medication unless medical advice confirms that they can do so. Adult medication on the premises must be securely stored out of the reach of children.

## 13. One-to-one situations and meetings with pupils

One-to-one situations have the potential to make children and young people more vulnerable to harm by those who seek to exploit their position of trust. Adults working in one-to-one settings with pupils may also be more vulnerable to unjust or unfounded allegations being made against them. Adults must recognise this possibility and plan and conduct such meetings accordingly.

Every attempt should be made to ensure that the safety and security needs of both adults and pupils are met. Leaders should undertake a risk assessment in relation to the specific nature and implications of one-to-one work for each adult and pupil, which should be reviewed regularly. Where such a meeting is demonstrably unavoidable, it is advisable to avoid remote or secluded areas and to ensure that the door of the room is left open and/or visual/auditory contact with others is maintained. Any arrangements should be reviewed on a regular basis.

Pre-arranged meetings with pupils away from the premises or on the school site when the school is not in session are not permitted unless written approval is obtained from their parent/carer and the headteacher or other senior colleague with delegated authority.

No pupil should be in or invited into the home of an adult who works with them, unless they are family members or close family friends, in which case, adults are advised to notify their line manager or a senior leader. Pupils must not be asked to assist adults with jobs or tasks at or in their private accommodation or for their benefit.

Other than in an emergency, an adult must not enter a pupil's home if the parent/carer is absent. Always make detailed records, including times of arrival and departure, and ensure any behaviour or situation that gives rise to concern is discussed with the headteacher or a senior leader.

A risk assessment should be undertaken and appropriate risk management measures put in place before any planned home visit taking place. In the unlikely event that little or no information is available, home visits should not be made alone.

## 14. Transporting pupils

In certain situations, e.g. out of school activities, adults may agree to transport pupils. Transport arrangements should be made in advance by a designated employee who will be responsible for planning and overseeing all transport arrangements and responding to any concerns that may arise. Wherever possible and practicable, transport should be provided other than in private vehicles, with at least one adult, in addition to the driver, acting as an escort.

Adults should ensure that their behaviour is safe and that the transport arrangements and the vehicle meet all legal requirements. They must ensure that the vehicle is roadworthy and appropriately insured and that the maximum capacity is not exceeded.

It is a legal requirement that all passengers wear seatbelts, and the driver should ensure that they do so. The driver should be aware of the current legislation concerning the use of car seats for younger children, where applicable. It is illegal to drive using hand-held phones or similar devices, and the driver must ensure that they adhere to all driving regulations.

It is inappropriate for adults to offer lifts to a pupil unless the need has been agreed with a senior leader and, if this falls outside their normal working duties, has been agreed with parents/carers.

There may be occasions where a pupil requires transport in an emergency, or where not giving a lift may place a pupil at risk. Such circumstances must always be recorded and reported to a senior leader and parents/carers.

## 15. Educational visits and school clubs

Adults should take particular care when supervising pupils in the less formal atmosphere of an educational visit, particularly in a residential setting or after-school activity. Adults remain in a position of trust, and the same standards of conduct apply. Please refer to the school's Educational Visits and Health and Safety policies.

## 16. Curriculum

Some areas of the curriculum can include or raise subject matter that is sexually explicit, of a political, cultural, religious, or otherwise sensitive nature. Care should be taken to ensure that resource materials cannot be misinterpreted and relate to the learning outcomes identified by the lesson plan.

The curriculum can sometimes include or lead to unplanned discussion about subject matter of a sexually explicit, political, cultural, religious, or otherwise sensitive nature. Responding to pupils' questions requires careful judgement, and adults must take guidance in these circumstances from the DSL.

Adults must not enter into or encourage inappropriate discussion about sexual, political, or religious activity or behaviour, or discussions which may offend or harm others. Adults should

take care to protect children from the risk of radicalisation and should act per the advice given under Part 1 of 'Keeping Children Safe in Education' and accordingly must not express any prejudicial views or attempt to influence or impose their personal values, attitudes, or beliefs on pupils.

Please refer to the school's policy on curriculum and on relationships and sex education (see the Trust's RSE Policy). From September 2026, teaching must be consistent with the DfE's revised statutory RSHE guidance.

**17. Photography, videos, and other creative arts**

Please refer to the school's Online Safety Policy, the use of images and the consent forms therein. Adults should have regard to the ICO guidance on video surveillance (including CCTV) and the guidance 'Taking Photographs in Schools'.

Many educational activities involve the taking or recording of images. This may be undertaken as part of the curriculum, extra school activities, for displays, publicity, to celebrate achievement or to provide evidence of the activity. The UK GDPR and the Data Protection Act 2018 affects the use of photography.

An image of a child is personal data, and it is, therefore, a requirement under the data protection legislation that consent is obtained from the parent/carer of a child before any images are made, such as those used for school websites, notice boards, productions, or other purposes.

Adults need to be aware of the potential for such images to be taken and/or misused to create indecent images of children and/or for 'grooming' purposes. This includes the risk of images being manipulated or used to create synthetic or AI-generated imagery; adults must never use AI tools to create, adapt, or manipulate images of pupils. Careful consideration should be given as to how these activities are organised and undertaken. There should be an agreement as to whether the images will be destroyed or retained for further use, where these will be stored, and who will have access to them.

Adults should remain sensitive to any pupil who appears uncomfortable and should recognise the potential for misinterpretation. It is also important to take into account the wishes of the child, remembering that some children do not wish to have their photograph taken.

Adults should only use equipment provided or authorised by the school to make/take images and should not use personal equipment, mobile telephones, or any other similar devices to make/take images.

The following guidance should be followed:

- if a photograph is used, avoid naming the pupil
- if the pupil is named, avoid using the photograph
- photographs/images must be securely stored and used only by those authorised
- be clear about the purpose of the activity and about what will happen to the photographs/images when the lesson/activity is concluded
- only retain images when there is a clear and agreed-upon purpose for doing so
- ensure that a senior member of staff is aware that the photography/image equipment is being used and for what purpose
- ensure that all photographs/images are available for scrutiny to screen for acceptability
- be able to justify the photographs/images made
- do not take images of pupils for personal use
- only take images where the pupil consents to this
- do not take photographs in one-to-one situations
- do not publish, display, or distribute photographs/images of pupils unless there is consent to do so from the parent/carer

- do not take images of pupils in a state of undress or semi-undress, or which could be considered as indecent or sexual

The property provided within the workplace, or to support the effective operation of a colleague's work such as telephones, mobile phones, the internet, intranet, email, stationery, photocopiers and other machines or tools, materials, offices, car parks and facilities, may only be used for the school business unless permission for private use is given by the headteacher.

School telephones (mobile and landline) should not be used to make personal telephone calls or send personal texts, except in an emergency or where appropriate permission to make a call has been sought.

Any communications using school systems may be monitored. Any such monitoring will be in accordance with the law. Telephone calls and email/internet logging systems may be used to identify usage for private purposes.

Colleagues must adhere to all of the school-specific system security measures that are currently in place or will be introduced in the future.

**18. Unacceptable use of IT facilities and monitoring**

Please refer also to the Online Safety policy (Inc. Acceptable Use) that includes information about using mobile phones and personal devices in school, and the EYFS policy.

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

Staff are expected to ensure that personal mobile phones are not used in the presence of children for safeguarding reasons. Personal mobile phones should be switched to silent and securely locked away during working time and may only be accessed in the staff room or another designated staff-only area, when staff are not responsible for supervising children.

Members of the Leadership Team and Premises Team may use mobile phones when required as part of their role, as mobile communication is an important means of communication for safeguarding, site and emergency matters. In these circumstances the member of staff must ensure they are using the mobile phone away from the presence of children. Any use of mobile phones must remain professional and must not compromise the safety, supervision or wellbeing of children.

Adults must only use generative artificial intelligence (AI) tools in accordance with the Trust's Online Safety and AI Policies (Inc. Acceptable Use) and with regard to the DfE's guidance 'Generative artificial intelligence (AI) in education'. Personal, confidential, or special category data relating to pupils, families, or colleagues must never be entered into AI tools that have not been approved by the Trust, and AI-generated content must be checked for accuracy and appropriateness before use.

Posting, creating, accessing, transmitting, downloading, uploading, or storing any of the following material (unless it is part of an authorised investigation) is likely to amount to gross misconduct and result in summary dismissal. This list is not exhaustive:

- pseudo-images of children (child abuse images) including AI-generated or otherwise digitally created indecent images of children
- pornographic or sexually suggestive material or images of children or adults which may be construed as such in the circumstances (that is, writing, texting, pictures, films, and video clips of a sexually explicit or arousing nature)
- any other type of offensive, obscene, or discriminatory material, criminal material, or material which is liable to cause distress or embarrassment to the school or others

If indecent images of children are discovered at the premises or on the school's equipment/devices, an immediate referral should be made to the school's DSL and headteacher (unless he or she is implicated) and the LADO and, if relevant, the police.

The images/equipment should be secured, should not be used by others, and should be isolated from the network. There should be no attempt to view, tamper with, or delete the images as this could jeopardise any necessary criminal investigation. If the images of

children are known to the school, a referral should also be made to children's social care per local arrangements.

The contents of our IT resources and communications systems are our property. Therefore, adults should have no expectation of privacy in any message, files, data, document, facsimile, telephone conversation, social media post, conversation or message, or any other kind of information or communications transmitted to, received or printed from, or stored or recorded on the school's electronic information and communications systems.

We reserve the right to monitor, intercept, and review (without prior notification or authorisation from adults) usage of our IT resources and communications systems, including but not limited to telephone, email, messaging, voicemail, CCTV, internet, and social media postings and activities. These are monitored to ensure that our rules are being complied with and for the following purposes:

- to monitor whether the use of email or the internet is legitimate and in accordance with this code
- to assist in the investigation of alleged wrongful acts
- to comply with any legal obligation

Adults consent to monitoring by acknowledging this code and the use of our resources and systems. We may store copies of data or communications for a period of time after they are created, and may delete such copies from time to time without notice. If necessary, information may be handed to the police in connection with a criminal investigation.

A CCTV system monitors the school 24 hours a day. This data is recorded and may be used as evidence of any alleged wrongdoing.

Cyber-bullying can be experienced by adults as well as pupils. Adults should notify the school's DSL if they are subject to cyberbullying. The school will endeavour to protect adults and stop any inappropriate conduct.

## 19. Reporting concerns and recording incidents

All adults must report concerns and incidents in accordance with the Trust's Safeguarding Policy. In the event of an allegation being made or an incident being witnessed, the relevant information should be immediately recorded and reported to the DSL or Headteacher as appropriate. An employee who fails to bring a matter of concern to the attention of senior leaders or the relevant agencies will be subject to disciplinary action.

In addition to behaviours outlined elsewhere in this code and the types of abuse and neglect set out in 'Keeping Children Safe in Education', the following is a non-exhaustive list of some further behaviours which would be a cause for concern. An adult who:

- allows a pupil/young person to be treated badly; pretends not to know it is happening
- gossips or shares information inappropriately
- demonstrates inappropriate discriminatory behaviour and/or uses inappropriate language
- dresses in a way that is inappropriate for the job role
- does not treat pupils fairly - demonstrates favouritism
- demonstrates a lack of understanding about personal and professional boundaries
- uses his/her position of trust to intimidate, threaten, coerce, or undermine
- appears to have an inappropriate social relationship with a pupil or pupils
- appears to have special or different relationships with a pupil or pupils
- seems to seek out unnecessary opportunities to be alone with a pupil

## 20. Disclosure of information, confidentiality, and references

Confidential, personal, or financial information about any colleague, pupil, or parent/carer, must not normally be disclosed to any organisation person, or normally, to any external organisation/agency, without the express approval of the person concerned. There may be safeguarding or other circumstances where there is a justifiable reason to disclose without that approval. Colleagues seeking clarification about 'authorised' or 'unauthorised' persons or about disclosure without approval should seek the guidance of their Headteacher or appropriate senior leader, who will take specialist advice on the matter.

Colleagues must not abuse their position by disclosing confidential information to any third party, which includes the unauthorised release of confidential information regarding:

- competitive tendering or tendering for work that may be beneficial to a third party
- an employee or service user
- colleagues must not use any information obtained in the course of their employment or tenure for personal gain or benefit or to attempt to obtain personal gain, nor pass it on to others who might use it in such a way
- if during the course of their employment, colleagues are dealing with members of their family, partners, friends, or business associates, this must be declared to the headteacher. Where such contact occurs, colleagues must be impartial and act in a professional manner
- references in relation to employment by the school should only be given by persons authorised to do so by the headteacher and must be provided in accordance with the safer recruitment requirements of 'Keeping Children Safe in Education'

The LETTA Trust ensures that all employees are aware of their responsibilities regarding preventing sexual harassment. Training will be provided to all staff, and recruitment processes will include clear expectations on professional conduct. Employees who fail to comply with these legal obligations may be subject to disciplinary action.

## 21. Recruitment and other employment matters

In accordance with the Trust's Equalities Policies, colleagues must take care that they are not open to any charge of discrimination in recruitment or employment practices by fully adhering to the Trust's Safer Recruitment procedures (in the Child Protection and Safeguarding Policy).

To avoid any possible accusation of bias, colleagues must not be involved in selection and appointment processes where they are related to an applicant or have a close personal or business relationship with them. They should declare an interest where there is a potential conflict of interest in such cases.

Work decisions should be objective and always based on merit. Colleagues must not be involved in decisions relating to discipline, promotion, or pay for any colleague who is a relative, or with whom they have a close personal or business relationship.

If there are exceptional reasons why the above should not be complied with, or any doubt as to how to proceed, advice must be sought from the headteacher, who will take professional advice before acting.

The Trust recognises its duty to provide a workplace free from discrimination and harassment, including sexual harassment. In line with The Worker Protection (Amendment of Equality Act 2010) Act 2023 and, from October 2026, the Employment Rights Act 2025 , we are committed to taking all reasonable steps to prevent sexual harassment in our schools and workplaces. This includes regular training, clear reporting procedures, and a commitment to taking swift and appropriate action against any form of harassment.

## 22. Equality, diversity, and inclusion

The Trust values variety and individual differences, and aims to create a culture, environment, and practices which encompass acceptance, respect, and inclusion. Colleagues must ensure that they read and adhere to any related school policies or guidance (including the Trust's Equality Information & Objectives) and adhere to all related legal requirements, such as the Equality Act and the Human Rights Act.

All colleagues, pupils, governors, parents/carers contractors, partners, trade union representatives and members of the public must be treated equally and in a way that creates mutual respect, they must not be discriminated against on grounds of ethnicity, sex, pregnancy or maternity, disability, age, religion or belief, marriage or civil partnership status, gender identity or sexual orientation.

## 23. Health and Safety

Colleagues are required at all times to observe and work to school's Health and Safety Policies and in accordance with safe systems of work, regulations and codes of practice, and relevant Health and Safety law.

## 24. Monitoring and review

The Headteacher is responsible for monitoring the implementation, use, and effectiveness of this policy and will report on these matters to the CEO and Local Governing Board. This policy will be reviewed by the Trust Board Resources Committee annually.

## 25. Related policies:

- Child protection and safeguarding policy
- Information governance policy
- Online safety policy (Inc. Acceptable Use)
- Behaviour & Anti-bullying Policy (Inc. Using Reasonable Force)
- Equality Information & Objectives
- Health and safety policy

- Remote learning and communication with families addendum
- Staff Disciplinary Policy
- Staff Grievance Policy
- Staff Capability Policy
- Whistleblowing Policy
- Anti-Fraud Policy
- Gifts and Hospitality Policy
- Tendering Policy
- First Aid Policy
- Medical Needs Policy (incl. Asthma & Intimate Care)
- Managing Unreasonable Behaviour by Parents and Visitors Policy
- Educational Visits Policy
- RSE Policy

## Appendix A - Preventing and Addressing Sexual Harassment and Victimisation

1. What is sexual harassment?

   1.1. Sexual harassment is any unwanted physical, verbal or non-verbal conduct of a sexual nature that has the purpose or effect of violating a person's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. A single incident can amount to sexual harassment.

   1.2. It also includes treating someone less favourably because they have submitted or refused to submit to unwanted conduct of a sexual nature, or that is related to gender reassignment or sex, in the past.

2. Sexual harassment may include, for example:

   2.1. unwanted physical conduct or "horseplay", including touching, pinching, pushing, and grabbing

   2.2. continued suggestions for sexual activity after it has been made clear that such suggestions are unwelcome

   2.3. sending or displaying material that is pornographic or that some people may find offensive (including emails, text messages, video clips, and images sent by mobile phone or posted on the internet)

   2.4. unwelcome sexual advances or suggestive behaviour (which the harasser may perceive as harmless)

   2.5. offensive emails, text messages, or social media content

3. A person may be sexually harassed even if they were not the intended target. For example, a person may be sexually harassed by pornographic images displayed on a colleague's computer in the workplace.

4. Victimisation includes subjecting a person to a detriment because they have done, or are suspected of doing or intending to do, any of the following protected acts:

   4.1. bringing proceedings under the Equality Act 2010

4.2. giving evidence or information in connection with proceedings under the Equality Act 2010

4.3. doing any other thing for the purposes of or in connection with the Equality Act 2010

4.4. alleging that a person has contravened the Equality Act 2010

4.5. victimisation may include, for example:

4.5.1. denying someone an opportunity because it is suspected that they intend to make a complaint about sexual harassment

4.5.2. excluding someone because they have raised a grievance about sexual harassment

4.5.3. failing to promote someone because they accompanied another staff member to a grievance meeting

4.5.4. dismissing someone because they gave evidence on behalf of another staff member at an employment tribunal hearing

5. Sexual harassment and victimisation are unlawful and will not be tolerated. They may lead to disciplinary action up to and including dismissal if they are committed:

5.1. in a work situation

5.2. during any situation related to work, such as at a social event with colleagues

5.3. against a colleague or other person connected to us outside of a work situation, including on social media

5.4. against anyone outside of a work situation where the incident is relevant to your suitability to carry out your role

6. We will take into account any aggravating factors, such as abuse of power over a more junior colleague, when deciding the appropriate disciplinary action to take.

7. If any sexual harassment or victimisation of staff occurs, we will take steps to remedy any complaints and prevent it from happening again. [These may include updating

relevant policies, providing further staff training, and taking disciplinary action against the perpetrator.]

8. Third-party harassment occurs where a person is harassed or sexually harassed by someone who does not work for, and who is not an agent of, the same employer, but with whom they have come into contact during the course of their employment. Third-party harassment could include, for example, unwelcome sexual advances from a client, customer, or supplier visiting the employer's premises, or where a person is visiting a client, customer, or supplier's premises or other location in the course of their employment.

9. Third-party sexual harassment can result in legal liability and will not be tolerated. The law requires employers to take reasonable steps to prevent sexual harassment by third parties. From October 2026, under the Employment Rights Act 2025, employers must not permit third parties to harass their employees and will be liable unless they have taken all reasonable steps to prevent it. This applies to harassment related to any protected characteristic, not only sexual harassment, and employees will be able to bring employment tribunal claims for third-party harassment. All staff are encouraged to report any third-party harassment they are a victim of or witness to, in accordance with this policy.

10. Any sexual harassment by a member of staff against a third party may lead to disciplinary action up to and including dismissal.

11. We will take active steps to try to prevent third-party sexual harassment of staff. These may include warning notices to customers or recorded messages at the beginning of telephone calls.

12. If any third-party harassment of staff occurs, we will take steps to remedy any complaints and to prevent it from happening again. These may include warning the harasser about their behaviour, banning them from our premises, reporting any criminal acts to the police, and sharing information with other schools within the Trust. See also the Trust's Managing Unreasonable Behaviour by Parents and Visitors Policy.

13. **If you are being sexually harassed: informal steps**

a. If you are being sexually harassed, consider whether you feel able to raise the problem informally with the person responsible. You should explain clearly to them that their behaviour makes you uncomfortable.

b. If this is too difficult, you should speak to your line manager and/or the HR Manager, who can provide confidential advice and assistance in resolving the issue. If you feel unable to speak to your line manager because the complaint concerns them, you should speak informally to HR. If this does not resolve the issue, you should follow the formal procedure set out in the Grievance policy.

14. Whistleblowing protection. From 6 April 2026, under the Employment Rights Act 2025, a disclosure that sexual harassment has occurred, is occurring, or is likely to occur is a 'qualifying disclosure' under whistleblowing legislation. Colleagues who report sexual harassment in good faith are protected from detriment and dismissal, and may also refer to the Trust's Whistleblowing Policy.