



SPARKEN HILL
ACADEMY

Staff Code of Conduct (2026-27)

Staff Code of Conduct

Excellence and Enjoyment in Education for Everyone

Item	Detail
Policy	Staff Code of Conduct
Applies to	All employees, and all volunteers, supply and agency workers, students on placement and contractors engaged by the Academy
Policy owner	Richard Lilley, Principal
Version	1.9 — September 2026
Supersedes	Version 1.7 (September 2025)
Approved by	Trust Board — [DATE TO CONFIRM]
Review cycle	Annually each September, in consultation with recognised trade unions
Next review	September 2027
Staff declaration	Required annually via SAM People, or in writing at Appendix A

What has changed in version 1.9

Updated for Keeping Children Safe in Education 2026 and Working Together to Safeguard Children 2026. Section 11 now covers the duty to prevent sexual harassment under the Worker Protection Act 2023 and the Employment Rights Act 2025, including third-party harassment. Section 22 has been substantially expanded into full safer working practice guidance — one-to-one working, physical contact, communication, transport, images and gifts. A new section 28 covers generative AI. Part C no longer duplicates the Managing Allegations policy and instead cross-refers to it. Legal citations, section numbering and appendix references have been corrected throughout.

Revision History

Version	Date issued	Prepared by	Comments
1.0	September 2015	RTL	Adopted
1.1	July 2018	RTL	KCSiE update
1.2	October 2019	RTL	General review
1.3	November 2021	RTL	Low level concerns introduced; approved by FGB
1.4	September 2022	RTL	Updated for KCSiE 2022; approved 13 October
1.5	September 2023	RTL	Updated for KCSiE 2023; approved 12 October
1.6	September 2024	RTL	Updated for KCSiE 2024; approved 10 October
1.7	September 2025	RTL	Updated for KCSiE 2025; approved 11 October
1.9	September 2026	RTL	Updated for KCSiE 2026, WTSC 2026, ERA 2025; safer working practice and AI sections added

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Part A — Policy

1. Policy Statement

Sparken Hill Academy expects the highest standards of personal and professional conduct from all employees, and requires everyone to act in a manner that reflects the values and ethos of the school.

Employees must ensure that their behaviour and actions are consistent with their position as a role model to pupils and are compatible with working with children in a school setting. They must act with integrity and honesty, and demonstrate ethical and respectful working practices towards pupils, colleagues, parents and carers, and the wider school community.

All employees have a responsibility to observe appropriate professional boundaries and to act at all times in a way that safeguards and promotes the welfare of pupils.

Employees must disclose any relevant information that may affect their job role or their suitability to work with children or in a school setting. Section 13 sets out this duty in full.

Each employee has an individual responsibility to uphold the school's interests and protect its reputation, is accountable for their own actions and conduct, and should seek advice from their line manager or the Principal if unsure what is expected.

Failure to comply with this Code may result in disciplinary action, including dismissal.

This Code sets out expectations in four areas: professional conduct, safeguarding, the use of ICT, social media and AI, and business conduct.

2. Scope

This Code applies to all employees of Sparken Hill Academy. It must also be observed by volunteers, supply and agency workers, students on placement and contractors engaged by the school.

References to “employees” throughout this document should be read as including all of those groups. It does not include governors, for whom separate arrangements apply.

References to the management role of the Principal may include a nominee. Where the Principal is the subject of a matter, that function is undertaken by the Chair of Governors.

3. Adoption and Review

This Code was adopted by the Trust Board on [DATE TO CONFIRM] and supersedes all previous versions. It is reviewed each September, or earlier if there is a need, in consultation with the recognised trade unions.

All employees confirm annually that they have read, understood and will comply with this Code, either on the SAM People portal or by signing the declaration at Appendix A.

4. Responsibilities of the School

- To explain the provisions of this Code and signpost employees to other relevant policies and guidance.
- To provide advice and guidance on the application of the Code.
- To coach, support and give feedback on performance against the standards of conduct required.
- To take appropriate action at the earliest opportunity where standards are not met.
- To create a culture in which staff feel able to ask questions, admit mistakes and raise concerns about the conduct of others.

5. Responsibilities of Employees

- To read, understand and comply with this Code at all times.
- To use it, alongside other school policies and professional codes, to guide their practice.
- To seek guidance from their line manager or the Principal (or the Chair of Governors in the case of the Principal) if unclear about the conduct expected of them.
- To alert the Principal (or the Chair of Governors in the case of the Principal) at the earliest opportunity if they believe they may have breached the expected standards.
- To confirm annually that they have read and understood this Code.

6. Related Standards and Guidance

This Code is not exhaustive and does not replace the general requirements of the law, common sense and good conduct. It should be read alongside the policies listed at Appendix B.

All staff employed under Teachers' Terms and Conditions have a statutory obligation to adhere to the STPCD and to the Teachers' Standards, including Part 2 — Personal and Professional Conduct. While this is a contractual requirement for teaching posts only, the Academy expects all employees to reflect those expectations in their conduct.

All employees must read, understand and comply with Part One of Keeping Children Safe in Education 2026, in force from 1 September 2026. Annex A, the shorter version of Part One, has been withdrawn — every member of staff now reads the same Part One, including those who do not work directly with children.

The Academy has adopted the Safer Recruitment Consortium's Guidance for Safer Working Practice as the basis for section 22 of this Code. Links to all external guidance are at Appendix D.

Part B — Professional Conduct

7. General Standards

Employees are expected to demonstrate consistently high standards of personal and professional conduct, to work in a diligent and conscientious manner, to work to the requirements of their job, and to respect managerial authority and follow reasonable instructions.

Employees should work their contracted hours and maintain a high level of attendance and punctuality. Being on time for duties, lessons and gate supervision is a safeguarding matter as much as a professional one.

8. Honesty and Integrity

Employees must maintain high standards of honesty and integrity, and should not behave in a manner that would call their motivation or intentions into question. In the course of their work, employees must not:

- provide false or misleading information;
- destroy or alter information or records without proper authorisation;
- withhold information or conceal matters they could reasonably be expected to disclose;
- misrepresent the Academy or their own position;
- accept or offer any form of bribe or inducement, or engage in any other corrupt practice.

Where an employee becomes aware of conduct by a colleague that raises concerns about health and safety, safeguarding or criminal activity, they have a duty to disclose it. Allegations of fraudulent, dishonest or corrupt practice, or the falsification or withholding of information, may be addressed as a disciplinary matter.

9. Setting an Example

Staff are role models. Behaviour must set a good example to pupils and be appropriate to a school setting. This includes:

- refraining from abusive, offensive or discriminatory language or actions;
- demonstrating tolerance of and respect for others;
- observing boundaries appropriate to a school setting;
- ensuring that topics of conversation with pupils are suitable to the setting and the curriculum;
- not allowing personal or political opinions to affect the discharge of duties or unduly influence pupils;
- maintaining high standards of personal presentation, attendance and punctuality.

Employees in doubt about the appropriateness of their behaviour should seek guidance from the Principal. Breaches may be considered under the disciplinary procedure.

10. Confidentiality and Data Protection

Employees may have access to confidential or sensitive information about pupils, colleagues or the operation of the Academy. Such information must not be disclosed to anyone not entitled to it or who does not legitimately need it for work purposes. This includes sharing information about pupils — particularly safeguarding information — with colleagues who have no valid reason to know it.

Specifically, all employees must:

- **work in accordance with the UK GDPR and the Data Protection Act 2018;**
- observe the school's procedures for releasing information to other agencies and members of the public;
- not use or share confidential information inappropriately or for personal gain;
- not speak inappropriately about the school community, pupils, parents, staff or governors, including discussing incidents, operational or employment matters with parents or members of the public;
- keep all confidential data secure and password protected, and not store school data on personal devices or personal cloud accounts.

Data protection law is not a barrier to sharing information in order to keep a child safe. Where safeguarding requires information to be shared, share it, and record the decision. If unsure, speak to a Designated Safeguarding Lead — do not delay.

For the avoidance of doubt, the staff room is not a confidential space. Pupils, visitors, supply staff and parents may be present. Exercise caution when discussing sensitive information anywhere others may overhear, including corridors, the playground and the school office.

11. Working Relationships, Dignity and Harassment

The Academy expects employees to maintain positive and professional working relationships. Colleagues, pupils, parents and other stakeholders should be treated with dignity and respect, and interactions should be polite and courteous.

Bullying, harassment, intimidation, victimisation and discrimination will not be tolerated and may be addressed under the disciplinary policy. This includes physical and verbal abuse, and the use of inappropriate language or unprofessional behaviour towards colleagues, children or parents.

The duty to prevent sexual harassment

Since October 2024, the Worker Protection (Amendment of Equality Act 2010) Act 2023 has required the Academy to take proactive steps to prevent the sexual harassment of its workers. From October 2026 that duty is strengthened: the Academy must take all reasonable steps, and becomes liable for harassment of staff by third parties — which in a school includes parents, carers, contractors, visitors and hirers.

Sexual harassment of a colleague is a serious disciplinary matter and may amount to gross misconduct.

Any member of staff who experiences or witnesses sexual harassment — whether by a colleague or by a third party — should report it to their line manager, the Principal or the Chair of Governors. Since 6 April 2026, a disclosure about sexual harassment is expressly a protected disclosure under whistleblowing law, and anyone raising such a concern is protected from detriment and from dismissal. Non-disclosure agreements cannot be used to prevent such a disclosure.

Harassment by a parent or other third party towards a member of staff should be reported immediately and will be addressed under the Violence to Staff Policy. Staff are not expected to absorb abuse as part of the job.

Other relationships

Where an employee works in the school their own child attends, appropriate professional boundaries must be maintained — including in relation to information about other children, staff room conversation and the parent community.

Close personal relationships between colleagues should be declared to the Principal where one party manages, supervises, appraises or has decision-making influence over the other, so that any conflict can be managed. Declaration is not a judgement; failing to declare is the difficulty.

Employees should be aware of the Complaints Procedure and address concerns from parents and pupils in accordance with it.

12. Conduct Outside of Work

Employees must not engage in conduct outside work which has the potential to:

- affect their suitability to undertake their role or to work with children or in a school setting;
- impact on the operation, reputation or standing of the school;
- impact on the school's relationships with its staff, parents, pupils or other stakeholders;
- seriously undermine the trust and confidence the Academy has in them.

Such conduct may be the subject of disciplinary action which could lead to dismissal. This is not a general power to police private life; it applies where there is a genuine connection between the conduct and the employee's role or the school's reputation.

13. Duty to Disclose

All employees must immediately disclose to the Principal — or to the Chair of Governors in the case of the Principal — any change in circumstances or any information which may affect their suitability to undertake their role or to work with children or in a school setting.

This duty applies before employment begins, on starting, and throughout employment.

This includes, but is not limited to:

- being subject to any police investigation or enquiry, arrest, ban, charge, caution, reprimand, warning, fine, pending prosecution or criminal conviction — including any act committed overseas that would be subject to police investigation or formal action if committed in the United Kingdom;
- any referral to, or investigation, proceedings or prohibition order by, the Teaching Regulation Agency, the General Teaching Council for Scotland or the Education Workforce Council in Wales;
- inclusion on the DBS Children's Barred List, any change in DBS status during employment, or any referral to or investigation by the DBS;
- any referral to, or investigation, proceedings or prohibition order by, any other regulatory or professional body, or action by any other agency relating to child protection or safeguarding;
- any order made in relation to the care of children, the refusal or cancellation of registration relating to childcare or children's homes, or being prohibited from private fostering;
- any live disciplinary process, formal sanction or other relevant information arising from previous or current secondary employment or voluntary work which may affect suitability, including substantiated safeguarding allegations;
- a close personal relationship outside the workplace which may present a risk to the safeguarding of children.

This list is not exhaustive. Employees unsure whether a matter should be disclosed are encouraged to seek guidance from the Principal at the earliest opportunity. Asking is always the right course; the difficulty arises from silence.

Employees must also report any current or historical information in the public domain, or likely to enter it, which may be relevant to their role or suitability, or which may attract adverse media attention or damage the reputation of the school.

Childcare disqualification

The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 apply to staff working directly with children under the age of five, and to staff providing wraparound care such as breakfast and after-school clubs for children up to the age of eight.

Affected employees must immediately disclose to the Principal if at any point they become disqualified from providing childcare or from being involved in the management of such provision, including where an application for an Ofsted waiver has been made, whether or not it was successful.

Disqualification “by association” was removed for school and non-domestic settings from 31 August 2018. An employee is not disqualified because of an offence committed by someone in their household. This is separate from the duty above to disclose a close personal relationship that may present a safeguarding risk, which continues to apply and is a matter for professional judgement rather than automatic disqualification.

How the school will respond to disclosures

Disclosures will be handled sensitively and discreetly, with regard to data protection. The Principal will consider carefully any disclosure and the appropriate response, which may include suspension from duties while an investigation or risk assessment takes place, or an application for an Ofsted waiver.

Where disclosed information constitutes a risk to the safeguarding of children, or is incompatible with an employee's role or suitability, termination of employment may be considered. Failure to disclose information required under this section may itself be the subject of disciplinary action which could lead to dismissal.

14. Secondary Employment

Employees must ensure that activities outside work do not conflict with their duty to the school, and must discuss with the Principal and obtain consent before taking up additional paid or unpaid employment or engaging in any other business.

Consent will not be unreasonably refused, provided that:

- it does not affect the employee's suitability to undertake their role or work with children;
- it does not conflict with the interests of the Academy or risk bringing it into disrepute;
- there is no detrimental impact on work performance, or on the health and safety of the employee or others;
- privileged or confidential information is not shared;
- the work is undertaken outside the school and outside contracted hours;
- the activity is not in direct competition with the school.

Employees are responsible for monitoring the hours they work across all employments and ensuring they are rested and able to carry out their role. An average working week of 48 hours across all

employments should not normally be exceeded unless the employee has opted out of the Working Time Regulations.

Private tutoring of a pupil currently on roll at Sparken Hill Academy, for payment, is not permitted.

15. Dress and Presentation

The Academy expects smart, professional dress that is appropriate to the role, to the activity being undertaken, and to a primary school setting. The standard is functional rather than prescriptive: staff are trusted to exercise judgement, and the outcome is what matters.

All employees must ensure that their dress, appearance and personal hygiene:

- present a professional image to pupils, parents, visitors and colleagues;
- are suited to the activity — including PE, forest school, practical lessons, trips and residential;
- do not restrict movement or supervision, and allow the wearer to respond quickly in an emergency;
- are not revealing or sexually suggestive, and carry no wording or imagery that could cause offence.

Health and safety requirements

The following are requirements rather than matters of judgement:

- footwear must be safe, secure and suitable for duties, supervision and moving around a busy site — open-toed sandals and flip-flops are not permitted;
- suitable protective equipment must be worn where provided, and uniforms worn where issued;
- appropriate kit must be worn to lead PE and physical activity, including Sports Day — an Academy PE kit is available on request;
- jewellery must not present a risk to the wearer or to children, particularly during PE, practical activities and intimate care;
- lanyards and identity badges must be worn at all times on site.

Individual circumstances

The Academy recognises the diversity of cultures, religions and beliefs among its staff, and matters relating to disability, pregnancy and medical need. Where dress, jewellery, headwear or appearance relates to a protected characteristic, or to a health condition, the Academy will take a sensitive and individual approach. Speak to the Principal, and a reasonable accommodation will be made wherever health and safety allows.

Where a member of staff is unsure whether something meets the standard, ask before rather than after. Where a judgement has to be made, it will be made on the basis of professionalism and safety, applied consistently and without reference to sex, religion, race, age or any other protected characteristic.

16. Smoking, Alcohol and Drugs

Sparken Hill Academy is a no-smoking environment. Smoking and the use of e-cigarettes or vaping is not permitted on school premises or during working time, and staff should also refrain from smoking or vaping immediately outside school entrances or anywhere they can be seen by pupils.

Employees must not consume or use alcohol, illicit drugs or other illegal substances in the work place, or be under the influence of such substances while at work. This includes school trips, residentials and any occasion where staff are responsible for pupils.

Employees must ensure that any use of alcohol or other substances outside work does not adversely affect their work performance, attendance, conduct, working relationships, or the health and safety of themselves or others, or damage the school's reputation.

Where prescribed medication may affect an employee's ability to work safely, this must be reported to the Principal or the School Business Manager. Such information is treated confidentially.

17. Health and Safety

All employees must, by law, take reasonable care for their own health and safety and that of others, and must comply with the Health and Safety Policy and agreed procedures at all times. This includes:

- avoiding risk of injury or danger to yourself or others;
- using any protective clothing and equipment supplied;
- complying with hygiene requirements;
- **observing the Hot Drinks Policy in full — open-top mugs only in designated areas, sealed cups with locking lids everywhere else, and no drink ever left where a child could reach it;**
- **never allowing pupils to use staff lanyards** to access any area of the school — specific pupil-role lanyards are available which restrict which doors can be opened;
- reporting hazards, defects, accidents, incidents and near misses at the earliest opportunity;
- not interfering with or misusing anything provided for health, safety or welfare;
- informing the school of any medical condition or prescribed medication that may have an impact on health and safety in the workplace;
- knowing the fire evacuation procedure, your assembly zone, and the lockdown procedure.

Employees with managerial responsibilities must also comply with any additional health and safety obligations associated with their role.

Reporting a health and safety concern

Where staff identify anything that could be a health and safety hazard, complete a Health and Safety Concern Record. Forms are held on the staff information boards, by the photocopier, outside the staff room and in the Foundation Stage staff room, and are available on request from the office. The completed form should be handed to the Principal, the Vice Principal or the School Business Manager, who will assess the risk and take action proportionate to it as soon as is practicable.

18. Contact with the Media

All enquiries from the media must be directed to the Principal. Employees should not contact or comment to the media about matters relating to the Academy without the Principal's prior approval.

Employees should raise concerns about their own employment or the operation of the school with the Principal in the first instance, and may use the Whistleblowing or Grievance policies to raise a formal concern.

Where an employee speaks to the media in a personal capacity on non-school matters, care must be taken to make clear that any opinions are personal and that they are not acting on behalf of the

school. Such contact must remain compatible with their role working with children and must not damage the school's reputation.

19. Whistleblowing

Employees may raise concerns about any aspect of the operation of the Academy which is not directly related to their own employment through the Whistleblowing Policy. Anyone raising a concern with reasonable grounds for doing so will not be subject to discrimination, harassment or victimisation.

Whistleblowing protection covers disclosures about criminal offences, breaches of legal obligations, miscarriages of justice, dangers to health and safety, damage to the environment, sexual harassment, and the deliberate concealment of any of these. Protection applies whether or not the words "whistleblowing" are used.

Matters relating only to an employee's own treatment or contract are grievances rather than disclosures, and should be raised under the Grievance Policy.

20. Misconduct

Failure to follow this Code may result in disciplinary action, including dismissal. Employees should be familiar with the conduct that may be regarded as a breach of school rules. Examples of behaviour likely to constitute misconduct and gross misconduct are set out in the appendix to the Disciplinary Policy and Procedure, under which allegations will be managed.

Part C — Safeguarding

21. General Safeguarding Obligations

All employees have a responsibility to:

- safeguard pupils from physical abuse, sexual abuse, emotional abuse and neglect;
- promote the welfare of pupils and provide a safe environment in which children can learn;
- identify children who may need extra help, or who are suffering or likely to suffer significant harm, and know when a child may need early help or Family Help;
- report any child protection or safeguarding concern to a Designated Safeguarding Lead immediately and without delay — or to the Chair of Governors where the concern relates to the Principal;
- recognise that self-harm, suicidal ideation and risk of suicide are safeguarding concerns in their own right;
- attend and comply with all safeguarding training required by the Academy.

All employees must read, understand and comply with:

- Part One of Keeping Children Safe in Education 2026;
- the Child Protection and Safeguarding Policy;
- the Managing Allegations Against Staff policy, including Low Level Concerns;
- the Relationships and Behaviour Regulation Policy;
- the Online Safety Policy and ICT Acceptable Use Policy.

Employees with managerial responsibilities must additionally comply with Parts Two to Four of Keeping Children Safe in Education and with the school's procedures for managing allegations against staff.

A lack of reports does not mean there is nothing to report. If something makes you uneasy, say so.

22. Safer Working Practice

This section is based on the Safer Recruitment Consortium's Guidance for Safer Working Practice. Its purpose is to protect children, and to protect you. Working in an open and transparent way that would not lead any reasonable person to question your actions or intent is the best protection against misinterpretation and against allegation.

The underlying test: would you be comfortable if a colleague, a parent or the Principal saw what you are doing, or read the message you are about to send? If not, do it differently.

22.1 Power and position of trust

Adults working with children are in a position of trust and hold power over them. That imbalance means the responsibility for maintaining boundaries always rests with the adult, never with the child, whatever the child's behaviour or apparent wishes. A child cannot consent to a breach of professional boundaries.

Staff must not seek, or allow, a relationship with any pupil that could be interpreted as personal rather than professional — including favouritism, singling a child out for special attention, or forming an emotional attachment that goes beyond the professional role.

22.2 One-to-one working

- Wherever possible, work with a child in a room with a window or an open door, or in a space where others can see in.
- Tell a colleague where you are, who you are with and roughly how long you expect to be.
- Avoid working with a child in an isolated or unobserved area of the site.
- Where one-to-one work is a planned part of provision — interventions, nurture, pastoral support — the arrangement should be recorded and known to the SENCOs or the DSL team.
- Never take a child into an area of the school where you cannot be observed or overheard.

22.3 Physical contact

Some physical contact is entirely proper in a primary school — comforting a distressed child, first aid, supporting a child in PE, guiding a hand in early writing. The tests are that it is necessary, appropriate to the child's age and needs, and would be understood by any observer.

- Contact should be in response to the child's need, not the adult's.
- Be aware of any individual plan or preference — some children, including some pupils with SEND, find touch distressing.
- Avoid contact that could be misinterpreted, or that continues beyond what the situation requires.
- Reasonable force and positive handling are governed by the Relationships and Behaviour Regulation Policy and by staff training. Any use must be recorded on the day.
- Report and record any contact that could be misconstrued, or any occasion where a child initiates contact you were not expecting, so that there is a contemporaneous account.

22.4 Intimate care and toileting

- Intimate care is delivered only in accordance with the child's intimate care plan, by staff identified in that plan.
- Care is given in a way that preserves the child's dignity and, so far as possible, their independence.
- Another adult should be aware that intimate care is taking place, and where.
- Each occasion is recorded.
- Where a child resists or becomes distressed, stop and seek advice rather than continuing.

22.5 Communication with pupils and families

- All communication with pupils and families uses school systems and school accounts — never personal email, personal phone numbers or personal messaging apps.
- Do not give a pupil or parent your personal contact details, and do not accept theirs for personal use.
- Communication should be professional in tone, and should take place within the working day wherever possible.
- Never engage in communication with a pupil that is secretive, or that you would not want a parent or colleague to see.
- **Never ask or encourage a pupil to keep anything secret from their parents or from other staff.** Confidentiality and secrecy are not the same thing, and grooming behaviour depends on the second.

22.6 Transporting pupils

- Staff should not transport a pupil in their own vehicle other than in an emergency, and then only with the prior agreement of the Principal or a senior leader where practicable.

- Where transport is unavoidable, a second adult should be present wherever possible, and the journey should be recorded.
- Parents should be informed.
- Staff using their own vehicle for school business must hold appropriate business insurance, a valid licence and a roadworthy vehicle.

22.7 Home visits

- Home visits take place only where they form part of an agreed role or plan, and are authorised in advance.
- Two members of staff should attend wherever possible.
- The office is told where you are going and when you expect to return, and told on your return.
- A written record is made of every visit, including any concern arising.

22.8 Photography, images and recordings

- **Never use a personal phone, camera or tablet to photograph or record pupils.** School devices only.
- Images are stored on school systems, never on personal devices or personal cloud accounts, and are deleted from the capturing device at the end of the day where practicable.
- Check consent status before an image is used or shared, and never publish an image of a child whose consent is withheld.
- Never photograph a Refugee (PO Box) child under any circumstances, and never confirm to any caller that such a child attends the school.
- No photographs on trips or visits using personal equipment, and no selfies with or near pupils.
- Images must be appropriate — children suitably dressed, and the purpose clear.

22.9 Gifts, rewards and favouritism

- Staff should not give personal gifts to individual pupils. Rewards form part of the agreed behaviour and reward system and are available to all.
- Small tokens received from pupils and families at the end of term may be accepted — see section 34.
- Avoid any arrangement that singles out one child for special treatment, access or privilege.

22.10 Trips, residentials and out-of-hours activity

- Sleeping, changing and washing arrangements on residentials must be planned in advance, with clear staff arrangements, and recorded in the visit risk assessment.
- Staff do not share sleeping accommodation with pupils.
- Staff do not consume alcohol at any point while responsible for pupils.
- The same standards of conduct, communication and physical contact apply off site as on site — and the informality of a residential is precisely when boundaries slip.

22.11 Social contact and relationships with families

Many staff live locally and know families outside school. That is normal and not a problem in itself. What matters is transparency: where a personal relationship with a family may affect, or appear to affect, professional judgement, tell the Principal. Where a pupil or family seeks a personal relationship with a member of staff, decline it and report it.

Staff must not babysit, tutor privately for payment, or provide childcare for a pupil on roll without the prior knowledge and agreement of the Principal.

22.12 If something goes wrong

If you find yourself in a situation that could be misinterpreted, or you become aware that you have breached a boundary — even accidentally — report it to the Principal the same day. Self-reporting is treated as a sign of professionalism, not as an admission. The difficulty arises when concerns emerge later and there is no contemporaneous record.

23. Reporting Concerns About an Adult

All employees have a duty to report to the Principal or a Designated Safeguarding Lead, at the earliest opportunity, the conduct of a colleague that may place a child at risk. Where the concern relates to the Principal, it should be reported to the Chair of Governors. Failure to report such a concern may itself be a disciplinary matter.

This duty applies to all adults working in or on behalf of the school, including supply teachers, agency staff, trainee teachers, volunteers and contractors.

Which route applies

If the concern is...	Then...
That an adult has harmed a child, may have harmed a child, may have committed a criminal offence against a child, or may pose a risk of harm to children	This meets the harm threshold. Report to the Principal immediately. The Principal will consider a referral to the Local Authority Designated Officer at the earliest stage. Managed under the Managing Allegations Against Staff policy.
That an adult has behaved in a way inconsistent with this Code, but below the harm threshold — including a sense of unease or a nagging doubt	This is a low level concern. Report it to the Principal, using the form at Appendix C if helpful. Low level concerns are recorded centrally and reviewed for patterns.
About wider wrongdoing or malpractice not related to your own employment	Use the Whistleblowing Policy.
About your own treatment or contract	Use the Grievance Policy.

If you are unsure which applies, report it anyway and let the Principal decide. It is not for the person raising a concern to assess the threshold.

The full procedure — including the role of the case manager, suspension and its alternatives, timescales, outcome definitions, record-keeping, references and support for the person concerned — is set out in the Managing Allegations Against Staff policy, which follows Part Four of Keeping Children Safe in Education 2026. It is not reproduced here, so that there is a single authoritative version.

Every member of staff should know that any concern about an adult will be taken seriously, handled fairly, and will not result in detriment to the person who raised it.

24. Other Safeguarding Duties

Prevent

The Academy has a duty to protect children from radicalisation and extremism. All staff must report any concern that a pupil may be at risk to a Designated Safeguarding Lead.

Female genital mutilation

Teachers have a statutory duty to report to the police where, in the course of their work, they discover that an act of FGM appears to have been carried out on a girl under 18. All staff must discuss any concern with a Designated Safeguarding Lead.

Serious violence and weapons

Any concern that a pupil is carrying, threatening to use, or intending to use a weapon must be reported to a Designated Safeguarding Lead immediately.

Mental health

Staff are not mental health professionals and are not expected to diagnose. They are, however, well placed to notice change. Report concerns about a pupil's mental health — including withdrawal, changes in behaviour, sleep difficulties, loss of interest in things they usually enjoy, or physical signs of harm — to a Designated Safeguarding Lead.

Children requiring additional support

Be alert to children who may benefit from early help or Family Help, including those who are absent as well as those missing from education, those repeatedly removed from the classroom or on a part-time timetable, and those with SEND, who may not recognise that what is happening to them is abuse.

Part D — ICT, Social Media and AI

25. General ICT Obligations

Employees must read, understand and comply with the ICT Acceptable Use Policy and the Online Safety Policy at all times. Whether at work or using a work device, all employees must:

- ensure all electronic communication with pupils, parents, colleagues and other stakeholders is compatible with their professional role and appropriate boundaries;
- not use work IT equipment to browse, create, transmit, display, publish or forward any material or image that is illegal, sexually explicit, obscene, or which could offend, harass or upset others, or bring their role or the Academy into disrepute;
- not use personal IT equipment to do any of the above;
- respect ICT system security and observe password protocols, including strong passwords, multi-factor authentication where enabled, and encryption;
- not install personal software on school equipment or make unauthorised copies of school-registered software;
- lock devices when leaving them, and never leave a device logged in and unattended in a pupil area.

Limited personal use of school internet, email and ICT equipment is permitted within the scope of the ICT Acceptable Use Policy, provided it does not affect the individual's work. Access to gaming, gambling, social networking sites and internet chatrooms from school devices is not permitted.

26. Social Media

Employees must ensure that their online presence is compatible with their professional role. All employees should:

- apply appropriate privacy settings on social media accounts, and review them periodically;
- refrain from sharing confidential or privileged information, discussing incidents or operational or employment matters, or making critical or negative comments about the Academy, pupils, parents or colleagues;
- not browse, create, transmit, display, publish or forward material that is illegal, could offend or harass, or could bring their role or the Academy into disrepute;
- never share or post images of pupils;
- not post images of colleagues without their permission;
- not access or update social media using school devices or during working time.

Employees should not make contact with pupils or parents through personal social media accounts, or have them as social media friends or contacts. This extends to former pupils and their families, and applies whatever the pupil's current age.

Where an employee is contacted by a pupil, former pupil or parent through personal social media, they should not respond, and should report it to the Principal.

27. Personal Mobile Phones and Devices

Employees may not make or receive personal calls or texts, send or receive personal email, or access the internet or social media during working time where children are present.

Personal mobile devices must be stored securely and out of sight during contact time, unless explicit permission has been given by the Principal or the Vice Principal — for example, where a member of staff is expecting an urgent call about a family emergency. Where permission is given, the device must be kept silent and out of sight.

Employees must never use personal equipment — phones, cameras, tablets, smart watches or wearables — to take photographs or make recordings of pupils. See section 22.8.

Sparken Hill Academy is a phone-free school for pupils. Being phone-free is now a statutory expectation, and staff are asked to model and uphold it: pupils should not access mobile phones during lessons, breaks, lunchtimes or between lessons.

28. Generative Artificial Intelligence

Generative AI tools can support planning, resource creation and administrative work. Used carelessly, they create real risks around personal data, accuracy and professional judgement. The following applies to all staff.

What must not go into an AI tool

- **Never enter personal data about a pupil, a family or a colleague into any generative AI tool.** This includes names, dates of birth, addresses, SEND information, medical or safeguarding information, attendance or behaviour records, and anything from a pupil's file — whether or not the tool is approved.
- Never enter safeguarding information, or use AI to draft a safeguarding record, referral or chronology.
- Never enter confidential school information, including staffing, financial, HR or governance material.
- Assume that anything entered into a public AI tool may be retained and used to train that tool, and may not be recoverable.

Using AI well

- AI may be used to help draft, structure or refine your own work — planning, resources, letters, presentations — provided no personal or confidential data is entered.
- **You remain professionally responsible for anything you produce with AI assistance.** Check it. AI tools state incorrect things fluently and confidently, and can invent references, statistics and quotations.
- AI must not be used to write pupil reports, references, or any assessment of an individual child's progress or character. These require professional judgement about a specific child and cannot be delegated.
- Do not rely on AI-generated content for statutory, safeguarding or legal matters without checking it against the source guidance.
- Where AI has materially shaped a document that will be published or relied upon by others, say so.
- Use school-approved tools where they are available, in preference to consumer tools.

AI and safeguarding

The definition of nude and semi-nude imagery now includes images that are digitally altered or generated by AI. Any AI-generated sexual image of a person under 18 is a safeguarding incident

and must be reported to a Designated Safeguarding Lead immediately. Staff should be alert to the use of AI tools by pupils to create or alter images of other children or of adults.

Staff must never use AI to generate images of pupils, or to alter images of pupils, for any purpose.

If you are unsure whether a particular use of AI is appropriate, ask before you use it.

29. Monitoring of Usage

Emails, documents and browsing history on school systems should not be considered private, and may be monitored and recorded to ensure the safety of pupils and compliance with this Code. Monitoring is proportionate and takes place in accordance with data protection and privacy legislation.

A senior member of the leadership team, supported by the DSL and IT, reviews the effectiveness of the school's filtering and monitoring systems at least once each academic year, and a record is kept of those checks.

The Academy may address unauthorised, unacceptable or inappropriate use of ICT systems, devices, social media or AI tools as a disciplinary matter.

Part E — Business Conduct

30. Use of Financial Resources

The Academy requires employees to observe the highest standards of business and financial practice, and to ensure that school and public funds entrusted to them are used responsibly and lawfully.

- Comply with the school's financial regulations, the Academy Trust Handbook and any relevant audit requirements.
- Obtain appropriate authorisation for any expenditure and keep a suitable audit trail.
- Never use school monies, credit or debit cards, or accounts for personal purposes.
- **Avoid using personal credit cards or accounts to purchase goods and services on behalf of the Academy.**
- Ensure all travel and subsistence claims are authorised and accompanied by receipts.
- **Do not use personal loyalty cards when making purchases on behalf of the school.**

31. Personal Use of Equipment and Resources

Employees may not make personal use of the school's property, materials or facilities unless authorised by the Principal.

32. Declaration of Interests

The Academy recognises that employees may take an active role in the local community and undertake activities outside work. In most cases these will have no bearing on their role, but occasionally a conflict of interest may arise.

Employees must declare annually to the Principal any financial or non-financial interest that may conflict with those of the school, and any membership of a professional body or organisation that may conflict with their role. Employees in doubt should seek guidance from the Principal.

33. Procurement and Contracting

- Follow agreed school protocols for the award of contracts to external providers.
- Adhere to the rules on separation of roles in procurement and tendering.
- Ensure competition between prospective contractors is fair and open and that all parties are treated equally.
- Show no preferential treatment to current or former employees, partners, close relatives, friends or associates.
- Never accept any financial or other inducement from a potential contractor — report all such approaches to the Principal.
- Never disclose confidential tendering information to an unauthorised party.

34. Gifts and Hospitality

Employees must not accept significant gifts from parents, carers, pupils, or actual or potential contractors and suppliers, where doing so could compromise the individual or the Academy.

Small tokens of appreciation with no substantial financial value — under £25, such as end-of-term presents from pupils — may be accepted and need not be declared. Cash should never be accepted, in any amount.

Any unsolicited gift above that value should be notified to the Principal and returned to the sender with a polite letter of refusal. A record is kept of all gifts received.

Hospitality may be accepted only where there is a genuine need to represent the Academy in the community. Employees should discuss any invitation with the Principal.

Where the Academy receives sponsorship for an activity or event, care must be taken to ensure this does not imply that the sponsor will receive preferential treatment in any future tendering process. No employee, or their partner, family member or friend, may benefit from sponsorship.

35. Appointments

An employee must not be involved in a recruitment or promotion decision where one of the applicants is a relative, partner or close friend, and must declare any such relationship as soon as it becomes apparent.

36. Political Activity

Employees may engage in political activity outside work, but must not allow personal or political views to interfere with their duties or unduly influence pupils. Any such activity should be compatible with their responsibility as a role model.

Care must be taken to make clear that any opinions expressed are personal and that the individual is not acting on behalf of the school.

37. Intellectual Property

Any intellectual property created by an employee in the course of their employment is the property of the Academy, unless specific permission is granted for the employee to retain ownership.

Appendix A — Staff Declaration

Confirmation may be given on the SAM People portal. Where a paper record is preferred, please complete this form and return it to Mrs Dashper, School Business Manager.

I confirm that I have read, understood and agree to comply with the provisions of the Sparken Hill Academy Staff Code of Conduct (version 1.9).

I understand that if I have any query about any aspect of the Code, or am unclear about the school's expectations, I will discuss this with the Principal at the earliest opportunity.

I understand my duty to disclose any change in circumstances that may affect my suitability to work with children, as set out at section 13.

Field	Detail
Name	
Job title	
Signed	
Date	

Employees should re-read this Code annually to ensure they are familiar with any changes.

Appendix B — Related Policies

This Code should be read alongside:

- Child Protection and Safeguarding Policy
- Managing Allegations Against Staff, including Low Level Concerns
- Whistleblowing / Confidential Reporting Policy
- Disciplinary Policy and Procedure
- Grievance Policy
- Relationships and Behaviour Regulation Policy
- ICT Acceptable Use Policy and Online Safety Policy
- Health and Safety Policy
- Fire Safety Policy
- Hot Drinks Policy
- Violence to Staff Policy
- Data Protection Policy
- Staff Dress Code
- Finance Policy and the Academy Trust Handbook
- Educational Visits Policy
- Intimate Care Policy

Appendix C — Staff Behaviour Concern Form

Use this form to share any concern with the Principal or a Designated Safeguarding Lead, however small or seemingly insignificant — including where it amounts to no more than a sense of unease or a nagging doubt that an adult may have acted in a way inconsistent with this Code, including conduct outside work, and which on first glance does not appear to meet the harm threshold.

Give a concise record: brief context, then details that are chronological, precise and as accurate as possible. Continue on a separate sheet if needed. Sign, time and date the form.

Field	Detail
Your name	
Your role	
Time and date	
Details of the concern	
Signed	

For completion by the recipient

Field	Detail
Received by	
Time and date received	
Was the staff member spoken to?	Yes / No — if no, give a brief but valid reason
Staff member's response	
Action taken	
Advice sought from LADO or HR?	Yes / No
Signed and dated	

This record is held securely, digitally or in paper form, in one central file, in accordance with this Code and the school's data management policies. Low level concern reporting is treated as confidential so far as possible. In certain circumstances it may be necessary to share the information

with third parties for relevant and necessary reasons, including where the person reporting has asked to remain anonymous.

Appendix D — Key External Guidance

Guidance	Where to find it
Keeping Children Safe in Education 2026	gov.uk — search “keeping children safe in education”. All staff read Part One.
Working Together to Safeguard Children 2026	gov.uk — published March 2026
Teachers’ Standards, Part 2	gov.uk/government/publications/teachers-standards
Guidance for Safer Working Practice	saferrecruitmentconsortium.org — check for the current edition
Disqualification under the Childcare Act 2006	gov.uk/government/publications/disqualification-under-the-childcare-act-2006
Generative AI in education	gov.uk — DfE guidance on generative artificial intelligence in education
Mobile phones in schools	gov.uk — statutory guidance
Academy Trust Handbook 2026	gov.uk — effective from 1 October 2026

Links are given by title rather than full URL so that this document does not go out of date when a page moves. Where a hyperlink is needed, the current version is held on the staff shared area.

Approved and adopted by the Trust Board:

Role	Signature	Date
Chair of Governors		
Principal		