



Staff Code of Conduct and Whistleblowing Procedure

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v1.0	Sept 23	J. McLellan	New document Whistleblowing procedure taken from GCC model.	Delegated to Co-HTs	Mar 25
v2.0	Nov 23	M Davies	12 Dress and Appearance Added By all staff. Removed point about what men should wear.		
V3.0	Mar 24	J. McLellan	Inappropriate behaviour towards pupils added to Safeguarding pupils section.	Co-HTs	Sept 25

SOUTHROP C OF E PRIMARY SCHOOL
Staff Code of Conduct
and
Whistleblowing

May 2025

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1. Aims and principles

This Code of Conduct is designed to give clear guidance on the standards of behaviour all school employees are expected to observe. School employees are role models in a unique position of influence, and so must adhere to behaviour that sets a good example to the pupils within the school. As a member of a school community, each employee has an individual responsibility to maintain their reputation and the reputation of the school, whether inside or outside working hours.

This Code of Conduct applies to all employees of the school. This code does not form part of any employee's contract of employment and it may be amended at any time.

In addition to this Code of Conduct, all employees engaged to work under Teachers' Terms and Conditions of Employment have a statutory obligation to adhere to the 'Teachers' Standards 2012' and in relation to this policy, Part 2 of the Teachers' Standards - Personal and Professional Conduct.

This Code helps all staff to understand what behaviour is and is not acceptable. Staff should be aware that a failure to comply with the school's Code of Conduct could result in disciplinary action including but not limited to dismissal.

2. Setting an Example

All staff who work in schools set examples of behaviour and conduct which can be copied by pupils. They should therefore, demonstrate high standards of conduct in order to encourage our pupils to do the same.

- Staff must avoid using inappropriate, loud or offensive language at all times.
- Staff must maintain high standards in their attendance and punctuality.
- Staff must express personal beliefs in a way that will not overly influence pupils and will not exploit pupils vulnerability
- Staff must also avoid putting themselves at risk of allegations of abusive or unprofessional conduct.
- All staff are expected to familiarise themselves and comply with all school policies and procedures.

3. Safeguarding Pupils

Staff have a duty to safeguard pupils from harm, and to report any concerns they have. This includes physical, emotional and sexual abuse, or neglect. Staff will familiarise themselves with our safeguarding policy and procedures and the Prevent initiative, and ensure they are aware of the processes to follow if they have concerns about a child. Our Child Protection and Safeguarding policy and procedures are available on the website, in the staff room and from the school office. New staff will also be given copies on arrival.

Children should not be left unattended in the classroom. Safety needs to be considered for the safety of children under 7 moving around the site. Generally a member of staff should be with them. Children over this age may be sent to do errands in pairs.

Staff should be aware of the school's high expectations for appropriate behaviour towards children, as outlined in our Low Level Safeguarding Policy.

Staff should only exercise physical restraint as a last resort to prevent injury.

Staff are allowed to comfort a child who is hurt/distressed in a manner appropriate to the age of the child.

Adults should not initiate any physical contact unnecessarily, and there should be clear boundaries:

- Children should not be picked up. (unless medically necessary or being restrained)
- Adults should avoid being in a room alone with a child where the door is closed. If you need to talk to a child, either leave a door open and position yourself within sight of the door, or ask another adult to be present.

Inappropriate behaviour can exist on a wide spectrum, from inadvertent or thoughtless behaviour to behaviour which is ultimately intended to enable abuse. Examples of inappropriate behaviour that would constitute a low-level concern that should be reported to the DSL include, but are not limited to:

- Being overly friendly with children – this could include, but is not limited to, allowing inappropriate conversations or enquiries to occur with pupils, e.g. conversations that are about a staff member's personal life.
- Having favourites – this could include, but is not limited to, calling pupils by pet names or terms of endearment or buying pupils gifts.
- Taking photographs of children on mobile phones, contrary to school policy.
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door.
- Humiliating children.

4. Attendance

The school expects that staff members will:

- Attend work in accordance with their contract of employment and associated terms and conditions in relation to hours, days of work and holidays.
- Make routine medical and dental appointments outside of their working hours or during holidays where possible
- Refer to the school's Staff Absence Policy if they need time off for any reason other than personal illness
- Follow the school's absence reporting procedure when they are absent from work due to illness or injury.

5. Personal Interest

Employees should act professionally. They should not abuse their position in the school to confer an advantage or disadvantage on any person or obtain an advantage for themselves, whether financial or otherwise. They should not allow their personal interests to interfere with their work at the school.

Employees should not use their position in school to advocate any one religion, culture, political ideology to students. It is the direct responsibility of all employees to uphold British Values as defined in law. To avoid any doubt or unwarranted suspicion employees should tell the school about a personal interest which might compromise or be seen as compromising their position in the school. If in doubt about what should be declared they should seek advice. Examples of personal interests about which they should tell the school include:

- Situations in which the employee's job (for example, as head teacher) could unduly influence decisions on contracts into which the school has entered or is proposing to enter, or where an employee has a personal or financial interest in any of the contracts, either directly or indirectly (for example, through a partner or relative).
- Where an employee holds a position with an external company or organisation, whether paid or unpaid, which may lead to a conflict of interest. (Examples include directorships of companies, serving on bodies such as charities, voluntary groups, governing bodies of other educational establishments.)
- If an employee has a close personal relationship with a person who has influence over the employee's employment.

6. Gifts and hospitality

The offer of any gift or hospitality, whether from outside or inside the school, which might be interpreted as an attempt to influence an employee in his or her conduct towards pupils, parents or other employees or influence a decision around provision of a service must be treated with caution. Employees should seek advice if in any doubt. The governing body acknowledges that pupils, parents or fellow-employees often wish to make small gifts (such as sweets) to employees on specific occasions (such as Christmas or at the end of the school year) and sees the spirit of giving as one to be nurtured in children.

Any offer of a gift or inducement, whether made at specific occasions or casually, should be declared to the school if the gift is made by, or indirectly by, a person, firm or organisation which, to the knowledge of the employee, has, or seeks to do, business of any kind with the School which maintains the School or to have an interest in its decisions. The receipt of minor articles, often by way of trade advertisements, is acceptable.

Where there is any doubt, employees should seek guidance from the Head Teacher or Line Manager before accepting any gifts or hospitality. The Head Teachers should seek guidance from the governing body. If there is any doubt further advice can be requested from the Local Authority's Internal Audit Office.

7. Relationships

Staff must declare any relationships that they may have with pupils and their families outside of school; this may include mutual membership of social groups, tutoring, or family connections. Staff should not assume that the school are aware of any such connections. A declaration form may be found in **Appendix 1** of this document.

Relationships with pupils must be professional at all times.

Staff must refer to each other appropriately, by their professional or chosen names, where appropriate. Nicknames, surnames or mis-pronunciation might cause offence and should be avoided.

Contact with pupils and their families must be via school-authorised mechanisms and solely for educational purposes. At no time should personal telephone numbers, text, email addresses or communication routes via personal accounts on social media platforms be used to communicate with pupils. If contacted by a pupil by an inappropriate route, staff should report the contact to their Line Manager immediately.

Behaviour giving rise to concern should also be reported which includes pupils seeking affection, being sexually provocative or exhibiting overly familiar behaviour.

Existing or new personal relationships at work should be declared to the Line Manager or Co-Head Teacher, who will treat declarations in confidence.

Staff should inform their Line Manager of any relationships which may create an enhanced risk to children so that necessary steps can be taken by the Trust e.g. cohabitation with a person convicted of a serious offence.

8. Honesty and Integrity

Staff must maintain high standards of honesty and integrity in their work, including the handling and claiming of money and the use of school property and facilities.

Staff must not act on behalf of the school unless they have the authority to do so.

Professional references from the school will be provided by the employee's line manager. . References given by other members of staff must be clear that they are provided in a personal capacity.

9. Conduct Outside of Work

Staff must not engage in conduct outside work which could seriously damage the reputation of the school or the employee's own reputation or the reputation of other members of the school community.

Staff may undertake work outside school, either paid or voluntary, provided that it does not conflict with the interests of the school nor be to a level which may contravene the working time regulations or affect an individual's work performance in the school. It is recommended that permission is sought in advance.

Staff must disclose any work outside school or outside business interests where there is a potential conflict of interests with their employment at the school.

If any allegation of wrongdoing occurs in a staff member's work outside school (whether or not they deny this) which may have a bearing on their employment they must disclose this immediately to the Head Teacher or their Line Manager.

Forming inappropriate relationships or friendships with children or young people who are pupils under the age of 18 at another school/college will be viewed as inappropriate and impact upon

the school's ability to trust the member of staff to maintain professional boundaries with pupils at the school.

10. IT Use

Staff must exercise caution when using information technology and be aware of the risks to themselves and others. Regard should be given to the school's IT Acceptable Use Policy at all times, both inside and outside of work.

11. Confidentiality

Where staff have access to confidential information about pupils or their parents or carers, staff must not reveal such information except to those colleagues who have a professional role in relation to the pupil.

All staff are likely at some point to witness actions which need to be confidential. For example, where a pupil is bullied by another pupil (or by a member of staff), this needs to be reported and dealt with in accordance with the appropriate school procedure. It must not be discussed outside of school, including with the pupil's parent or carer. Within the school it should only be discussed with other staff on a need to know basis.

However, staff have an obligation to share with their manager or the school's Designated Senior Lead any information which gives rise to concern about the safety or welfare of a pupil in accordance with the schools Child Protection and Safeguarding Policy.

12. Photocopying

Staff may occasionally photocopy or print a document for their personal use – for example 3 or 4 pages. If you wish to photocopy or print more than this, please ask the admin for details of cost and make a payment to them.

13. Dress and Appearance

As a general principle, staff should be able to dress according to their professional judgement, individual style and personality unless this is detrimental to their capacity to do their job, safeguard pupils or is deemed unsafe or inappropriate for some other good reason.

- Suitable, smart clothing must be worn by all staff.
- Denim jeans and denim jeggings must not be worn.
- Tracksuit bottoms are not to be worn, unless for P.E
- Ensure underwear is not show, including bra straps
- If jewellery is worn please ensure that it is not excessive and does not present a potential health and safety risk to either pupils or staff.
- Ensure large jewellery is removed during P.E. sessions
- No aspect of an employee's dress or appearance should be politically motivated, sexually provocative, discriminatory, insensitive or offensive
- If visible, tattoos must not cause offence to others; if tattoos are likely to cause offence, they must be covered up whilst at work
- Appropriate clothing should be worn for the occasion (e.g. if you are sitting on the floor/crawling around outside etc)

- There may be special occasions or events when the dress code does not have to be adopted (e.g non-uniform days, school trips)
- ID Badges must be worn at all times

14. Whistleblowing Procedure

Introduction

Employees are often the first to realise that there may be something wrong within a School. However, they may not express their concerns because they feel that speaking up would be disloyal to their colleagues or to the School. They may also fear harassment or victimisation and it may be easier, therefore, to ignore the concern rather than report what may just be a suspicion of malpractice.

Southrop C of E Primary School is committed to the highest standards of openness, probity and accountability. It expects employees, and others that it deals with, who have serious concerns about any aspect of the School's work, to come forward and voice those concerns. The phrase 'whistle-blowing' in this procedure refers to the disclosure internally or externally by employees of malpractice, as well as illegal acts or omissions at work.

This Procedure makes it clear that employees can report, in a confidential manner, their concerns without fear of victimisation, subsequent discrimination or disadvantage and is intended to encourage and enable serious concerns to be raised with the School, rather than overlooking a problem or 'blowing the whistle' outside. It is stressed that under the Public Interest Disclosure Act 1998, employees of the School who, in the public interest, speak out against corruption or malpractice at work have statutory protection against victimisation and dismissal.

14. Aims and scope of this procedure

This Procedure aims to:

- Encourage employees to feel confident in raising serious concerns in those cases where they do not wish to use the normal reporting routes within their service area
- Provide alternative avenues for raising concerns
- Ensure that responses to concerns are made
- To reassure employees that they will be protected from possible reprisals or victimisation if they have a reasonable belief that they have raised a concern in the public interest.

There are existing procedures in place to enable employees to lodge a grievance relating to their own employment. This Procedure is intended to cover concerns that fall outside the scope of other procedures and include:

- Conduct which is an offence or a breach of law
- Disclosures related to miscarriages of justice
- Health and safety risks, including risks to the public as well as other employees (where the concerns raised have not been addressed through normal departmental procedures)
- Damage to the environment
- The unauthorised use of public funds including fraud and corruption
- Sexual or physical abuse
- Other unethical or unprofessional conduct

- Notification of any suspicions of price-fixing cartels providing services/goods to the Council/School.

The School fully understands that employees who are members of a trade union recognised by the Council may, in the first instance, wish to seek advice and guidance from their union on the application of this Procedure.

Any serious concerns that employees have about any aspect of service provision, or the conduct of employees or members of the Governing Board/School/Council or others acting on behalf of the Governing Board/School/Council, can be reported under this Procedure. This may be about something that:

- Makes an employee feel uncomfortable in terms of apparent non-adherence to known standards
- Appears to be contrary to the requirements of the Council's Standing Orders and the School's Code of Conduct
- Falls below established standards of practice
- May amount to improper conduct
- Appears to be an attempt to mislead.

13. Safeguards: harassment or victimisation

Southrop C of E Primary School recognises that the decision to report a concern can be a difficult one to make, not least because of the fear of reprisal from the person(s) who is the subject of the complaint. However, if employees believe that what they raise as a concern to be the truth and in the public interest they should be confident that they are fulfilling their duty to their employer and those for whom they are providing a service.

The School will not tolerate any form of sexual, racial or general harassment or victimisation and will take appropriate action to protect employees, when they raise a concern in the public interest, from suffering a detriment (including bullying or harassment) either from the employer or from co-workers.

Any investigation under this procedure, into allegations of potential malpractice will be dealt with separately to any grievance, disciplinary or redundancy procedure concerning an employee. Equally, any investigation will not be influenced by any such procedures involving an employee. However the outcome of the investigation may lead to action under other school procedures.

Confidentiality

All concerns will be treated in confidence and every effort will be made to protect an employee's identity if that is their wish. However, this cannot be guaranteed if, say, following an investigation a case is taken to Court, where the employee may need to be called as a witness.

Anonymous allegations

In order to ensure that employees receive protection of the Public Interest Disclosure Act 1998 employees should put their name to their allegation. Concerns expressed anonymously are sometimes less credible. Anonymous concerns and allegations, whether made to the Headteacher or the Governing Board, will therefore be investigated at the discretion of the School.

In exercising this discretion the factors to be taken into account would include:

- The seriousness of the issues raised
- The credibility of the concern
- The likelihood of confirming the allegation from attributable sources' factual evidence.

Untrue Allegations

If an employee makes an allegation in the public interest, but it is not confirmed by the investigation, no action will be taken against them. If, however, the allegation is frivolous, malicious or for personal gain, disciplinary action may be taken against them.

How to raise a concern

Employees who wish to raise a serious concern should do so verbally or in writing (marked 'Confidential') to one of the Head Teachers or Chair of Governors.

Alternatively the concern can be raised by writing to Monitoring Officer, Gloucestershire County Council, Shire Hall, Gloucester, GL1 2TZ. You can also complete the online [Whistleblowing Allegation form](#) which will go directly to the Monitoring Officer.

Or employees may wish to use the Council's 24 hour "whistle blowing" answerphone service on Gloucester 01452 - 427052 to report any concern relating to possible fraud, corruption, conduct or mal-practice/administration.

Employees who wish to make a written statement/report are invited to set out:

- The background and history of the concern
- Relevant dates, person involved
- Details of supporting evidence.

Although employees are not expected to prove an allegation they will need to demonstrate that the disclosure is in the public interest.

How the School/Council will respond

In all cases in order to protect individuals and those involved in the concern, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. The overriding principle which the School/ Council will take into account is public interest; however, there is a zero tolerance attitude to any fraudulent activity. Concerns or allegations which fall within the scope of specific procedures (for example, child protection) will normally be referred for consideration under those procedures.

Within 10 working days of a concern being raised, the employee will be contacted at their private address:

- Acknowledging that the concern has been received
- Indicating how it is proposed to deal with the matter
- Telling the employee whether any initial enquiries have been made
- Telling the employee whether further investigations will take place and, if not, why not.

Allegations reported to the school will normally be investigated by the Co-Head Teachers/Governing Board. However in some circumstances, sometimes to avoid contaminating evidence which may then go to a criminal investigation, they may decide to involve external investigators.

Advice/support on investigation can be obtained from Piyush Fatania, Head of Internal Audit on 01452 328883 or e-mail piyush.fatania@gloucestershire.gov.uk or Carolyn Wignall Counter Fraud Specialist on 01452 328887 or e-mail

The Monitoring Officer will arrange investigation of allegations reported to the Council. The Monitoring Officer will respond to such concerns and, where appropriate, the matters raised may be:

- Investigated by school management, Internal Audit
- Referred to the Police
- Referred to the District Auditor
- The subject of an independent enquiry.

The School's Conduct Procedures will be used where the outcome of an investigation indicates improper behaviour by an employee.

A representative of a trade union recognised by the School/Council or work place colleague may accompany an employee during any stage of an investigation conducted under this Procedure.

The School/Council will take steps to minimise any difficulties which may be experienced as a result of raising a concern. For instance, where an employee is required to give evidence in criminal or disciplinary proceedings the School/Council will arrange for them to receive advice about the procedures involved.

The School/Council accepts that employees need to be assured that matters of concern have been properly addressed and, therefore, subject to legal constraints, employees will be informed of the outcome of any investigation.

Whenever possible, we will give you feedback on the outcome of any investigation. Please note, however, that we may not be able to tell you about the precise actions we take where this would infringe a duty of confidence we owe to another person. If you have raised a concern anonymously, we will not be able to write to you. While we cannot guarantee that we will respond to all matters in the way that you might wish, we will strive to handle the matter fairly and properly. By using this policy, you will help us to achieve this.

Further Action

This Procedure is intended to assist employees who wish to raise concerns within the School and it is hoped that employees will be satisfied with any action taken. However, if they are not, and they feel it is right to take the matter outside the School/Council, the following organisations are possible contact points:

External Contact	Contact Information
Health & Safety Executive	Tel: 0300 003 1647 or Online form: Raising your concern
Environment Agency	Tel: 03708 506 506 or Website: Environment Agency
External Auditors	
The Financial Conduct Authority/Prudential Regulation Authority	
Department for Work and Pensions	Telephone: 0800 854 440 or you can also report
	suspected benefit fraud online
Serious Fraud Office	Website: Reporting serious fraud, bribery or corruption
Trade Union	
Her Majesty's Revenue & Customs	Tel: 0800 788 887 or Website: Reporting Tax Evasion
Relevant Voluntary Organisation	
Charity Commission	Tel: 0300 066 9197 or Email: whistleblowing@charitycommission.gsi.gov.uk
Police	Telephone 101 or In an emergency telephone 999
Public Concern at Work	Tel: 0207 404 6609
Ofsted	Complaints about schools and childminders Contact https://www.gov.uk/complain-about-school Complaints about other providers Ofsted inspects Contact https://contact.ofsted.gov.uk/online-complaints

If employees do decide to take the matter outside the School/Council, they must ensure that they do not disclose to a third party any School/Council confidential information. If employees are in any doubt, they are strongly advised to seek confidential advice before taking any action to ensure that they are not putting themselves in a vulnerable position.

14. Equalities

This policy has been written to take into account the needs of all regardless of age, disability, race, religion, belief and gender. In respect of adults this list also includes gender reassignment, marriage & civil partnership, pregnancy, maternity or paternity and sexual orientation.

15. Values

Our Christian values underpin the life of the whole school community. Those particularly pertinent to charging are:

Respect. We show empathy and respect to the feelings and beliefs of other.

16. Monitoring and review

This policy is monitored by the governing body, and will be reviewed every two years, or earlier if necessary.

Appendix 1

Relationships with pupils outside of work declaration

It is recognised that there may be circumstances whereby employees of the school are known to pupils outside of work. Examples include membership of sports clubs, family connections, or private tutoring.

Staff must declare any relationship outside of school that they may have with pupils.

Employee Name	Pupil Name	Relationship

I can confirm that I am fully aware of the code of conduct relating to contact out of school with pupils in line with this policy.

I confirm that if these circumstances change at any time I will complete a new form to ensure the school are aware of any relationships.

Signed Date