THAMES FEDERATION
HIGH EXPECTATIONS | ENRICHMENT | EXCELLENCE

Staff Code of Conduct

&

Staff Personal Code of Conduct

Reviewed by: HR
Approved by: Executive Head Teacher Date approved: September 2026
Date for Review: September 2027 (to reflect any KCSIE updates)
Adopted policy Hammersmith & Fulham L.A.

Contents

Summary

Staff Code of Conduct for School Based Employees 3

Introduction 3

Safeguarding staff 3

Disclosure of information 4

Political Neutrality/Activity 4

Relationships 5

Appointment and other employment matters 5

Outside commitments 5

Personal interests 6

Equality issues 6

Separation of roles during tendering 6

Corruption 7

Use of financial resources 7

Hospitality 7

Sponsorship – Giving & Receiving 7

Appendix A Staff Personal Code of Conduct 9

Staff Confirmation and Declaration 12

Staff Code of Conduct for School Based Employees

Members of the public are entitled to expect the highest standards of conduct from all school based employees. The Staff Code of Conduct contains guidelines on ethical standards and covers issues such as political neutrality, outside commitments, appointments, tendering and contracting for work, personal interests, corruption and sponsorship.

The Code of Conduct is supplementary to the disciplinary procedure that has been adopted by the Governing Body.

The Code of Conduct assists employees in understanding the standards of conduct expected of them and assists managers in ensuring that all staff are treated fairly.

It is recommended good practice by the Local Government Management Board and takes account of the requirements of the law.

1 Introduction

(a) The public is entitled to expect the highest standards of conduct from all employees who work in the school and that their conduct should never be influenced by improper motives.

(b)The purpose of this code is to provide guidance for all employees in the school on the ethical standards expected of them, particularly where the exercise of individual judgement is necessary in order to maintain public confidence. It is of particular significance for employees involved in the procurement of goods and services.
(c) This document is based on a model drawn up by the Local Government Management Board and has been adopted by the Council in relation to non-school employees. It takes account of the requirements of the law and the appropriate national conditions of service. It is compliant with the Statutory Framework for the Early Years Foundation Stage (EYFS)

(d)Failure to meet the standards and requirements of this code may result in disciplinary action. If in doubt, employees should seek advice from their Executive Head Teacher, in the case of the Executive Head Teacher, from the Director of Education.

2 Standards

Employees are expected to give the highest possible standard of service to pupils and parents, and where it is part of their duties, to provide appropriate advice to other employees and Governors with impartiality. Employees should bring to the attention of management any deficiency in the provision of service and must report any impropriety or breach of procedure. **See Appendix A for Employee Personal Code of Conduct**

3. Safeguarding and Child Protection Responsibilities

3.1 Core Duty:

Safeguarding and promoting the welfare of children is everyone's responsibility. All staff must:

* Read, understand, and adhere to Part 1 and Annex B of Keeping Children Safe in Education (KCSIE 2026), signing an annual declaration.

* Maintain an attitude of "it could happen here" and exercise professional curiosity at all times.

* Immediately record all disclosures, concerns, or indicators of abuse via CPOMS and alert the relevant Designated Safeguarding Lead (DSL).

3.2 Low-Level Concerns Policy:

A low-level concern is any concern—no matter how small—that an adult working in or on behalf of the Federation may have acted in a way that is inconsistent with this Code of Conduct, but does not meet the harm threshold (e.g., being overly friendly with pupils, having favourites, taking photos on personal devices, or being alone with a pupil in a secluded area).

* Reporting Route: Staff must report all low-level concerns (including self-referrals) directly to the Executive Head Teacher. Where the concern relates to the Executive Head Teacher, it must be reported to the Chair of Governors (refer to Safeguarding Policy, Appendix 3, Section 2).

* Culture of Openness: The Federation supports an open, transparent culture where concerns are addressed supportively and early before patterns escalate.

* Record Keeping: All low-level concerns are logged confidentially, reviewed for patterns, and retained in line with statutory data protection requirements.

3.3 Allegations Meeting the Harm Threshold:

Any allegation that a member of staff, volunteer, or contractor has harmed a child, committed a criminal offence, or behaved in a way that indicates unsuitability to work with children must be reported immediately to the Executive Head Teacher (or Chair of Governors if concerning the Executive Head Teacher), who will liaise with the Local Authority Designated Officer (LADO) within 1 working day (refer to Safeguarding Policy, Appendix 3, Section 1).

3.4 Whistleblowing:

Staff must report any concerns regarding poor or unsafe practice, or failures in school safeguarding systems, in accordance with the Federation Whistleblowing Policy and Section 17.3 of the Safeguarding Policy.

4 Disclosure of information

(a) The law requires that certain types of information must be available to Governors, Members, auditors, government departments, service users and the public e.g. on school performance and budgetary matters.

(b) Employees must not use any information obtained in the course of their employment for personal gain or benefit, nor shall they pass it on to others who might use it in such a way.

(c) Only employees authorised by their Executive Head Teacher to do so may talk to the Press, or otherwise make public statements on behalf of their school. Generally, an employee (including the Executive Head Teacher) contacted by the Press should seek the advice of the Council's Press Office who may deal with the matter on the school's behalf if the school wishes.

This is not intended to prevent employees from writing or talking to the press on behalf of a trade union.

5 Political Neutrality/Activity

(a) Employees serve the Governing Body of their school within the overall framework of the Council.

(b) Some school based non-teaching employees, who are normally those in more senior positions, are in politically restricted posts and by law are prevented from taking part in certain political activities outside their work. Employees who are in this position should have been told of this in writing and of the rules for claiming exemption, but any employee who is in any doubt about their position should contact their Executive Head Teacher . In any event, all teachers including the Executive Head Teacher are exempt from these restrictions.

(c) Employees, whether or not politically restricted, must not allow their own personal or political opinions to interfere with their work and must exercise careful judgement if asked to express personal opinions in the course of their work.

6 Relationships

(a) Governors

Some employees are required to give advice to Governors as part of their job. Mutual respect between employees and Governors is essential to good local practice in schools but close personal familiarity between employees and individual Governors can damage the relationship and prove embarrassing to other employees and should therefore be avoided.

(b) The school's local community and service users

Employees must always remember their responsibilities to the school and wider community they serve and ensure courteous, efficient and impartial service delivery to all groups and individuals within the school and wider community.

(c) Contractors

All relationships with contractors or potential contractors must be made known to the Executive Head Teacher . Orders and contracts must be awarded on merit, by fair competition against other tenders, and no favouritism should be shown to businesses run by for example friends, partners or relatives. No part of the community should be discriminated against.

Employees who engage or supervise contractors or have an official relationship with contractors and have previously had or currently have a relationship in a private or domestic capacity, must declare that relationship to the Executive Head Teacher.

(d) Duty of Disclosure and Changes in Circumstances

All staff have an ongoing statutory duty to immediately inform the Executive Head

Teacher in writing if they:

- Receive any criminal caution, reprimand, warning, charge, or conviction.
- Become subject to any police investigation or court proceeding.
- Are disqualified under the Childcare (Disqualification) Regulations 2018 or subject to an interim prohibition or suspension order by any professional regulator (e.g., TRA).
- Experience any personal or health circumstances that directly impede their ability to

safeguard children effectively.

(e) Professional Boundaries and Staff-Pupil Relationships

Staff hold a unique position of trust and authority. To protect both pupils and themselves, staff must:

- Maintain professional boundaries at all times; never display favouritism, develop personal relationships outside of school, or interact on personal social media, personal numbers, or gaming accounts with pupils or former pupils under 18.
- Conduct one-to-one sessions in visible, monitored spaces (doors kept open or with clear vision panels); staff must never isolate themselves with a pupil in secluded rooms.
- Ensure physical contact is professional, age-appropriate, pupil-initiated when comforting distress, and governed by pupil consent. A "no contact" rule is not adopted; restrictive physical interventions and reasonable force must strictly comply with Federation Behaviour and Restrictive Intervention policies.
- Never dismiss sexualised behaviour, derogatory language, or misogyny/misandry as "banter" or "part of growing up." Staff must actively challenge and log all child-on-child concerns on CPOMS.
- Not initiate social transition or make unilateral changes to a pupil's name, pronouns, or access to single-sex facilities. Any requests, disclosures, or discussions regarding gender questioning must be referred immediately to the Designated Safeguarding Lead (DSL) so that parents/carers can be engaged in accordance with Section 16 of the Federation Safeguarding Policy.

7 Appointment and other employment matters

(a) Executive Head Teachers and other employees involved in appointments must ensure that these are made on the basis of merit. It would be unlawful for an employee to make an appointment, which was based on anything other than the ability of the candidate to undertake the work. In order to avoid any possible accusation of bias, employees must not be involved in an appointment where they are related to an applicant, or have a personal relationship outside work with them.

(b) Similarly, Executive Head Teacher and other employees must not be involved in decisions relating to discipline promotion or pay adjustments for any employee who is a relative, partner or close friend.

8 Outside commitments

(a) Employees' off-duty hours are their personal concern, but they must not subordinate their duty to their private interests or put themselves in a position where duty and private interests conflict.

(b) The Council would not wish to preclude employees unreasonably from undertaking additional work unless that work:

- conflicts with or detrimentally affects the interests of the Council or individual school's interests or
- in any way weakens public confidence in the conduct of the Council's or individual school's business or any other way adversely affects their ability to undertake their work.

Should this be the case, their conduct will be considered a breach of the Council's or school's Disciplinary Code.

(c) Employees must not, therefore, engage in any other business or take up any other additional appointment without first having carefully considered and ruled out the possibility of

an adverse effect on their work or the interests of the Council or their school. Where there is any doubt as
to the implications, the nature of the proposed employment must be discussed with their Chief Officer or Executive Head Teacher.

(d) If an employee decides to take up additional employment or engage in any other business, no outside work of any sort should be undertaken in the workplace and use of facilities for this, e.g. telephones, photocopying, etc., is forbidden.

9 Personal Interests

(a) Employees must declare to their Executive Head Teacher, non-financial interests that they consider could bring about conflict with the school's interests.

Membership of a trade union is exempted from this requirement.

(b) Employees must declare any financial interests which could conflict with the school's interests.

(c) Employees must declare to their Executive Head Teacher or in the event of the Executive Head Teacher to the Chair of Governors, membership of any organisation not open to the public without formal membership and commitment of allegiance and which has secrecy about its rules or membership or conduct e.g. freemasons.

(d) Employees who have an interest, financial or non-financial, should not involve themselves in any decision on allocation of school services or resources from which they, their friends or family might benefit, and should ensure that the matter is referred immediately to their Executive Head Teacher, or in the event of the Executive Head Teacher to the Chair of Governors.

10 Equality Issues

Employees have an obligation to ensure that policies relating to equality issues as agreed by the school are complied with, as well, of course, as the requirements of the law. Everyone in the school and its wider community have a right to be treated with fairness and equity.

11 Separation of roles during tendering

(a) Where employees are involved in letting contracts, or procuring goods or services, on behalf of the school, they must exercise fairness and impartiality when dealing with contractors, sub contractors and suppliers.

(b) Such employees who are privy to confidential information on tenders or costs for either internal or external contractors must not disclose that information to any unauthorised party or organisation.

(c) Such employees must ensure that no special favour is shown to current or recent former employees or their partners, close relatives or associates in awarding contracts to businesses run by them or employing them in a senior or relevant managerial capacity.

12 Corruption

It is a criminal offence for an employee to receive or give any gift, loan, fee, reward or advantage for doing or not doing anything or showing favour or disfavour to any person in

their official capacity. It is for the employee to demonstrate that any such rewards have not been corruptly obtained.

13 Use of financial resources

Employees must ensure that they use public funds entrusted to them in a responsible and lawful manner, ensuring value for money to the school and its wider community and avoiding legal challenges to the school or the Council.

14 Hospitality

(a) Employees should only accept offers of hospitality if there is a genuine need to impart information or represent the school in the community. Offers to attend purely social or sporting functions should be accepted only when these are part of the life of the community or where the school should be seen to be represented. It must be properly authorised and recorded in a hospitality register maintained by the school.

(b) When hospitality has to be declined the offered should be courteously but firmly informed of the procedures and standards operating within the school.

(c) Employees must not accept significant personal gifts from pupils, parents, contractors and outside suppliers, other than insignificant tokens such as pens or diaries or small festive gifts.

(d) When considering whether or not to accept hospitality, employees must be sensitive to the timing of decisions for letting contracts for which the provider may be bidding, and must never accept hospitality from a contractor during a tendering period.

(e) Acceptance by employees of hospitality whilst in attendance at relevant conferences and courses is acceptable where it is clear the hospitality is for the school rather than personal. Where visits to inspect equipment etc. are required, employees must ensure that the school meets the cost of such visits to avoid jeopardising the integrity of subsequent purchasing decisions are not compromised.

15 Sponsorship - Giving and Receiving

(a) Where an outside organisation wishes to sponsor or is sought to sponsor a school activity, whether by invitation, tender, negotiation or voluntarily the basic conventions concerning acceptance of gifts or hospitality apply. Particular care must be taken when dealing with contractors or potential contractors.

(b) Where the school wishes to sponsor an event or service neither an employee nor any partner, spouse or relative must benefit from such sponsorship in a direct way without there being full disclosure to the Executive Head Teacher of any such interest. Similarly, where the school, through sponsorship, grant aid, financial or other means, gives support in the community, employees must ensure that impartial advice is given and that there is no conflict of interest involved.

APPENDIX A

STAFF PERSONAL CODE OF CONDUCT

Brief and Purpose

The **Employee Code of Conduct policy** outlines the Governing Body's expectations regarding employees' behaviour towards their colleagues, supervisors and overall to the school.

The Thames Federation promotes freedom of expression and open communication. We expect all employees to follow our code of conduct. Employees should avoid offending, participating in serious disputes and disrupting the workplace. We expect all employees to foster a well-organized, respectful and collaborative environment within the school.

All employees should read and follow the school/council policies. If employees have any questions, they should ask their managers, Human Resources, or the Council's (HR) department.

Scope

This policy applies to all our employees regardless of employment agreement or rank.

Employees must:

● Maintain the highest level of courtesy and respect when dealing with colleagues, councillors, residents and other members of the public

● Always be polite, responsive, helpful, respectful and professional

● Carry out your responsibilities in a way that is fair, just and equitable and reflects the Council's/Schools commitment to equality and diversity

● Never make remarks that are racist, sexist, or otherwise inappropriate

● Must understand the importance of upholding their online reputation, their professional reputation and that of the Thames Federation, and do nothing to impair either by posting anything on social media/online which could bring this institution into disrepute or damage the reputation of the Federation. More guidance on this point can be found in the Online Reputation guidance for schools.

● Never bully/harass or discriminate against any member of the public, employee or anyone you meet in the course of your work

● Avoid any conduct (including online) inside or outside of work which may discredit you and/ or the Council/School.

● Not disclose confidential information

Uphold the five fundamental British Values:

1. **Democracy**

- Everyone has a voice and the right to be heard.
- People can vote and participate in decision-making.

2. **The Rule of Law**

- Laws help keep people safe and ensure fairness.
- Everyone is expected to follow the law, and there are consequences when laws are broken.

3. **Individual Liberty**

- People are free to make their own choices and express themselves, provided they do not harm others.
- This includes freedom of speech, belief, and lifestyle.

4. **Mutual Respect**

- Treating others with kindness, courtesy, and consideration.
- Valuing different opinions and backgrounds.

5. **Tolerance of Those with Different Faiths and Beliefs**

- Understanding and respecting people whose religions, beliefs, cultures, or lifestyles may differ from your own.
- Recognising that diversity is a positive part of society.

Mobile Phones, Smart Technology, and Cameras:

- EYFS Settings (Bayonne & James Lee): In accordance with EYFS Statutory Framework (paras 3.7–3.8), personal mobile phones, smartwatches, cameras, and recording devices are strictly prohibited in the presence of children or anywhere children are cared for. They must be switched off/silent and locked securely in designated staff areas during working hours.

- Primary Setting (Melcombe): Personal devices may only be accessed in designated staff-only areas (e.g., staff rooms) during non-contact time and never in classrooms or circulation areas when pupils are present.

- Photography & Media: Staff must NEVER take photographs, videos, or audio recordings of pupils on personal devices. Only setting-owned, authorised school cameras/tablets may be used for documenting learning and observations.

- Generative AI: Staff must not input identifiable pupil data, work, or photographs into unapproved generative AI tools, nor use AI to alter or create images of pupils.

Early Years Safe Working Expectations (EYFS Staff):

Constant Supervision: Children must always be within sight or hearing of staff, and within both sight and hearing during eating and snack times to prevent choking risks.

- Intimate Care & Toileting: Intimate care must follow agreed care plans and hygiene protocols. Staff must ensure another practitioner is aware when intimate care is taking place to protect both child and staff member.

- Language Standard: In line with EYFS regulations, all staff caring for EYFS children must demonstrate sufficient proficiency in English to secure children's wellbeing, maintain accurate records, administer medicines safely, and liaise with emergency services without delay.

- Abide by the rules and procedures as specified by the school.

All employees are to be smartly dressed, presenting a positive and professional image of Thames Federation. Staff will be expected to dress modestly and wear appropriate footwear (see list below). We expect the children to be smartly dressed and our expectation is for all adults to be as well.

Employees must:

Wear appropriate clothing which is appropriate to their role:-

- No jeans/denim, no flip-flops, no trainers unless approved when employed in particular roles or at Executive Head Teacher's discretion or on medical grounds, no leggings unless covered by a long top.
- is not likely to be viewed as offensive, revealing or sexually provocative,
- does not distract, cause embarrassment or give rise to misunderstanding
- is absent from any political or otherwise contentious slogans
- is not discriminatory
- Tattoos must be covered up where possible or where (b) to (e), above, apply.
- Treat school's property, whether material or intangible, with respect and care.
- Shouldn't misuse company equipment or use it frivolously.
- Should respect all kinds of incorporeal property. This includes trademarks, copyright and other property (information, reports etc.)
- Employees should use them only to complete their job duties.
- Please note that any breach of conduct above may result in disciplinary action being taken against you, which ultimately could result in dismissal under the School's disciplinary procedure.

Staff Confirmation and Declaration

I confirm that I have read, understood, and agree to abide by the Thames Federation Staff Code of Conduct and Staff Personal Code of Conduct.

- I understand my duty to maintain professional boundaries
- uphold the five fundamental British Values
- safeguard pupils, report low-level concerns and allegations
- adhere to acceptable mobile technology/social media use,
- keep my suitability declarations up to date in line with Keeping Children Safe in Education (KCSIE 2026).

Staff Name (Print):

Role / School:

Date: