



*Saint***GREGORY'S**
Bath

Staff Code of Conduct

Key Information

Title	Staff Code of Conduct	
Prepared By	Karen Howard, Director of Finance & Premises	Date 02.07.19
Checked By	Ann Cusack, Headmistress	Date 02.07.19
Approved By	Governors' Staffing Committee	Date 22.07.19
Endorsed By	John Eddison, Chair of Governors, on behalf of FGB	Date 10.08.19
Version	V02	
Document Update	Policy to be reviewed every 5 Years. Next review due June 2024	

Version History

Version	Date	Amendments
V01.00	22.07.19	Revised version of June 2018 Policy to Staffing Committee including updates re use of photography and videos.
V.02	26.10.2022	Updated to reflect changes to the school day and staff signing in.

In Christ we Flourish

Statement of intent

St Gregory's Catholic College expects all students to receive the highest possible quality of teaching and learning within a positive and respectful environment.

Employees at the school should understand that their own behaviour, and the manner in which they conduct themselves with their colleagues, students, parents and other stakeholders, sets an example.

We recognise that the majority of staff members act appropriately and treat each other with dignity and respect; however, we consider it important to clarify the expected standards.

This document forms part of a staff member's contract of employment and failure to comply with it, and with the associated school policies, may result in disciplinary action being taken, including legal action where this is warranted.

This document applies to all staff members who are:

- Employed by the school, including the Headteacher.
- Employed in units or bases that are attached to the school.

This document does not apply to:

- Peripatetic staff members who are centrally employed by the LA.
- School catering staff employed by Sodexo.
- Employees of external contractors.

These employees are governed by their employment contracts and any relevant laws pertaining to their activities within the school, for example, the General Data Protection Regulation (GDPR).

Introduction

The purpose of this document is to set out the expected standards of conduct from teaching and support staff of St Gregory's and outline the basic principles of responsible and professional conduct in line with the mission of the school. The document should be read in conjunction with all school policies, the Catholic Education Service's contract of employment, and the Teachers' Standards. This document is not intended to be exhaustive but illustrative of the ethos and behaviours expected of all staff at St Gregory's.

Disciplinary Action

In the unlikely event that disciplinary action has to be taken against a member of staff for breaches of this Code then the school will follow the disciplinary procedures published by B&NES Council, following consultation with the local unions. Prior to January 2018 the suite of B&NES personnel policies were adopted formally each year by the governing body at the first meeting of the academic year. However, B&NES no longer provide this service and therefore the school purchases HR advice from an external provider, currently EPM. HR associated policies are therefore being updated in line with EPM advice as they come up for review.

Mission

St. Gregory's was founded by and is part of the Catholic Church. The school is to be conducted as a Catholic school in accordance with the canon law and teachings of the Roman Catholic Church, and in accordance with the Trust Deed of the Diocese of Clifton and at all times the school is to serve as a witness to the Catholic faith in Our Lord Jesus Christ.

The school's **Mission Statement**, as approved by the governing body, is as follows:

"As a Catholic school, our inspiration is Jesus Christ. We therefore promote the dignity and well-being of every child and ensure that they flourish with us in a safe, happy and enriching environment. We believe that everyone is gifted and called by God to fulfil some definite service for the greater good of society. We will help our students to discover their vocation in life, to achieve their full potential and to use their gifts for the greater glory of God."

All staff are expected to be familiar with the mission statement and to support and promote the school's mission within his or her role in school.

General Expectations of Staff

For teaching and support staff, the CES contracts of employment state that colleagues are:

- Expected to be conscientious and loyal to the aims and objectives of the school;
- To have regard to the Catholic character of the school and not to do anything in any way detrimental or prejudicial to the interests of the same.

In practice this means that staff while in school should not support or promote any beliefs (including support for political parties) practices or lifestyle choices which are contrary to the teaching of the Catholic Church, nor behave in ways which are contrary to the teaching of the Catholic Church. Staff should at all times and as far as possible within their role support the Catholic Christian values of the school. According to the terms of the CES contract, teaching staff are further required to maintain and develop the Catholic character of the school.

1. Legal framework

1.1. This policy has due regard to statutory legislation including, but not limited to, the following:

- The General Data Protection Regulation (GDPR)
- The Education Act 2002
- The Children Act 1989
- The Working Time Regulations 1998 (as amended)

1.2. This policy also has due regard to statutory guidance including, but not limited to, the following:

- DfE 'Keeping children safe in education' 2018
- DfE 'Working together to safeguard children' 2018

2. Related school policies

2.1. This Staff Code of Conduct has due regard to the following school policies and procedures:

- Child Protection and Safeguarding Policy
- Health and Safety Policy
- Data Protection Policy
- Allegations of Abuse Against Staff Policy
- Intimate Care Policy
- Discretionary Leave of Absence Policy
- Whistleblowing Policy
- Use of Reasonable Force Policy
- E-safety Policy
- Acceptable Use Agreement

3. Safeguarding students

3.1. In accordance with 'Keeping children safe in education' guidance, all staff members have a responsibility to safeguard students and protect their welfare.

3.2. All staff members have a responsibility to ensure that they provide a learning environment in which students feel safe, secure and respected.

3.3. In order to effectively safeguard students, staff members are required to follow the procedures outlined in this Staff Code of Conduct and the Child Protection and Safeguarding Policy, ensuring that they do not act in a way that may put students at risk of harm, or lead others to question their actions.

3.4. In accordance with the school's Child Protection and Safeguarding Policy, staff members will be prepared to identify students who may be subject to, or at risk of, abuse and neglect, and will follow the necessary reporting and referral procedures.

- 3.5. Any staff member who has concerns about a staff member's actions or intent that may lead to a student being put at risk of harm will report this in line with the Whistleblowing Policy to the Headteacher immediately so appropriate action can be taken.

4. Dress Code

- 4.1 The appearance of staff at St. Gregory's is of a high standard as befits an Outstanding school with a strong emphasis on excellence and the dignity of the individual. Since we have a sixth form with a formal dress code, it is appropriate that we clarify the expectations of staff dress. The general principle is that staff should dress in a smart, professional style.

Male Colleagues: the appropriate dress for male colleagues is shirt and tie, with dress trousers and shoes (i.e. not jeans and/or trainers). A jacket should be worn on 'formal' occasions such as assembly and parents' evening. Jackets worn around the school routinely is more in line with the general expectations of the students and a convention that should be the norm. The exceptions to the above expectations are the site team and the PE team (or our cover supervisors when on PE cover) whose roles in school require more functional dress.

Female Colleagues: the appropriate dress for female colleagues is smart top or blouse with dress trousers (i.e. not jeans), or skirt, or dress of appropriate length and cut, and shoes (i.e. not trainers). A jacket should be worn on 'formal' occasions such as assembly and parents' evening. Jackets worn around the school routinely is more in line with the general expectations of the students and a convention that should be the norm. The exceptions to the above expectations are the PE team/dance team whose roles in school require more functional dress and agreed uniforms are worn by these colleagues

- 4.2 All staff should be mindful of the example we are called to give to our young people and to be aware of the standards expected by the safeguarding agenda. While there are no 'rules' regarding staff jewellery or piercings, it would be appropriate for staff to avoid any egregious piercings and any piercings or jewellery which compromise health and safety.
- 4.3 The monitoring arrangements for the dress code should be on the level of the 'quiet word'. However for staff who persistently disregard the governors' dress code a more formal conversation may be required. It is fully expected however that given the current standard of staff dress and general responsiveness to reasonable requests, this should not be an issue.

Please note: the Dress Code was approved by the governing body on 12 September 2013

- 4.4 All staff should wear their identity badges on a **green lanyard** at all times. Green signifies that a colleague is DBS cleared and can supervise students on site. As the school has grown in size it is important to be able to vouch for all adults on site. All adult visitors should have a lanyard with a visitor's badge. **If any member of staff comes across an adult on site without a badge/lanyard they should be challenged**, taken immediately to reception and senior management informed, unless it is a simple oversight which can readily be corrected.

5. Attendance

- 5.1 For full-time teaching staff the school day **begins at 8.30 am and finishes at 3.30 pm** or later, if

there is a directed time meeting or activity. Full-time teaching staff are expected to be on site by 8.30 am and remain on site until 3.30 pm. Full-time teaching staff are expected to attend the staff briefing on a Monday and Friday morning at 8.30 am and, if responsible for a tutor group, **are expected to be ready to supervise their students in their classrooms on the registration bell at 8.40 am.** All teaching staff are expected, wherever possible, to be at the door of their classrooms to welcome their students either **before** the lesson bell or as soon after as possible

5.2 Part-time teaching staff are expected to be on site in good time to teach their contracted hours. Support staff are expected to be on site in good time to fulfil their contracted hours.

5.3 All members of staff should sign in and out using the InVentry signing in system located in Main Reception and the entrance to the Gateway. **Any member of staff needing to leave the school site during their contracted hours must sign out at Main Reception and sign back in on their return;** this is to ensure all members of the school community can be accounted for in case of emergency.

5.4 All staff, both teaching and support staff, are expected to be vigilant at all times around the school site and to be mindful of the health and safety and welfare of our students and school community, particularly in corridors and on staircases.

5.5 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 **Discretionary Leave of 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.

6. Communication

6.1 In school staff will often be required to communicate **sensitive information regarding students.** The most common means of such communication, apart from conversations, will be email. When doing so staff should only refer to the student in the subject box by his or her initials and group (e.g. AB Y9). If the issue is especially sensitive, or relates to a serious child protection issue then the word **CONFIDENTIAL** should appear first in the subject box.

6.2 In the general use of emails staff should assume that any email they send may at a later date be seen by anybody who makes a Subject Access Request. Emails should always begin with a salutation (typically "Dear.." or "Hi..." and end with a courteous sign off (e.g. "Regards.." "Best wishes..." "Many thanks..") Emails should not be used by staff for social networking or to generate discussion. Likewise, **trivial or jokey messages are not appropriate use of the system.** Staff should think carefully about their intended audience and only copy in those who need to read the message. **Messages to all staff should be avoided where possible.**

- 6.3 Staff should exercise great care in their **communications with students** so as to avoid any possible misinterpretation of their motives or behaviour. Staff should not give their personal contact details to students including email, home or mobile phone numbers, unless the need to do so is agreed with senior leadership and parents. Email or text communication between a member of staff and a student outside agreed protocols may lead to disciplinary action. This also includes communications through internet based web sites, social networking platforms or gaming. St. Gregory's staff may use **social networking sites for personal use**.
- 6.4 However, the school requires that profiles and photos of the member of staff are 'locked down' as private so that students or parents do not have access to your personal data or images. For more information see the Acceptable Use Policy for Staff on the school network; P:drive > Policies> General School Policies.
- 6.5 Communication with former students who are over 18 is left to staff discretion, but staff should be aware that former students may be in contact with current students.
- 6.7 **Communications with parents** must always be courteous and positive. When any member of staff receives a message from a parent (either a letter, phone message or email) our policy is to acknowledge the message within 24 hours (in the case of phone or email message only) and to **reply within five working days**.
- 6.8 Any letters or messages which staff wish to send out to parents must be written on the current letterhead, using **Calibri font**, and checked with a line manager. The highest standards of accuracy and expression are expected as the norm for all communications from the school, especially student reports.
- 6.9 If any member of staff is contacted by any media organisation they must tell the Headteacher at once. **Any communication with the press or media** can only be authorised by the Headteacher.

7. Professional behaviour and conduct

- 7.1 Staff members are expected to treat other colleagues, students, parents, and external contacts with dignity and respect.
- 7.2 The use of foul and abusive language will not be tolerated.
- 7.3 Discrimination, bullying, harassment or intimidation, including physical, sexual and verbal abuse, will not be tolerated.
- 7.4 Staff members will not misuse or misrepresent their position, qualifications or experience, or bring the school into disrepute.
- 7.5 Staff members will inform the Headteacher if they are subject to a criminal conviction, caution, ban, police enquiry, investigation or pending prosecution.

8. Conduct outside of work

- 8.1 Staff may undertake work outside school, either paid or voluntary, provided that it does not conflict with the interests of the school. The nature of the work cannot be seen to bring the school into disrepute, nor be at a level which may contravene the working time regulations or affect an individual's work performance.
- 8.2 Staff will not engage in outside work which could seriously damage the reputation and standing of the school or the employee's own reputation, or the reputation of other members of the school community. In particular, criminal offences that involve violence, possession or use of illegal drugs or sexual misconduct are unacceptable.
- 8.3 Staff will not engage in inappropriate use of social network sites which may bring themselves, the school, school community or employer into disrepute. This is explored further in Section 17.

9. Smoking, alcohol and other substances

- 9.1 Staff will not smoke on the school premises. This includes the use of electronic cigarettes and vaperisers.
- 9.2 Staff will not smoke or take illegal drugs or alcohol whilst working with or supervising students off-site, such as when on educational visits and trips.
- 9.3 The taking of illegal drugs or alcohol during working hours is unacceptable and will not be tolerated. Staff members must never attend work under the influence of alcohol or illegal drugs.
- 9.4 If alcohol or drug usage impacts on a staff member's performance, the school has the right to discuss the matter with the employee and take appropriate action in accordance with the school's disciplinary procedures, including referral to the police.

10. Health and safety

- 10.1 Staff members will:
- Be familiar with and adhere to the school's Health and Safety Policy and ensure that they take every action to keep themselves and everyone in the school environment safe and well.
 - Comply with health and safety regulations and use any safety equipment and protective clothing which is supplied to them.
 - Comply with hygiene requirements.
 - Comply with accident reporting requirements.
 - Inform the Headteacher of any paid work which is undertaken elsewhere, for compliance with The Working Time Regulations 1998 (as amended).

11. Declaration of interests

- 11.1 Staff members are required to declare their interests, both personal and financial, where the group or organisation they are affiliated with would be considered to be in conflict with the ethos of the school.

11.2 For the purposes of this policy, a financial conflict of interest is one where there is, or appears to be, opportunity for personal financial gain, financial gain for close relatives or friends, or where it may be reasonable for a third party to take the view that financial benefits may affect an individual's actions.

11.3 The term 'financial interest' means anything of monetary value, including the following:

- Payments for services
- Equity interests
- Intellectual property rights
- Hospitality or gifts

11.4 Examples of financial interests that must be declared include, but are not limited to, equity interests in services considered for use by the school.

11.5 Non-financial conflicts of interest can also come into conflict, or be perceived to come into conflict, with an individual's obligations or commitments to the school. These interests may include any benefit or advantage including, but not limited to, direct or indirect enhancement of an individual's career or gain for immediate family or someone with whom the individual has a close relationship.

11.6 Examples of situations that could give rise to non-financial conflicts of interest include the following:

- Pressure or temptation to accept gifts, inducements or hospitality
- Participating in the appointment, hiring, promotion, supervision or evaluation of a person with whom the individual has a close personal relationship
- Where a member of staff has or develops a close personal relationship with a colleague

11.7 Membership to a trade union or staff representative group does not need to be declared.

11.8 Staff members will also carefully consider whether they need to declare their relationship with any individual where this might cause a conflict with school activities.

11.9 Failure to make a relevant declaration of interests is a very serious breach of trust and, therefore, if employees are in doubt about a declaration, they are advised to contact the school or trade union.

11.10 All declarations, including nil returns, will be submitted in writing to the Director of Finance and Premises for inclusion on the Register of Business Interests.

12. Relationships with students

12.1 The school expects that staff will:

- Maintain professional boundaries and relationships with students at all times, and will consider whether their actions are warranted, proportionate, safe and necessary.
- Act in an open and transparent way that would not lead to others questioning their actions.
- Ensure that they do not establish social contact with students for the purpose of securing a friendship, or to pursue or strengthen a relationship.
- Ensure that they do not develop personal or sexual relationships with students: this includes sexual remarks and discussing their own sexual relationships with, or in the presence of, students.

- Only contact students via the school's established mechanisms: personal phone numbers, email addresses or social media platforms will not be used to contact students.

13. Physical contact with students

- 13.1 The school understands that there are circumstances in which it is entirely necessary for staff to have physical contact with students, e.g. when applying first aid and assisting with intimate care, but staff will only do so in a professional and appropriate manner in line with relevant school policies.
- 13.2 When physical contact is made with students, it is imperative that it is conducted in a way which is responsive to the student's needs, is of limited duration and is appropriate to their age, stage of development, gender, ethnicity and background.
- 13.3 Staff will seek the student's permission, where possible, before initiating contact.
- 13.4 Staff will always use their professional judgement when determining what physical contact is appropriate, as this may differ between students. As such, the student's feelings and wishes will always be taken into account.
- 13.5 Staff will never touch a student in a way which is indecent and will always be prepared to explain their actions.
- 13.6 Staff will be aware that even well-intentioned physical contact may be misconstrued by a student, an observer or by anyone to whom this action is described and, therefore, will be prepared to justify their actions.
- 13.7 Staff will not engage in rough play, tickling or play fights with students.
- 13.8 Extra caution will be taken where it is known that a student has previously suffered from abuse or neglect.
- 13.9 Physical contact will never be secretive; if a member of staff believes an action could be misinterpreted, this will be reported to the Headteacher and appropriate procedures will be followed.
- 13.10 Where it is necessary in PE classes for teachers to demonstrate use of equipment, this will be conducted with another member of staff if possible. If a student is required to participate, their consent will be given before doing so.
- 13.11 If a child is in distress and in need of comfort as reassurance, staff may use age-appropriate physical contact, such as placing their hand on the student's shoulder. Staff will remain self-aware of their actions at all times and ensure that their contact is not threatening, intrusive or subject to misinterpretation.
- 13.12 Staff may also use reasonable force as a means of physical contact with students for restraint purposes, such instances will always be in accordance with the school's **Use of Reasonable Force Policy**.

14. Showering and changing

- 14.1. Students are entitled to respect and privacy whilst they are changing before/after PE; however, a level of supervision is required to ensure that students are safe, and that they are not subjected to bullying.
- 14.2. The supervision will be appropriate to the needs and ages of the students, and sensitive to the potential for embarrassment.
- 14.3. Staff will announce their intention of entering the changing room to allow students to maintain their privacy.
- 14.4. Staff will never change or shower in the same area as students.

15. Transporting students

- 15.1 When it is necessary to transport students off-site, staff will ensure that the transport arrangements of the vehicle meet all legal requirements, they have an appropriate license and the vehicle is roadworthy, has a valid MOT certificate and is insured.
- 15.2 Staff will gain consent from parents/carers where possible before transporting students and will be aware that the welfare of all students in the vehicle is their responsibility.
- 15.3 Two or more staff will be present in the vehicle to avoid any discrepancy regarding safeguarding concerns, except in an emergency.

16. Financial inducements

16.1. Staff members will:

- Familiarise themselves and comply with the school's financial regulations.
- Declare to the governing board, in writing, any gifts received, with the exception of:
 - Low cost, functional items suitable for business rather than personal use and displaying the supplier's logo – these items may be accepted.
 - Gifts offered by parents or students to school staff to express their gratitude, but staff members should always refuse monetary gifts.
 - Hospitality in the form of meals and drinks where it is part of a normal business meeting.
 - Authorised visits to exhibitions, demonstrations, conferences, business meals and social functions in connection with the school's business, which shall be at the school's expense.
- Not accept a personal gift, payment, or other incentive from a business contact – any such gifts should be returned.
- Declare any gift that cannot be returned to the governing board, who will decide how it will be used.
- Only accept offers to specific events after authorisation from the governing board.

17. E-safety

- 17.1. Staff will adhere to the procedures outlined in the school's **E-safety Policy** and **Acceptable Use Agreement** at all times.
- 17.2. Staff are required to employ the highest security settings on any personal profiles they may have.
- 17.3. Staff will not engage in inappropriate use of social networking sites including contacting students or their family members, accepting or inviting friend requests from students or their family members, or following students or their family members on social media.
- 17.4. The school understands that some staff members are also parents of students at the school and, therefore, may wish to make contact with other parents. When doing so, staff will exercise their professional judgement and will not contact family members on social media if this would lead to a conflict of interest.
- 17.5. Staff will remain mindful of their use of social media and their web-based presence including written content, videos or photographs, and views expressed directly or indirectly which may bring themselves, the school or the school community into disrepute.

18. Premises, equipment and communication

- 18.1. School equipment and systems are available only for school-related activities and will not be used for the fulfilment of another job or for personal use, unless specifically authorised by the Headteacher.
- 18.2. Illegal, inappropriate or unacceptable use of school equipment or communication systems may result in disciplinary action and, in serious cases, could lead to an employee's dismissal.
- 18.3. Employees receiving inappropriate communication or material, or who are unsure about whether something he/she proposes to do might breach this policy, should seek advice from the Headteacher.
- 18.4. The school reserves the right to monitor emails, phone calls, internet activity or document production, principally in order to avoid offensive or nuisance material and to protect systems from viruses, but also to ensure proper and effective use of systems.
- 18.5. Communication systems may be accessed when the school suspects that the employee has been misusing systems or facilities, or for the investigation of suspected fraud or other irregularity. Access will be secured by the systems manager, only with the permission of the governing board.
- 18.6. Passwords should not be shared and access to computer systems must be kept confidential except on the express request of the Headteacher or systems manager. Breaches of this confidentiality may be subject to disciplinary action.
- 18.7. School equipment that is used outside the premises, e.g. laptops, will be returned to the school when the employee leaves employment or if requested to do so by the Headteacher.

19. Photography and videos

- 19.1 Photographs and videos must only be taken using school equipment – using personal mobile phones for this purpose is prohibited, in accordance with the school’s **Acceptable Use Policy for Staff and the Photograph, Video and CCTV Policy**.
- 19.2 Consent must be obtained from parents, or the students themselves (in the case of our 6th Form students), if a member of staff wishes to use any images or videos of students, e.g. to publish on our website. The member of staff must ensure that the consent is freely given and the individual clearly understands what the images may be used for and who may see them.
- 19.3 Students in respect of whom no consent has been provided or who make it clear that they do not wish to have their photograph taken or be filmed, will have their wishes respected, in line with our Privacy Notice.
- 19.4 Before any photos or filmed images of students or staff are published the DPO will be notified of the proposed use of the imagery or video so that any concerns can be addressed.
- 19.5 All photographs and videos taken by staff in the course of their employment will be available for scrutiny, and staff must be prepared to justify the images or footage taken.
- 19.6 Careful consideration will always be given to the activities which are being filmed or photographed, in order to ensure that images or videos are not inappropriate and cannot be misused.

20 Data protection and confidentiality

- 20.1 Whenever Staff access or use any ‘Personal Data’ (that is data from which an individual student, staff member or other stakeholder can be identified), they must adhere to data protection law and follow the School’s Data Protection Policy. As staff routinely create and access personal data, (e.g. every time they look at information about a student’s attainment or needs, or when they mark a student’s work), it is imperative that they familiarise themselves with the Data Protection Policy and the rules it contains. In particular staff must:
- Seek advice from the School’s Data Protection Officer (hereinafter ‘DPO’) if they ever have any data protection related queries or if they are ever unsure as to whether a proposed course of action involving personal data is lawful.
 - Advise the DPO immediately if they discover a potential or actual breach of security and/or of data protection law (i.e. if they discover that student data has been accidentally disclosed in error).
 - Be mindful of the need for confidentiality and not disclose personal data to third parties unless they have firstly obtained the express consent of the individual concerned or they are clear that the disclosure is made pursuant to a statutory obligation (e.g. in the case of safeguarding).
 - Take great care to ensure that personal data is not disclosed either orally or in writing, accidentally or otherwise, to any unauthorised third party, (i.e. by double checking recipients email addresses before sending emails and being mindful of compliance when speaking to

stakeholders). **Circular emails to parents must be sent blind carbon copy (bcc), so email addresses are not disclosed to other recipients.**

- Take all necessary steps to ensure that any personal data that they hold is kept securely so that it cannot be accessed by third parties. Use locked drawers, locked filing cabinets etc. and they must not access data where other people can see it (i.e. **no checking emails in a public area**).
- Take particular care when transferring data and never transfer personal data onto mobile devices or home PCs unless appropriate security measures are in place - such as encryption and the data has been backed up.
- **Ensure that no-one else is able to see their mobile phone if they are using it to access school emails and make sure it is password protected and has suitable security software on it.**
- Wherever they take personal data off the premises, (whether it's electronic or in paper format), take extra care to follow the same procedures for ensuring its security whilst it is off site. **The staff member will be responsible for its security whilst it is off site.**

20.2 Staff members have the right to request access to data that is held about them, these are called 'Subject Access Requests'. If any member of staff wishes to access any personal data pertaining to them, they must make the request in writing to the School's Data Protection Officer (DPO).

20.3 Staff members will not disclose any sensitive or confidential information about the school, its employees or the LA to other parties, (without the prior written consent of the Headteacher). This applies regardless of whether any personal data is involved and also covers purely corporate data or commercial information pertaining to the School and its business and its stakeholders.

20.4 The only exception whereby it may be acceptable for a staff member to disclose information which would otherwise be considered confidential is when the confidential information gives rise to concerns about the safety or welfare of a student.

21 Probity of records

21.1 The deliberate falsification of documents, such as references, academic qualifications or legal documents, is unacceptable. Where a staff member falsifies records or other documents, including those held electronically, this will be regarded as a serious disciplinary matter and potentially a criminal offence.

22 Contacts

22.1 Staff members shall not use school business contacts for acquiring materials or services at trade/discount prices for non-school activities, unless participating in concessionary schemes arranged by trade unions or other such groups.

23 Staff Consultation

At St. Gregory's a culture of openness and honest self-evaluation is encouraged. It is important that staff feel they have a voice in the way the school is run. There will be occasions when feedback from staff will be invited:

- Staff Consultation groups, chaired by the Headteacher
- Staff questionnaires and interviews as part of our Investors in People commitment
- www/ebi (what went well/even better if) at staff meeting open forums when time allows

It has already been noted that the school's email system is not the appropriate place to raise concerns, nor are staff briefings on a Monday and Friday morning, when the focus needs to be on the business of the week and student issues.

All members of staff should moreover feel that they can raise any matters of concern. We have adapted the **Whistleblowing Policy** of B&NES Council (P: drive> Safeguarding Policies and Key Documents).

All members of staff are also directed to the document **Allegations of Abuse made against Teachers and Other Staff** (P: drive> Safeguarding Policies and Key Documents) which is taken from the DfE document 'Keeping children safe in education' September 2018. The guidance is about managing causes of allegations that might indicate a person would pose a risk of harm if they continue to work in regular or close contact with children in their present position or in any capacity.

If any member of staff has concerns about any breaches of this Code or the improper conduct of a member of staff they should raise the matter with their line manager or a member of the senior leadership team.

24 Monitoring and review

- 24.1 This policy will be reviewed on a five year basis by the Headteacher and any changes made will be communicated to all members of staff.
- 24.2 All members of staff are required to familiarise themselves with this policy as part of their induction programme.