



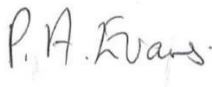
**The Westminster
School**

Safe, Happy and learning Together

www.thewestminsterschool.co.uk

2023/2024 Staff Code of Professional Conduct

Building foundations and providing opportunities to create confident, aspirational, and independent members of our community.

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| Approved by Governing Body on: | 25/04/2024 |
| Signed by Chair of Governors: |  |
| Head Teacher: | O M Flowers |
| Lead Personnel: | A Gibson |
| Date of Review: | 25/04/2026 |

Aims, scope and principles

This policy aims to set and maintain standards of conduct that we expect all staff to follow.

By creating this policy, we aim to ensure our school is an environment where everyone is safe, happy and treated with respect.

Many of the principles in this code of conduct are based on the [Teachers' Standards](#).

School staff have an influential position in the school and will act as role models for pupils by consistently demonstrating high standards of behaviour.

We expect that all teachers will act in accordance with the personal and professional behaviours set out in the Teachers' Standards.

For those employees on National Joint Council (NJC)/Local Government Contracts their code of conduct is encompassed in Section 82 of the Local Government Act 2000 which details that a Model Code of employee's Conduct to be issued to employees. Details of this requirement is found in the Sandwell MBC, The Constitution, Part 5, Officers Code of Conduct document (HR9).

We expect all support staff, governors and volunteers to also act with personal and professional integrity, respecting the safety and wellbeing of others.

This code aims to establish the usual standard of conduct expected of all employees, whilst also reflects the Core Values and Vision of the School. It is a combination of these regulations, standards and values which formulates how an employee of The Westminster School is expected to conduct themselves.

Failure to follow the code of conduct may result in disciplinary action being taken, as set out in our staff disciplinary procedures.

Please note that this code of conduct is not exhaustive. If situations arise that are not covered by this code, staff will use their professional judgement, and common sense and act in the best interests of the school and its pupils.

As an employee, you must not put yourself in a position where duty and private interests conflict and you must not make use of your employment to further your private interests.

Legislation and guidance

We are required to establish procedures for the regulation of staff conduct under regulation 7 of [The School Staffing \(England\) Regulations 2009](#).

In line with the statutory safeguarding guidance [Keeping Children Safe in Education](#), we should have a staff code of conduct, which should cover low-level concerns, allegations against staff and whistle-blowing, as well as acceptable use of technologies (including the use of mobile devices), staff/pupil relationships and communications, including the use of social media.

Responsibilities of the School

- Explain the provisions of the Code of Conduct to employees and signpost employees to other relevant policies, document and guidelines
- Provide additional advice and guidance to staff in relation to queries they may have regarding the application of the Code of Conduct
- Coach, support and provide feedback to employees on their performance in relation to the required standards of conduct
- Take appropriate action at the earliest opportunity to address breaches of the expected standards of conduct

Responsibilities of the Employee

- To read, understand and comply with the Code of Conduct at all times
- To use this code, alongside other relevant School policies and professional codes, to guide them in their role

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- To seek guidance from the Headteacher (or Chair of Governors in the case of the Headteacher) if they are unclear about the conduct or actions expected of them
- To alert the Headteacher (or Chair of Governors in the case of the Headteacher) at the earliest opportunity where an employee believes they may have acted in a manner which is inconsistent with the Code of Conduct and other relevant School Policies and professional codes.

Setting an example

School employees are role models and must strive to adhere to behaviour that sets a good example to all the pupils/students within the School and is appropriate in a School setting. This includes:

- Refraining from abusive or potentially offensive/discriminatory language or actions. (The use of profanity, vulgar expressions, personal insults, violence, and harassment for example, will be considered unacceptable)
- Being mindful and sensitive to the customs, practices, culture and personal beliefs of others.
- Positively contributing to the creation of a fair and inclusive work environment where everyone can thrive and do their best work.
- Demonstrating tolerance and respect towards others by being mindful and sensitive to the customs, practices, culture and personal beliefs of others
- Contributing to the creation of a fair and inclusive School environment where everyone can thrive and do their best work.
- Observing boundaries appropriate to their role and a School setting
- Ensuring personal / political opinions or beliefs do not impact on the discharge of duties and/or are not expressed in a way which exploits pupils /students vulnerability or seeks to unduly influence.
- Not undermine fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs
- Maintaining high standards of personal presentation, attendance and punctuality
- Understand the statutory frameworks they must act within
- Adhere to the Teachers' Standards (where appropriate)
- Adhere to Sandwell MBC's Model Code of Conduct (where appropriate)

Should employees be in doubt about the appropriateness of their behaviour they should seek guidance from the Headteacher (or Chair of Governors in the case of the Headteacher).

Safeguarding

Everybody working in a School must understand their safeguarding responsibilities. 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 are likely to suffer, significant harm
- Report as soon as possible and without delay any concerns regarding child protection / safeguarding to the Designated Safeguarding Lead (or Chair of Governors where concerns relate to the Headteacher)
- Part 1 of Keeping Children Safe in (KCSIE) as updated annually
- Child Protection and Safeguarding Policy
- Behaviour (Wellbeing and Engagement) Policy
- Additionally, employees with managerial responsibilities must ensure they comply with the School's Procedures for Managing Child Protection Allegations against Staff and Parts 2-4 of Keeping Children Safe in Education and Safeguarding Procedures for Managing Allegations Against Staff

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All School policies are available on the Policies Hub on SharePoint and the School Website. Printed copies are available from the HR Manager. New staff, governors, volunteers and students on placement will also be given copies on arrival.

All staff should have an awareness of safeguarding issues that can put children at risk of harm and how to deal with these accordingly. These include:

- › Child on Child abuse – including bullying (cyberbullying, prejudice-based and discriminatory bullying)
- › Sexual Violence & Harassment - abuse of intimate relationships, physical abuse, sexual abuse & harassment, non-consensual sexual activity/sharing of images, upskirting and initiation/hazing type violence and rituals.
- › Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)
- › Domestic Abuse – including psychological, physical, sexual, financial or emotional abuse.
- › Mental Health – including the impact of suffering abuse or neglect
- › Radicalisation – including the Prevent agenda
- › Serious Violence – including Female Genital Mutilation (FGM), honour-based abuse and forced marriage.

Employees are guided to refer to the latest version of Keeping Children Safe in Education for further information.

Employees must attend and comply with any training as required by the School associated with safeguarding and child protection.

Child protection and safeguarding children is the responsibility of all staff in school. Children and their families are entitled to expect that where a member of staff or a volunteer witnesses an incident of a safeguarding nature or inappropriate conduct in school, that they will report it in line with school policies and procedures. Where allegations of a safeguarding nature arise, all staff and volunteers are expected to co-operate with any associated processes, such as acting as a witness as part of an internal investigation or as part of an external Police investigation.

We appreciate that these processes can be stressful for staff and volunteers, and appropriate pastoral support will be provided. However, refusal to co-operate with such investigations brings into question the ability of those refusing, to safeguard children, and may be considered to be neglect of duty under the Disciplinary Rules.

Allegations that may meet the harm threshold

This section applies to all cases in which it is alleged that anyone working in the school, including a supply teacher, volunteer or contractor, has:

- › Behaved in a way that has harmed a child, or may have harmed a child, and/or
- › Possibly committed a criminal offence against or related to a child, and/or
- › Behaved towards a child or children in a way that indicates they may pose a risk of harm to children, and/or
- › Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place inside or outside of school

We will deal with any such allegation quickly and in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

A 'case manager' will lead any investigation. This will be the Headteacher, or the chair of governors where the Headteacher is the subject of the allegation.

Low-level concerns about members of staff

A low-level concern is a behaviour towards a child by a member of staff that does not meet the harm threshold, is inconsistent with the staff code of conduct, and may be as simple as causing a sense of unease or a 'nagging doubt'. For example, this may include:

- › Being over-friendly with children

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- › Having favourites
- › Taking photographs of children on a personal device
- › Engaging in 1-to-1 activities where they can't easily be seen
- › Humiliating pupils

Low-level concerns can include inappropriate conduct inside and outside of work.

All staff should share any low-level concerns they have using the reporting procedures set out in our Child Protection and Safeguarding Policy and Managing Low Level Concerns Policy. We also encourage staff to self-refer if they find themselves in a situation that could be misinterpreted. If staff are not sure whether behaviour would be deemed a low-level concern, we encourage staff to report it.

All reports will be handled in a responsive, sensitive and proportionate way.

Unprofessional behaviour will be addressed, and the staff member supported to correct it, at an early stage.

This creates and embeds a culture of openness, trust and transparency in which our values and expected behaviour are constantly lived, monitored and reinforced by all staff while minimising the risk of abuse.

Reporting and responding to low-level concerns is covered in more detail in our Child Protection and Safeguarding policy and Management of Low Level Concern Policy. These are available on the Policies Hub on SharePoint and School Website. Printed copies are available from the HR Manager.

Position of Trust

All staff who work in a school setting are in a position of trust in relation to individuals in their care and so must adopt high standards of personal integrity and conduct and behave in such a way that does not compromise their position both within and outside of the workplace or the safety and/or welfare of children and young people. This is known as transferable risk and examples include:

- › Domestic abuse
- › Drug and alcohol use
- › Extremism and radicalisation
- › Mental health
- › Friendships/close personal relationships with people who may pose a risk to children
- › Involvement with the Police/social care

The above list is not exhaustive and if there are any matters in a member of staff's personal life which could compromise their position both within and outside the workplace they must notify the Head Teacher immediately. This includes any involvement with the Police, regardless of whether the Police decide to take any action or not.

Staff-pupil relationships

Staff will observe proper boundaries with pupils that are appropriate to their professional position. They will act in a fair and transparent way that would not lead anyone to reasonably assume they are not doing so.

If staff members and pupils must spend time on a one-to-one basis, staff will ensure that:

- › This takes place in a public place that others can access
- › Others can see into the room
- › In view of the CCTV cameras and not in rooms without CCTV cameras
- › A colleague or line manager knows this is taking place

Staff should avoid contact with pupils outside of school hours if possible.

Personal contact details should not be exchanged between staff and pupils. This includes social media profiles.

There may be occasions when a pupil is in distress and in need of comfort as a reassurance. This may include age-appropriate physical contact. Staff should always remain self-aware so that their contact is not

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threatening, intrusive or subject to misinterpretation. If possible Individual work with pupils should not be undertaken in isolated areas or rooms, rooms without CCTV or areas without viewing panels.

If a staff member is concerned at any point that an interaction between themselves and a pupil may be misinterpreted, or if a staff member is concerned at any point about a fellow staff member and a pupil, this should be reported in line with the procedures set out in our Child Protection and Safeguarding Policy.

Other relationships

Staff must declare any relationships that they may have with pupils, staff, clients, contractors, suppliers or parents/carers outside of the school. This may include mutual membership of social groups, care, tutoring and/or family connections. Existing or new personal relationships at work between colleagues should be declared to the Head Teacher where there is a potential for this to impact upon the work of either (for example: a risk of allegations of bias or conflict of interest).

All staff must complete a declaration of business interest form and declare any business and/or pecuniary interests annually.

Whistleblowing

Whistle-blowing reports wrongdoing that it is “in the public interest” to report. Examples linked to safeguarding include:

- Pupils’ or staff’s health and safety being put in danger
- Failure to comply with a legal obligation or statutory requirement
- Attempts to cover up the above, or any other wrongdoing in the public interest

Staff are encouraged to report suspected wrongdoing as soon as possible. Their concerns will be taken seriously and investigated, and their confidentiality will be respected.

Staff should consider the examples above when deciding whether their concern is of a whistle-blowing nature. Consider whether the incident(s) was illegal, breached statutory or school procedures, put people in danger or was an attempt to cover any such activity up.

Staff should report their concern to the Headteacher. If the concern is about the Headteacher, or it is believed they may be involved in the wrongdoing in some way, the staff member should report their concern to the chair of the governing board.

Concerns should be made in writing wherever possible. They should include names of those committing wrongdoing, dates, places and as much evidence and context as possible. Staff raising a concern should also include details of any personal interest in the matter.

For our school’s detailed whistleblowing process, please refer to our Whistleblowing policy.

Communication and social media

School staff’s social media profiles should not be available to pupils. If they have a personal profile on social media sites, they should not use their full name, as pupils may be able to find them. Staff should consider using a first and middle name instead and set public profiles to private.

Staff should not attempt to contact pupils or their parents via social media, or any other means outside school, to develop any sort of relationship. They will not make any efforts to find pupils’ or parents’ social media profiles. Employees must not post any comments, photographs, images or conversations on social networking websites which may bring them or the School into disrepute. Security settings should be maintained at the highest level in order to prevent members of the public seeing any employee’s personal information.

Staff will ensure that they do not post any images online that identify children who are pupils at the school without their consent.

Staff should be aware of the School’s Online Safety Policy.

Acceptable use of technology

Staff will not use technology in school to view material that is illegal, inappropriate or likely to be deemed offensive. This includes, but is not limited to, sending obscene emails, gambling and viewing pornography or other inappropriate content.

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Staff will not use personal mobile phones and laptops, or school equipment for personal use, in school hours or in front of pupils. They will also not use personal mobile phones or cameras to take pictures of pupils.

We have the right to monitor emails and internet use on the School IT system.

Staff should be aware of the School's Acceptable Use Policy.

Confidentiality

In the course of their role, members of staff are often privy to sensitive and confidential information about the school, staff, pupils and their parents.

Such information must not be disclosed to any person who is not entitled to have access to this or legitimately needs it for work purposes. Specifically, all employees must:

- › Work in accordance with the requirements of the General Data Protection Regulation (2018) and associated legislation
- › Observe the School's procedures for the release of 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/members of the public
- › Ensure all confidential data is kept secure and password protected

This does not overrule staff's duty to report child protection concerns to the appropriate channel where staff believe a child has been harmed or is at risk of harm, as detailed further in our Child Protection and Safeguarding policy.

Should employees be in doubt about the appropriateness of sharing information they should seek guidance from the Headteacher.

Honesty and integrity

Staff should maintain high standards of honesty and integrity in their role. This includes when dealing with pupils, handling money, claiming expenses and using school property and facilities. Staff will not accept bribes.

Staff will ensure that all information given to the school is correct. This should include:

- › Background information (including any past or current investigations/cautions related to conduct outside of school)
- › Qualifications
- › Professional experience

Where there are any updates to the information provided to the School, the member of staff will advise the school as such as soon as reasonably practicable. Consideration will then be given to the nature and circumstances of the matter and whether this may have an impact on the member of staff's employment.

Criminal Charges and Convictions

All employees have a duty to immediately disclose to the Principal/Headteacher (or Chair of Governors in the case of a Principal/Headteacher) prior to the start of their employment, at the start of their employment or during the course of their employment, any change in their circumstances or any information which may affect or is likely to affect the suitability of the employee to undertake their job role or work with children/young people or in a School setting. This includes, but is not restricted to:

- › the employee being subject to any police investigation / enquiry, arrest, ban, charge, caution, reprimand, warning, fine or pending prosecution or criminal conviction. This includes any actions committed overseas which would be subject to a police investigation or formal action if such actions had been committed in any part of the United Kingdom
- › the employee being subject to any referral, made to, or any investigation, proceedings, or prohibition order being undertaken by the Teaching Regulation Agency, General Teaching Council for Scotland, or the Education Workforce Council in Wales

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- › the employee being subject to the inclusion on the DBS Children's Barred List and any change in DBS status during employment, or any referral, made to, or any, investigation or proceedings being undertaken by the DBS
- › the employee being subject to any referral, made to, or any investigation, proceedings, or prohibition order being undertaken by any other regulatory or professional authorities or actions of other agencies relating to child protection and/or safeguarding concerns
- › the employee being subject to any orders 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
- › the employee being subject to any 'live' disciplinary process, formal sanction or any other relevant information arising from a previous or current secondary employment/voluntary work which may impact on the employee's suitability to undertake their role or work with children/young people or in a School setting. This includes substantiated safeguarding allegations
- › the employee's close personal relationships outside of the workplace presenting a 'risk by association' to the safeguarding of children/young people.

This list is not exhaustive. Should an employee be unclear about whether it is appropriate to disclose a matter they are encouraged to seek guidance from the Headteacher (or Chair of Governors in the case of a Headteacher) at the earliest opportunity. The School acknowledges the obligation to disclose protected convictions and cautions is governed by the requirements of the Rehabilitation of Offences Act 1974 (Exceptions) Order 1975 (as amended in 2013).

Prospective employees should be aware that when applying for particular jobs and activities, certain convictions and cautions are considered 'protected'. This means that they do not need to be disclosed to employers, and if they are disclosed, employers cannot take them into account.

Employees are advised that Guidance about whether a conviction or caution should be disclosed can be found here: [Check if you need to tell someone about your criminal record: What information you need to give - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

Gifts and hospitality

Employees must not accept any fee or reward for work done other than their pay and allowances as set out in their contract of employment except as set out below. It is an offence under the Bribery Act 2010 for School staff to accept gifts, loans, fees or rewards as an inducement to act in a certain way in their official capacity. School staff must not receive gifts, hospitality or benefits of any kind from a third party which might be seen to compromise their personal judgement or integrity. School staff must immediately report any offer or receipt of such gifts to the Finance Manager to be recorded in the Register of Gifts and Hospitality. Governors and School staff may accept the following gifts without the need to seek the approval of the School or formally register receipt:

- › Courtesy hospitality at business lunches/dinners or in attendance in an official capacity at a public function
- › Incidental promotional gifts such as calendars, diaries or pens;
- › Receipt of small items from suppliers or contractors as expressions of gratitude such as boxes of chocolates or individual bottles of drink (at a value of less than £25).
- › Receipt of small items from families of pupils, or from pupils themselves as expressions of gratitude, such as boxes of chocolates or individual bottles of drink (at a value of less than £25).

It is unacceptable to give personal gifts to pupils. This could be misinterpreted as a gesture either to bribe, or single out the young person. Any reward given to a young person should be in line with agreed practice within the School,

Care must always be taken to ensure that whenever such gifts/hospitality are accepted no obligation to the person or organisation in question is accepted. In cases of doubt, employees should consult the Finance Manager.

The following examples of gifts/hospitality require approval and are to be formally recorded by the Finance Manager in the Register of Gifts and Hospitality:

- › Attendance as a non-paying guest of a commercial organisation or individual at a non-work related cultural or sporting event (at a value of more than £25);
- › Promotional gifts worth more than £25;

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- › Other offers of gifts/hospitality not falling into any of the above categories.

Unacceptable gifts/hospitality

The following are examples of offers of gifts/hospitality which should be refused by staff:

- › Gifts of money (not including donations to the School);
- › Free membership or subscriptions (e.g. sports clubs);
- › Foreign travel unless as a specific element of a business, academic or research activity approved in advance by the School;
- › Free goods, services or equipment which are normally provided by a supplier to the School at a charge;

Any offers of gifts and hospitality falling into any of the above categories should be reported immediately to the Headteacher.

Dress code

There is a general expectation that dress will be appropriate to the nature of the duties and responsibilities of the job. For instance, sport-type clothing will be worn when conducting practical PE lessons however smart business dress will be worn when conducting other classroom lessons. This also applies to off-site activities and as representatives of the school smart business dress is required at all times unless the activity is of a physical nature.

The School values and welcomes the ethnic diversity of its workforce and therefore dress codes will take account of ethnic and religious dress requirements with sensitivity ensuring that employees are free to observe them.

Where there is a clear business case or a health and safety reason, the School may introduce appropriate dress codes to suit the services provided.

For clarity, smart business dress does not include:

- Denim
- Leggings with short tops
- Tracksuits
- Jogging bottoms
- Flip-flops or Crocs

Appropriate clothes should be worn for trips and visits (eg waterproofs and walking boots for Baggeridge etc) and for PE. Staff should also wear aprons for activities such as DT and Food Tech.

There will also be occasionally “mufti days” for special events as in previous years where staff and pupils can wear casual clothes and we will try to give advance notice of these so everyone is aware. Just a reminder that there are items of staff uniform available to purchase through <https://wmsstaff.online.co.uk/catalogue>.

Conduct outside of work

Staff will not act in a way that would bring the school, or the teaching profession, into disrepute. This covers conduct including but not limited to relevant criminal offences, such as violence or sexual misconduct, as well as negative comments about the school on social media. Staff should ensure that the use of alcohol/drugs outside of work does not adversely affect the work performance and safety of themselves or others, and does not bring the School into disrepute.

Fitness for work

The School accepts that alcohol is legally and freely available. Employees must:

- › Ensure that the use of alcohol out of work does not adversely affect your work performance, the health, safety or welfare of yourself or others and does not damage the Schools image and reputation.

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- If you are a Head Teacher or Manager, consider the options available for managing employees in the above situation and consider if there is a need to make a supportive referral to the services of Sandwell Occupational Health.
- Not consume or be under the influence of alcohol, use illicit drugs or other illegal substances while at work.
- If taking medication you must seek the advice of your doctor to ensure that such medication will not impede your ability to do the job (e.g. operate machinery).
- Inform your Head Teacher or Line Manager of any situations where a risk to yourself or others may arise because of this.
- If you are a Head Teacher or Line Manager consider the options available for assisting employees who are required to take legally prescribed drugs and whose levels of performance has been impaired. In these circumstances a risk assessment should be undertaken.

Health and Safety

Employees have a duty to take reasonable care of themselves and to co-operate with management under the Health and Safety at Work Act 1974. These responsibilities are identified in the School's Health and Safety policy.

Employees are required to act at all times in accordance with this policy and generally to act in such a way to ensure their own safety and that of others.

Any action which potentially puts at risk the health and/or safety of yourself or others will be viewed seriously and may result in disciplinary action may be taken.

Staff must read and implement Risk Assessments and be aware of COSHH sheets in relation to school activities. These can be found on the Health and Safety Hub on SharePoint.

Following instructions

Employees are expected to follow all reasonable and lawful instructions by a person with the authority to issue such instructions unless:

- There is a danger to a person's health and safety.
- A conflict of interest may exist.
- It does not comply with School's policy and practice.

Head Teachers and Line Managers must be able to justify their instructions and decisions in line with their delegations, authority, and School policy and procedures, and be open and respond promptly to constructive questions.

Disciplinary rules

The School has a disciplinary procedure which is detailed in the Disciplinary Policy.

The disciplinary procedure is concerned with instances of alleged misconduct, either ordinary or gross. It is anticipated that the vast majority of breaches will be minor and that they can be resolved without recourse to a formal procedure. Some breaches will be more serious or there may be circumstances where there is repetition of a minor breach. In such circumstances, the matter will be formally investigated and progressed under the formal procedure.

The School also has a separate capability procedure which provides a framework for managers and employees to cope with issues relating to performance. The underlying intention of the Procedure is to give the employees who are falling below the established acceptable standards the opportunity to improve. Further details of this can be found in the Capability Procedure for Teaching Staff (Sandwell Policy) and the Capability Policy for Non-Teaching staff (Sandwell Policy)

Use of financial resources

The School requires employees to observe the highest standards of business and financial practice. Employees should ensure that School/public funds with which they are entrusted are used in a responsible and lawful manner. Employees must comply with the School's stipulated financial regulations and any other relevant policies/audit requirements. Appropriate authorisation should be sought for any expenditure

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and audit trail/suitable records kept. School monies, credit/debit cards and accounts should not be used for personal purposes. The use of personal credit cards/accounts to purchase goods and services on behalf of the School should be avoided unless prior agreement from the Finance Manager is obtained. All expense claims for travel and subsistence should be appropriately authorised and accompanied by receipts/proof of purchase.

Personal loyalty cards should not be used when making purchases on behalf of the School.

Personal use of equipment and resources

Employees may not make personal use of the School's property, materials or facilities unless authorised to do so by the Headteacher.

Declaration of interests

The School recognises that employees may wish to take an active role in the local community and undertake additional personal / business activities outside of work. In the majority of instances such activities will have no impact on their role in School. However, on occasion, there may be a potential conflict of interest. Employees should therefore declare annually any interests which may conflict with those of the School. Employees should also declare membership of any professional bodies/organisations which may conflict with their School role. Should Employees be in doubt about whether a conflict of interest may exist they should seek guidance from the Headteacher (or Chair of Governors in the case of the Headteacher).

Contracting out of services

Employees should follow agreed School protocols for the award of contracts to external providers. Employees should adhere to School rules regarding the separation of roles in procurement process. Care should be taken to ensure competition between prospective contractors is fair and open and that all competing parties are treated equally.

Employees should ensure that preferential treatment is not shown to current/former employees or partners, close relatives or friends/associates in the award of contracts. Employees must not accept any form of financial or other inducement which may be offered by a potential contractor. All such approaches should be reported to the Headteacher (or Chair of Governors in the case of the Headteacher). Confidential information relating to the tendering process, must not be disclosed to any unauthorised party or organisation.

Equality, diversity and inclusion

The School is committed to the promotion and implementation of equality diversity and inclusion both internally and externally and aims to ensure that everyone who comes into contact with it is treated equally and not in any way disadvantaged by factors which could prevent the implementation of fair policies and operations. For more information about the policy see the School's Equality Policy.

The School will recognise the differences which exist and will seek to understand the needs of people within the groups which are afforded protection or assistance through this policy.

The School expects all its employees to uphold its Equality Policy and to accept the duty not to discriminate, either in employment practices or in the provision of facilities and services by reference to age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

Discrimination, harassment and victimisation

Employees must treat all other employees, pupils, parents, and people with whom they come into contact with courtesy and respect and must not make any remarks or gestures relating to the protected characteristics of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation which may cause offence.

Any incident involving bullying or harassment will be dealt with in accordance with Sandwell MBC Harassment and Bullying Policy (PERS 41b). Any complaint of discrimination, harassment, or victimisation or complaints made on the grounds of any of the protected characteristics listed above, will be taken

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seriously and will be the subject of a thorough investigation. This could give rise to the implementation of the School's Disciplinary procedure, depending on the outcome of the investigation.

Attendance

Employee's contracts of employment contains the main terms and conditions of their employment with the School. It is expected that employees are available for work during school hours and take an unpaid lunch break during designated and timetabled periods.

Employees must sign in and out of the building to ensure a roll can be called in the event of a fire alarm or other need to evacuate the building.

Non-attendance at work is covered by the Management of Absence Policy (Sandwell Policy). The procedures for informing the School about absence are contained in the Staff Handbook.

Secondary employment

Employees should ensure that any external paid or unpaid work does not conflict with their duty to the School or pose the potential to damage the employee's own or the School's reputation within the context of their job role and seniority. Employees must discuss with the Headteacher and obtain their consent before taking up additional paid/unpaid employment.

Requests will not be unreasonably refused providing that:

- It does not affect or is unlikely to affect the suitability of the employee to undertake their job role or work with children/young people or in a School setting
- There is no detrimental impact on an employee's work performance or their own or others health and safety.
- Privileged or confidential information is not shared
- Work is undertaken outside of the School and of contracted hours of work
- The activity is not in direct competition with those of the School If school staff work for another organisation or as a PA for a pupil, they must not act as a messenger between that organisation and the school. Formal channels of communication must be maintained.

It is an employee's responsibility to monitor the hours they work and ensure they are rested and refreshed to be 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 elected to opt out of the Working Time Regulations.

Insurance

Staff should not use their own private vehicles to transport pupils or staff on school business unless they have their own business insurance, which needs to be checked by the Finance Team. Occasional Business Use Insurance is in place for staff that do not have Business Insurance but need to use their own car for school business. For example attending off-site training, banking etc. Prior to being added to the register for OBU the driver must present share their driving licence [View or share your driving licence information - GOV.UK \(www.gov.uk\)](#), present a valid MOT and insurance.

To become a registered driver of a school vehicle the staff member must meet the required criteria and undertake the relevant qualification and training. See the School Vehicle Policy for clarification. All drivers need to share their driving licence annually.

Political activity

Employees may engage in political activity outside of work – however they should not allow personal/political views to interfere with their duties. Any activity should be compatible with the employee's responsibility as a role model to pupils. Where an employee is involved in political activity outside of work care must be taken to ensure that it is clear that any opinions expressed are personal and that the individual is not acting on behalf of or representing the School.

Intellectual property

Any intellectual property created by an employee during their employment and for the purposes of their employment will be considered the property of the School, unless specific permission is granted to the employee to have ownership of such materials.

Identity badges

All employees are issued with identity badges and appropriate lanyards and these should be worn at all times during the school day. This is particularly important if they visit the public in their homes. Where managers decide that it is not practical to wear identity badges then employees should have them available for inspection at all times. As the badge also acts as an access pass employees must alert the School Business Manager immediately that it is lost to prevent unauthorised access to the building.

Smoking and vaping

The School is a non-smoking organisation. With this in mind employees are not permitted to smoke or vape in any of the School's offices, or any other building or grounds, owned or occupied by the School, at any time. Smoking or vaping whilst on the School's premises may be subject to disciplinary action.

Personal mobiles

Employees are not permitted to make/receive calls/texts during work time where pupils are present (excluding break times).

Staff should ensure that mobiles are always set to silent during the school day. They should not be left on display.

Staff are not permitted to use recording equipment on their personal mobile phones.

Work mobiles

Some School staff will be allocated a mobile phone to go about their business. This phone needs to be on throughout the working day to ensure calls, text messages and emails can be taken and responded to.

Contact with the media

All enquiries from the media should be directed to the Headteacher. Employees should not make contact with or comment to the media about matters relating to the School without the prior approval of the Principal/Headteacher. Employees should speak to the Headteacher in the first instance about any concerns they have regarding their own employment or operation of the school and refer to the School's Whistleblowing or Grievance policies if they wish to raise a formal complaint. Should staff speak directly to the media about non-school matters care should be taken to ensure that any opinions expressed are personal and that the individual is not acting on behalf of the School. Any contact with the media in a personal capacity should be compatible with the employee's role and their position working with young people or in a school setting and must not negatively impact on the reputation of the school.

Linked policies

- School Disciplinary Policy which will be used if staff breach this code of conduct. It also sets out examples of what we will deem as misconduct and gross misconduct
- GDPR Policy
- Finance Procedures and Responsibilities Policy
- Equality Policy
- Health and Safety Policy
- Harassment and Bullying Policy
- Management of Absence Policy
- Capability Procedure for Teaching Staff
- Online Safety and Acceptable Use Policies
- Managing Low-Level Concerns Policy
- Social Media Policy
- School Vehicle Policy

All policies are available on the school website and the Policies Hub in SharePoint.