



Staff Code of Conduct

Version: 3

Date: 01/02/2023

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The Sovereign Trust is a Multi Academy Trust registered in England No. 09666511. Registered Office: Manor Academy Sale, Manor Avenue, Sale M33 5JX



Document Control

Title	Staff Code of Conduct Policy
Supersedes	2.0
Owner	CEO
Circulation/Distribution	All Staff
Review Period	Annually

Version History

Next Review Date		01/02/2024		
Version	Date	Amendments	Author	Status
1.0	27/09/2020		CEO	Approved
2.0	22/09/2021	Formatting into new Trust format	CEO	Approved
3.0	22/09/2022	Formatting changes & updates to include allegations that may meet the harms threshold and whistle-blowing To remove the example 'using inappropriate language from the list of possible low-level concerns and replace with it 'humiliating pupils'.	CEO	Approved
3.0	02/02/2023		CEO	Approved

Staff Code of Conduct Policy

1. AIM OF THIS CODE OF CONDUCT

- 1.1 The Sovereign Trust ('Trust') expects all pupils to receive high-quality teaching and to learn in a positive and respectful environment.
- 1.2 Employees at the Trust should ensure that their behaviour and conduct with colleagues, pupils, parents and other stakeholders set a positive and professional example for pupils.
- 1.3 We recognise that most staff members act appropriately and treat each other with dignity and respect; however, we consider it important to clarify the expected standards.
- 1.4 This Policy forms part of a staff member's contract of employment, and failure to comply with it and the associated Trust policies may result in disciplinary action, including legal action where this is warranted.
- 1.5 This document applies to staff members who are:
 - Employed by the Trust, including the Senior Leadership Teams, Central Executive Team and volunteers.
 - Employed in units or bases that are attached to the Trust.
 - This document does not apply to:
 - Trust catering staff employed by Mellors Ltd.
 - Employees of external contractors.
 - These employees are governed by their employment contracts and relevant laws about their activities within the Trust, for example, the UK GDPR and the Data Protection Act 2018.

2. LEGISLATION AND GUIDANCE

- 2.1 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.

3. GENERAL OBLIGATIONS

3.1 Staff set an example to pupils. They will:

- Maintain high standards in their attendance and punctuality
- Never use inappropriate or offensive language in school
- Treat pupils and others with dignity and respect
- Show tolerance and respect for the rights of others
- 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
- Not express personal beliefs in a way that exploits pupils' vulnerability or might lead them to break the law
- Understand the statutory frameworks they must act within

4. SAFEGUARDING PUPILS

4.1 By 'Keeping children safe in education 2022' (KCSIE), staff members are responsible for safeguarding pupils and protecting and promoting their welfare.

4.2 Staff must safeguard pupils from harm and report any concerns. This includes physical, emotional and sexual abuse and neglect.

4.3 Staff members are responsible for ensuring that they provide a learning environment where pupils feel safe, secure and respected.

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

4.5 By the Trust's Behavioural Policy and Child Protection and Safeguarding Policy, staff members will be prepared to identify pupils who may be subject to, or at risk of, various types of abuse and neglect, including, but not limited to, the following:

- Physical abuse
- Emotional abuse
- Sexual abuse
- Neglect
- Peer-on-peer abuse
- Serious violence
- FGM
- Radicalisation

- Child sexual exploitation (CSE)
- Child criminal exploitation (CCE)
- Bullying; this includes cyberbullying, and prejudice-based and discriminatory bullying

4.6 Copies of policies and a copy of Part one (or Annex A for staff members not working directly with children) of KCSIE will be provided to staff at induction. Staff will clearly understand the Trust's policies and procedures regarding safeguarding issues, e.g. abuse, and their important role in preventing harm to pupils.

4.7 By the Trust's Child Protection and Safeguarding Policy, staff will also be aware of the factors that could increase a pupil's risk of being subject to safeguarding issues, including but not limited to:

- Pupils who need a social worker (Child in Need and Child Protection Plans).
- Pupils requiring mental health support.
- LAC and previously LAC.
- Pupils with SEND.
- Pupils who identify as LGBTQ+.
- Pupils are perceived to be LGBTQ+.
- Pupils struggling with mental health needs.
- Pupils who have a family member in prison or are affected by parental offending.
- Pupils that are frequently absent or permanently excluded from Trust.

4.8 If a staff member identifies a pupil subject to, or at risk of, abuse and neglect, they will follow the reporting and referral procedures outlined in the Trust's Child Protection Policy and Safeguarding Policy. In addition, staff will know the procedures to follow if a pupil tells them they are experiencing abuse, exploitation or neglect.

4.9 In all cases, if a staff member feels unsure whether an incident or pupil would be classed as a safeguarding concern, they will speak directly to the DSL. However, staff will not assume a colleague will act and share information that might be critical in keeping children safe.

4.10 Staff will understand that even if there are no reports of peer-on-peer abuse in the Trust, this does not mean it is not happening. Staff will report any concerns regarding any form of abuse to the DSL without undue delay. Staff will understand the importance of challenging inappropriate behaviours between peers that are abusive.

5. ALLEGATIONS THAT MAY MEET THE HARM THRESHOLD

- 5.1 This section is based on 'Section 1: Allegations that may meet the harm threshold' in part 4 of Keeping Children Safe in Education.
- 5.2 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
- 5.3 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.
- 5.4 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.

6. LOW-LEVEL CONCERNS ABOUT MEMBERS OF STAFF

- 6.1 Wherever possible, staff should avoid behaviour which might be misinterpreted by others and should report and record any incident with this potential. A low-level concern is 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
 - 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 also include inappropriate conduct inside and outside of work.
- 6.2 All staff should share any low-level concerns using the reporting procedures set out in our child protection and safeguarding Policy. We also encourage staff to self-refer if they find themselves in a situation that could be misinterpreted. If staff are unsure whether behaviour would be deemed a low-level concern, we encourage them to report it.

- 6.3 All reports will be handled in a responsive, sensitive and proportionate way.
- 6.4 Unprofessional behaviour will be addressed, and the staff member will be supported in correcting it early.
- 6.5 This creates and embeds a culture of openness, trust and transparency in which all staff constantly live, monitor and reinforce our values and expected behaviour while minimising the risk of abuse.
- 6.6 Reporting and responding to low-level concerns are covered in more detail in our child protection and safeguarding Policy. This is available on the Trust's website in the policies section.
- 6.7 Our procedures for dealing with allegations will be applied with common sense and judgement.

7. EQUALITY AND DIVERSITY

- 7.1 All staff within the academies in the Trust are expected to treat people fairly and with respect irrespective of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

8. WHISTLEBLOWING

- 8.1 Whistleblowing reports wrongdoing that it is "in the public interest" to report. Examples linked to safeguarding include:
- Pupils' or staff's health and safety are 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
- 8.2 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.
- 8.3 Staff should consider the examples above when deciding whether their concern is whistleblowing. In addition, consider whether the incident(s) was illegal, breached statutorily or school procedures, put people in danger or was an attempt to cover any such activity up.
- 8.4 Staff should report their concern to the Executive Headteacher/Head of School. In addition, if the concern is regarding a member of the Senior Leadership Team or Central Executive Team, or it is believed they may be involved in the wrongdoing in some way, the staff member should report their concern to the CEO or the Board of Directors.
- 8.5 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.

- 8.6 Staff will partake in the appropriate safeguarding and child protection training, including online safety; additionally, staff will receive regular safeguarding and child protection updates at least annually.
- 8.7 Staff will recognise that, when teaching pupils about safeguarding and online safety, a one-size-fits-all approach may not be appropriate for every pupil, and a more personalised or contextualised approach may be needed for pupils who are vulnerable, victims of abuse and/or have SEND.
- 8.8 Staff will be aware of their local early help process and understand their role in it. Staff will also be aware of the process for making referrals to children's social care service (CSCS) and for statutory assessments under the Children Act 1989, along with the role they may be expected to play in such assessments.
- 8.9 Staff will reassure victims that they are being taken seriously and will be supported and kept safe by the Trust. Staff will never give the impression that pupils are creating a problem by reporting abuse, sexual violence or sexual harassment, nor should a pupil ever be made to feel ashamed for reporting an incident.
- 8.10 Staff will be aware that confidentiality must never be promised to a pupil – staff will understand the procedure for if a pupil discloses a potential safeguarding issue, in accordance with the Trust's Child Protection and Safeguarding Policy.
- 8.11 Staff will be aware of the Trust's legal duty to refer anyone who has harmed, or poses a risk of harm to, a child or vulnerable adult to the DBS – this includes where:
- The harm test is satisfied in respect of that individual.
 - The individual has received a caution or conviction for a relevant offence, or if there is reason to believe that the individual has committed a listed relevant offence.
 - The individual has been removed from working in regulated activity or would have been removed if they had not left their post.

9. APPEARANCE AND DRESS

- 9.1 The Trust expects that staff members will:
- Ensure their appearance is clean and neat when at work or representing the Trust.
 - Dress in a manner that is appropriate to their role – the Trust will make reasonable adjustments to expectations to suit disabilities, medical conditions, and religious and cultural beliefs.
 - Remember that they are role models for pupils and that their dress and appearance should reflect this.
 - Not dressed in a way that would cause embarrassment to pupils, parents, colleagues or other stakeholders.

10. ATTENDANCE

10.1 The Trust 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 their working hours or during holidays.
- Refer to the Trust's Staff Leave of Absence Policy if they need time off for any reason other than personal illness.
- Follow the Trust's absence reporting procedure when they are absent from work due to illness or injury.

11. PROFESSIONAL BEHAVIOUR AND CONDUCT

11.1 Staff members must treat other colleagues, pupils, parents, and external contacts with dignity and respect.

11.2 The use of foul and abusive language will not be tolerated. In addition, discrimination, bullying, harassment or intimidation, including physical, sexual and verbal abuse, will not be tolerated.

11.3 Staff members will not misuse or misrepresent their position, qualifications or experience or bring the Trust into disrepute.

11.4 Staff members will inform the Executive Headteacher/Head of School if they are subject to a criminal conviction, caution, ban, police enquiry, investigation or pending prosecution.

11.5 Staff will know that professional behaviour and conduct are expected to be extended to extra-curricular trips and visits. Staff attending a trip or visit will act in accordance with this Code of conduct.

11.6 Staff will act appropriately regarding the views they express (in particular political views) and the use of Trust resources at all times and will not use Trust resources for party political purposes.

12. CONDUCT OUTSIDE OF WORK

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

13. SMOKING, ALCOHOL AND OTHER SUBSTANCES

- 13.1 Staff will not smoke on the Trust premises and whenever in the sight of pupils, parents or visitors.
- 13.2 Staff will not smoke whilst working with or supervising pupils off-site, such as during educational visits and trips.
- 13.3 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.
- 13.4 If alcohol or drug usage impacts a staff member's performance, the Trust has the right to discuss the matter with the employee and take appropriate action in accordance with the Trust's disciplinary procedures, including referral to the police. Further details can be found in the Staff Drug and Alcohol Policy.

14. HEALTH AND SAFETY

- 14.1 Staff members will:
- Be familiar with, and adhere to, the Trust's Health and Safety Policy and ensure that they take every action to keep themselves and everyone in the Trust environment safe and well.
 - Comply with health and safety regulations and use any safety equipment and protective clothing supplied to them.
 - Comply with hygiene requirements.
 - Comply with accident reporting requirements.

- Inform the Executive Headteacher/Head of School of any paid work undertaken elsewhere for compliance with The Working Time Regulations 1998 (as amended).

15. DECLARATION OF INTERESTS

- 15.1 Staff members are required to declare their interests, both personal and financial, where the group or organisation they are affiliated with could be considered to be in conflict with the ethos of the Trust.
- 15.2 For the purposes of this Policy, a financial conflict of interest is one where there is, or appears to be, an 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.
- 15.3 The term 'financial interest' means anything of monetary value, including the following:
- Payments for services
 - Equity interests
 - Intellectual property rights
 - Hospitality or gifts
- 15.4 Examples of financial interests that must be declared include, but are not limited to, equity interests in services considered for use by the Trust.
- 15.5 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 Trust. 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.
- 15.6 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
- 15.7 Membership in a trade union or staff representative group does not need to be declared.
- 15.8 Staff members will also carefully consider whether they need to declare their relationship with any individual where this might cause a conflict with Trust activities.
- 15.9 Failure to make a relevant declaration of interest is a serious breach of trust and, therefore, if employees are in doubt about a declaration, they are advised to contact the Executive Head or trade union.

- 15.10 All declarations, including nil returns, will be submitted in writing to the Trust HR Department for inclusion on the Register of Business Interests.

16. RELATIONSHIPS WITH PUPILS

- 16.1 The Trust expects that staff will:
- Maintain professional boundaries and relationships with pupils at all times and will consider whether their actions are warranted, proportionate, safe and necessary.
 - Act openly and transparently so that it would not lead to others questioning their actions.
 - Ensure they do not establish social contact with pupils to secure a friendship or pursue or strengthen a relationship.
 - Ensure that they do not develop personal or sexual relationships with pupils, including sexual remarks and discussing their sexual relationships with, or in the presence of, pupils.
- 16.2 Only contact pupils via the Trust's established mechanisms: personal phone numbers, email addresses, or social media platforms will not be used to contact pupils.
- 16.3 Under the Sexual Offences Act 2003, it is an offence for a person aged 18 or over to have a sexual relationship with a child under 18 where that person is in a position of trust in respect to that child, even if the relationship is consensual.

17. PHYSICAL CONTACT WITH PUPILS

- 17.1 The Trust understands that there are circumstances in which it is entirely necessary for staff to have physical contact with pupils, e.g. when applying first aid and assisting with intimate care, but staff will only do so professionally and appropriately in line with relevant Trust policies.
- 17.2 When physical contact is made with pupils, it must be conducted in a way responsive to the pupil's needs, limited duration and appropriate to their age, stage of development, gender, ethnicity and background.
- 17.3 Staff will seek the pupil's permission, where possible, before initiating contact. Staff will always use their professional judgement when determining what physical contact is appropriate, as this may differ between pupils. As such, the pupil's feelings and wishes will always be considered. Staff will never touch a pupil in a way which is indecent and will always be prepared to explain their actions. Staff will be aware that even well-intentioned physical contact may be misconstrued by a pupil, an observer or by anyone to whom this action is described and, therefore, will be prepared to justify their actions.
- 17.4 Staff will not engage in rough play, tickling or play fights with pupils.
- 17.5 Extra caution will be taken when a pupil has previously suffered from abuse or neglect.

- 17.6 Physical contact will never be secretive; if a staff member believes an action could be misinterpreted, this will be reported to the Executive Headteacher/Head of School, or if the concern is about the Executive Headteacher/Head of School, it should be reported to the CEO and appropriate procedures will be followed.
- 17.7 Where it is necessary for PE classes for teachers to demonstrate the use of equipment, this will be conducted with another staff member if possible. If a pupil is required to participate, their consent will be given before doing so.
- 17.8 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 pupil's shoulder. However, staff will remain self-aware of their actions at all times and ensure that their contact is not threatening, intrusive or subject to misinterpretation.
- 17.9 Staff may also use reasonable force as a means of physical contact with pupils for restraint purposes; such instances will always be in accordance with the Trust's Positive Handling Policy.

18. SHOWERING AND CHANGING

- 18.1 Pupils are entitled to respect and privacy whilst changing, e.g. before and after PE; however, a level of supervision is required to ensure that pupils are safe and not subjected to bullying.
- 18.2 The supervision will be appropriate to the needs and ages of the pupils and sensitive to the potential for embarrassment.
- 18.3 Where possible, female staff will supervise girls, and male staff will supervise boys.
- 18.4 Staff will announce their intention of entering the changing room to allow pupils to maintain their privacy and will only remain in the room for as long as necessary.
- 18.5 Staff will never change or shower in the same area as pupils.

19. TRANSPORTING PUPILS

- 19.1 When it is necessary to transport pupils off-site, staff will ensure that the transport arrangements of the vehicle meet all legal requirements, they have an appropriate licence, and the vehicle is roadworthy, has a valid MOT certificate and is insured.
- 19.2 Staff will gain consent from parents before transporting pupils and will be aware that the welfare of all pupils in the vehicle is their responsibility.
- 19.3 Staff will use their professional judgement as to whether two members of staff are required.

20. FINANCIAL INDUCEMENTS

20.1 Staff members will:

- Familiarise themselves and comply with the Trust'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.
- Non-excessive gifts are offered by parents or pupils to Trust staff to express their gratitude, but staff members should always refuse monetary gifts.
- Hospitality in the form of meals and drinks which is part of a normal business meeting.
- Authorised visits to exhibitions, demonstrations, conferences, business meals and social functions in connection with the Trust's business, which shall be at the Trust's expense.
- Do Not accept a personal gift, payment, or other incentives from a business contact – any such gifts should be returned.
- Declare any gift that cannot be returned to the governing board, which will decide how it will be used.
- Only accept offers to specific events after authorisation from the governing board.

21. ICT & INTERNET ACCEPTABLE USE POLICY

- 21.1 At all times, staff will adhere to the procedures outlined in the Trust's Online Safety Policy and ICT & Internet Acceptable Use Agreement (Appendix 5).
- 21.2 Staff will be aware of how the use of technology can impact safeguarding and well-being issues, e.g. online abuse. As a result, staff will be vigilant to ensure their behaviour is respectful and that pupils use technology appropriately while under their care.
- 21.3 Staff are required to employ the highest security settings on any personal profiles they may have.
- 21.4 Staff will not engage in inappropriate use of social networking sites, including contacting pupils or their family members, accepting or inviting friend requests from pupils or their family members, or following pupils or their family members on social media.
- 21.5 The Trust understands that some staff members are also parents of pupils at the Trust and, therefore, may wish to contact 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.

- 21.6 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 disrepute themselves, the Trust or the Trust community.

22. PREMISES, EQUIPMENT AND COMMUNICATION

- 22.1 Trust equipment and systems are available only for work-related activities and will not be used for the fulfilment of another job or personal use unless specifically authorised by the Executive Headteacher/Head of Schools.
- 22.2 Illegal, inappropriate or unacceptable use of our equipment or communication systems may result in disciplinary action and, in serious cases, could lead to an employee's dismissal.
- 22.3 Employees receiving inappropriate communication or material or who are unsure about whether something they propose to do might breach this Policy should seek advice from the Executive Headteacher/Head of School.
- 22.4 The Trust reserves the right to monitor emails, phone calls, internet activity or document production on Trust-owned equipment to avoid offensive or nuisance material, protect systems from viruses, and ensure proper and effective systems use.
- 22.5 Communication systems may be accessed when the Trust suspects that the employee has been misusing systems or facilities or for the investigation of suspected fraud or other irregularity. The Trust's IT Manager will secure access only with the permission of the CEO or the Board of Directors.
- 22.6 Passwords should not be shared, and access to computer systems must be kept confidential except at the express request of the Trust or Trust's IT Manager. Breaches of this confidentiality may be subject to disciplinary action.
- 22.7 Trust's equipment used outside the premises, e.g. laptops, will be returned to the Trust when the employee leaves employment or if requested by the Trust.

23. PHOTOGRAPHY AND VIDEOS

- 23.1 Photographs and videos will only be taken using Trusts equipment – using personal mobile phones for this purpose are prohibited, per the Trust's Photography Policy.
- 23.2 Consent for taking photographs will be obtained from parents, or the pupil themselves, if they are deemed old enough and able to decide for themselves.

- 23.3 The age of consent that is legislated is 13 and above; however, this is only applicable to online services provided directly to children. For everything else, the appropriate age of consent is considered case-by-case by the DPO, Executive Headteacher/Head of School and a pupil's parents (where appropriate).
- 23.4 Pupils who have not provided consent, either personally or via their parents, to have their photograph taken or be filmed will have their wishes respected, in line with the Photography Policy.
- 23.5 The Executive Headteacher/Head of Schools will be notified of the proposed use of the imagery or video and the equipment and ensure that the use of such is included in lesson plans where this is necessary.
- 23.6 All photographs and videos will be available for scrutiny, and staff will be prepared to justify the images or footage taken.
- 23.7 Careful consideration will always be given to the activities which are being filmed or photographed to ensure that images or videos are not indecent and cannot be misused.

24. DATA PROTECTION AND CONFIDENTIALITY

- 24.1 Regarding personal and sensitive data, staff members are required, under the UK GDPR and the Data Protection Act 2018, to:
- Consider the legal basis for collecting the data, ensuring that this is documented.
 - Ensure that the data is stored on a GDPR-compliant server and that the data is not held for longer than necessary.
 - Securely dispose of the data when the relevant retention period ends.
- 24.2 Staff members will not disclose sensitive information about the Trust and its employees to other parties.
- 24.3 The only exception whereby it is acceptable for a staff member to disclose information that would otherwise be considered confidential is when the confidential information gives rise to concerns about the safety or welfare of a pupil.
- 24.4 Staff members have the right to request access to data held about them. Such requests will be made to the Executive Headteacher/Head of School in writing in accordance with the Trust's Data Protection Policy.

25. PROBITY OF RECORDS

- 25.1 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 considered a serious disciplinary matter and potentially a criminal offence.

26. CONTACTS

- 26.1 Staff members will not use Trust business contacts to acquire materials or services at trade/discount prices for non-Trust activities unless participating in concessionary schemes arranged by trade unions or other groups.

27. MONITORING AND REVIEW

- 27.1 The CEO will review this document annually, and any changes made will be communicated to all staff members.
- 27.2 All staff members must familiarise themselves with this document as part of their induction programme.