



Staff Code of Conduct

1. 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 College 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](#). College staff have an influential position in the College and will act as role models for students by consistently demonstrating high standards of behaviour.

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

Bath Academy is an international community committed to encouraging students to develop their intellectual and social abilities in order to lead fulfilling lives as adults, who will contribute to society. The College provides a safe, modern and friendly environment in which students are encouraged to fulfil their potential. Students are expected to behave in a way that promotes decency, harmony and trust. They should strive to achieve their best at all times. Staff will support them in this goal.

Aims

- To provide an inclusive academic education to students from around the world including the UK.
- To give students the confidence and qualifications to enable them to enter good quality universities in the UK and beyond.
- To provide a safe and caring environment in which students can live, learn and grow.
- To give opportunities for students to find self-worth and enjoy their student life through a range of curricular and enrichment activities.
- To give students opportunities to stay in contact with home and the wider world.
- To recruit, retain, support and develop high quality staff who are committed to the ethos of the college.
- To encourage all students and staff to value the community of the college and its emphasis on decency and trust. To prepare all students for the challenges of adult life.

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 act in the best interests of the College and its students.

2. Legislation and guidance

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

Staff set an example to students. They will:

- Maintain high standards in their attendance and punctuality
- Never use inappropriate or offensive language in College
- 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
- Comply with all reasonable instructions from the Principal and Vice-Principals.

4. Safeguarding (including radicalization)

LADO Local Authority Designated Officer Victoria Harlin, 01225 396810

Staff have a duty to safeguard students from harm, and to report any concerns they have. This includes physical, emotional and sexual abuse, neglect and being drawn into extremism.

Staff will familiarise themselves with our child protection and safeguarding policy and procedures, and the Prevent initiative, and ensure they are aware of the processes to follow if they have concerns about a child. For the seek of clarity, if any member of staff has concerns that a student is vulnerable to being drawn into violent extremism for ideological reasons, they should report this to the DSL or Deputy DSL.

Our child protection and safeguarding policy and procedures are available on the V drive of the college computer system. New staff will also be given copies on arrival.

4.1 Allegations that may meet the harm threshold

This section applies to all cases in which it is alleged that anyone working in the College, 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 College

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 Principal, or the Chair of the Board of Directors where the Principal is the subject of the allegation.

4.2 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
- 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. 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. This is available on the V drive of the College computer system, as well as in the policies section of our College website.

Our procedures for dealing with allegations will be applied with common sense and judgement.

4.3 Whistle-blowing

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

- Pupils' or staff members' 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 College procedures, put people in danger or was an attempt to cover any such activity up.

Staff should report their concern to the Principal. If the concern is about the Principal, 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 board of Directors.

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 detailed whistle-blowing process, please refer to our whistle-blowing policy, which can be found in the Staff HR Handbook.

5. Staff-pupil relationships

Staff will observe proper boundaries with students 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. 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 of that child, such as a teacher, even if, in the case of those over 16, the relationship is consensual. Relationships with students aged over 18, whilst not illegal, risk bringing the teaching profession into disrepute and will be judged to be gross professional misconduct.

Staff must ensure that their behaviour does not place students or themselves at risk of harm or inadvertently lay them open to allegations of harm, abuse or misconduct. They should try, as far as possible, not to be alone with a child or young person under the age of 18. Where this is not possible, for example, in a boarding situation, or a one-to-one lesson, or Personal Tutor sessions, it is good practice to ensure that others are within earshot. Keep all college-related conversations focused on teaching and learning.

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

- This takes place in a public place that others can access
- this is known to at least one other member of staff (for scheduled one-to-one lessons or personal tutorials the published timetable is publication of this information);
- **the door of the room should be left ajar and not closed** (it does not have to be wide open); a delegated member of staff will check that no one-to-one lessons are taking place behind closed doors.
- Others can see in to the room
- where possible, a gap or barrier should be maintained between teacher and child at all times.
- any physical contact should be the minimum required for care, instruction or restraint.
- A colleague or line manager knows this is taking place (this will be the case automatically if it is a timetabled lesson)

Staff should avoid contact with students outside of College hours if possible.

While we are aware many students and their parents may wish to give gifts to staff, for example, at the end of the College year, gifts from staff to students are not acceptable.

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 immediately to the Principal or one of the Vice-Principals.

The College acknowledges that there is a specific need for guidelines regarding boarding accommodation for members of staff irrespective of their gender or sexual orientation. Members of boarding staff should see the students in their House only with the knowledge of the member of College Residence Staff on duty. They should not visit the students in their rooms, but should conduct all conversations in the reception or common areas of the House.

Physical contact with students

There are occasions when it is entirely appropriate and proper for staff to have physical contact with students, but it is crucial that they only do so in ways appropriate to their professional role. Staff should, therefore, use their professional judgement at all times. Staff should not have unnecessary physical contact with students and should be alert to the fact that minor forms of friendly physical contact can be misconstrued by students or onlookers. A member of staff can never take the place of a parent and should be cautious of any demonstration of affection.

Physical contact should never be secretive, or for the gratification of the adult, or represent a misuse of authority. If a member of staff believes that an action could be misinterpreted, the incident and circumstances should be recorded as soon as possible, the Principal must be informed and, if appropriate, a copy placed on the student's file.

Physical Restraint

Any physical restraint is only permissible when a student is in imminent danger of inflicting an injury on himself/herself or on another, and then only as a last resort when all efforts to diffuse the situation have failed. Another member of staff should, if possible, be present to act as a witness. All incidents of the use of physical restraint should be recorded in writing and logged in the College Incident Record (to be found in Reception).

In physical education and other activities requiring physical contact where exercises or procedures need to be demonstrated, extreme caution should be used if the demonstration involves contact with students and, wherever possible, contact should be avoided. It is acknowledged that some staff, for example, those who teach PE will, on occasions, have to initiate physical contact with students in order to support a student so they can perform a task safely, to demonstrate the use of a particular piece of equipment or assist them with an exercise. This should be done with the student's agreement.

Contact under these circumstances should be for the minimum time necessary to complete the activity and take place in an open environment. Staff should remain sensitive to any discomfort expressed verbally or non-verbally by the child.

Transporting students

Members of staff should not give lifts to students unless in an emergency or unless prior permission has been obtained from the Principal or one of the Vice-Principals and the child's parent. Wherever possible and practicable it is advisable that transport is undertaken other than in private vehicles, with at least one adult additional to the driver acting as an escort.

6. Communication and social media

To protect themselves from allegations of abuse staff should not give their personal mobile phone numbers or personal email addresses to students, nor should they communicate with them by text message or personal email. This includes social media profiles. If they need to speak to a student by telephone, they should use one of the College's telephones and email using the College system.

6.1 Use of Social Media

Similarly, it is not acceptable to use networking websites e.g., Instagram, Facebook to communicate with students and especially to have students logged as a 'Friend' or to let them have your details. If a student asks you to be a "friend/follower" please refuse and refer the matter to the relevant Vice Principal. College staff's social media profiles should not be available to pupils. If they have a 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 College. You are strongly advised not make any efforts to find pupils' or parents' social media profiles.

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

- Be professional on the internet - including Facebook, Instagram, X (Twitter) and any other social media networks.
- Don't post anything inappropriate, including comments or photos which might embarrass yourself or the college or would be incompatible with your role in the college.
- Avoid interacting with, initiating contact with or "friending" current students using your personal profile.
- Remember, there is potential for anything you post online to be copied and distributed. Bear this in mind every time you post.
- Check – are you able to delete the content once you have posted it? How long will the material stay online? Consider your digital footprint.
- Always ensure you own the rights to your content. Posting someone else's copyrighted material will appear very unprofessional if a complaint is made.
- If you intend to use social media as part of your teaching, ensure parents and other teachers are clearly briefed on how this will work. Seek and obtain written permissions if required.

The group leader on all trips and visits involving an overnight stay should take a College mobile phone with him/her and may ask the students for their mobile numbers. The College mobile should be used for any contact with students that may be necessary. The group leader will delete any record of students' mobile phone numbers at the end of the trip or visit and should ensure that students delete any staff numbers that they may have acquired during the trip.

Staff should be aware of the College's online safety policy.

7. Acceptable use of technology

Staff will not use technology in College or belonging to the College 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.

Staff will not use personal mobile phones and laptops, or College equipment for personal use, in College 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 College IT system.

8. Confidentiality

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

This information should never be:

- Disclosed to anyone unless required by law or with consent from the relevant party or parties
- Used to humiliate, embarrass or blackmail others
- Used for a purpose other than what it was collected and intended for

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.

Members of staff are required to keep confidential, both during their employment and at any time after its termination, all information gained in the course of their employment about the College's business and that of the students.

Student confidentiality is the paramount consideration of the College. Disclosure of student residential information without the authorisation of senior management will be treated as Gross Misconduct. It may also constitute an offence under the Data Protection Act 1998. If members of staff are in any doubt about whether or not to disclose any piece of information, they should not do so until they have asked either the Principal or one of the Vice Principals.

Staff members should never give absolute guarantees of confidentiality to students or adults wishing to tell them about something serious. They should guarantee only that they will pass on information to the minimum number of people who must be told in order to ensure that the proper action is taken to resolve the problem and that they will not tell anyone who does not have a clear need to know. They will also take whatever steps they can to protect the informing student or adult from any retaliation or unnecessary stress that might be feared after a disclosure has been made. Staff are reminded that the contents of all meetings are confidential. Great care should be taken with minutes of meetings which are circulated to staff and with memos and other correspondence.

Staff are asked to be discreet in their conversations in the corridors and on the stairs, and in public places, where the privacy of the individual, both Staff and students, as well as the reputation of the College must be protected.

9. Honesty and integrity

Staff should maintain high standards of honesty and integrity in their role. This includes when dealing with students, handling money, claiming expenses and using College property and facilities.

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

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

Where there are any updates to the information provided to the College, the member of staff will advise the College 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.

10. Health & Safety

Members of staff are required to gain and understanding of the College's Health & Safety Procedures, observe them, and ensure that safety equipment and clothing are always used. Members of staff must report all accidents, however small, as soon as possible, recording it in writing and logged in the College Incident Record (to be found in Reception).

11. Smoking/Vaping

Smoking/Vaping is not permitted anywhere inside the College premises and not outside the front of the building or the garden of the cafe.

12. Whistleblowing

Bath Academy is committed to conducting its business with honesty and integrity, and we expect all staff to maintain high standards in accordance with our Code of Conduct. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring and to address them when they do occur. The college has a comprehensive Whistleblowing Policy contained in the Staff HR Handbook.

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:

- criminal activity
- failure to comply with legal or professional obligations or regulatory requirements
- miscarriages of justice
- danger to health and safety
- damage to the environment
- bribery under our Anti-Bribery Policy
- financial fraud or mismanagement
- breach of our internal policies and procedures including our Code of Conduct
- conduct likely to damage our reputation or financial wellbeing
- unauthorised disclosure of confidential information
- negligence
- the deliberate concealment of any of the above matters

13. Dress code

The image that the college presents to its students and parents is very important. Accordingly, members of staff are required to dress in a professional, appropriate manner (in the reasonable opinion of the Principal) during working hours. Staff should not wear t-shirts or shorts, or tracksuits as normal working dress apart from during extracurricular activities. Outfits will not be overly revealing, and we ask that tattoos are covered up. Clothes will not display any offensive or political slogans.

14. Conduct outside of work

Staff will not act in a way that would bring the College, 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 College on social media or in email to parents and students. Such conduct will be deemed as Gross Professional Misconduct.

15. Monitoring arrangements

This policy will be reviewed annually but can be revised as needed. It will be approved by the Principal.

Our Chairman of the Board of Directors will ensure this code of conduct is implemented effectively, and will ensure appropriate action is taken in a timely manner to safeguard children and deal with any concerns.

16. Links with other policies

This policy links with our policies on:

- Staff disciplinary procedures, 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
- Staff grievance procedures
- Child protection and safeguarding
- Online safety

Reviewed: May 2025

Next Review: May 2026

Responsible Officer: Tim Naylor