LEITHS EDUCATION

Professional Code of Conduct and Safe Working Practice for Leiths' Employees

Author/reviewer responsible:	Rachel Seghers & Sophie Kidd
Date of last review:	October 2025
Next review date:	October 2026
Lead for review:	Head of People & Culture
Approved by:	Maria Dunbar
Notable changes:	

Introduction

We aim to provide an environment for our staff, students, board members, customers, clients and visitors that is consistently professional and respectful at all times.

This document applies to all employees of Leiths Education and will be updated and developed over time. Updates will be made in line with national policy, legislation and guidelines, and also take into account best practice at a national level and Leiths' own experiences.

Information has been drawn from the DfE guidance (2005) which was produced by the National Network of Investigation and Referral Support Co-ordinators and the document Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings (updated February 2022). It also reflects the requirements of the relevant sections of the Education (Independent Schools Standards) Regulations (England) (2015) and the Independent School Standards – Guidance for Independent Schools (April 2019).

The guidance recognises that the vast majority of adults working with children in education settings act professionally, seeking to provide a safe and supportive environment to secure the wellbeing and best outcomes for the young people in their care. Members of staff have a crucial role to play in shaping the lives of young people. They have a unique opportunity to interact with children and young people in ways that are both affirming and inspiring.

This guidance has been produced to help staff establish the safest possible learning and working environments. The aims are to safeguard young people and reduce the risk of staff being falsely accused of improper or unprofessional conduct.

This Code of Conduct applies to all members of staff working at Leiths Education. This includes: teaching staff; support staff; temporary part-time workers; contractors; volunteers and Directors (hereafter referred to as "staff").

The use of the term "student" refers to any child, young person or student of any age whether on Leiths premises, online or through partner schools or organisations unless this is expressly set out in the Code of Conduct.

This Code of Conduct will be provided to all staff as part of their induction, so that they are clear about professional conduct and boundaries.

Policies

All members of staff should follow all the procedures outlined in all policy documents. It is essential that our practice mirrors what our documentation states. This will help to ensure that our approach to students is consistent. All policies are available on Teams and policies which form part of our safeguarding procedures are available on the Leiths website. Key policies which are part of our safeguarding procedures include:

- Anti-bullying policy and procedure
- Child Protection and Safeguarding policy
- Equality, Inclusion and Diversity policy
- Health and Safety policy
- Online Safety Policy
- Student Sexual Harassment Policy
- Disciplinary Policy

All of the above policies should be read annually by all members of staff.

Equal Opportunities and Principles

Leiths will not tolerate discrimination on grounds of race, gender, religious belief, disability, sexuality, marital status, personal circumstances or any relevant criminal conviction.

All staff will be treated fairly by Leiths Education and in a way that demonstrates Leiths' commitment to its values and equality of opportunity.

It is everyone's responsibility to play a role in providing a positive ethos and culture for all of the Leiths community: staff, workers and external partners. As a consequence, all staff are expected to manage interactions with students, parents and other members of staff with respect, courtesy and helpfulness. To promote this culture and in order to provide education of the highest quality, all staff must:

a) be polite and courteous at all times and show respect for students, colleagues and all others, and not display discrimination, harassment or discourteous behaviour of any kind
b) abide by Leiths' core values and British/Democratic values, as outlined in the Government's Prevent agenda
c) act professionally, honestly, with the utmost integrity and in ways that protect and promote the best interests of Leiths Education, avoiding any action that could breach confidentiality, bring Leiths into disrepute or weaken confidence in it as a business
d) work at all times to ensure the safety and security of young people and vulnerable young adults, as set out in Leiths' policies and procedures, and ensure that by your actions, Leiths complies with its obligations as set out in the most up to date version of Keeping Children Safe in Education
e) understand and discharge their responsibility to ensure the safe, effective and efficient running of Leiths, and abide by all policies and procedures, and reasonable requests, in order to achieve this. Policies and procedures are published on the Leiths Education staff Teams folder, and it is the responsibility of individuals to ensure that they are familiar with them.

Duty of Care

All staff have a duty to keep young people safe and to protect them from physical and emotional harm. This duty is in part exercised through the development of respectful, caring, and professional

relationships between staff and students and behaviour by staff that demonstrates integrity, maturity, and good judgement.

This duty extends to students of all ages.

Employers have a duty of care towards their employees under the Health and Safety at Work Act 1974 which requires them to provide a safe working environment for staff and guidance about safe working practices. The Act also imposes a duty on employees to take care of themselves and anyone else who may be affected by their actions or failings. In this respect, the duty of care towards both staff and students can be demonstrated through the use of these guidelines.

Core Values

Part of the code of conduct involves adhering to Leiths values, which can be found in an accompanying document.

Working with other staff

All staff are expected to display the highest level of professionalism at all times and, in particular, in their relationships with colleagues, students and their individual standards. Leiths will not accept the use of intimidatory, offensive, threatening or insulting words or behaviour.

Working relationships with Colleagues

All staff are expected to:

a) work harmoniously and positively with their colleagues
b) be mindful in their interactions to ensure individuals do not feel excluded
c) resolve any issues in a professional manner and raise any grievance in accordance with the appropriate company procedures
d) avoid discussions with staff about the conduct, competence or efficiency of other members of staff except in the pursuance of their professional responsibilities
e) avoid disclosure of any confidential information about a member of staff to anyone inside or outside Leiths Education, except in the pursuance of their professional responsibilities or if required to by law, or if the individual member of staff has given express consent to such disclosure
f) seek assistance from senior staff or Human Resources on any staff related matters that are causing them concern, or which they do not have experience to deal with.

Working relationships with Students

All staff are expected to comply with and abide by the Teachers' Standards. Staff will:

a) show equal favour to all students

b) avoid discussions with students about the conduct, competence or efficiency of other members of staff or students, except in the pursuance of their professional responsibilities
c) ensure the disclosure of confidential information about a student to a member of staff is managed appropriately, being mindful of the individual's wishes, the environment where the conversation is being held, safeguarding requirements and health and safety considerations
d) avoid the disclosure of any confidential information about a student to anyone outside of Leiths Education unless required to do so to comply with legal or statutory obligations
e) avoid exerting influence on the attitudes, opinions or behaviour of students which are unconnected with Leiths, and which may conflict with Leiths Education's statutory duties under Prevent and safeguarding
f) avoid entering into improper or very close association with a student. This includes, but is not limited to, the exchange of messages of a personal nature which would be considered not necessary in the pursuance of professional responsibilities, whether in person or by any medium including telephones, text, email or social networking platforms or websites.
g) avoid entering into any form of sexual relationship with a student whether they are under 18 or an adult (see also 12). It is an offence under the Sexual Offences Act 2003 for a person over 18 to have a sexual relationship with a child under 18 where that person is in a position of trust in respect of that child, even if the relationship is consensual. Any improper relationship is a breach of trust. Should a close personal relationship already exist with a student over 18 you have a responsibility to disclose this in confidence to your line manager or a suitable senior member of staff. Such a relationship should be conducted appropriately to avoid negative perceptions from other members of staff or students. Any disclosure might need to be shared, in confidence, and this would be discussed with you
h) avoid spending time alone with students and exercise particular care in one to one situations such as during individual tutoring or interviews. Examples of such care could be: informing colleagues in advance, leaving doors open and conducting meeting in public areas. Furthermore, staff should not arrange meetings with students away from Leiths premises, or when their course is not in session, without the prior approval of one of the Safeguarding Team or a member of Leiths Executive Team. This includes transporting students in private cars without the expressed permission of a member of the Safeguarding Team or a member of the Executive Team
i) exercise caution and professional judgment over any form of physical contact, including offering comfort, using force to avert an incident, demonstrations in techniques administering medication or first aid. Please refer to paragraph 10 below and Leiths the Child Protection & Safeguarding Policy for further details
j) be aware of what constitutes malpractice in the eyes of Leiths and avoid any such action (this is any action which compromises the process of an assessment, the integrity of a qualification, or contravenes accepted professional practice)
k) seek assistance from a member of the Executive or Safeguarding Team on any student related matters that are causing them concern, or with which they do not have experience to deal with the matter.

Exercise of Professional Judgement and Training

This guidance cannot provide a complete checklist of what is, or is not, appropriate behaviour for staff. It does highlight, however, behaviour that is illegal, inappropriate or inadvisable. There will be occasions and circumstances in which staff have to make decisions or take action in the best interests of the young person or student which could contravene this guidance or where no guidance exists.

Leiths recognises the importance of appropriate training in informing teachers' professional judgement. The CEO and Culinary School Director (Principal) are responsible for ensuring that all staff who are new to Leiths receive training in Safe Working, Child Protection and Acceptable use of ICT as part of the induction process. This training will also include informing staff about behaviour which may constitute serious misconduct, as outlined in Leiths Disciplinary Policy & Procedure. The CEO and Culinary School Director (Principal) are also responsible for informing all staff of any substantive changes to policies and guidelines which relate to child protection and safer working.

Power and Positions of Trust

As a result of their knowledge, position and/or the authority invested in their role, all adults working with children and young people in education settings are in positions of trust in relation to the young people and all students in their care.

A relationship between a member of staff and any student cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable young people, and staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.

Staff should avoid behaviour with any student which might be misinterpreted by others and must report and record any incident with this potential immediately to the DSL.

Infatuation

Occasionally, a young person or student may develop an infatuation with an adult who works with them. These situations should be dealt with sensitively and appropriately to maintain the dignity and safety of all concerned.

It is important to note that such infatuations carry a high risk of words or actions being misinterpreted. Staff should therefore make every effort to ensure that their own behaviour is above reproach, always acknowledging and maintaining professional boundaries.

A member of staff, who becomes aware that a student is developing an infatuation either with the member of staff themselves or a colleague, must discuss this at the earliest opportunity with the DSL so that appropriate action can be taken to avoid any hurt, distress or embarrassment.

The member of staff should record any incidents or indications (verbal, written or physical) that suggest a young person or student may have developed an infatuation with an adult in the workplace.

Propriety and Behaviour

1.1. Leiths is in a unique position: offering teaching and learning directly to students undertaking the diploma and all professional courses; through its work with partnership schools and online teaching, and as cookery education specialists.

In view of this aspirational approach and to protect our staff and brand, staff are referred to The DfE Teachers' Standards which include the following section on Personal and Professional Conduct; this section applies equally to all Leiths staff in their interactions with all members of the Leiths community.

A teacher is expected to demonstrate consistently high standards of personal and professional conduct. The following statements define the behaviour and attitudes which set the required standard for conduct throughout a teacher's career.

- Teachers uphold public trust in the profession and maintain high standards of ethics and behaviour, within and outside Leiths, by:
    - treating students with dignity, building relationships rooted in mutual respect, and at all times observing proper boundaries appropriate to a teacher's professional position;
    - having regard for the need to safeguard students' well-being, in accordance with statutory provisions;
    - showing tolerance of and respect for the rights of others;
    - not undermining fundamental British values, including democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs;
    - ensuring that personal beliefs are not expressed in ways which exploit students' vulnerability or might lead them to break the law.
- Teachers must have proper and professional regard for the ethos, policies, and practices of Leiths and the schools in which they teach, and maintain high standards in their own attendance and punctuality.
- Teachers must have an understanding of, and always act within, the statutory frameworks which set out their professional duties and responsibilities.

1.2. In addition, the Education (Independent Schools Standards) (England) Regulations (ISSRs) (2014) places a responsibility on Leiths and its staff to:

- *Actively promote the fundamental British values of democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs;*
- *Not discriminate against students on the basis of protected characteristics, which include: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex, sexual orientation.*

1.3. Leiths rejects absolutely any form of prejudiced discrimination, intolerance of difference and any form of bullying, harassment or abuse related to race, gender, sexuality, or other characteristics protected under the Equality Act (2010). All staff must model fair-minded, generous, and inclusive interactions, and must uphold the Student Behaviour Code and Anti-Bullying policy located in the student handbook by appropriately challenging or reporting student attitudes or behaviours in breach of these standards, for instance the use of misogynistic or racist language. In addition, in accordance with the Safeguarding and Child Protection policy, staff must remain alert to the signs that a young person has been the victim or perpetrator of any form of harassment or abuse, including peer on peer abuse, and including sexual harassment, assault or other harmful sexual behaviour. Leiths holds a zero-tolerance position on any form of sexual abuse and will proceed on both a safeguarding and disciplinary basis as appropriate in accordance with DfE guidelines.

Confidentiality

1.4. Members of staff may have access to personal details about students in order to undertake their everyday responsibilities. In some circumstances, staff may be given additional highly sensitive or private information. This includes but is not necessarily limited to information regarding SEN, medical or personal information. Such information should be treated in a discreet and confidential manner. Confidential information about a student or young person should never be used casually in conversation or shared with any person other than on a need-to-know basis. In circumstances where the student's identity does not need to be disclosed, the information should be used anonymously.

1.5. Members of staff may have access to personal details about students in order to undertake their everyday responsibilities. In some circumstances, staff may be given additional highly sensitive or private information. Such information should be treated in a discreet and confidential manner. In particular, staff should never use online media to discuss students, colleagues, parents, or carers or to criticise colleagues, Leiths' leadership team or others within the Leiths community.

To help ensure sensitive data is suitably protected, staff are expected to:

- use strong passwords for digital accounts which are changed regularly in line with Leiths IT usage/GDPR policies
- protect mobile devices with a password or PIN, whether in or outside of the building, to protect access to its content and prevent potential misuse.
- Using screen lock when away from your device.

There are some circumstances in which a member of staff may be expected to share information about a young person or student, for example when abuse is alleged or suspected. In such cases, individuals have a duty to pass information on without delay, in accordance with the Safeguarding and Child Protection Policy.

If a member of staff is in any doubt about whether to share information, or keep it confidential, they should seek guidance from one of the DSLs.

The storing and processing of personal information about students is governed by the Data Protection Act (DPA) 2018 and the General Data Protection Regulations. Staff should refer to Leiths GDPR and Retention policies for further information.

1.6. Members of staff are often provided with information about the business, its plans, financial and marketing matters and other interests. If you are unsure about the type of information that can be shared or discussed please check with the CEO or Director of Culinary. If you are unable to check, the approach adopted should be to assume that nothing must be shared unless told otherwise at the time.

1.7. Members of staff should be mindful of their obligations of confidentiality when working outside of business premises or offsite.

Social Contact

1.8. Members of staff must not establish or seek to establish social contact of any kind with current students, or former students under the age of 19. If a student seeks to establish social contact, or if this occurs coincidentally, the member of staff should contact the DSL immediately and, where appropriate, submit a Low-Level Concern

1.9. For the avoidance of doubt, Leiths students become Leiths alumni following their final assessment. Staff are forbidden from entering into an intimate or sexual relationship with a former student (Leiths alumni) within two years of them leaving Leiths. If this were to happen it would raise concerns about possible abuse of the staff member's professional position in grooming the student whilst studying at Leiths. Any such concerns would be referred by Leiths or the DSL to the LADO and may lead to disciplinary action being taken against the member of staff after an appropriate hearing.

1.10. Members of staff must not reach out and make or reciprocate social contact of any kind with students who are under the age of 19 on the date of their final assessment at Leiths for a period of 24 months thereafter. If a member of staff is approached or contacted after the final assessment date by any alumni that do not fall into the 19 and under category through a channel that is not an official work channel, i.e. social media, then this must be disclosed to the DSL. If in doubt, staff members should contact the DSL for advice. We encourage all staff to carefully consider the appropriateness of connecting with students over social media. Inappropriate messaging of any form, including on social media, about Leiths, teachers, board members, customers, clients, visitors, students or other staff members which could bring Leiths into disrepute is also strictly forbidden.

1.11. All staff should carefully consider the appropriateness of connecting with students and alumni in person and over social media. The inherent nature of staff and student roles means that staff are in a position of power relative to a student, irrespective of the staff member or student's age, maturity and student's level of study. This power imbalance between staff and students creates potential for relationships to be misconstrued or misinterpreted, or to be abused; therefore, staff must always act, communicate and behave in a professional, respectful and fair manner towards students and alumni recognising this differential of power and influence. If in doubt, staff members should contact the DSL for advice.

1.12. Inappropriate communication and messaging of any form, including on social media, about staff, former staff, students, board members, customers, clients, visitors or any aspect of the business which could bring Leiths Education into disrepute or breaches confidentiality is strictly forbidden.

1.13. Staff must not share their personal contact details, such as home/mobile phone number, home, or personal e-mail address, with students. Staff must not have student phone numbers on personal phones. A central contact number or business phone must be used in situations where staff/students may require an emergency contact number, such as during a day trip. There is a dedicated phone number which students can use to reach the Safeguarding team at any time. This dedicated phone number is shared with students when they begin their course and is displayed in the building.

Any member of staff who unintentionally shares their personal contact details with a student must record the incident using Leiths Low Level Concern form.

1.14. Staff must maintain the highest professional standards at Leiths Education social events, and they must not continue to socialise with students after the official finishing time or at alternative locations.

1.15. Staff must politely decline any invitation to attend a student's family home unless this has been sanctioned in advance by the DSL.

1.16. Individual staff must politely decline any parental invitation to socialise informally, such as dinner or drinks, in restaurants or elsewhere, or offers of hospitality at events. The practice of socialising informally with parents carries with it the risk of blurring professional boundaries and this is not necessarily in the best interests of the student. In managing the parent-staff relationship, staff should be aware of appropriate professional boundaries and feel confident in holding to them. Advice is available, as required, from the Principal, DSL and CEO.

1.17. Some staff may have established family friendships/relationships with current parents and/or current students (for example where a student's parent is a previous employee of Leiths). In these circumstances, social contact, which may include visiting the family home, is acceptable, though staff must always be mindful of maintaining appropriate professional boundaries and confidences. Such friendships/relationships must be formally declared at the start of each academic year via an annual Low-Level Concern 'Declaration of Interests'. Advice is also available, as required, from the Principal, DSL or CEO.

Physical Contact

1.18. 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.

1.19. A 'no touch' approach is impractical for most staff and may in some circumstances be inappropriate. When physical contact is made with students this should be in response to their needs at the time, of limited duration and appropriate given their age, stage of development, gender, ethnicity, and background.

1.20. It is not possible to be specific about the appropriateness of each physical contact, since an action that is appropriate with one student in one set of circumstances may be inappropriate in another, or with a different student. Staff should therefore use their professional judgement at all times.

1.21. Where feasible, staff should seek the student's permission before initiating contact.

1.22. Physical contact should never be secretive, for gratification, or represent a misuse of authority. If a member of staff believes that an action by themselves or a third party could be misinterpreted, the DSL should be informed of the incident and a Low-Level Concern (reference here) submitted as soon as possible and, if appropriate, a copy placed on the student's file.

1.23. Physical contact may be appropriate where a student is in distress and needs comforting or if a member of staff has to give first aid. Staff should remain self-aware at all times in order that their contact is not threatening, intrusive or subject to misinterpretation. Staff should listen, observe, and take note of the student's reaction or feelings, and so far as possible, use a level of contact or form of communication which is acceptable to the student and their job role. Parents should

always be informed when first aid has been administered to a student under the age of 18. Staff should use their own professional judgment when they feel a student needs this kind of support and should be aware of any special circumstances relating to the student. Particular care must be taken in instances which involve the same student over a period of time.

1.24. In certain curriculum areas staff may need to initiate some physical contact with students, for example to support a student so that they can perform a task safely, to demonstrate the use of a particular piece of equipment or technique. Physical contact should only take place when it is necessary in relation to a particular activity, it should be for the minimum time necessary to complete the activity and take place in an open environment [see reference one-to-one]. Contact should be relevant to a student's age and understanding and staff should at all times remain sensitive to any discomfort expressed verbally or non-verbally by the student.

1.25. Physical contact which occurs regularly with an individual young person or student is likely to raise questions unless the justification for this is part of a formally agreed plan (for example in relation to students with SEN or physical disabilities). Any such contact should be the subject of an agreed organisation risk management plan and subject to review. Where feasible, staff should seek the student's permission before initiating contact. Staff should listen, observe, and take note of the student's reaction or feelings and – so far as is possible – use a level of contact which is acceptable to the student for the minimum time necessary.

1.26. Extra caution may be required where it is known that a student has suffered previous abuse or neglect. In the student's view, physical contact might be associated with such experiences and lead to staff being vulnerable to allegations of abuse.

1.27. The general culture of 'limited touch' should be adapted, where appropriate, to the individual requirements of each student. Students with special needs may require more physical contact to assist their everyday learning. The arrangements should be understood and agreed by all concerned, justified in terms of the student's needs, consistently applied and open to scrutiny.

1.28. **Student in Distress**. There may be occasions when a distressed student needs comfort and reassurance. This may include age-appropriate physical contact. Staff should remain self-aware at all times in order that their contact is not threatening, intrusive or subject to misinterpretation. If a member of staff believes such action could be misinterpreted, the Designated Safeguarding Lead should be informed of the incident and the circumstances should be recorded in writing as soon as possible and, if appropriate, a copy placed on the student's file. The DSL will decide upon the next steps to be taken. Incorporate into physical contact

Changing Areas and Washrooms

1.29. Young people and students are entitled to respect and privacy when changing clothes, using the toilet, or taking a shower. However, there needs to be an appropriate level of supervision in order to safeguard young people, satisfy health and safety considerations and ensure that bullying or teasing does not occur. This supervision should be appropriate to the needs and age of the students concerned and sensitive to the potential for embarrassment.

1.30. Staff should enter the changing rooms, toilets, or shower areas only in an emergency or when addressing genuine concerns about a student's safety or welfare, or where there is reasonable suspicion of a serious breach of Leiths discipline. Wherever possible, the staff member should seek support from a colleague so that they are not working alone.

1.31. If a member of staff believes their actions in any of these areas could be misinterpreted, the DSL should be informed of the incident and a Low-Level Concern submitted as soon as possible and, if appropriate, a copy placed on the student's file.

1.32. Staff must be mindful of a colleagues entitlement to respect and privacy when using the changing rooms or shower.

Conflict of Interests, Gifts & Hospitality

1.33. A conflict of interests may arise where an individual's personal, family or business interests and/or loyalties conflict (or may conflict) with those of the business. Such conflicts can create problems by inhibiting free discussion; resulting in decisions or actions which are not in the best interests of the business and risking the impression that Leiths has acted improperly.

1.34. Leiths' 'Register of Interests' is a formal record which allows for the declaration of any possible conflict of interests while discharging professional duties. All staff have obligations of loyalty and mutual trust and confidence to Leiths; these, and the associated actions, are set out in Leiths 'Conflict of Interests' policy, with which all staff should be familiar. All staff are required to report relevant interests, which will be recorded in the 'Register of Interests'.

1.35. If a member of staff is uncertain as to whether they should notify Leiths about a particular circumstance they should discuss the matter with the CEO, who will then decide whether the matter should be entered in Leiths' 'Register of Interests'.

1.36. From time-to-time students, parents of students (or suppliers) may offer members of staff gifts on an individual basis as a demonstration of their gratitude for the work done on their behalf, and this is perfectly legitimate. However, in some contexts such gifts could be construed as an improper inducement to, for instance, accord preferential treatment in the future. It may also be in breach of the Bribery Act 2010. Consequently, it is necessary for Leiths to have rules applying to such gifts. These are set out in detail in Leiths' Anti Bribery, Hospitality & Gifts Policy, with which all staff should be familiar. In particular, please note:

- Any gifts of cash of whatever value, or any other gifts of a total value over £50, must be declared on the Gifts and Hospitality Register in line with the procedure set out in the Anti Bribery, Hospitality & Gifts Policy. You may retain any gifts, although a gift or gifts from an individual student which has a total value over £100 should not be accepted without the prior approval of the Director of Higher Education and CEO.
- Gifts received from suppliers may be retained if they are token work-related items e.g. pens, notepads, flash drives, desk calendars or diaries. Any other gifts or gifts in kind e.g. flight or theatre tickets, or opportunities that would not be offered to an employee were they not employed by Leiths etc. must be declared on the Gifts and Hospitality Register.

- Staff should not put themselves in a position where it might appear that they are showing favouritism to one or more students. In particular, members of staff should not give gifts to individual students as doing so may give rise to concerns about grooming. As far as possible, be consistent and transparent in how you reward students or otherwise foster teacher-student relationships. In addition, be aware of the potential for a student to form an unsolicited, emotionally-dependent, attachment to a teacher (see cross reference). If pastoral interactions with a student become inappropriate or difficult, then the DSL should be immediately informed and guidance sought. The circumstances should be recorded in writing by submitting a Low-Level Concern (see reference) and, if necessary, a note placed on the student's file.

Sharing Concerns and Recording Incidents

1.37. The welfare of the child is paramount. All staff should be aware of Leiths' Safeguarding and Child Protection policy (available on Teams, on the company website and circulated after every update), including procedures for dealing with allegations against staff. Staff who are the subject of allegations are advised to contact their professional association.

1.38. In the event of an incident occurring, which may result in an action being misinterpreted and/or a spurious allegation being made against a member of staff, the relevant information should be clearly and promptly recorded and shared with the CEO (or in their absence, the Chair of Directors) in accordance with Leiths' Safeguarding and Child Protection policy.

1.39. Members of staff should feel able to discuss with their Head of Department or a member of the Senior Leadership Team (SLT) any difficulties or problems that may affect their relationship with students so that appropriate support can be provided, or action can be taken.

1.40. All staff have a duty to report any child protection concerns to the DSL, or in their absence, a Deputy DSL.

Whistleblowing

1.41. Whistleblowing is the mechanism by which staff can voice their concerns, made in good faith, without fear of repercussion. Leiths has a Whistleblowing Policy, published on Teams and on the company website that meets the terms of the Public Interest Disclosure Act 1998 and aims to support staff in appropriately reporting any such concerns.

1.42. Staff members are expected to understand and take seriously their individual responsibilities to bring matters of concern to the attention of senior management and, where necessary, relevant external agencies. This includes concerns about the behaviour of another staff member in addition to concerns about poor or unsafe practices or potential failures in Leiths' safeguarding regime.

Low Level Concerns Policy

1.43. As part of our whole organisation approach to safeguarding we wish to promote an open and transparent culture in which all concerns about all adults working on behalf of Leiths (including supply teachers, volunteers, and contractors) are dealt with promptly and appropriately. Creating a culture in which all concerns are shared responsibly and with the right person, and recorded and dealt with appropriately, is critical.

1.44. There may be occasions where something occurs which is out of the ordinary and which causes a member of staff to have doubts about the behaviour of another adult towards a student or concerns about how their own behaviour might be misinterpreted. It is important that any concerns, or incidents which might give rise to concerns about the conduct of staff, are reported to the CEO, Principal and DSL, however minor. In the vast majority of cases, there will be a perfectly innocent explanation for what has occurred, and staff should not feel that making a report, or being the subject of a report, will cause them to suffer any detriment or stigma where this is the case. Reporting of these types of concerns is a neutral act, and the CEO, Principal and DSL will, on receipt of a report, determine how to best approach the issue.

1.45. A concern of this nature is called a 'Low-Level Concern'. The term 'Low-Level Concern' does not mean that it is insignificant, it means that the behaviour towards a student does not meet the threshold of harm. A Low-Level Concern is any concern – no matter how small, but still the cause of a sense of unease or a 'nagging doubt' – that an adult working in or on behalf of Leiths may have acted in a way that is inconsistent with the staff code of conduct.

1.46. A Low-Level Concern should be used by staff where they are at all concerned about the behaviour of an adult, not just where it is clear that a role or professional boundary has been broken. The purpose of such reporting is to protect both pupils, and the staff working with them, and allows a system for a simple record to be kept in case events are later referred to or any patterns emerge. In this way we can:

- address unprofessional behaviour, and support the individual to correct it at an early stage;
- provide a responsive, sensitive, and proportionate handling of such concerns when they are raised;
- help identify any weakness in Leiths' safeguarding system.

1.47. The Low-Level Concern system also enables staff to self-report, as well as to report on other staff members. It is accepted that there are occasions when Leiths staff, as professionals, have to make decisions to act in a particular way in order to protect the health, safety, and welfare of their pupils. This may, in some cases, put the adult in a vulnerable position and cause the adult, with hindsight, to consider that on reflection they might not act in the same way in a similar situation in future. In this scenario, staff must submit a Low-Level Concern.

1.48. A Low-Level Concern report may be made in person to the DSL, CEO, or Principal (as appropriate). Low Level Concerns must also be recorded in writing by the DSL or DDSL on the log of Low Level Concerns – a confidential log shared by all members of the Safeguarding Committee.

1.49. Examples of circumstances in which staff must submit a Low-Level Concern include but are not limited to:

- witness a colleague being over familiar with students;
- know that a colleague has favourites amongst those they teach;

- become aware that a colleague has images of students on personal devices;
- email, messaging, use of social media sites or other communication between a colleague and students outside agreed protocols;
- if a staff member becomes involved in an intimate or sexual relationship with a former Leiths student, regardless of the age of the (former) student;
- any incident where, for whatever reason, you believe a member of staff has not complied with this Code of Conduct;
- any social contact with students outside of Leiths (other than planned/authorised events, mutual employment situations, educational visits or trips, or trivial incidents such as passing a pupil in the street or the supermarket or noticing that they are sitting, separately, in the same restaurant or cinema) particularly where the member of staff and /or student(s) is/are under the influence of alcohol;
- the fact of, and explanation for, any one-to-one contact with a student on trips, particularly if this takes place in a bedroom or other private space;
- any incident of physical contact with a student when no one else is present, including when administering first aid or medical treatment, and including physical demonstrations etc;
- any incident where a staff member feels that their own actions or behaviour towards a student, or that of another adult, may have been misinterpreted or may have given rise to a risk of misinterpretation.

This is not intended to be an exhaustive list. Anything which causes staff to have a 'nagging doubt' about the way in which other adults behave or interact with students should be notified, in order to protect both students and the members of staff involved.

1.50. Where a member of staff, or a member of their family, has an established family friendship/relationship with a current parent and/or current pupil this should be formally declared at the start of each academic year via an annual Low-Level Concern 'Declaration of Interests'. Once declared this removes the need for informal social contact associated with such friendships/relationships to be reported using the Low-Level Concern system.

Disclosure and Barring Service checks

All staff are subject to an enhanced Disclosure and Barring Service check before taking up their position at Leiths Education. It is the responsibility of members of staff to inform the CEO or Principal in confidence if they are charged with a criminal offence whilst in the employment of Leiths Education.

Staff must notify the CEO or Principal immediately of anything that affects their suitability, including any cautions, warnings, convictions, orders, or other determinations made in respect of them that would render them disqualified from working with children.

Sexual Contact with Young People

Any sexual behaviour by a member of staff with or towards a child or young person is both inappropriate and illegal. Children and young people are protected by the same laws as adults in relation to non-consensual sexual behaviour. They are additionally protected by specific legal provisions regardless of whether the child or young person consents or not.

The sexual activity referred to does not just involve physical contact it may also include noncontact activities, such as causing children to engage in or watch sexual activity or the production of pornographic material. For further information the DfE Keeping Children Safe in Education (2014) provides a definition of what constitutes sexual abuse.

There are occasions when adults embark on a course of behaviour known as 'grooming' where the sole purpose is to gain the trust of a young person and manipulate that relationship so sexual abuse can take place. Staff should be aware that conferring special attention and favour upon a young person might be construed as being part of a 'grooming' process, which is an offence.

Staff should avoid any form of communication with a young person or student which could be interpreted as sexually suggestive or provocative i.e. verbal comments, letters, notes, electronic mail, phone calls, texts or physical contact.

Staff should be aware of the section in the Safeguarding and Child Protection Policy relating to Sexual Violence and Harassment as well as the Sexual Harassment Policy and Student Sexual Harassment Policy in line with relevant legislation and regulatory conditions (such as the Worker Protection Bill and the Condition E6).

One to One Situations

Staff working in one to one situations with young people and students generally may be more vulnerable to allegations. Teachers and others should recognise this possibility and plan and conduct meetings accordingly. Every attempt should be made to ensure the safety and security needs of both staff and students are met.

Where possible, staff should avoid meetings with students in remote, secluded areas of the building.

They should ensure that there is visual access and/or an open door in one-to-one situations.

Should a student become distressed or angry during such a meeting, this must be reported to a member of the Executive Team or the DSL and a written report detailing the incident kept on the student's file.

Internet Use

As part of our safeguarding policy, we expect staff and students, and where appropriate, parents, to follow this protocol when using PCs and mobile devices. We encourage staff to use the internet and web in an informed, thoughtful, way that is fully consistent with the position of trust we occupy.

All of the advice contained in other sections of this Code applies equally in the digital realm. In addition, there are other risks, specific to the use of PCs, mobile devices, software applications and the internet, that need to be understood by those who work with young people.

Appearance

1.51. Staff should ensure that they are dressed decently, safely, and appropriately for the tasks they undertake; this applies equally to online or virtual teaching. It is important that staff maintain a professional appearance at all times when pupils are present on site. Line managers are responsible for ensuring that staff observe the standards set by this dress code.

1.52. All members of staff are supplied with an identity badge that must be worn and visible at all times when on site for security reasons, whether in or out of term-time.

1.53. The normal dress code for teaching and office-based staff is smart office wear, which may include shirt/blouse, trousers, skirts, suits, and dresses.

1.54. The normal dress code for teaching staff when teaching is chefs whites and relevant PPE.

1.55. Staff may wear religious and cultural dress (including clerical collars, head scarves, skullcaps, and turbans).

1.56. Staff should be mindful of the need to project a professional appearance when hosting visitors on site, or, for example, when conducting interviews or hosting visitors and dress accordingly.

1.57. It is inappropriate in a business setting at any time to wear casual clothing such as cut-off shorts, crop tops, see-through material or clothes that expose areas of the body normally covered at work. Similarly, staff should not wear excessive or unconventional clothing, t-shirts with inappropriate slogans or excessive branding, or jewellery that could present a health and safety risk. Footwear must take account of health and safety considerations; for example, flip-flops should not be worn. Staff should consult their line manager if specific clothing is required for a medical issue (such as, for example, a request to wear shorts due to a plaster required for a broken leg).

1.58. Tattoos that include imagery and/or text that are inappropriate for a business setting should remain covered at all times.

1.59. Staff involved in manual labour may wear clothing appropriate to their professional role. Contractors will wear clothing suitable for their role, which will be agreed in advance, and which does not contravene the direction given above.

1.60. Where there is a requirement to use safety clothing and equipment, it should be worn or used as appropriate and directed.

1.61. In the event of a dispute on any aspect of the dress code, staff should consult with the Principal or CEO.

Definition: Confidential Information and Confidentiality

What should be confidential and what does “on a need-to-know basis” mean?

Managers should ensure they manage the flow of information to their direct reports and direct reports are always encouraged to approach all aspects of the business with curiosity. However, it is also important to understand that it is not always appropriate for all information to be shared with all employees or students and/or that timing may be a factor.

As a team we should respect the boundaries of individual conversations (e.g. 1:2:1 conversations between a student and staff member, an appraisal conversation or an employment interview etc) and mindful of the timing of our approach if we do have questions to ask. If it is not appropriate for information to be shared due to confidentiality, we should not be offended if a colleague tells us that.

Where possible we should work on the basis that we will be given the information that we need to know. Where you feel that this is not the case then you should raise this with your line manager initially and if you have concerns that a matter relates to a safeguarding matter you should refer these to the DSL.

Confidentiality of business interests is also important and when working outside of business premises or regular office space it is vital you work in a situation where you cannot be overheard.

Finally, be mindful of what you discuss with a third party about Leiths business. If you are asked a question directly and you are unsure of how you should answer, please speak with the Executive Team. A general rule of thumb is that business plans should not be shared unless you have been advised that they should.

Please sign to confirm that you agree to abide by Leiths Code of Conduct.

Name:……

Signature:……

Date:……..