STAFF CODE OF CONDUCT
2026-27

ST ANDREW'S COLLEGE POLICY DOCUMENT	
TO BE REVIEWED: August 2027	RESPONSIBILITY: Head / Principal
AUTHORISED BY: Annette Poulain **DATE: 26/08/26**	SIGNATURE:

1. Purpose, scope and status

This Staff Code of Conduct sets out the standards of professional behaviour expected of all adults working for or on behalf of St Andrew's College. It applies to employees, senior leaders, governors, boarding and support staff, peripatetic staff, agency and supply staff, trainee teachers, contractors and volunteers, whether paid or unpaid.

The Code forms part of the College's safeguarding arrangements and should be read alongside the Safeguarding and Child Protection Policy, Whistleblowing Policy, Online Safety / Acceptable Use requirements, Behaviour Policy, Health and Safety Policy and other relevant College procedures.

For the 2026–27 academic year, this Code has been updated with regard to Keeping Children Safe in Education 2026 (KCSIE 2026), which comes into force on 1 September 2026, and Working Together to Safeguard Children 2026. KCSIE defines a child as anyone under the age of 18. The College applies the professional-boundary expectations in this Code to all current students, including students aged 18 or over.

2. Key legal and statutory framework

This Code is informed by the following legislation and guidance, as applicable to the College:

- Keeping Children Safe in Education 2026 (Department for Education) – statutory guidance from 1 September 2026.
- Working Together to Safeguard Children 2026 – statutory multi-agency safeguarding guidance.
- Education (Independent School Standards) Regulations 2014.
- Children Act 1989 and Children Act 2004.
- Sexual Offences Act 2003, including provisions relating to abuse of positions of trust.
- Equality Act 2010.
- Data Protection Act 2018, UK GDPR and the Data (Use and Access) Act 2025.
- Prevent duty guidance and relevant counter-terrorism legislation.
- Teachers' Standards 2012, where applicable.
- Department for Education guidance on restrictive interventions and the use of reasonable force in schools.
- Guidance for Safer Working Practice for those working with children and young people in education settings (as non-statutory good-practice guidance).

3. Core professional expectations

Staff must maintain high standards of professional conduct and act in a way that protects students, supports their welfare and learning, and maintains public confidence in the College. Staff are expected to:

- place the welfare, safety and best interests of children first and act promptly on safeguarding concerns;
- maintain clear and appropriate professional boundaries with students at all times, both inside and outside College;
- act as positive role models, including through punctuality, reliability, professional language, appropriate dress and responsible conduct;
- treat students and colleagues with dignity, fairness and respect and challenge discriminatory, prejudicial, racist, sexist, misogynistic, misandrist, homophobic, transphobic or otherwise degrading behaviour;
- have due regard to the protected characteristics under the Equality Act 2010 and make reasonable adjustments where required;
- avoid conduct which could reasonably be interpreted as favouritism, grooming, intimidation, humiliation, coercion, exploitation, harassment or an abuse of authority;
- follow College policies, lawful instructions and safeguarding procedures, and complete required training and updates.

4. Safeguarding responsibilities and staff training

Safeguarding and promoting the welfare of children is everyone's responsibility. All staff must know how to identify and respond to concerns, including concerns about abuse, neglect, exploitation, child-on-child abuse, online harm, domestic abuse, serious violence, radicalisation, modern slavery and other contextual or extra-familial risks.

- All staff must read KCSIE 2026 Part One in full and confirm that they have understood it. The previous condensed Annex A has been removed from KCSIE 2026.
- All staff must receive appropriate safeguarding and child protection training, including online safety and their responsibilities in relation to filtering and monitoring, at induction; training must be regularly updated, with safeguarding updates provided at least annually.
- Staff must know the identity of the Designated Safeguarding Lead (DSL), deputies and relevant safeguarding contacts, and know how to report concerns when the DSL is unavailable.
- If a member of staff has any concern about a child's welfare, they must act on it and follow the College's safeguarding procedures. If unsure, they should speak to the DSL or a deputy.
- Staff must never promise confidentiality to a child. Information should be shared only with those who need it for safeguarding or other lawful purposes.

5. Positions of trust and relationships with students

Adults working in education hold positions of authority, responsibility and trust. Staff must never use their position to secure personal advantage, sexual or romantic contact, emotional dependency, secrecy, money, gifts or any other benefit from a student.

The Sexual Offences Act 2003 contains specific offences relating to sexual activity with a child under 18 where an adult is in a defined position of trust. Irrespective of the precise statutory position in an individual case, College policy prohibits staff from entering into a sexual, romantic or otherwise inappropriate intimate relationship with any current student, including a student aged 18 or over. Any breach will be treated as a serious disciplinary and safeguarding matter and may also be referred to external agencies.

- Staff must not flirt with, sexualise, make sexual remarks to, or engage in sexualised banter with students.
- Staff must not seek or encourage secrecy with a student about contact, conversations, meetings, gifts or communications.
- Staff must not develop relationships that create emotional dependency or give rise to a reasonable perception of favouritism or exclusivity.
- Any staff member who becomes concerned that a professional boundary may have been crossed, or that a situation could be misinterpreted, should self-refer promptly in accordance with the low-level concerns procedure.

6. One-to-one working and private meetings

One-to-one work can be educationally necessary and is not prohibited. It must, however, be planned and conducted in a way that is open, professional and capable of being observed or accounted for.

- Use an appropriate College location wherever possible, with visibility through a window or open door where this is reasonable and compatible with confidentiality.
- Avoid unnecessarily secluded or locked rooms. Do not arrange private meetings off-site or at a private residence unless specifically authorised as part of an approved College activity.
- Where a sensitive pastoral or safeguarding conversation requires privacy, staff should use professional judgement and ensure the meeting is known to an appropriate colleague where practicable.
- Staff should be mindful of the individual needs of students, including SEND, medical needs, cultural factors and any relevant risk assessment.

7. Physical contact, personal care and reasonable force

Appropriate physical contact may sometimes be necessary or supportive. A blanket “no contact” approach is not expected. Any physical contact must be proportionate, appropriate to the role and circumstances, and never for the adult’s gratification or to create secrecy, intimidation or dependency.

Reasonable force or restrictive intervention may be used only in limited circumstances and in accordance with the law, College policy and current Department for Education guidance. Any force used must be no more than necessary and for the least amount of time required. Particular care must be taken where a child has SEND, a medical condition or mental health needs, including consideration of reasonable adjustments and individual plans.

Any significant incident involving restraint, restrictive intervention or reasonable force must be reported promptly to the Principal/Head and DSL and recorded in accordance with College procedures.

8. Professional language, behaviour and classroom conduct

- Staff must use calm, respectful and professional language and must not humiliate, ridicule, threaten or deliberately embarrass students.
- Staff must model the behaviour expected of students, including punctuality and appropriate use of College time and facilities.
- Teaching staff should remain with their class and should not leave students unsupervised unless this is necessary, safe and consistent with College procedures.
- Staff must not use corporal punishment or any sanction that is degrading, unsafe, discriminatory or inconsistent with the College's Behaviour Policy.
- Staff should challenge inappropriate or discriminatory conduct and report safeguarding concerns arising from student behaviour.

9. Communication, social media and personal devices

Professional boundaries apply equally online and offline. Communication with students should normally take place through College-authorised systems and for legitimate educational, pastoral or operational purposes.

- Staff must not use personal social media accounts to follow, friend, privately message or otherwise socialise online with current students.
- Staff must not give students personal telephone numbers, personal email addresses or private messaging details unless expressly authorised for a defined College purpose.
- Staff must not use disappearing-message functions or informal/private channels for routine communication with students.
- Personal devices must not be used to take photographs, video or audio of students except where specifically authorised by College policy and with a legitimate purpose. College devices or approved systems should be used wherever possible.
- Staff should maintain appropriate privacy and security settings on personal accounts, while recognising that privacy settings do not remove the obligation to maintain professional standards.
- Staff must not post content online that breaches confidentiality, identifies students without authority, undermines safeguarding, harasses others, or is likely to bring the College or profession into serious disrepute.

10. Generative AI, digital tools and online safety

KCSIE 2026 includes updated guidance on online safety and the safe and effective use of generative artificial intelligence in education. Staff must use digital and AI tools in accordance with College policies, data protection requirements and safeguarding expectations.

- Do not enter confidential, special-category, safeguarding or personally identifying student information into unauthorised AI systems or digital services.
- Do not generate, alter, share or retain sexualised, humiliating or otherwise harmful images of students, including AI-generated or digitally altered imagery.
- Use only College-approved platforms for educational work where required, and follow instructions relating to accounts, passwords, filtering, monitoring and cyber security.
- Report suspected online safeguarding incidents, harmful content, account compromise or misuse of technology promptly.

11. Confidentiality, information sharing and records

Staff must handle information about students sensitively and lawfully. Safeguarding information is not subject to an absolute duty of confidentiality: relevant information should be shared when necessary to protect a child or support lawful safeguarding action.

- Share information on a need-to-know basis and with appropriate safeguarding personnel or agencies when required.
- Record safeguarding concerns, discussions, decisions and reasons clearly, factually and promptly, distinguishing observed facts from professional opinion where relevant.
- Keep records secure and use only authorised College systems for storing or transmitting confidential information.
- Do not discuss confidential student matters in public places, on personal social media, or with people who do not have a legitimate need to know.
- Comply with the Data Protection Act 2018, UK GDPR, the Data (Use and Access) Act 2025 and College data-protection procedures.

12. Gifts, money, favouritism and personal benefit

- Staff must not accept or give gifts, money, loans or benefits that could create an obligation, conflict of interest, appearance of favouritism or inappropriate personal relationship.
- Small, proportionate gifts offered openly at customary times may be accepted only where consistent with College policy; anything unusual or of significant value should be declared to a senior leader.
- Staff must not enter into private business, tutoring, accommodation or financial arrangements with students or families where this creates a conflict of interest or bypasses College approval.

13. Alcohol, smoking, drugs and medication

- Staff must not be impaired by alcohol, illegal drugs or misuse of medication while on duty or responsible for students.

- Staff must not smoke or vape in prohibited areas or in circumstances that model unsafe or inappropriate conduct to students.
- Illegal drugs must never be possessed, supplied or used on College premises, on College activities or while responsible for students.
- Any prescribed medication that may materially affect safe performance of duties should be managed responsibly and, where necessary, discussed confidentially with the appropriate manager.

14. Transport, off-site activities and accommodation

- Staff must follow risk assessments, safeguarding arrangements and College procedures for trips, transport, boarding and residential activities.
- Staff should not routinely transport a student alone in a private vehicle unless this is authorised, necessary and appropriately recorded. Emergencies should be reported as soon as practicable.
- Staff must not invite students to their private home, visit students socially at private accommodation, or arrange private overnight stays, except where an approved College arrangement specifically requires this and appropriate safeguards are in place.
- The same standards of professional boundaries apply during trips, residential activities, evening events and informal College occasions.

15. Reporting concerns or allegations about adults

All concerns about adults working in or on behalf of the College must be taken seriously and reported without delay. The response depends on whether the concern may meet the harm threshold or is a low-level concern.

Concerns that may meet the harm threshold: A safeguarding concern or allegation that a member of staff, supply staff member, trainee teacher, volunteer or contractor has harmed a child, may have harmed a child, possibly committed a criminal offence against or related to a child, or may pose a risk of harm to children must be reported immediately to the Head/Principal. The Head/Principal will consider whether a referral to the Local Authority Designated Officer (LADO) is required.

Concern about the Head/Principal: This must be reported to the proprietor or other person identified in the College Safeguarding Policy. Where the Head/Principal is also the sole proprietor, or there is a conflict of interest, the concern should be reported directly to the LADO in accordance with KCSIE.

Supply staff, trainee teachers and contractors: The College will work with the relevant employer or training provider as required; safeguarding responsibility is shared and the College must not simply cease using a person without considering the appropriate safeguarding process.

16. Low-level concerns

A low-level concern does not mean an insignificant concern. It is any concern, however small, that an adult working in or on behalf of the College may have acted in a way that is inconsistent with this Code, including

inappropriate conduct outside work, but which does not meet the harm threshold or is otherwise not serious enough for a LADO referral.

Examples may include being overfriendly with students, having favourites, taking photographs of students on a personal mobile phone contrary to policy, meeting a student one-to-one in a secluded area or behind a closed door without good reason, or humiliating a student.

- Low-level concerns should be reported promptly and confidentially to the Head/Principal and/or DSL in accordance with the College Safeguarding Policy. Where the DSL receives the concern first, the Head/Principal must be informed in a timely way. The Head/Principal is the ultimate decision-maker for low-level concerns.
- Staff are encouraged to self-refer where they have found themselves in a situation that could be misinterpreted, appears compromising, or may have fallen below expected professional standards.
- All low-level concerns must be recorded in writing, including the context, action taken and rationale for decisions. Records must be kept confidentially and securely and reviewed for patterns.
- If there is any doubt about whether a concern meets the harm threshold, the College should consult the LADO.

17. Whistleblowing and concerns about safeguarding practice

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the College's safeguarding provision. Such concerns will be taken seriously and should be raised through the College's Whistleblowing Policy or with an appropriate senior leader.

Where a member of staff feels unable to raise a concern internally, or believes a genuine safeguarding concern is not being addressed, external whistleblowing routes are available, including the NSPCC Whistleblowing Advice Line and general statutory whistleblowing protections. Staff should refer to the current KCSIE guidance and College Whistleblowing Policy for details.

18. Conduct outside work

Staff conduct outside the College may become a professional or safeguarding matter where it raises concerns about suitability to work with children, breaches professional boundaries, involves criminal conduct, creates a conflict of interest, damages trust and confidence, or is otherwise inconsistent with this Code. Staff must notify the College promptly of any relevant arrest, charge, conviction, caution, investigation, disqualification, barring matter or other circumstance where required by contract, policy or law.

19. Breaches of this Code

A breach of this Code may result in management action, additional training, disciplinary action, referral to the LADO, local authority children's social care, police, Disclosure and Barring Service, Teaching Regulation Agency or another relevant body, depending on the circumstances and legal requirements. Nothing in this Code prevents or delays immediate safeguarding action where a child may be at risk.

20. Staff acknowledgement

All staff must confirm that they have read, understood and will comply with this Staff Code of Conduct and the safeguarding documents identified below. Staff should seek advice from the DSL or a senior leader if any expectation is unclear.

My signature confirms that I have read and understood the Staff Code of Conduct and will abide by its contents.

Full Name:	
Signature:	
Date:	

My signature also confirms that I have read and understood the following policies and documents, as applicable to my role:

- Keeping Children Safe in Education 2026 – Part One (in full)
- Working Together to Safeguard Children 2026
- St Andrew's College Safeguarding and Child Protection Policy
- St Andrew's College Online Safety / Acceptable Use requirements
- St Andrew's College Whistleblowing Policy
- St Andrew's College Behaviour Policy
- St Andrew's College Missing Student / Child Policy
- St Andrew's College Health and Safety Policy
- Guidance for Safer Working Practice for those working with children and young people in education settings

Full Name:	
Signature:	
Date:	