



Code of Conduct

Responsible for policy:

Policy status:

Policy review:

Chair of Directors

CC2 Strategy, People and Organisational Development

Compliance with KCSIE

Annual



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1. Definitions

In this “**Code of Conduct**”, unless the context otherwise requires, the following expressions shall have the following meanings:

- i. **‘The Romero Catholic Academy’** means the Company named at the beginning of this ‘**Code of Conduct**’ and Procedure and includes all sites upon which the Company is undertaking, from time to time, being carried out. The Romero Catholic Academy includes **Corpus Christi, Good Shepherd, Sacred Heart, SS Peter and Paul, St Gregory, St John Fisher, St Patrick, Cardinal Wiseman, Shared Services Team**.
- ii. **‘Romero Catholic Academy’** means the Company responsible for the management of the Academy and, for all purposes, means the employer of staff at the Company.
- iii. **‘Board’** means the board of Directors of the Romero Catholic Academy.
- iv. **‘Governance Professional’** means the Clerk to the Board or the Clerk to the Local Governing Body of the Academy appointed from time to time, as appropriate.
- v. **‘Chair’** means the Chair of the Board of the Directors or the Local Governing Body appointed from time to time.
- vi. **‘Chief Executive Officer’** means the person responsible for performance of all Academies and Staff within the Multi Academy Company and is accountable to the Board of Directors.
- vii. **‘Diocesan Schools Commission’** means the education service provided by the diocese, which may also be known, or referred to, as the Birmingham Diocesan Education Service.
- viii. **‘Local Governing Body’** means the governing body of the School within the Multi-Academy Company
- ix. **‘Governing Body Representatives’** means the governors appointed and elected to the Local Governing Body of the School, from time to time.
- x. **‘Principal’** means the substantive Principal, who is the person with overall responsibility for the day-to-day management of the school.
- xi. **‘School’** means the school or college within The Romero Catholic Academy and includes all sites upon which the school undertaking is, from time to time, being carried out.
- xii. **‘Shared Services Team’** means the staff who work in the central team across the Company.
- xiii. **‘Vice-Chair’** means the Vice-Chair of the Governing Body elected from time to time.

Note to all staff

Changes in circumstances; your duty is to notify us immediately.

In line with Keeping Children Safe in Education (KCSIE) for **all staff**, if there are any changes to your circumstances such as you get married or something happens that may affect your standing with regards to DBS if it was to be renewed, you have a duty to notify us. Staff **must** immediately disclose any arrest, charge, caution, conviction, police investigation or circumstance which could affect their suitability to work with children.

Term time

- Under KCSIE to notify your Line Manager **without delay** on the **next available working day**. We must ensure that your details are up to date in between the DBS official checks.

Holidays

- If the change occurs in the holidays, you are obliged under KCSIE to notify the central team HR **without delay** on HR@romeromac.com with the subject line ‘**Change in DBS status**’ or ring 024 76 451888.

2. Introduction

- 2.1 This model code of conduct, as adopted, applies to all those employed in The Romero Catholic Academy (The 'Romero Catholic Academy') working in one of the Academy Schools (The 'School')
- 2.2 This code is designed to set the required standards and help employees understand the working relationship between themselves, their managers, colleagues, pupils and members of the public to whom they deliver a service.
- 2.3 This policy details the main standards of behaviour that you need to adhere to and details the behaviours that The Romero Catholic Academy would normally regard as gross misconduct. The standards of behaviour and the examples of gross misconduct (listed in the TRCA Disciplinary Policy) should not be considered exhaustive. The Romero Catholic Academy believe that employees are responsible for their actions. Principals/LGBs/Line Managers will ensure that staff are fully briefed on the content and have access to a copy of the Code of Conduct, it is however the responsibility of all employees to read the Code. If any of the provisions contained within the Code of Conduct, related Codes of Practice or Policies are not fully understood, then the employee must, in their own interest, seek clarification from their Line Manager or from HR by emailing hr@romeromac.com
- 2.4 Principals must ensure that current HR policies and other advice/guidance referred to throughout this document are accessible for all staff employed within The Romero Catholic Academy. The current HR policies are available on <https://romeromac.com/policies-procedures/> or via the HR Team in the Shared Services Office. Policies are reviewed annually, to ensure the most appropriate employment legislation is adhered to.
- 2.5 If an employee's actions or behaviour fall below the standards set out in this Code, then The Romero Catholic Academy may take formal disciplinary action which may include the full range of disciplinary sanctions. Serious misconduct, criminal offences or other acts committed outside of working hours, which bring The Romero Catholic Academy into disrepute or impact on the employee's ability to carry out their role, may also result in formal disciplinary action being taken, in accordance with The Romero Catholic Academy's procedures.

Our Vision

A Beacon of Excellence for Catholic Education

Our Mission

Forming Christ-centred pilgrims of hope with kind hearts, questioning minds, a thirst for knowledge and hunger for justice.

Our Values

Respect, Integrity, Service and Excellence

Our Aims

Spiritual Growth, Formation of the Whole Person, Inspire, Innovate and Excel, Family Partnership,
Vibrant Communities, Global awareness and Stewardship.

[Click here](#)

3. General Principles

- 3.1 All employees are expected to perform their duties with honesty, integrity, impartiality and objectivity in order to give the highest possible standards of service and avoid any conduct which could compromise them and The Romero Catholic Academy and the School. Therefore, this code sets the required standards for all employees.
- 3.2 Employees should comply with the rules and procedures set by The Romero Catholic Academy/School in relation to actions and behaviours. These can be found in school documents on school or TRCA websites. The HR Policies are available on our TRCA website:
<https://romeromac.com/documents/>
<https://romeromac.com/policies-procedures/>
- 3.3 Employees working with children, young people or vulnerable adults are in a position of great trust. Serious breaches of that trust; assault or sexual misconduct or deliberate disregard of policies and procedures meant to safeguard children, young people or vulnerable adults and other recipients of Romero Catholic Academy/School services will be regarded as potential gross misconduct.
- 3.4 Employees have a responsibility for ensuring a safe learning environment for children and young people within the school.
- 3.5 Employees who believe that a colleague is acting in a way which might be harmful to the school or individual pupils, should raise the matter with the Principal/Line Manager/designated person for child protection.
- 3.6 Employees should have regard to the TRCA **Relationship and Positive Behaviour Policy** (on link above) to provide guidance and support in dealing with behaviour issues as they arise.
- 3.7 Employees should not demean or undermine pupils, their parents, carers or colleagues or display any discriminatory behaviour with regards to Protected Characteristics as detailed in the Equality Duty [here](#).
- 3.8 Employees should comply with statutory provisions which support the well-being and development of pupils.
- 3.9 Employees, who are in a position of trust, must not enter a personal relationship with pupils at the school or conduct improper relationships. Furthermore, staff must not engage in conduct outside work which could seriously damage the reputation of the school or the employee's own reputation or the reputation of other members of the school community. This could result in disciplinary action. For past students leaving Year 11,12,13 (or equivalent) and are 18 years +, there must be at least two years after leaving before a personal relationship can take place.
- 3.10 Any communication with students who have left the school, should be through the Company's monitored IT systems or the school number/extension telephone number or mobile. Staff must not communicate with current or past pupils using personal mobile phones, e-mail, and social media and Internet chat rooms/websites.
- 3.11 Employees should not bring the reputation and standing of The Romero Catholic Academy/School into disrepute.
- 3.12 Employees should always be sympathetic to the Catholic identity as detailed in the Object. Staff are expected to be conscientious and loyal to the aims and objectives of the Academy, and the Academy Company; staff should have regard to the Catholic character of the Academy and the Academy Company and not to do anything in any way detrimental or prejudicial to the interest of the same.
- 3.13 Personal calls and text messages should be made during your normal break times only. In an emergency, you should speak with your manager about taking or receiving personal calls outside normal break times.

3.14 From June 2026, DfE states that mobile phones must not be used by pupils in the school day at any time. Therefore, staff should be mindful of usage of phones in presence of pupils. Personal mobile devices must not be used for communication with pupils, recording images, accessing pupil information or storing Academy data unless expressly authorised. Staff must always adhere to Academy mobile phone procedures.

3.15 Personal mobile phones and devices with cameras must not be used for taking pictures of children/young people unless you have prior permission from your Principal/Line Manager. If permission is granted, pictures and videos must be uploaded onto a school computer and deleted from any personal device within 48 hours. Sharing of files is not permitted. Please refer to e-Safety Policy for further information.

3.16 Employees must always wear their lanyard and ID badge whilst representing The Romero Catholic Academy/School.

3.17 You are solely responsible for the safety of your personal possessions on company premises and should ensure that your personal possessions are always kept in a safe place. If you find an item of lost property on the premises, you are required to inform management immediately.

Safeguarding

All staff who work in a school are particularly important in safeguarding, as they can identify concerns early, provide help for children, promote children's welfare and prevent concerns from escalating. All staff have a responsibility to provide a safe environment in which children can learn and, in a position, to take action to enable all children to have the best outcomes.

All staff who work in a school, regardless of role (including those who do not work directly with children), must read and understand **Part One of Keeping Children Safe in Education** and confirm this annually. Staff are expected to keep themselves up to date with safeguarding changes and participate in all mandatory safeguarding training:

- The school's Safeguarding and Child Protection policy
- Online Safety

And any updated policies including:

- The school's **Relationships and Positive Behaviour Policy**
- The school's safeguarding response to children who go absent or missing from education; **staff should understand that persistent absence, unexplained absence, as well as children missing education, may be indicators of safeguarding concerns including neglect, child sexual exploitation, child criminal exploitation or abuse.**
- The staff Code of Conduct (this document)
- The role of the DSL and DDSL

You must/ should

- Demonstrate a responsibility to provide a safe environment, where children can learn
- Know indicators of abuse and should know what to do if a child tells them that he/she is being abused, exploited or neglected
- Be prepared to identify children who may benefit from early help
- Be prepared to raise concerns and make referrals for Early Help, Family Help or Children's Social Care where appropriate, and understand the role they may be expected to play in assessments and multi-agency support
- Work with social workers and other agencies following a referral if appropriate
- Reassure victims that they are being taken seriously and that they will be supported
- **Staff must actively challenge misogyny, sexist attitudes, sexual harassment and behaviours that contribute to violence against women and girls. Such behaviours should never be viewed as "banter", "part of growing up" or accepted as normal.**

- Staff must understand the safeguarding risks associated with artificial intelligence technologies, including AI-generated imagery, deepfakes, nudification applications, impersonation, misinformation and online abuse. Any concern involving AI-generated content that may place a child at risk, constitute child-on-child abuse, or compromise staff or pupil safety must be reported immediately to the DSL.

Low Level Concerns

- It is necessary to ensure a culture of openness and trust is fostered within an organisation in which staff can share any concerns about the conduct of colleagues and be assured that these will be received in a sensitive manner. It is well documented that organisational child sexual abuse is often preceded by grooming, and that such conduct was observed and considered questionable. This could be targeted at protective adults, not just children or vulnerable adults. This behaviour was rarely reported to the relevant individual in the organisation, was not recorded, and not available later for evaluation of patterns emerging. Research has shown that it is not possible for individuals to accurately judge people, as there is no one profile to describe everyone who abuses a child, so focus should be placed upon specific behaviours.
- To minimise the risk of situational offending, there needs to be a culture of allowing the confidence to speak out. This requires a robust framework, policy, training, support and leadership to facilitate this and a willingness to accept that abuse could happen in any organisation.
- All staff should be familiar with the Low-level concern policy and Low-level concern reporting form, which can be found here:
 - <https://romeromac.com/policies-procedures/>

General behavioural standards

You should:

- maintain satisfactory standards of performance at work
- comply with all reasonable management instructions
- co-operate fully with your colleagues and with management
- ensure the maintenance of acceptable standards of politeness
- take all necessary steps to safeguard the company's public image and preserve positive relationships with all people and organisations connected to the company
- ensure that you behave in a way that does not constitute unlawful discrimination
- comply with The Romero Catholic Academy/Schools Operating Policies and Procedures.

Attendance and timekeeping

You should:

- comply with the rules relating to notification of absence set out in The Romero Catholic Academy's absence procedure
- arrive at work promptly, ready to start work at your contracted starting time
- remain at work until your contracted finishing time
- obtain management authorisation if for any reason you wish to arrive later or leave earlier than your agreed normal start and finish times

4. Working Relationships

4.1 All employees have a right to be treated with dignity at work. Staff should always respect their colleagues, the pupils and the reputation of The Romero Catholic Academy/School.

4.2 The Romero Catholic Academy is committed to promoting equality and diversity among our workforce and eliminating unlawful discrimination. We believe that excellence will be achieved through recognising the value of every individual. We aim to create an environment that respects the diversity of staff, enabling them to achieve their full potential, contribute fully and derive maximum benefit and enjoyment from their involvement in the life of the Academy.

4.3 To this end, we acknowledge the following basic rights for all members and prospective members of our community:

- No individual will be unjustly discriminated against. This includes, but is not limited to, discrimination because of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex and sexual orientation (known as **protected characteristics**)
- All forms of bullying, including threats or verbal aggression towards colleagues is unacceptable and will be dealt with seriously by The Romero Catholic Academy
- If there are work-related issues, which cannot be resolved informally with another colleague, the Line Manager should be advised. Also refer to **The Romero Catholic Academy's Grievance Procedure**
- Employees should not be involved in decisions relating to any discipline, promotion, performance development review, or pay progression of any employee who is a relative, or with whom they have a close personal relationship. If an employee develops a close personal relationship where a conflict of interest might arise, they should notify their Line Manager/HR
- Employees should maintain an effective and professional working relationship with their colleagues and Line Manager
- Employees should participate in initiatives designed to improve efficiency and effectiveness of service delivery

4.4 Romero Catholic Academy /Statutory policies, procedures (including the Single Equality Duty) and codes of practice should be followed at all times. These are available <https://romeromac.com/policies-procedures/>

4.5 An employee should never conceal a matter that should be reported; furthermore an employee should not damage, alter or falsify any document, form or record. Please see **Whistleblowing Policy** at the link in 4.4.

4.6 It is the responsibility of the employee that if their personal circumstances change, i.e. change of address or home telephone number, they must inform a member of the school's administrative team and their Line Manager who will make the relevant changes.

5. Working with Children and Young People

5.1 Infatuations

- Occasionally, a child or young person may develop an infatuation with an adult who works with them. When this does occur, words or actions may be misinterpreted. An employee who becomes aware that a child or young person is developing an infatuation, should discuss this at the earliest opportunity with their line manager so appropriate action can be taken to avoid any hurt, distress or embarrassment.

5.2 Social Contacts

- Employees should not seek to have social contact with a child or young person (including those past students who have left Year 11,12,13 for at least two years) have or their families unless the reason for this contact has been firmly established and agreed with their Principal/Line Manager. If a parent or child seeks to establish social contact, or if this occurs coincidentally, the employee should exercise their professional judgement in making a response but should always discuss the situation with their Line Manager. Such examples could be related to internet social networking sites (i.e. being asked to be a 'friend' on 'Facebook'). Further details are included in TRCA Social Media Policy.
- Employees should always communicate with current and past pupils/ parents using the Company's monitored IT system or the school mobile or telephone/extension number. In rare circumstances where this is not possible, the employee should gain permission from their Principal/Line Manager if there is a need for them to give their personal details such as home/mobile phone number, home or email address to a child or young person. Under normal circumstances this would be discouraged because of the potential implications for such an action. The process of gaining permission examines the reason for the need and allows it to be 'noted' - in the interest of seeking to protect the employee.

5.3 Physical Contact

- There are occasions when it is entirely appropriate for employees to have some physical contact with the child or young person with whom they are working, for example those who teach PE, Games, Drama or who offer music tuition. However, it is crucial that in all circumstances, employees should only touch children in ways which are appropriate to their professional or agreed role and responsibilities.
- When physical contact is made with a child this should be in response to their needs at the time, of limited duration and appropriate to their age, stage of development, gender, ethnicity and background.
- In all circumstances where a child or young person initiates inappropriate physical contact, employees should deter the child and help them understand the importance of personal boundaries and must always report such circumstances to their Principal/Line Manager.

5.4 Use of Reasonable Force, Restraint and Restrictive Interventions **(new section)**

- Staff must be familiar with the Department for Education's statutory guidance *Restrictive Interventions, including the Use of Reasonable Force in Schools* (effective from 1 April 2026). Restrictive interventions should only be used when necessary, proportionate and in the best interests of preventing harm, injury, serious disorder or damage to property. Staff should always seek to prevent situations from escalating through **positive relationships, behaviour support strategies and de-escalation** techniques wherever practicable. The use of force as a punishment is unlawful. Any significant incident involving the use of force, restraint or seclusion must be recorded and reported in accordance with Academy procedures and statutory requirements. Staff who may be required to use restrictive interventions must follow Academy training, policies and risk assessments at all times.
- What staff need to know:
 - Prevention and de-escalation must always be considered first.
 - Force can only be used when it is necessary, reasonable and proportionate.
 - The use of force as a punishment is unlawful.

- Significant incidents involving force, restraint or seclusion must be formally recorded.
- Parents must be informed following reportable incidents in line with statutory requirements.
- Particular consideration should be given to pupils with SEND and those with identified behaviour support plans.

For full guidance <https://www.gov.uk/government/publications/use-of-reasonable-force-in-schools>

5.5 Sexual Contact

- It is an offence 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. This applies where the child is in full-time education and the person works in the same establishment as the child, even if s/he does not teach the child. The sexual activity referred to does not just involve physical contact it may also include non-contact activities.
- Any sexual activity between an employee and a child or young person with whom they work may be regarded as a criminal offence and will always be a matter for disciplinary action.
- Forming inappropriate relationships or friendships with pupils who are ex-pupils under the age of 18 will be viewed as inappropriate and impact upon the school's ability to trust the member of staff to maintain professional boundaries with pupils at the school. Employees must not enter a personal relationship with pupils at the school or conduct improper relationships. For past students leaving Year 11/12/13 (or equivalent) and are 18 years +, there should be at least two years after leaving before a personal relationship can take place.

5.6 Apprentices

- Apprentices joining the Romero Catholic Academy under the age of 18 will be discussed on a case-by-case basis and contacts and relationships already existing within the academy will need to be disclosed at earliest opportunity.

6. Working and Contact with the Media

- 6.1 There may be occasions where the press will contact an Employee for information about the Academy. Employees must refer requests for this type of 'information' to the Academy's Escalation for Media Protocol which details the process employees should follow. This policy can be located through your Office or Business or Operations Manager.
- 6.2 Employees who write or give interviews must ensure that they make it clear that they are not representing The Romero Catholic Academy/School's view and do not bring The Romero Catholic Academy/School into disrepute. Also, we ask employees to refer to the Whistleblowing Policy.
- 6.3 Employees should not publicise material which is confidential or against The Romero Catholic Academy/School/any employee's interest or the Catholic Church.

7. Working with Neutrality

- 7.1 If an employee develops a close personal relationship with a Board Director/Colleague where a conflict of interest might arise, they should notify their Principal/Line Manager or HR.
- 7.2 Employees must not allow their personal or political opinions to interfere with their work.

8. Working and the Law

8.1 Employees always have a duty to uphold the law.

8.2 Teaching is a notifiable occupation, which means that the police report any conviction or caution given to a teacher to the Department for Education (DFE). Offences involving a risk of harm to children or to vulnerable adults are considered by the **Disclosure and Barring Service (DBS)**. All other convictions and cautions are passed to the National College for Teaching & Leadership under section 141D of the Education Act 2011, which has a role in determining if a caution or criminal offence is relevant to a teacher's registration.

8.3 An employee must immediately disclose any arrest, charge, caution, conviction, police investigation or circumstance which could affect their suitability to work with children.

8.4 and if they receive any criminal conviction, they must inform their Principal/Line Manager the **next available working day**. If it takes place in the holidays, HR should be notified via email HR@romeromac.com with the Subject Line – '**Change in DBS status**'. The Principal/Line Manager will then consider if any follow-up action is necessary and decide if the matter should be referred to and considered at a disciplinary hearing. Some offences would be classed as serious and would fall under the definition of gross misconduct. (Also refer to the Disciplinary Procedure.)

8.5 Employees must comply with the requirements of statutory bodies relating to the examination, assessment and evaluation of pupil achievement and attainment. They must not alter, falsify or add to scripts for SATs, coursework or moderating marks submitted for GCSE/ A Level examination, and should not provide unauthorised photocopies of forthcoming examination papers to students.

9. Working Safely

9.1 It is the duty of all employees to take reasonable care of their health and safety and that of others who are affected by what they do or do not do. They should also ensure that they keep up to date with health and safety guidance as provided by the employer. (Also refer to the Health and Safety Policy within the School)

9.2 Employees working in one-to-one situations with children and young people may be more vulnerable to allegations. They should therefore assess the need to have another adult present and consider the location and facilities to ensure their own security and safety and that of the child/young person.

9.3 An employee should use any safety clothing and equipment provided by the employer that is needed in their role and ensure that the equipment is not misused, neglected or damaged.

9.4 An employee must report any accident or "near misses" they have at work as soon as possible and accurately complete an accident report form; this includes verbal and physical assaults.

9.5 Employees must take reasonable care of pupils under their supervision with the aim of ensuring their health and safety. (Also refer to Educational Visits Policy available within the school).

9.6 The Romero Catholic Academy/School prohibits:

- alcohol consumption (including low alcohol or alcohol free) on school premises without prior consent
- illegal substance/drug use
- being under the influence of drugs or alcohol while at work
- encouraging others to misuse alcohol or drugs.

Drug and alcohol use may become a matter for disciplinary action in accordance with the disciplinary or capability procedure.

9.7 Prescribed drugs may be taken but if a GP gives an employee any medication that may have a negative effect on their performance, they should tell their Line Manager in confidence. Possession of and dealing in illegal substances will be immediately reported to the police in all cases and may result in formal disciplinary action, including the possibility of summary dismissal.

9.8 The Romero Catholic Academy/School operates a No Smoking Policy which includes e-cigarettes/vaping. This applies to all Romero Catholic Academy premises, including the grounds, and those where Romero Catholic Academy services are provided. It also applies when transporting children/young people in Romero Catholic Academy or private vehicles and to visits to children/young people in their own homes or other establishments.

10. Gifts and Hospitality

10.1 The general principles which govern gifts and hospitality are:

- Offers of hospitality should only be accepted if there is a genuine need to represent the Academy
- Gifts (under £50) may be accepted outside these principles in exceptional circumstances
- The Code of Conduct applies to all staff of the Romero Catholic Academy. There is a separate Code of Conduct for governors.
- To determine whether a gift or hospitality is acceptable, the 'PROVEIT' test should be applied by staff and referred to the Principal/Chair of Governing Body/ CEO if in doubt. (See Appendix A of the TRCA Gifts and Hospitality Policy)
- The registers are accessible to school Principals, the Board of Directors, Local Governing Body Representatives, Executive Team and External Auditors
- Any request by a member of the public to view a register will be referred to by the CEO. In considering any request, the requirement for the Academy to be open and transparent will be balanced against the requirements of prevailing GDPR and Freedom of Information legislation
- An employee's actions must not be influenced by offers of gifts or hospitality and must not give the impression to another member of staff, parent, pupil or service user that they are influenced in this way. (Also see TRCA Gifts and Hospitality Policy).

10.2 All personal gifts should be refused or donated to charity unless they come within the categories set out below.

All personal gifts should be refused or donated to charity unless they fall within the categories set out below:

- Modest gifts of a promotional character, e.g. calendars, diaries, stationery.
- Gifts on the conclusion of any courtesy visit to an external organisation of a sort normally given by that organisation.
- Gifts up to £50 in value.
- Gifts which are intended for the benefit of the Academy as a whole or for an individual school within the Academy e.g. donated raffle prizes.

Gifts are deemed to include:

- Goods provided for personal or other private use.
- Personal services.
- Loans of equipment, vehicles etc for personal use.
- The provision of goods/services at preferential cost for personal or other private use.
- Staff must, within 28 days of accepting any gift or hospitality with an estimated value more than £50, provide written notification to the Principal using the 'Declaration of Gifts and Hospitality' form (Appendix B).

All offers accepted should be recorded in case of any queries, through Freedom of Information (FOI) requests. The Declaration of Gifts and Hospitality forms must be completed in full. Full details are included in **Appendix 2** of the **TRCA Gifts and Hospitality Policy** available www.romeromac.com/policies-procedures

- 10.3 Employees should be cautious when selecting children and/or young people for specific activities or privileges to avoid perceptions of favouritism or unfairness. Methods and criteria for selection should always be transparent and subject to scrutiny.

11. Working with Integrity

- 11.1 If a school wishes to sponsor an event or service, no employee, relative or friend should benefit from such sponsorship in a direct way without there being full disclosure to, and prior approval by the Principal/ LGB Chair/Line Manager
- 11.2 Employees are required to declare to the Line Manager, any pecuniary interests which could conflict with The Romero Catholic Academy/School's interests, including any Directorships or equivalent position, which they may hold
- 11.3 Deliberately giving false information on claims such as mileage, travel/subsistence allowances, self-certification forms or attendance records will be deemed as fraud. All documents/forms/records should be completed honestly
- 11.4 Activities/private interests/outside employment, which employees may participate in when they are not at work, must not bring The Romero Catholic Academy/School into disrepute. Employees should not put themselves in a position which could result in public confidence in The Romero Catholic Academy /School being weakened
- 11.5 As a rule, behaviour outside of normal working hours is a personal matter and does not directly concern the company. However, there are some exceptions to this rule. The company will become involved when incidents occur:
- at office parties or other work-related social occasions or gatherings
 - at social occasions or gatherings organised by a third party, where you have been invited in your capacity as an employee
 - at work related conferences
 - while working away on business on behalf of the company.
- 11.6 On these occasions you are expected to behave in an appropriate and responsible manner, keeping in mind that you are representing The Romero Catholic Academy/School. You are instructed specifically not to consume any alcohol at such events if you are driving.
- 11.7 Any employee whose conduct brings The Romero Catholic Academy/School into disrepute will be subject to The Romero Catholic Academy/School's disciplinary procedure. Such behaviour may be viewed as gross misconduct and could result in disciplinary action up to and including dismissal without notice.

12. Working with Money and Property

- 12.1 Employees should ensure that they use school funds entrusted to them in a responsible and lawful manner.

- 12.2 Financial and Accounting procedures within the School and The Romero Catholic Academy/School should be always followed. Further details are included in the policy.
- 12.3 The Romero Catholic Academy/School property such as stationery, photocopiers etc. may be used for Romero Catholic Academy/School business only, unless permission has been given for other use. Facilities such as telephones, mobile phones, Internet, email and other ICT facilities can only be used in accordance with the school's policies, e.g. use of facilities by recognised trade unions and/or with the permission of the Principal/Line Manager.
- 12.4 In relation to IT, all employees must adhere to The Romero Catholic Academy/School's policy on internet and email use. In particular:
- All emails **should reflect our values** as an organisation, showing respect, integrity, service and excellence
 - No obscene or offensive language should ever be used in emails
 - Emails of a discriminatory, derogatory or defamatory nature must never be sent
 - Email must never be used as a form of communication which could cause harassment or be abusive to someone
 - Emails should not be copied to people inappropriately
 - if an employee receives an offensive email this should be reported to his/her line manager and should not be passed on to other employees
 - Internet sites should only be accessed if they are appropriate to the work that is being carried out.
 - Personal emails should not be used to communicate school business, unless the activity requires (CSI/ Ofsted inspectors who must use personal accounts to separate from school). In such cases, the employee should notify their line manager of when personal emails will be used.
 - You must not use your school devices for transactional activity
 - **LightSpeed** is the filtering system used by the Shared Services Team as approved by Core Committee 1. It is used for staff, pupils and governors in school who use emails to filter inappropriate words or phrases
 - All emails are consistently **filtered** and **monitored**; any inappropriate words or activity will be **flagged** to the **DSL** and then your line manager will be informed or if a pupil, the appropriate person (Year head or class teacher)
 - **The Academy will undertake an annual review of filtering and monitoring systems in line with DfE Filtering and Monitoring Standards. Reviews will be undertaken by the designated senior leader responsible for filtering and monitoring, supported by the DSL and IT colleagues.**
 - All staff must be aware of any **websites or online activity** that are inappropriate for pupils
 - All staff and governors should seek to prevent children accessing inappropriate and harmful content online while pupils are in school. When pupils access inappropriate and harmful content, the **TRCA Behaviour Policy** or **TRCA Information Security Policy** should be invoked and appropriate action/sanctions taken
 - The **Designated Safeguarding lead** will take the lead responsibility for understanding the filtering and monitoring systems in place at the school. KCSIE signposts schools and colleges to the DfE's latest **filtering and monitoring** standards and **cyber security standards** for schools and staff in turn must ensure they engage and confirm they have received training
- 12.5 Proposals to use any social media applications as part of your role within the company must be approved by your principal or Line Manager Use of social media for personal reasons does not need to be approved by the company, but your conduct while using social media for personal reasons may lead to disciplinary action if it affects your role.
- 12.6 Employees should follow The Romero Catholic Academy/School policy and procedures on computer

virus protection. A virus, which is maliciously hidden in a programme, can corrupt and damage computer files and discs. Employees need to be made aware that if they knowingly introduce a computer virus, this is not just a contravention of expected behaviour within their employment, they are breaking the law.

- 12.7 Employees should ensure that they follow the school's security procedures in relation to the use of computers and the proper management of computer held information. Care must be taken to observe established procedures when using passwords and logging on and off. Employees should never share a password or similar security device that may lead to unauthorised access to the schools' systems or property.
- 12.8 Employees should gain proper prior approval from the owner of the copyright before copying computer programmes (software) and other literature for personal use as it is an offence (Copyright, Designs and Patents Act 1988).
- 12.9 Employees should return any property or equipment which they have been allowed to borrow by the school as soon as they leave their job or when requested by their Line Manager.

13. Recruitment and Selection and Other Employment Matters

- 13.1 If employees are involved in recruitment and selection, they are expected to ensure that all appointments are made strictly on the basis of merit in accordance with The Romero Catholic Academy/School recruitment and selection process. Employees should not be involved in an appointment where they are related to an applicant, or have a close personal relationship outside work with him/her
- 13.2 Any reference provided by the principal in relation to another employee on behalf of The Romero Catholic Academy/School, should be factual and give an honest representation of the experience, skills, abilities and/or other qualities of that employee.
- 13.3 Employees must not misuse or misrepresent their professional position, qualifications or experience, nor should they falsify a reference.
- 13.4 Recruitment practices will comply with the latest statutory guidance regarding regulated activity, DBS checks, barred list checks, contractors, volunteers and agency staff.

14. Outside Commitments and Private Work

- 14.1 Employees should notify their Line Manager before taking up any outside employment. The Line Manager should assess if the nature of the work might be seen to conflict with the interests of The Romero Catholic Academy/School and advise accordingly.
- 14.2 Any secondary employment cannot be carried out by employees during the time the school employs them (i.e. when they should attend the school/undertaking work for the school under their contract of employment for those specific hours), which includes periods of sickness absence.
- 14.3 Employees should follow the appropriate guidance regarding the ownership of intellectual property or copyright created during their employment. Any paid work carried out on behalf of the Academy outside your contracted hours, must be paid to the Academy.

15. Disclosure of Information and Confidentiality

- 15.1 Employees may have access to confidential information about children and young people to undertake their responsibilities. In some circumstances they may have access to or be given highly sensitive or private information. These details must be always kept confidential and only shared when it is in the interests of the child to do so. They should gain the permission of the Principal/Line Manager before disclosing this information to any unauthorised party, in order to protect the employee from any accusations of inappropriate use.
- 15.2 Information held by The Romero Catholic Academy/School in relation to staff and pupils may be subject to the provision of the **UK GDPR and Data Protection Act 2018**.
- 15.3 Employees should never put themselves in the position where the disclosure of information puts themselves, a colleague, a pupil or the reputation of The Romero Catholic Academy/School at risk.
- 15.4 Employees should respect the confidentiality of Romero Catholic Academy/School meetings and the contents of any confidential Romero Catholic Academy/School documents and work within Data Protection Legislation. (see Data Protection Policy.)

16. Being a Member of an Organisation

- 16.1 Employees should ensure that their membership or involvement with any external organisation does not lead to an actual or perceived (maybe because of its nature and maybe because it is in the 'public domain') conflict of interest with their position as an employee of The Romero Catholic Academy/School, or conflict with the Catholic Church, The Romero Catholic Academy/School policies/objectives or damage to The Romero Catholic Academy/School reputation. It is important to avoid any perception that advice, guidance, or decisions for which they are responsible could be influenced by their membership of a particular organisation. This does not apply to membership of a trade union.

17. Whistleblowing

- 17.1 Under the Whistleblowing policy and procedure, if an employee believes that there has been any fraud, irregularity, improper behaviour towards a pupil, corruption or the law has been broken, they should report such incidents under this policy. (Also see the Whistleblowing Policy)
- 17.2 The Whistleblowing policy is intended to encourage and enable employees to raise concerns safely and without fear of retribution within The Romero Catholic Academy/School rather than overlooking a problem. The Romero Catholic Academy/School will not tolerate harassment or victimisation and will take action to protect any employee when they have raised a concern in good faith. Similarly, no employee must treat another employee less favourably on the grounds that that employee has, intends, or is suspected of doing anything under the Whistleblowing procedures.

18. Dress Code

- 18.1 As a general principle, staff should dress according to their professional judgement, unless this is detrimental to their capacity to do their job or is deemed unsafe or inappropriate for some other good reason. Employees should dress in a way that presents The Romero Catholic Academy in a positive and professional manner.

- 18.2 Staff dress code should remain business dress in line with the expectations in place for students e.g. in Winter, when pupils are expected to wear a shirt and tie, the same is expected for staff in a formal attire. In Summer, when pupils are wearing a Summer uniform which may include a polo, the expectations for staff align too.
There should be no change from this unless relaxed at the discretion of the principal due to special circumstances, or the role requires a different type of uniform which is provided see additional table **18.11**.
- 18.3 No aspect of an employee's dress or appearance should be politically motivated, sexually provocative, discriminatory, insensitive or offensive. Employees should dress appropriately for a school setting and take care to consider what the child can see, in terms of length of skirt and the exposure of chest area.
- 18.4 No denim should be worn whilst an employee is carrying out their duties.
- 18.5 Jewellery and piercings should not be worn excessively nor amount to an unacceptable risk either to the employee or to the pupil.
- 18.6 Staff to be conscious of health and safety when choosing appropriate footwear. Open toed, high heeled shoes, backless footwear and flip-flops are worn at the risk of everyone.
- 18.7 If visible, tattoos must not cause offence to others; if tattoos are likely to cause offence, they must be covered up whilst on duty.
- 18.8 Hair should be kept tidy and out of an employee's face and nails should be kept at a length where they are unlikely to amount to a risk or cause harm to pupils.
- 18.9 Dress codes may be relaxed in certain circumstances such as outdoor/adventure visits, training days and charity days– in these circumstances, common sense should prevail at the Principal/line manager's discretion.
- 18.10 All staff will be supplied with a school identity security badge that should be worn and visible at all times both when in school or outside the premises on school business and should only be removed for safety reasons. Staff working within the community must carry their school I.D. badges with them at all times. It is the responsibility of the member of staff to inform their manager if their I.D. badge is lost/stolen or if details on the badge need altering e.g. for a name change.
- 18.11 Staff should ensure that they are dressed safely and appropriately for the tasks they undertake and wear clothing appropriate to their work area. If you are supplied with a uniform or protective clothing for your role with the school then you must wear these whilst carrying out your duties. Facilities staff may wear practical, protective clothing as appropriate to their role as determined and provided by the Academy.

Change from 'Professional' dress	Uniform	Comments
Subject specific		
For PE/ dance/ swimming/ drama type activities or days in which appropriate competitions or activities are taking place	Branded polo shirt (and trousers/ shorts for PE Kit) will be provided by school	For any teaching or support staff who require it for school based activities.
Outdoor environmental activities for science or eco days	Branded polo shirt will be provided by school	
Job Families		
Catering	- Branded navy polo shirts - Branded chefs trousers - Navy branded fleece	
Estates	- Branded navy polo shirts - Branded navy trousers - Branded coat - Steel toe capped shoes - Hi-vis	
Cleaners	- Branded navy polo shirts, Wiseman only - Branded trousers, Wiseman only - Branded navy fleece, Wiseman only - Tabards in the primary schools	
Those who work in Early Years	- Option of branded polo shirt - Option of waterproof outdoor jacket	
Outdoor wear (Secondary)		
- Coat - Hi Vis	Branded items provided for bus duty, lunch duty, period switchovers	
Summer 2		
When dress code is relaxed as discretion	- Tailored shorts may be worn - School branded polo may be worn if there are high temperatures.	At the principal's discretion where working conditions warrant relaxing
Other branded items:		
- Gillet - Coat (Primary) - Branded polo shirt for staff when it is not provided	Can be purchased for own use	

Linked Policies and Documents available [here](#)

- TRCA Accounting Finance and Resources Policy
- TRCA Acceptable Use Policy
- TRCA Relationships and Positive Behaviour Policy
- TRCA Data Protection Policy
- TRCA Disciplinary Policy
- TRCA Gift and Hospitality Policy
- TRCA Grievance Policy
- TRCA Health and Safety Policy (for the school)
- TRCA Information Security Policy
- TRCA Media Protocol (under review)
- TRCA Single Equality Duty
- TRCA Social Media Policy
- TRCA Travel and Expense Policy
- TRCA Whistleblowing Policy
- KCSIE Annually updated

19. Monitoring and Review

- This code of conduct will be kept under review in the light of recommendations and guidance issued nationally in relation to standards of conduct in public life and revised as necessary.
- The Board of Directors delegate the implementation of this policy to the Governing Body.
- This policy will be reviewed by CC2 Strategy, People and Organisational Development.
- This policy is based on a Diocesan Code of Conduct.