



## STAFF CODE OF CONDUCT

This policy will be reviewed annually or in response to changes in legislation		
Created	June 2024	HR Director, Head of Compliance
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Approved	November 2025	Group Leadership Team
Approved by Board	September 2024	Shareholder Board

This Policy applies to all schools that are part of the Thomas's London Day Schools Group. Thomas's London Day Schools operates as a united group of schools with a similar ethos and values and as such is referred to as a singular body.

## **1. INTRODUCTION**

- 1.1. This policy applies to all Staff and volunteers at Thomas's London Day Schools regardless of their position, role or responsibility. It sets out clear guidance on the standards of behaviour expected from all Staff (as defined below) at the Group.
- 1.2. References to "Staff" throughout this policy relate to all of the following groups:
  - all members of staff including teaching and non-teaching staff;
  - proprietors;
  - volunteers;
  - casual workers;
  - temporary and supply staff, either from agencies or engaged directly; and
  - student placements, including those undertaking initial teacher training and apprentices.
- 1.3. The principles underlying the guidance aim to encourage Staff to achieve the highest possible standards of conduct and minimise the risk of inappropriate conduct occurring.
- 1.4. Staff are in a unique position of trust and influence as role models for pupils and must adhere to behaviour that sets a good example to all pupils within the schools.
- 1.5. Staff also have an individual responsibility to maintain their reputation and the reputation of the Thomas's, both inside and outside working hours and whether they are inside or outside the work setting. This policy therefore applies equally when staff are conducting lessons online or when it is necessary for them to work from home.
- 1.6. Thomas's requires that all Staff have read and agree to comply with this policy. Breach or failure to observe this policy may result in action being taken under the disciplinary procedures including, but not limited to, dismissal.
- 1.7. This Staff Code of Conduct is not an exhaustive list of acceptable and unacceptable standards of behaviour. In situations where guidance does not exist in this policy, Staff are expected to exercise their professional judgement and act in the best interests of the pupils and the School.
- 1.8. This policy should be read in conjunction with the following related policies and procedures:
  - Safeguarding and Child Protection Policy;
  - Equity Diversity and Inclusion Policy;
  - Staff ICT Acceptable Use Policy
  - Health and Safety Policy and Procedures;
  - Grievance Procedure (Appendix 2 - Bullying & Harassment)
  - Anti-Bribery and Corruption Policy;

- Whistleblowing Policy; and
  - Teachers' Standards
- 1.9. Staff should ensure that they have read and are familiar with these policies and procedures.
- 1.10. Staff who work directly with children are required to read and understand Part One and Annex B of the statutory guidance 'Keeping Children Safe in Education'. Those members of staff who do not work directly with children will be required to read Annex A of 'Keeping Children Safe in Education'.

## **2. ATTENDANCE AND TIMEKEEPING**

- 2.1. Should you need to be absent or expect to be late for any reason, you should ask your Head, designated member of the leadership team or line manager for cross-schools staff in advance when possible. If this is not possible, please contact your Head, designated member of the leadership team or line manager for cross-school staff at the earliest opportunity. Refer to the Staff Absence from Work Procedure for further details.

## **3. SMOKING**

- 3.1. To promote a healthy and pleasant working environment and because of the fire risk, smoking (in any form, including the use of e-cigarettes) is not allowed anywhere on the school site or other premises, or within any Thomas's vehicles. You must not smoke on school premises or outside school gates. Any member of Staff wishing to smoke must leave the school premises.
- 3.2. Staff may smoke before and after working hours and during their scheduled breaks.
- 3.3. You must not smoke whilst working with or supervising pupils offsite.

## **4. ALCOHOL, ILLEGAL DRUGS AND MEDICATION**

- 4.1. Consumption of alcohol is not permitted on site, save where at a school function or as otherwise agreed when modest amounts of alcohol may be consumed. Staff that reside on site may consume modest quantities of alcohol in private accommodation when they are not on duty. Consumption of illegal drugs is never permitted.
- 4.2. Staff are only permitted to consume alcohol on school trips when permission has been granted by the EVC and Trip Leader, and authorised by the Head during the planning process. Refer to the Educational Visits Policy for further details.
- 4.3. Your conduct and performance must not be adversely impacted by alcohol or drugs when undertaking your duties.
- 4.4. Any member of staff is prescribed medication by a doctor, should inform the doctor of their responsibilities and check whether any side effects might affect their ability to carry out these responsibilities. Where medication may have an impact on a member of staff's ability to carry out their responsibilities, staff should inform the Head so that a risk assessment can be carried out and any reasonable adjustments made to their working environment or responsibilities while they remain on the course of treatment.

- 4.5. Staff should ensure any medication of their own held in school is secured safely in a lockable drawer or their bag. If they are unable to store it safely they should request that the Medical Lead stores it securely on their behalf in the lockable Medications Cabinet.

## **5. SECURITY**

- 5.1. In the interests of security, employees must wear or carry their identity card whilst in School and produce it on request. You must not remove any School documents from the site or take any photographs without due permission. The School reserves the right to search the outer clothing, bags, lockers and vehicles etc. of employees whilst on site. Staff may have a colleague in attendance on such occasions.

## **6. HEALTH AND SAFETY**

- 6.1. All Staff have a duty to ensure that a safe working environment exists. Fire and evacuation procedures must be adhered to at all times and Staff are required to familiarise themselves with the procedures and their responsibilities set out in the Health and Safety Policy and associated procedures.

## **7. PERSONAL APPEARANCE**

- 7.1. We regularly receive visits from parents, potential parents and others, and naturally wish to convey an impression of professionalism and organisation. Therefore, whilst not wishing to impose unreasonable obligations, Staff are, nonetheless, required to look smart in appearance at all times. Refer to the Staff Dress Code for further details.
- 7.2. When working from home or remotely (including the delivery of online lessons, or virtual meetings using a virtual meeting platform such as Zoom and/or Google Meet) staff must ensure they are dressed appropriately in clothing that is smart and of a similar style to what they would wear on a normal school day.

## **8. GIFTS, REWARDS AND FAVOURS**

- 8.1. Staff should take care to ensure that they do not appear to accept a gift that may be construed as a bribe or lead the giver to expect preferential treatment. Staff are required to familiarise themselves with the content of the Anti-Corruption and Bribery Policy.
- 8.2. Staff should exercise care when selecting pupils for school teams, productions, trips and/or specific work tasks in order to avoid perceptions of favouritism or injustice. Similar care should be exercised when excluding a child from an activity without prior consultation with the Head or Deputy Head.
- 8.3. Staff should not give presents/rewards to an individual outside of the School reward system.

## **9. PROFESSIONAL BEHAVIOURS AND RELATIONSHIPS**

- 9.1. All staff are expected to behave in a professional way that is not offensive to others and that cannot be deemed as bullying or harassment. Staff must

treat colleagues and others with respect and positive regard at all times. Slurs and offensive banter will not be tolerated.

- 9.2. All staff must contribute to and share responsibility for the corporate life of the Group and the schools they work in.
- 9.3. Staff must not criticise colleagues in front of parents, pupils, or other members of staff. They must respect the skills, expertise and contribution each member of staff makes, and all staff are expected to make efforts to build productive working relationships with others in the interest of the pupils.
- 9.4. Professionalism involves using judgement to make the right decisions and the Group and school's policies and procedures provide staff with additional guidance and clarity.
- 9.5. Staff should:
  - 9.5.1. actively promote and not undermine fundamental British values, which are defined as comprising: democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs;
  - 9.5.2. ensure that they are aware that the school precludes the promotion of partisan political views in the teaching of any subject in the school;

## **10. COMMUNICATION**

- 10.1. Good communication between all members of the Thomas's community is vital. All communication between Staff, pupils and parents should take place within clear, explicit and professional boundaries.
- 10.2. Staff must never record a conversation between themselves and another colleague, pupil or parent without consent on all individuals involved.
- 10.3. *Communication with Parents*
  - 10.3.1. Class teachers / tutors are expected to be the first point of contact between parents and the School, although enquiries will also come through the School Office. Staff can contact parents by telephone or email. Staff should not contact pupils, parents or conduct any school business using personal email addresses.
  - 10.3.2. Where a member of Staff receives an email from a parent, a reply should normally be made within one working day. If a full reply cannot be made within that time, the member of Staff should send a brief acknowledgment email and let the parent know when a fuller reply can be expected.
  - 10.3.3. Staff sending emails to parents/carers are advised to send a copy (cc or bcc) to the relevant senior leader where the topic is more complex.
  - 10.3.4. Staff must inform the Head, a member of the school leadership team or their Line Manager if they receive an offensive email.

#### 10.4. *Communication with Pupils*

- 10.4.1. Staff should carefully consider the manner in which they communicate with pupils at all times so as to avoid any possible misinterpretation of their motives or behaviours.
- 10.4.2. Staff should never give their personal mobile phone numbers or email addresses to pupils, nor should they communicate with them by social media, text message or personal email. If they need to speak to a pupil by telephone, they should use one of the School's telephones and email using the School system. Any communication on video call platforms, such as Google Meet or Zoom must be for professional reasons only and should accord with the rules of this policy at all times.
- 10.4.3. Where older pupils are permitted to take their mobile phone on school trips, the Trip Leader may share the contact details for a trip phone with pupils. Pupils should delete any trip phone numbers at the end of the trip.
- 10.4.4. Pupils should be encouraged to discuss with their parents or guardians any issues that are troubling them. It may be appropriate to suggest that a pupil sees the School counsellor or a member of the pastoral team.

### **11. SOCIAL MEDIA**

- 11.1. A social networking site is any website which enables its users to create profiles, form relationships and share information with other users. It also includes sites which have online discussion forums, chat-rooms, media posting sites, blogs and any other social space online. It includes but is not limited to, sites such as Facebook, WhatsApp, Snapchat, Instagram, Ping, YouTube, TikTok, X and Wikipedia.
- 11.2. Where use has been permitted by the Head or Director of Marketing and Communications, this policy does not intend to affect your ability to use social media for purely professional purposes.
- 11.3. This policy applies to the use of social media for both business and personal purposes, whether during working hours or otherwise. The policy applies regardless of whether the social media is accessed using our IT facilities and equipment or equipment belonging to members of staff or any other IT equipment.
- 11.4. Breach of this policy may result in disciplinary action up to and including dismissal. Disciplinary action may be taken regardless of whether the breach is committed during working hours, and regardless of whether our equipment or facilities are used for the purpose of committing the breach. If you are suspected of committing a breach of this policy you will be required to co-operate with our investigation, which may involve handing over relevant passwords and login details so far as this is consistent with the right of an individual to private and family life.
- 11.5. You may be required to remove internet postings which are deemed to constitute a breach of this policy. Failure to comply with such a request may result in disciplinary action.

## *11.6. Relationship with other School policies*

- 11.6.1. If an internet post would breach any of our policies in another forum it will also breach them in an online forum. For example, you are prohibited from using social media to:
  - 11.6.1.1. breach our Staff ICT Acceptable Use Policy;
  - 11.6.1.2. breach our obligations with respect to the rules of relevant regulatory bodies;
  - 11.6.1.3. breach any obligations relating to confidentiality;
  - 11.6.1.4. breach our Disciplinary Policy or related rules, policies and procedures;
  - 11.6.1.5. defame or disparage the School or our affiliates, parents, staff, pupils, business partners, suppliers, vendors or other stakeholders;
  - 11.6.1.6. harass or bully other staff in any way or breach our Anti-Harassment and Sexual Harassment Policy;
  - 11.6.1.7. unlawfully discriminate against other staff or third parties or breach our Equity, Diversity and Inclusion Policy;
  - 11.6.1.8. breach our Data Protection Policy (for example, never disclose personal information about a colleague, pupil or parent online);
  - 11.6.1.9. breach any other laws or ethical standards (for example, never use social media in a false or misleading way, such as by claiming to be someone other than yourself or by making misleading statements).
- 11.6.2. Behaviour online can be permanent and so you must be extra cautious about what you say as it can be harder to retract.
- 11.6.3. You must also be aware of the particular risks to internet security that social media presents and so to comply with our existing policy on information security you must take any extra measures necessary not to allow any of your actions on social media sites to create vulnerability to our systems.
- 11.6.4. Staff who breach any of the above policies will be subject to disciplinary action up to and including termination of employment.

## *11.7. General rules for the responsible use of social media*

- 11.7.1. You must be aware that your role comes with particular responsibilities and adhere to our strict approach to social media. You must:
  - 11.7.1.1. ensure that wherever possible your privacy settings on social media sites are set so that pupils cannot access information relating to your personal lives;
  - 11.7.1.2. obtain the prior written approval of the Head, to the wording of any personal profile which you intend to create where the School is named or mentioned on a social networking site;
  - 11.7.1.3. seek approval from the Head before you speak about or make any comments on our behalf on the internet or through any social networking site;

- 11.7.1.4. report to the Head immediately if you see any information on the internet or on social networking sites that disparages or reflects poorly on the School or raises any safeguarding concerns about pupils within the School;
- 11.7.1.5. immediately remove any internet postings which are deemed by us to constitute a breach of this or any other School policy;
- 11.7.1.6. if applicable, consider whether a particular post puts your effectiveness as a teacher at risk;
- 11.7.1.7. post only what you want the world to see.
- 11.7.2. You must not:
  - 11.7.2.1. provide references for other individuals, on social or professional networking sites, as such references whether positive or negative can be attributed to the School and create legal liability for both the author of the reference and us;
  - 11.7.2.2. post or publish on the internet or on any social networking site, any reference to the School, your colleagues, parents or pupils;
  - 11.7.2.3. use commentary deemed to be defamatory, obscene, proprietary, or libellous. You must exercise caution with regards to exaggeration, colourful language, guesswork, obscenity, copyrighted materials, legal conclusions, and derogatory remarks or characterisations;
  - 11.7.2.4. discuss pupils or colleagues or criticise the School or staff;
  - 11.7.2.5. post images that include pupils;
  - 11.7.2.6. harass or bully other members of staff;
  - 11.7.2.7. attempt to communicate with pupils on any personal social network sites;
  - 11.7.2.8. initiate friendships with pupils on any personal social network sites;
  - 11.7.2.9. accept pupils as friends on any such sites; staff must decline any pupil-initiated friend requests.

#### *11.8. The use of social media for school purposes and in the School's name*

- 11.8.1. Refer to the Staff ICT Acceptable Use Policy.

#### *11.9. Personal use of social media*

- 11.9.1. Personal use of social media is not permitted by means of our computers, networks and other IT resources and communication systems (including via smartphones and tablets).
- 11.9.2. We prohibit you from using your work email address for any personal use of social media.
- 11.9.3. Circulating or posting commercial, personal, religious or political solicitations, or promotion of outside organisations unrelated to the School's business are also prohibited. You must ensure that your use of social media does not create any breaches of internet security and therefore must be careful to avoid any applications



that might interrupt our IT systems. Excessive use of social media that interrupts productivity will be subject to a disciplinary procedure, consistent with this policy.

#### *11.10. The monitoring of social media*

- 11.10.1. Our right to monitor, intercept and review communications applies equally to the use of social media platforms (and any postings and activities) made via our system or network. Any such monitoring will be for legitimate business purposes which include:
  - 11.10.1.1. ascertaining and demonstrating that our rules and being complied with;
  - 11.10.1.2. demonstrating that expected standards are being met by those using the systems; and
  - 11.10.1.3. for the detection and investigation of unauthorised use of the systems (including where this is necessary to prevent or detect crime).
- 11.10.2. This might include, without limitation, the monitoring, interception, accessing, recording, disclosing, inspecting, reviewing, retrieving and printing of transactions, messages, communications, postings, log-ins, recordings and other uses of the systems as well as keystroke capturing and other network monitoring technologies.
- 11.10.3. We may store copies of such data or communications for as long as is necessary for our legitimate business purposes in accordance with data protection law. We may delete such copies periodically or from time to time without notice when their retention is no longer necessary.
- 11.10.4. Further information on monitoring can be found in our Staff ICT Acceptable Use Policy and Staff Privacy Notice.
- 11.10.5. Do not use our IT resources and communication systems for any matter that you wish to be kept private or confidential from the School.

#### *11.11. Social media and the end of employment*

- 11.11.1. If your employment with us should end, for whatever reason, any personal profiles on social networking sites should be immediately amended to reflect the fact that you are no longer employed or associated with the School.
- 11.11.2. All professional contacts that you have made through your course of employment with us belong to us, regardless of whether you have made social media connections with them.
- 11.11.3. On the termination of employment for any reason, and when requested by us at any time, you will provide to the Director of IT any relevant passwords and other information to allow access to any social media site, page or account which has been used or set up for the purpose of furthering the School's business or facilitating the provision of our curriculum and will relinquish any authority you may have to manage or administer any such site, page or account.

## **12. RELATIONSHIPS WITH PUPILS**

- 12.1. Staff should understand that they are in a position of trust in relation to pupils, giving them influence and power by virtue of the knowledge they have and/or the authority invested in their role. Staff should ensure that their relationship with pupils clearly takes place within the boundaries of a respectful, professional relationship and avoid behaviour which may be misinterpreted by others.
- 12.2. Staff are encouraged to self-refer under the School's Low-Level Concerns Policy in the event that they have found themselves in a situation which may be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in a way that may be considered to fall below the expected professional standard. All concerns will be handled sensitively and will be dealt with appropriately and proportionately.
- 12.3. Staff are reminded that it is a criminal offence for a person aged 18 or over to have a sexual relationship with a child under 18 where that person is in a position of power, even if the child is over 16 and the relationship is consensual.

## **13. INFATUATIONS**

- 13.1. On occasion, pupils may develop an infatuation for a member of Staff. If a member of Staff suspects or becomes aware of an infatuation, the advice of the Head or DSL must be sought immediately.
- 13.2. Other members of Staff must alert a colleague to the possibility of an infatuation in order that appropriate steps can be taken.
- 13.3. Staff should deal with these situations sensibly and appropriately to maintain the dignity and safety of all concerned.

## **14. ONE TO ONE SITUATIONS**

- 14.1. Staff working individually with pupils should be aware of the potential vulnerability of pupils and Staff in such situations. Staff should manage these situations and take reasonable and sensible precautions to ensure the safety and security of the pupil and Staff alike.
- 14.2. Individual work with pupils should not be undertaken in secluded areas or behind a closed door. Where it is necessary to close doors for reasons of confidentiality a colleague should be made aware of this and asked to remain vigilant. Wherever possible one to one work should only be undertaken with the knowledge and consent of a senior member of staff to minimise risk to those involved.
- 14.3. Where possible, a gap or barrier should be maintained between teacher and child at all times. Any physical contact should be the minimum required for care, instruction or restraint. Refer to Appendix 1 for further details.
- 14.4. Where it is necessary to conduct a one to one session online with a pupil (for example, using a platform such as Zoom) staff must first get permission from the Head and parents of the child. Staff must take appropriate precautions with regards to safeguarding. Staff should refer to the Online Safety Policy for the expectations and protocols for online meetings and teaching.

## **15. PHYSICAL CONTACT WITH PUPILS**

- 15.1. There are occasions when it is entirely appropriate and proper for Staff to have physical contact with pupils, but it is crucial that they only do so in ways appropriate to their professional role. Physical contact may be appropriate in the following circumstances:
- when a pupil needs to get comfort or reassurance e.g. following an accident or personal crisis;
  - when a pupil needs encouragement to attempt a new challenge e.g. to climb on to a piece of apparatus;
  - to demonstrate how to use a musical instrument; or
  - when there is a need to take urgent action to avoid an incident or injury.
- 15.2. Staff should not remove earrings for pupils.
- 15.3. Staff should use their professional judgement at all times. Physical contact must be appropriate for the age, understanding and sex of the child and must never threaten or be sexually inappropriate. Staff must also be sensitive to an individual's cultural background and any special educational needs.
- 15.4. Staff should not have unnecessary physical contact with pupils and should be alert to the fact that minor forms of friendly physical contact can be misconstrued by pupils or onlookers.
- 15.5. Staff are referred to the School's Behaviour Policy for guidance on the use of physical intervention or reasonable force in relation to pupils.

## **16. INTIMATE / PERSONAL CARE**

- 16.1. Intimate care is one of the following:
- Supporting a pupil with dressing/undressing (this may be necessary in Early Years but staff should always encourage children to dress and undress unaided).
  - Assisting a pupil requiring medical care, who is not able to carry this out unaided.
  - Cleaning a pupil who has soiled themselves, has vomited or feels unwell.
- 16.2. Volunteers must not carry out intimate care procedures. Students should only do so under the supervision of a trained member of staff. Should a child require intimate care on a school visit, the volunteer should contact a staff member without delay.
- 16.3. When touching a child, staff must always be aware of the possibility of invading a child's privacy and must respect the child's wishes and feelings.
- 16.4. Staff should refer to the Intimate Care Policy for further details.
- 16.5. Staff need to have regard to the danger of allegations being made against them and take precautions to avoid this risk. These should include:
- gaining a verbal agreement from another member of staff that the action being taken is necessary;
  - allowing the child, wherever possible, to express a preference to choose their carer and encourage them to say if they find a carer to be unacceptable;

- allowing the child a choice in the sequence of care;
  - being aware of and responsive to the child's reactions;
  - ensuring a second member staff is present throughout the process of the intimate care
  - any concerns about physical changes in a pupil's presentation, e.g. bruising, marks, soreness observed on the child during an intimate care procedure are recorded and reported to the Designated Safeguarding Lead, with safeguarding procedures followed.
- 16.6. A record should be kept of all intimate and personal care tasks undertaken and parents informed the same day.

## **17. PREVENT DUTY**

- 17.1. All Staff should understand that the School has a legal duty under section 26 of the Counter-Terrorism and Security Act 2015 to have 'due regard to the need to prevent people from being drawn into terrorism'. This is known as the Prevent duty.
- 17.2. The School is required, in recognition that pupils may be susceptible to being drawn into terrorism or other forms of extremism, to carry out appropriate risk assessments. Consequently, Staff should be aware of:
- what extremism and radicalisation means and why people—including pupils and fellow Staff members—may be vulnerable to being drawn into terrorism as a consequence of it. Staff need to be aware of what is meant by the term "extremism" and the relationship between extremism and terrorism;
  - what measures are available to prevent people from becoming drawn into terrorism and how to challenge the extremist ideology that can be associated with it; and
  - how to obtain support for people who may be being exploited by radicalising influences.
- 17.3. The School protects children from being drawn into terrorism by having robust safeguarding policies in place to identify children at risk, and intervening as appropriate. The School's procedure for dealing with concerns that a pupil may be susceptible to being drawn into terrorism is set out in the School's Safeguarding and Child Protection Policy. There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be susceptible and act proportionately, which may include making a Prevent referral.
- 17.4. More guidance for schools from the DfE on this can be found at: <https://www.gov.uk/government/publications/prevent-duty-guidance>.
- 17.5. This guidance should be read in conjunction with other relevant guidance including Working Together to Safeguard Children, Keeping Children Safe in Education (September 2025) and Information Sharing: HM government advice for professionals providing safeguarding services to children, young people, parents and carers.

## **18. TRANSPORTING PUPILS IN PRIVATE VEHICLES**

- 18.1. In certain circumstances it may be appropriate for Staff to transport pupils offsite on approved school business in a private vehicle. The Head must oversee the plan and provide oversight of all transport arrangements. Staff should not transport pupils without prior authorisation or in the case of an emergency.
- 18.2. Staff should ensure that the driver is not distracted while the vehicle is in motion for any reason other than an emergency and should also ensure all passengers are wearing correctly fastened seatbelts.
- 18.3. Prior to transporting pupils offsite, consent must be obtained from a pupil's parent/guardian and Staff should be aware that the safety and welfare of the pupils is their responsibility until they are safely passed back to their parent/carer.
- 18.4. Staff should never be alone in a private vehicle with a pupil, except in cases of an emergency.

## **19. CONTACT WITH PUPILS OUT OF SCHOOL**

- 19.1. Staff should not:
  - arrange meetings with pupils off the School premises (whether in person or online) without the prior approval of the Head;
  - accept request from pupils to connect on social media platforms; or
  - give pupils their home address or any of their personal contact details.
- 19.2. Staff are only permitted to babysit for pupils with the express permission of the Head.
- 19.3. Staff should not arrange private tuition of any of the School's pupils in school or outside of school whether in term-time or outside of term-time without the prior written approval of the Head.
- 19.4. Staff are not permitted to provide tutoring to applicants of any Thomas's school.
- 19.5. Refer to the Additional Employment Policy for further details.

## **20. CONDUCT OUT OF SCHOOL**

- 20.1. Staff are expected to be loyal to the stated aims and objectives of Thomas's and may not engage in any outside activity which, in the reasonable view of the Head or CEO, might interfere with the efficient discharge of their duties or is in conflict with the interests of the School.
- 20.2. Staff should at all times, both in and out of School, uphold the ethos of the Thomas's and conduct themselves in a manner consistent with their position.
- 20.3. Staff must be aware that should they meet socially in local pubs, restaurants or other public places, their conversations may be overheard and so they must be extremely careful that confidential information about the Group, the parents or the pupils does not leak in this way or otherwise inadvertently. Staff should not wear clothing with Thomas's branding.
- 20.4. Staff must immediately notify the Group of any outside conduct, activity or circumstances that are likely to either bring the Group into disrepute or put into question a staff member's suitability for their role at the School.

## **21. SCHOOL EVENTS**

- 21.1. Staff are expected to behave appropriately at School events, including School organised social occasions. A School event, which may or may not take place outside of working hours or on School premises, is sufficiently connected to the School such that the standards of behaviour expected will be in line with the requirements in this policy.

## **22. ACCEPTABLE USE OF TECHNOLOGY**

- 22.1. Staff should ensure that they are familiar with and comply with the Staff ICT Acceptable Use Policy at all times. In particular, Staff must:
- not engage in inappropriate use of social network sites which may bring themselves, Thomas's or the Thomas's community into disrepute;
  - adopt the highest security settings on any personal profiles they have;
  - remain mindful of their digital footprint and exercise caution in all their use of social media or any other web based presence they have. This includes written content, videos or photographs and views expressed either directly or by 'liking' certain pages or posts or following certain individuals or groups;
  - exercise care when using dating websites where Staff could encounter pupils; and
  - not contact pupils, their guardians or family members, accept or initiate friend requests or follow pupils' or their guardians' accounts on any social media platform.

## **23. EQUAL TREATMENT**

- 23.1. We are committed to equal treatment for all Staff and pupils regardless of their race or colour, nationality or national or ethnic origins, religion or belief, sex, sexual orientation, pregnancy or maternity, marital or civil partnership status, gender reassignment, age, and disability (together known as "Protected Characteristics").
- 23.2. We aim to create a friendly, caring and perceptive environment in which every individual is valued. We endeavour to contribute positively towards the growing autonomy, self-esteem and safety of each pupil. Staff will be required to undertake regular consultation activities with pupils e.g. through safety questionnaires, participation in anti-bullying week and speaking to children about their experiences at lunchtime and playtimes.
- 23.3. Bullying, harassment, victimisation and/or discrimination will not be tolerated. We treat all our pupils and their parents fairly and with consideration which we expect them to reciprocate towards each other, the Staff and the School. Staff should ensure that they are familiar with the School's staff Equity Diversity and Inclusion Policy and the Anti-Bullying Policy.

## **24. PHOTOGRAPHS**

- 24.1. Many school activities involve recording images as part of the curriculum, extra school activities, publicity or to celebrate an achievement. In accordance with data protection legislation, the image of a pupil is personal data.

- 24.2. Photographs must only be taken where there is a legitimate purpose of the photograph. It is also important to respect the wishes of the pupil, remembering that some pupils do not wish to have their photograph taken or be filmed.
- 24.3. Where photographs are taken by Staff to evidence a child's progress, such photos should only be taken on School devices. Photos cannot be used or passed on outside the School.
- 24.4. Neither Staff nor children should use their own mobile phones or any other personal device to take or store photographs.

## **25. FRAUD & THEFT**

- 25.1. Staff must not use their position to obtain gain for themselves, business associates, friends or family either directly or indirectly. The Scheme of Delegation clearly details the decision-making powers each level of leadership has within the Group and this must be followed at all times. Senior leaders and staff involved in financial decisions in the Group must use public funds responsibly and lawfully. They must work to ensure that the Group and its schools use their resources prudently and within the law. The Group's Scheme of Delegation and Financial Procedures and Regulations must be observed, alongside other legal and statutory requirements.
- 25.2. Defrauding and stealing (or attempting to do so) from the Group, its schools or any person / organisation in any way will not be tolerated. This includes deliberate falsification of claims (e.g. time sheets, mileage and travel/subsistence allowances) with the intention of obtaining payment. Theft is a criminal offence and allegations of theft will be investigated under the Group's Disciplinary Policy, potentially as an allegation of gross misconduct, which can result in dismissal. Staff must report genuine concerns relating to potential fraud, theft or unethical behaviour to the Head, Chief People Officer, Chief Operating Officer or CEO. Further details are contained in the Whistleblowing Policy.
- 25.3. Any secondary employment (including voluntary work) undertaken must not conflict with the Group or school's interests or bring it into disrepute. It must not interfere with the proper performance of a staff member's duties and must only be undertaken outside the employee's working hours and in line with their contract of employment. In such a case, it is the responsibility of the individual to ensure they meet with all the appropriate taxation, insurance and Working Time Regulations associated with being self-employed / an employee of another organisation.
- 25.4. Employees are expected to declare any other paid or voluntary work with their Head (or Chief People Officer for centrally employed staff) prior to taking it up. It is also recognised that for some staff, their substantive employment may be in another organisation and their secondary employment is with the Group. They must declare their substantive employment and ensure their combined work meets the requirements of the Working Time Regulations.

## **26. CONCERNS OR COMPLAINTS**

- 26.1. The School aims to create an atmosphere in which a diverse range of people can work together openly in the spirit of mutual respect and trust

towards a common purpose. Nevertheless, we recognise that it is possible for misunderstandings and disagreements to arise or for mistakes to occur.

26.2. Staff Complaints

Complaints should be dealt with immediately and openly and Staff should try to resolve issues informally in the first instance. If this approach is impractical or unsuccessful, Staff may wish to raise their concerns more formally in accordance with the School's Grievance Procedure or Whistleblowing Procedure, depending upon the nature of the concern.

26.3. Parental Complaints

Staff must ensure that parental complaints are dealt with in accordance with the School's Complaints Policy.

## **27. SAFEGUARDING**

- 27.1. For procedures for dealing with concerns or allegations about a child or disclosures / allegations of abuse, Staff should refer to the School's Safeguarding and Child Protection Policy.

## **28. LOW-LEVEL CONCERNS**

- 28.1. As part of our whole school approach to safeguarding, we promote an open and transparent culture in which all concerns about adults working in or on behalf of the School are dealt with promptly and appropriately. This includes any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt'-- that an adult working in or on behalf of the School may have acted in a way that:
- is inconsistent with this Staff Code of Conduct, including inappropriate conduct outside of work; and
  - does not meet the harm threshold set out in Part 4 of the statutory guidance, Keeping Children Safe in Education (September 2025) (KCSIE), or is otherwise not serious enough to consider a referral to the LADO.
- 28.2. Such allegations or concerns are referred to as "low-level concerns" within KCSIE. The term "low-level" does not mean that it is insignificant. Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.
- 28.3. In order to create and embed a culture of openness, trust and transparency in which the School's values and expected behaviour set out in this Staff Code of Conduct are lived, monitored and reinforced constantly by all staff, it is vital that any such low-level concerns are shared in accordance with the School's Low Level Concerns Policy.
- 28.4. Any questions regarding low-level concerns and/or the procedure for reporting them should be raised with the DSL and/or Head

## **29. REFERENCES**

This code of conduct has been informed by:

DfE statutory guidance: 'Keeping children safe in education' (September 2025)



Guidance for safer working practice for those working with children and young people in education settings: Safer Recruitment Consortium (February 2022)  
HM Gov guidance: 'Working together to safeguard children' (2023),  
DfE Statutory Guidance Prevent duty guidance: England and Wales (2023)  
DfE: Teachers' Standards (June 2013)  
The Sexual Offences Act (2003)

### **30. APPENDICES**

Appendix 1: Working with Pupils One-to-One  
Appendix 2: Staff with children within the School  
Appendix 3: Monitoring Changing Areas  
Appendix 4: Staff Dress Code

## APPENDIX 1: WORKING WITH PUPILS ONE TO ONE

- Staff working in one-to-one situations with children and young people present a higher level of safeguarding risk. Teachers and others should recognise this possibility and plan and conduct such meetings in accordance with the guidance detailed below. Every attempt should be made to ensure the safety and security needs of both staff and pupils.
- Working or dealing with pupils one to one requires additional safeguards to be in place as staff are more vulnerable to unfounded or malicious allegations being made against them. One to one situations also have the potential to make the child more vulnerable to harm by those who seek to exploit their position of trust. Every attempt should be made to always ensure the safety and security needs of both staff and pupils.
- Members of staff teaching one pupil or conducting a one-to-one meeting with a pupil for any reason should take particular care in the following ways
  - do not arrange meetings with pupils in remote, secluded areas of school.
  - use a room that has a viewing panel in the door so the occupants can be seen easily, and/or keep the door open;
  - all window blinds should be up;
  - ensure a colleague knows that the lesson/meeting is taking place;
  - arrange the meeting during normal school hours when there are plenty of other people about;
  - not continue the meeting for any longer than is necessary to achieve its purpose;
  - not sit or stand in very close proximity to the pupil, except as necessary to check work;
  - avoid all unnecessary physical contact and apologise immediately if there is accidental physical contact;
  - avoid any conduct, language or humour that could be interpreted as over familiar or a sexual advance;
  - report immediately via the low level concerns system anything which causes concern, could be misinterpreted or any situation where a pupil becomes distressed, anxious or angry;
  - report any safeguarding concerns about a child to the DSL in accordance with the Safeguarding and Child Protection Policy.
- In the case of individual music lessons with Visiting Music Teachers (VMTs), the Music Administrator or Director of Music should ensure that all the VMTs have read and understood this Code of Conduct, particularly in relation to physical contact .
- Some pupils may be reluctant to end the pupil-staff relationship they have enjoyed whilst at school. When a pupil leaves school the professional duty of care ends however, it is important to continue to maintain professional standards of behaviour.
- Although current and former pupils may request meetings with staff for help with university applications, gap year advice or references for future careers, these meetings and any associated correspondence should be conducted at school within office hours and in a professional manner.

## APPENDIX 2: STAFF WITH CHILDREN WITHIN THE SCHOOL

The Group recognises that staff who have children within the Schools combine their professional role with that of being a parent, and for most this will be a rewarding, enjoyable and unproblematic experience. However, staff who are parents of current pupils should also be aware they may find themselves in positions where their professional responsibilities are at odds with that of being a school parent (possibly during social occasions involving their child and other Thomas's children and their parents).

- As a general rule, staff should try to avoid situations where it may prove awkward or difficult for them and subsequently compromise their ability to conduct their professional role within school. Where possible, avoiding discussions pertaining to school matters is sensible or situations where you may feel compromised.
- Parents should be politely encouraged to address all school matters through the appropriate channels rather than seeking any private counsel or opinion from the member of staff in an informal setting, thereby placing them in a difficult position.
- Staff are reminded that Thomas's friends of their child will view them both as parent and a member of school staff; as such, it is important for the member of staff to follow the same safeguarding protocols they would adopt with any other Thomas's pupils and not allow the relationship to become informal despite their child's friendship.
- It is good practice and expected that any member of staff who has attended a private social event involving Thomas's pupils or parents, has invited pupils to their home through their children or has attended the home of a parent to alert the school to this through the Low Level Concerns form. This is to ensure transparency and protect the member of staff in such matters and avoids the need for any declaration at a later date.
- While it is natural for staff who are parents to become friendly with parents of their children's peer group, the Group would advise staff not to engage through social media channels while these parents have any children at the school. It is advisable that membership of parent WhatsApp groups (or other online chat groups) are left to the non-staff parent.
- It is helpful for school matters involving the child of a staff member to always be dealt with through formal school channels; it may be helpful where possible – though not essential – that matters are raised by the non-staff parent. No member of staff should ever intervene or act on behalf of their child in any pastoral or academic matter without following the appropriate school procedures.
- Staff will at times be aware of or have access to information that relates to their own child and should exercise discretion in this situation. Where information relates to other pupils, they must be extremely careful to ensure that no confidential or sensitive material is compromised to their child. Should this occur, it is essential the incident is flagged to Head.
- Should any member of staff have concerns over how best to manage this situation, they should speak with the Head.

## APPENDIX 3: MONITORING CHANGING AREAS

- Pupils are entitled to respect and privacy at all times, and especially when in a state of undress, including when changing, toileting and showering.
- However, there also needs to be supervision which is appropriate to the needs and age of the pupils concerned to ensure health and safety and to ensure that poor behaviour does not occur.
- The following general guidelines should be observed by staff:
  - To avoid any visually intrusive behaviour;
  - To knock and announce the intention to enter the changing area if supervision is required;
  - To consider the necessary level of supervision and only remain in the room when pupils' needs require this;
  - To only assist with intimate or personal care tasks which the pupil is unable to undertake independently;
  - To never change in the presence or sight of pupils;
  - To never use pupils' toilets or shower with pupils;
  - To ensure that when using external facilities for sport or other trips, time spent in shared public changing rooms or toilets is kept to a minimum. Staff/pupil use of such facilities should be deliberately staggered so as not to coincide.
- For pupils in Reception to Year 2 staff may remain in changing areas as younger pupils need a greater level of supervision and it is more likely they will need some help to dress and/or undress. However, staff must still respect the privacy of pupils and only assist if a pupil is unable to complete a personal task independently.
- For pupils in Years 3 to 6 staff should place themselves at the entrance to the changing area. If a member of staff needs to enter a changing area when pupils are changing for swimming or PE, this should only be to ensure safety or address a genuine concern about a pupil's welfare. Wherever possible there should be a minimum of two members of staff supervising.
- In Years 7 and above, staff should place themselves outside the changing area and should only enter the changing rooms, toilets or shower areas in an emergency or when addressing genuine concerns about a child's safety or welfare, or where there is reasonable suspicion of a breach of school discipline. Wherever possible, there should be a minimum of two members of staff supervising.
- In line with agreed pupil management procedures, it is acceptable for senior staff, duty staff, or staff with specific responsibility for a changing area (e.g. PE/games coaches), to periodically check changing areas or washrooms to confirm that they are being used/occupied appropriately.
- 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 they should report this as a low level concern as soon as possible and, if appropriate, a record placed on the child's file.

## **APPENDIX 4: STAFF DRESS CODE**

The Schools regularly receive visits from parents, potential parents and others and naturally wish to convey an impression of efficiency and professionalism. Therefore, whilst not wishing to impose unreasonable obligations, members of staff are nonetheless required to look smart in appearance.

### **AIMS**

- For the members of staff of Thomas's to dress in a manner befitting the highest standards of the teaching profession and set an example to pupils and command the respect of parents and pupils alike.
- For dress to meet the expectations of common sense and the good opinion of the Senior Leadership Team and the Head.
- For teachers to be aware that older children especially follow the examples of members of staff and therefore to act as appropriate role models.

### **EQUALITY AND DIVERSITY**

Thomas's London Day Schools recognises the diversity of cultures, religions and disabilities and the individual circumstances of our employees and the value this brings. We also recognise that there are some situations where a sensitive and/or temporary adjustment to dress code requirements may be needed (e.g., pregnancy, menopause, broken limb). Priority will be given to health and safety considerations and risk assessments will be completed as appropriate involving the individuals concerned.

### **DRESS CODE**

The following guidelines should be observed:

- Trousers should be smart. Jeans style trousers, leggings and trousers with studs that are visible are not permitted.
- Denim of any colour should not be worn.
- Clothes should not be revealing, either around the cleavage or midriff. Dresses, skirts and shorts should not be overly short. Vest type or spaghetti strap tops or see-through fabrics are not appropriate.
- Clothing with motifs, logos or slogans are not allowed.
- All clothes should be in good repair with no rips.
- Appropriate footwear should be worn at all times. This means that trainers should only be worn with sport's kit. Flip-flops and other casual footwear should not be worn (e.g. Birkenstocks or Ugg boots).
- For formal occasions, such as Open Day, Parents' Evenings, school photographs etc more formal dress should be worn. Suits, tailored suit trousers, skirts or dresses are recommended, but trousers such as chinos may be worn as long as they are accompanied by a blazer/jacket and, on such occasions and where relevant, worn with a collared shirt and tie.
- For those involved in teaching Games, it is acceptable for kit to be worn all day. However, it is important that this should be smart. On these occasions, full Games kit is required, not a mixture of "civvies" and kit. PE Staff and those teaching Games will be provided with Thomas's PE kit.
- Members of classroom staff attending games sessions should dress appropriately and change into/out of professional dress at the first suitable opportunity.

- Staff accompanying trips off-site must dress appropriately. As a guide jeans may be worn for field trips, farm visits etc when the pupils wear PE kit or home clothes. For visits to theatres, galleries and museums etc., where the pupils are required to wear their normal uniform the above dress code applies.
- Staff should have regard to their professional appearance with regards to hair styles and colour, facial hair, piercings and tattoos. It is up to the discretion of the Head as to what tattoos and piercings are allowed to be obvious during the school day.

### ***Staff Badges***

- All members of staff should consistently wear a lanyard with ID or named kit (PE, Maintenance etc). However, for security, any ID should be removed when not on site.

### ***Thomas's jackets***

- Staff may be issued with a red or navy Thomas's jacket for use at playtimes, on trips or outdoor learning sessions. These remain the property of the school so must be signed for and returned once your employment with Thomas's ends.

### ***Yellow fluorescent jackets***

- Staff in te prep schools must wear a Thomas's reflective jacket when on duty at playtimes outside and when accompanying the children off site, including walking to church, games and on trips.

### ***Thomas's branded clothing***

- While it is practical for some members of staff to wear Thomas's branded clothing, for example PE kit, on their commute to and from work, teachers should be aware that at times it may not be appropriate to publicise your place of employment and change accordingly.
- If attending a venue outside school hours, for example a restaurant or a pub, members of staff should not wear Thomas's branded clothing.
- Staff must return all Thomas's branded clothing at the end of their contract.