

Code of Conduct Policy



Policy Owner:	Lighthouse Multi Academy Trust
Approved/ Ratified:	Pat Hunt
Review Dates:	September 2027

Document Version Control Log

Version	Modification Date	Synopsis of Changes
1.0	September 2025	
2.0	September 2026	Policy re-written due to Trust procedures, rather than Walsall Council.

1. Introduction

The Lighthouse Multi Academy Trust ("the Trust") is committed to creating and maintaining a culture where children are safe, valued, respected and able to thrive. Every adult working within the Trust has a responsibility to safeguard and promote the welfare of children and young people and to model the highest standards of professional conduct.

This Code of Conduct sets out the standards of behaviour and professional practice expected of everyone working for, or on behalf of, the Trust. It establishes clear expectations that support safe working practices, protect children from harm, maintain public confidence in the education profession and safeguard employees from situations that could place them at risk of misunderstanding or false allegation.

The Trust recognises that the majority of staff demonstrate exemplary professionalism every day. This Code is therefore intended to support staff by providing a clear framework for professional decision-making and behaviour rather than simply identifying unacceptable conduct. Where uncertainty exists, employees are expected to seek advice from their line manager or the Designated Safeguarding Lead before acting.

This Code should be read alongside all Trust policies, statutory safeguarding guidance and professional standards. Compliance with this Code forms part of every employee's contractual obligations and applies throughout the course of employment, including conduct outside the workplace where that conduct may affect professional suitability or bring the Trust into disrepute.

The principles within this Code apply equally whether staff are working face-to-face, remotely, online, during educational visits, at Trust events or in any other capacity connected with their employment.

The welfare of the child is paramount and must underpin every professional decision made by adults working within the Trust.

For the purposes of this Code, references to *child* or *children* include all pupils attending a Lighthouse Multi Academy Trust academy, including those aged 18 or over where they remain in education.

References to *staff* or *employees* include all individuals working for or on behalf of the Trust in either a paid or voluntary capacity, including agency staff, contractors, consultants, governors, trustees, trainees, apprentices and volunteers.

References to an *allegation* relate to circumstances where it is alleged that an adult working with children has:

- behaved in a way that has harmed a child or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

2. Purpose

The purpose of this Code is to:

- establish clear expectations for professional behaviour;
- promote a culture of safeguarding, integrity and accountability;
- protect pupils from harm;
- protect employees from avoidable allegations or misunderstandings;
- support consistent professional standards across all Trust academies;
- reinforce public confidence in the Trust and the wider education profession;
- ensure compliance with statutory safeguarding responsibilities;
- support an open, transparent and respectful working culture;
- promote ethical decision making that is always centred on the best interests of children.

Nothing within this Code replaces professional judgement. Staff are expected to apply these principles thoughtfully, seek advice where required and always act in a manner that is lawful, proportionate, transparent and capable of professional scrutiny.

3. Scope

This Code applies to everyone working for or on behalf of Lighthouse Multi Academy Trust including:

- all permanent employees;
- fixed-term employees;
- part-time employees;
- agency workers;
- supply staff;
- volunteers;
- trainee teachers;
- apprentices;
- contractors working directly with children;
- governors;
- trustees;
- members;
- central Trust employees;
- consultants engaged by the Trust.

Individuals working on behalf of external organisations are expected to comply with their employer's Code of Conduct while also adhering to the safeguarding expectations, policies and procedures of Lighthouse Multi Academy Trust whenever undertaking work within a Trust setting.

4. Our Values and Professional Expectations

Every employee contributes to the culture of the Trust. Professional conduct is not simply demonstrated through compliance with policies, but through everyday behaviours, attitudes and relationships.

All staff are expected to demonstrate:

Integrity

Act honestly, ethically and consistently in all professional matters. Staff must never misuse their position, influence or access to information for personal gain or to benefit another person.

Respect

Treat every pupil, colleague, parent, volunteer and visitor with dignity, fairness and professionalism. Differences should be respected and discrimination, bullying, harassment or victimisation will not be tolerated.

Accountability

Accept responsibility for professional decisions, actions and omissions. Staff are expected to be open to challenge, reflective in practice and willing to learn from mistakes.

Transparency

Work openly and professionally. Decisions should be capable of independent scrutiny and staff should avoid situations that could reasonably give rise to concerns about impartiality or professional judgement.

Professional Curiosity

Maintain an attitude of respectful challenge and professional curiosity. Staff should not make assumptions where concerns exist and must remain vigilant to indicators that a child may require help or protection.

Child-Centred Practice

Every decision should consider what is in the best interests of the child. Safeguarding responsibilities must take precedence over organisational convenience, personal relationships or competing priorities.

5. Underpinning Principles

This Code is underpinned by the Nolan Principles of Public Life:

- Selflessness
- Integrity
- Objectivity
- Accountability
- Openness
- Honesty
- Leadership

In addition, the Trust expects every employee to:

- safeguard and promote the welfare of children;
- maintain appropriate professional boundaries;
- demonstrate exemplary personal and professional conduct;
- contribute positively to an open safeguarding culture;
- report concerns promptly;
- work, and be seen to work, in an open and transparent manner;
- self-report any conduct, action or omission that may reasonably be perceived as inconsistent with this Code;
- seek advice promptly where professional judgement is required or where uncertainty exists;
- recognise that deliberately false or malicious allegations are rare and should never discourage the reporting of genuine concerns
- challenge poor practice appropriately;
- support colleagues while maintaining professional accountability;
- comply with Trust policies and statutory guidance;
- maintain confidentiality appropriately while recognising that safeguarding concerns must always be shared on a need-to-know basis;
- recognise that public confidence in education depends upon the conduct of every employee.

Staff should understand that professional behaviour extends beyond the working day. Conduct outside work, including online activity and personal relationships where these may affect professional suitability, may be considered under this Code where appropriate.

6. Safeguarding Responsibilities

6.1 Safeguarding is Everyone's Responsibility

Safeguarding and promoting the welfare of children is the responsibility of every adult working for or on behalf of Lighthouse Multi Academy Trust. Every member of staff has a duty to protect children from harm, identify concerns at the earliest opportunity and take prompt, appropriate action to ensure children receive the support and protection they need.

The Trust is committed to maintaining a culture where safeguarding is embedded within every aspect of school life. Safeguarding is not solely the responsibility of the Designated Safeguarding Lead (DSL) or senior leaders; it is a shared responsibility that underpins every role across the Trust.

Every employee must:

- place the welfare and best interests of children above all other considerations;
- maintain a child-centred approach in all aspects of their work;
- remain vigilant to signs that a child may be experiencing abuse, neglect, exploitation or harm;

- understand that abuse can occur both within and outside the home, including online;
- understand that safeguarding concerns may arise from a single incident or from a pattern of behaviour;
- recognise that some children may require additional support due to vulnerability, protected characteristics or individual circumstances;
- contribute to creating an environment where children feel safe, respected, listened to and able to seek help.

Safeguarding responsibilities continue during educational visits, off-site activities, remote learning, online engagement and any activity undertaken on behalf of the Trust.

6.2 Professional Responsibility

All employees are expected to understand and comply with statutory safeguarding guidance, Trust safeguarding policies and local safeguarding procedures.

Staff must:

- read and understand Part One of *Keeping Children Safe in Education* (or Annex A where appropriate);
- complete all safeguarding and child protection training required by the Trust;
- participate in regular safeguarding updates;
- understand the identity and role of the Designated Safeguarding Lead and Deputy DSLs;
- understand reporting procedures within their academy;
- self-report any conduct, action or omission that may reasonably be perceived as inconsistent with this Code
- work, and be seen to work, in an open and transparent manner
- cooperate fully with safeguarding enquiries, investigations and multi-agency working.

Failure to fulfil safeguarding responsibilities may constitute misconduct and may result in disciplinary action.

6.3 Professional Curiosity

Professional curiosity is an essential safeguarding responsibility.

Employees should remain professionally curious where something does not appear right, where information is inconsistent or where a child's presentation, behaviour or circumstances give rise to concern.

Staff should:

- ask appropriate professional questions;
- respectfully challenge where necessary;
- seek clarification when information appears inconsistent;
- avoid making assumptions;
- remain alert to cumulative concerns;
- record and report concerns even where uncertainty exists.

Employees should never assume that another member of staff has reported a concern.

Where in doubt, staff must always seek advice from the Designated Safeguarding Lead.

6.4 Early Identification and Early Help

Children should receive support as soon as concerns emerge.

Employees should recognise that early identification of need can significantly improve outcomes for children and families.

Staff are expected to:

- identify emerging concerns;
- recognise indicators of vulnerability;
- understand the importance of early intervention;
- contribute to assessments where requested;
- support Early Help and Family Help processes where appropriate;
- work collaboratively with other professionals to promote positive outcomes.

The Trust expects all staff to recognise that safeguarding is a continuum and that intervention should not be delayed until concerns become severe.

6.5 Duty to Report Concerns

Every employee has a personal responsibility to report concerns about the welfare or safety of a child immediately.

Concerns must never be ignored, minimised or investigated independently by staff unless specifically authorised to do so.

Employees must:

- report concerns without delay to the Designated Safeguarding Lead or Deputy DSL;
- follow Trust safeguarding procedures;
- make accurate, factual and timely written records;
- continue to report concerns where they believe a child remains at risk;
- escalate concerns where they believe appropriate action has not been taken.

The Trust recognises that safeguarding concerns may develop over time. Staff should therefore report all concerns, regardless of whether they appear significant in isolation.

6.6 Recording Safeguarding Concerns

Safeguarding records must be:

- factual;
- objective;
- contemporaneous wherever possible;
- accurate;
- signed or attributable;
- stored securely in accordance with Trust procedures.

Employees must clearly distinguish between:

- observed facts;
- professional observations;
- direct disclosures;
- information provided by others;
- professional opinion.

Records should never contain personal assumptions, speculation or unsubstantiated conclusions.

6.7 Working with the Designated Safeguarding Lead

Employees must work openly and collaboratively with the Designated Safeguarding Lead.

Staff should:

- seek advice whenever unsure;
- provide relevant information promptly;
- support safeguarding investigations where requested;
- maintain appropriate confidentiality;
- attend safeguarding meetings where required;
- implement safeguarding actions agreed for children they support.

Safeguarding is most effective where information is shared appropriately and professionals work collaboratively.

6.8 Low-Level Concerns

Lighthouse Multi Academy Trust is committed to creating an open, transparent and self-reflective safeguarding culture.

Employees are expected to report concerns about the behaviour or conduct of adults working within the Trust, including concerns that do not meet the harm threshold.

A low-level concern is any behaviour by an adult that:

- is inconsistent with this Code of Conduct;
- falls below expected professional standards;
- may create a sense of unease regarding professional boundaries;
- could undermine confidence in the individual's suitability to work with children;
- may indicate emerging patterns of behaviour if viewed alongside other concerns.

Employees should never dismiss concerns because they appear minor or isolated.

Reporting low-level concerns is intended to:

- protect children;
- protect staff;
- identify patterns of behaviour;
- promote professional accountability;
- support early intervention where appropriate.

All low-level concerns will be managed fairly, proportionately and in accordance with Trust procedures.

6.9 Allegations and Serious Concerns

Where concerns indicate that an adult may have:

- harmed a child;
- committed a criminal offence against or relating to a child;
- behaved in a manner indicating they may pose a risk to children; or
- behaved in a way that indicates they may not be suitable to work with children,

the matter will be managed in accordance with statutory guidance and the Trust's Managing Allegations Against Staff procedures.

Employees must cooperate fully with any safeguarding investigation and must not discuss allegations with colleagues, pupils, parents or members of the public unless authorised to do so.

6.10 Whistleblowing

The Trust is committed to fostering a culture in which employees feel confident to raise genuine concerns.

Employees have a professional duty to challenge unsafe practice and to report concerns where they believe:

- children may be at risk;

- safeguarding procedures are not being followed;
- professional standards are being compromised;
- unlawful or unethical practice has occurred;
- concerns have not been appropriately addressed.

No employee will suffer detriment for raising a genuine safeguarding concern in good faith.

Where staff believe concerns have not been addressed appropriately within the Trust, they should follow the Trust's Whistleblowing Policy and may refer concerns to the appropriate external authority where necessary.

6.11 Professional Judgement

This Code cannot anticipate every circumstance employees may encounter.

Where no specific guidance exists, staff must ask themselves:

- Is my decision in the best interests of the child?
- Is it lawful?
- Is it proportionate?
- Would I be comfortable explaining my actions to parents, colleagues, governors or inspectors?
- Would I be comfortable if my actions were scrutinised publicly?
- Does this maintain appropriate professional boundaries?
- Have I sought advice where appropriate?

If uncertainty remains, employees must seek advice before acting.

Professional judgement should always be informed by safeguarding principles, professional standards and the values of Lighthouse Multi Academy Trust.

6.12 Self-Reporting

Employees are expected to report their own actions or omissions where they believe these may have fallen below the standards expected within this Code or may reasonably be capable of being misunderstood.

Early self-reporting demonstrates professionalism, integrity and accountability and enables the Trust to provide appropriate support, advice and, where necessary, safeguarding oversight.

Employees should never attempt to conceal incidents or hope that concerns will not be identified. Openness and honesty will always be taken into account when concerns are considered.

7. Professional Conduct and Standards of Behaviour

7.1 Professional Expectations

Employees of Lighthouse Multi Academy Trust occupy positions of trust and influence. The Trust expects all employees to demonstrate the highest standards of personal and professional conduct at all times. The behaviour of every employee contributes to the culture, reputation and effectiveness of the Trust and directly influences the confidence that pupils, parents, colleagues and the wider community place in our academies.

Professional conduct extends beyond compliance with policies. Employees are expected to demonstrate sound judgement, integrity, honesty and professionalism in every aspect of their work and to act in a manner that reflects the Trust's values.

All staff are expected to:

- demonstrate honesty, integrity and professionalism;
- act with fairness, impartiality and objectivity;
- treat all individuals with dignity, courtesy and respect;
- promote a positive, inclusive and respectful working environment;

- exercise good judgement in all professional decisions;
- accept responsibility and accountability for their actions;
- maintain appropriate professional standards both within and outside the workplace;
- comply with all Trust policies, procedures and statutory guidance;
- model the behaviour expected of pupils.

Employees should recognise that they are role models for children and young people and that their conduct should inspire confidence and respect.

Employees must not:

- use sarcasm intended to humiliate or demean a child;
- ridicule, embarrass or publicly shame pupils;
- use degrading or humiliating sanctions;
- engage in horseplay, rough play or practical jokes with pupils;
- shout aggressively at pupils except where necessary to prevent immediate harm or ensure safety.

7.2 Maintaining Public Trust

Education is a profession founded upon public confidence. Employees are expected to maintain that confidence through exemplary conduct.

Staff must ensure that their behaviour does not:

- undermine confidence in their professional judgement;
- damage the reputation of the Trust;
- bring the education profession into disrepute;
- compromise safeguarding arrangements;
- diminish public confidence in children's services.

The Trust recognises that employees have private lives; however, where personal conduct has the potential to affect professional suitability, safeguarding, public confidence or the reputation of the Trust, it may be considered under this Code and other Trust procedures.

Employees should understand that conduct outside working hours, including online activity and behaviour in the local community, may be relevant where it impacts upon their professional role.

7.3 Respect, Equality and Inclusion

Lighthouse Multi Academy Trust is committed to fostering a culture where everyone is treated fairly, with dignity and respect.

Employees must:

- promote equality of opportunity;
- value diversity;
- challenge discriminatory attitudes and behaviour;
- contribute to an inclusive working and learning environment;
- respect the protected characteristics identified within the Equality Act 2010;
- ensure that pupils, families, colleagues and visitors are treated fairly regardless of age, disability, sex, gender reassignment, race, religion or belief, sexual orientation, pregnancy or maternity, marriage or civil partnership.

Discrimination, harassment, victimisation, bullying, intimidation or abusive behaviour will not be tolerated under any circumstances.

Employees should actively promote positive relationships and challenge language or behaviour that undermines dignity or inclusion.

7.4 Professional Relationships

Positive professional relationships are fundamental to an effective organisation.

Employees are expected to:

- work collaboratively with colleagues;
- communicate honestly and respectfully;
- value the contribution of others;
- resolve disagreements professionally;
- support a culture of openness and constructive challenge;
- demonstrate courtesy and professionalism in all communications.

Professional disagreement is entirely appropriate where it supports better outcomes for children. Such discussions should always remain respectful, evidence-informed and focused on improving practice.

Employees must never use their position to intimidate, bully, manipulate or undermine colleagues.

7.5 Personal Responsibility

Every employee is personally responsible for maintaining professional standards.

Staff should:

- recognise the limits of their own competence;
- seek advice where appropriate;
- participate in professional development;
- reflect upon their own practice;
- acknowledge mistakes honestly;
- report concerns promptly;
- cooperate with investigations;
- contribute positively to safeguarding and school improvement.

Employees must not knowingly ignore poor practice, unsafe behaviour or breaches of Trust policy.

7.6 Dress and Appearance

Employees should present themselves in a manner that reflects the professional nature of their role.

Dress and personal appearance should:

- promote confidence and professionalism;
- be appropriate to the duties being undertaken;
- support safe working practices;
- respect the diverse nature of the Trust community;
- avoid causing offence or unnecessary distraction;
- maintain appropriate professional boundaries.

Clothing should not:

- be excessively revealing;
- display offensive, discriminatory or inappropriate language or images;

- promote political organisations or extremist views;
- compromise health and safety requirements.

Where specialist clothing or personal protective equipment is required, employees must comply with Trust requirements.

The Trust recognises and respects cultural and religious dress requirements where these can be accommodated safely and appropriately. Employees must follow the Trust Dress Code Policy.

7.7 Language and Behaviour

Employees should communicate respectfully and professionally at all times.

Staff must not:

- use abusive, offensive or discriminatory language;
- humiliate, ridicule or belittle others;
- shout aggressively or use threatening behaviour;
- engage in inappropriate humour;
- use sarcasm intended to embarrass or undermine;
- make inappropriate personal comments about pupils, parents or colleagues.

Employees should remain calm, measured and professional, particularly when managing difficult situations.

Children learn from the behaviour they observe. Staff should therefore model respectful communication at all times.

7.8 Conduct Outside the Workplace

The Trust recognises that employees have private lives. However, employees remain ambassadors for Lighthouse Multi Academy Trust and their conduct outside work may affect public confidence in the Trust and their professional suitability.

Employees are expected to avoid behaviour that:

- could undermine confidence in their professional judgement;
- calls into question their suitability to work with children;
- damages relationships within the Trust community;
- brings the Trust or education profession into disrepute.

Examples may include:

- criminal behaviour;
- abusive or threatening conduct;
- discriminatory behaviour;
- inappropriate social media activity;
- conduct resulting in significant adverse publicity;
- behaviour inconsistent with safeguarding responsibilities.

The Trust will always consider the specific circumstances of any matter, balancing employees' right to a private life with its duty to safeguard children and maintain public confidence.

7.9 Criminal Investigations, Cautions and Convictions

Employees have a continuing duty to disclose matters that may affect their suitability to work with children or their employment within the Trust.

Staff must inform the Headteacher, Chief Executive Officer or designated senior leader without delay if they:

- are arrested for an offence relevant to their role;
- are charged with a criminal offence;
- receive a police caution;
- are convicted of a criminal offence;
- become subject to a court order or other legal restriction;
- become subject to any professional investigation or sanction by a regulatory body.

Disclosure does not automatically affect employment. Each matter will be considered individually, taking account of safeguarding, legal obligations, the nature of the offence, relevance to the role and any associated risk.

Failure to disclose relevant information may itself constitute misconduct.

7.10 Fitness for Work

Employees have a responsibility to ensure they are fit to undertake their duties safely and effectively.

Staff must:

- attend work physically and mentally fit to perform their role;
- comply with health and safety requirements;
- take reasonable care of their own health and wellbeing;
- consider the impact of fatigue arising from additional employment;
- inform their line manager where a medical condition or prescribed medication may affect their ability to undertake their duties safely.

Employees must never attend work whilst impaired through alcohol, illegal drugs, misuse of prescription medication or any other substance that may compromise judgement, safeguarding or safety.

The Trust will provide appropriate support where employees seek assistance for health or dependency issues, whilst maintaining its overriding duty to safeguard children.

7.11 Leadership Responsibilities

Leaders at every level have additional responsibilities to model exemplary conduct and establish a culture of integrity, openness and safeguarding.

Leaders are expected to:

- model the highest professional standards;
- promote a positive safeguarding culture;
- address poor conduct promptly and fairly;
- encourage professional curiosity and constructive challenge;
- support staff wellbeing whilst maintaining accountability;
- ensure concerns are addressed consistently;
- make decisions that are transparent, objective and capable of scrutiny.

Leadership behaviour sets the tone for organisational culture. Leaders are therefore expected to demonstrate the values and standards described within this Code consistently and visibly.

8. Professional Boundaries, Relationships, Conflicts of Interest and Professional Integrity

8.1 Professional Boundaries

Employees of Lighthouse Multi Academy Trust occupy positions of trust and authority. Pupils, parents, carers and colleagues are entitled to expect that these positions will always be exercised professionally, ethically and in the best interests of children.

Professional boundaries exist to:

- safeguard children and vulnerable adults;
- protect employees from misunderstandings or allegations;
- maintain public confidence in the Trust;
- promote safe and effective working relationships;
- ensure that decisions remain fair, transparent and objective.

Employees are expected to maintain clear and appropriate professional boundaries at all times, recognising that boundaries apply equally within the workplace, during educational visits, online, through social media, remote learning and outside normal working hours where professional relationships continue.

Staff must never exploit their position, authority, knowledge or access to information for personal benefit or the benefit of another person.

8.2 Positions of Trust

Every adult working within the Trust holds a position of trust.

Employees must recognise that pupils are entitled to safe, consistent and professional relationships with adults and that there is an inherent imbalance of power between staff and pupils.

Employees must therefore:

- always act professionally;
- avoid creating dependency;
- avoid favouritism;
- avoid relationships that blur professional boundaries;
- avoid situations where their conduct could reasonably be misinterpreted;
- ensure that all interactions are capable of public and professional scrutiny.

Staff must never use their position to:

- intimidate;
- coerce;
- manipulate;
- groom;
- exploit;
- influence children for personal benefit;
- pursue inappropriate emotional or personal relationships.

Employees should always consider whether their behaviour could be perceived differently by others, regardless of their own intentions.

8.3 Professional Relationships with Pupils

Positive, supportive relationships with pupils are essential to effective education. These relationships must always remain professional.

Employees should:

- treat every pupil fairly, consistently and with respect;
- maintain appropriate professional distance;
- encourage independence rather than dependency;
- communicate in ways appropriate to the child's age and understanding;
- ensure interactions remain transparent;
- work openly wherever possible.

Employees must not:

- develop exclusive relationships with individual pupils;
- communicate secretly with pupils;
- share personal problems with pupils;
- seek emotional support from pupils;
- exchange personal gifts unless authorised by school procedures;
- initiate unnecessary physical contact;
- meet pupils socially without appropriate approval;
- invite pupils into their home unless this forms part of an authorised arrangement;
- visit pupils' homes outside authorised professional duties;
- give pupils preferential treatment because of personal relationships.

Professional boundaries apply equally after pupils leave the Trust where safeguarding or professional reputation may still be affected.

8.4 Relationships with Parents and Carers

Constructive relationships with parents and carers are essential to supporting children's education.

Employees should:

- communicate professionally;
- maintain appropriate boundaries;
- remain impartial;
- respect confidentiality;
- avoid becoming involved in family disputes;
- avoid conflicts between professional responsibilities and personal relationships.

Employees must not:

- exploit relationships with parents for personal benefit;
- accept inappropriate hospitality or gifts;
- disclose confidential information;
- engage in behaviour that could compromise professional objectivity.

Where personal relationships exist with parents or carers, employees must declare these where they may affect professional judgement or create an actual or perceived conflict of interest.

Employees should recognise that personal gifts may, in some circumstances, be perceived as:

- creating favouritism;
- grooming behaviour;
- an attempt to influence professional judgement; or
- placing inappropriate obligations upon either the employee or the recipient.

Wherever possible, rewards should be provided through established academy systems and should never favour an individual pupil without clear educational justification.

8.5 Relationships with Colleagues

Professional relationships between colleagues should promote trust, mutual respect and accountability.

Employees should:

- support colleagues professionally;
- communicate respectfully;
- challenge unsafe practice appropriately;
- avoid gossip and speculation;
- maintain confidentiality;
- act with honesty and integrity.

Employees must never allow personal friendships or relationships to influence safeguarding decisions, recruitment, disciplinary processes, financial decisions or professional judgement.

8.6 Family Members, Close Personal Relationships and Household Members

The Trust recognises that employees may have family members, partners, household members or close personal associates who:

- work within Lighthouse Multi Academy Trust;
- are employed by partner organisations;
- are governors or trustees;
- are contractors;
- attend one of the Trust's academies as pupils.

Such relationships are not prohibited; however, they have the potential to create actual, potential or perceived conflicts of interest and, in some circumstances, safeguarding risks.

Employees have a duty to declare relevant relationships promptly.

For the purpose of this Code, a close personal relationship includes, but is not limited to:

- spouse or civil partner;
- partner;
- fiancé or fiancée;
- parent;
- child;
- sibling;
- grandparent;
- grandchild;
- aunt, uncle, niece or nephew;
- step-family members;
- household members;
- individuals with whom the employee has a close personal, financial or caring relationship.

The Trust may require additional declarations where relationships could reasonably affect professional judgement.

8.7 Declaration of Relationships

Employees must declare:

- family members employed within the Trust;
- close personal relationships with another employee;
- household members employed by the Trust;
- relatives who are pupils within the Trust;
- relationships with governors or trustees where relevant;
- relationships with contractors or suppliers;
- any relationship that could reasonably give rise to a conflict of interest.

Declarations should be made:

- on appointment;
- whenever circumstances change;
- during annual declarations of interest;
- immediately where a new relationship develops that may affect professional responsibilities.

Failure to declare relevant relationships may constitute misconduct.

8.8 Managing Conflicts of Interest

Employees must ensure that personal interests never influence professional decision making.

A conflict of interest may arise where personal, financial or family interests influence, or could reasonably be perceived to influence, professional judgement.

Employees must declare conflicts relating to:

- recruitment;
- promotion;
- procurement;
- disciplinary matters;
- grievance investigations;
- safeguarding decisions;
- admissions;
- SEND processes;
- complaints;
- financial authorisation;
- contract management;
- appraisal;
- performance management;
- examination processes;
- awarding of contracts;
- school improvement activity.

Transparency is essential.

The existence of a conflict does not necessarily prevent involvement in Trust activities; however, the conflict must be managed appropriately.

8.9 Preferential Treatment

Employees must not provide preferential treatment to any individual because of:

- family relationship;
- friendship;
- previous professional association;
- financial interest;
- social relationship;
- political affiliation;
- personal loyalty;
- community association.

This applies equally to:

- pupils;
- parents;
- employees;
- governors;
- trustees;
- contractors;
- volunteers.

Examples include, but are not limited to:

- giving preferential access to opportunities;
- influencing recruitment decisions;
- altering disciplinary outcomes;
- sharing confidential information;
- providing unauthorised assistance;
- overlooking poor conduct;
- influencing admissions;
- manipulating procurement;
- preferential timetabling;
- inappropriate allocation of resources;
- unfair performance management decisions.

Employees should also avoid creating the appearance of preferential treatment.

Public confidence depends upon decisions being capable of independent scrutiny

8.10 Safeguarding Risk Assessments for Family Relationships

Where family members or close personal associates work within the same academy or across Lighthouse Multi Academy Trust, the Headteacher, Executive Leader or Chief Executive Officer may determine that a documented safeguarding and conflict of interest risk assessment is required.

A risk assessment may be appropriate where relationships could affect:

- safeguarding responsibilities;
- line management;
- supervision;

- recruitment;
- appraisal;
- disciplinary processes;
- grievance investigations;
- financial authorisation;
- procurement;
- payroll;
- examinations;
- admissions;
- complaints;
- access to confidential information;
- decision making involving pupils or staff.

The purpose of the assessment is not to prevent family members working together, but to ensure that appropriate governance, safeguarding and accountability arrangements are in place.

Control measures may include:

- alternative line management arrangements;
- independent decision makers;
- additional oversight;
- separation of financial responsibilities;
- restrictions on access to confidential records;
- independent recruitment panels;
- independent investigation officers;
- enhanced monitoring where appropriate.

Risk assessments will be proportionate, reviewed regularly and amended where circumstances change.

8.11 Recruitment and Selection

Employees involved in recruitment must declare any relationship with an applicant before participating in the recruitment process.

Employees must not:

- shortlist;
- interview;
- appoint;
- influence appointment decisions;

where a conflict exists unless expressly authorised and appropriate safeguards have been implemented.

All recruitment decisions must be demonstrably fair, objective and based solely upon merit.

8.12 Confidential Information

Employees must never use confidential information obtained through their employment to benefit:

- themselves;
- family members;
- friends;

- associates;
- external organisations.

Confidential information must only be accessed where there is a legitimate professional need.

Unauthorised access to records relating to family members, friends or colleagues is a serious breach of professional standards and may constitute gross misconduct.

8.13 Professional Integrity

Professional integrity requires employees to demonstrate honesty, transparency and ethical decision making at all times.

Where an employee is uncertain whether a situation represents a conflict of interest or could compromise professional boundaries, they must seek advice before acting.

The Trust will always support employees who declare potential conflicts openly and at the earliest opportunity.

Failure to declare conflicts, misuse of professional position or deliberate concealment of relevant relationships may result in disciplinary action, including dismissal where appropriate.

9. Technology, Digital Professionalism, Artificial Intelligence and Social Media

9.1 Purpose

Technology plays a vital role in teaching, learning and the effective operation of Lighthouse Multi Academy Trust. Employees are expected to use digital technologies responsibly, securely and professionally, recognising that their online behaviour can have safeguarding, legal and reputational implications.

The same standards of conduct expected in face-to-face interactions apply equally to all digital communications, online platforms and emerging technologies.

Employees must ensure that technology is used in a manner that:

- safeguards children and young people;
- protects confidential information;
- supports effective teaching and learning;
- complies with legal and regulatory requirements;
- maintains public confidence in the Trust;
- reflects the highest standards of professional conduct.

9.2 Professional Use of Technology

Employees are expected to use Trust technology and digital systems responsibly and only for authorised purposes.

Staff must:

- use Trust equipment in accordance with Trust policies;
- protect usernames, passwords and authentication methods;
- lock devices when unattended;
- report lost, stolen or compromised devices immediately;
- take reasonable steps to prevent unauthorised access to information;
- ensure electronic records are accurate, professional and appropriate.

Employees must not:

- bypass Trust security controls;
- install unauthorised software or applications;

- access inappropriate or unlawful material;
- deliberately introduce malicious software;
- use Trust systems for personal commercial activities;
- misuse Trust resources for political campaigning or personal gain.

All use of Trust systems may be monitored in accordance with legislation and Trust policies.

9.3 Digital Communications

Employees should communicate professionally through all electronic means.

This includes:

- email;
- messaging platforms;
- learning platforms;
- video conferencing;
- telephone messaging;
- collaboration software;
- any other digital communication system approved by the Trust.

All communications should be:

- professional;
- respectful;
- accurate;
- appropriate to the recipient;
- capable of disclosure if required.

Employees should assume that electronic communications may become part of an investigation, subject access request, Freedom of Information request (where applicable), safeguarding enquiry or legal proceedings.

Informal communication should never reduce professional standards.

9.4 Communication with Pupils

Communication with pupils must always be transparent, appropriate and undertaken using Trust-approved systems.

Employees must:

- communicate only for legitimate educational or safeguarding purposes;
- use approved Trust communication platforms wherever possible;
- ensure communications are proportionate and professional;
- maintain appropriate records where necessary.

Employees must not:

- communicate with pupils using personal messaging applications;
- exchange personal telephone numbers unless specifically authorised;
- use personal email accounts for communication with pupils;
- engage in secretive or private online conversations;
- communicate outside appropriate times without a legitimate reason;
- establish online relationships that blur professional boundaries.

Where exceptional circumstances require alternative communication methods, these must be authorised by senior leadership and appropriately recorded.

Trust Devices

Wherever reasonably practicable, employees should use Trust-issued devices, systems and equipment when communicating with pupils, recording educational activities or undertaking Trust business.

Personal devices should not routinely be used for:

- photographing pupils;
- recording videos;
- communicating with pupils;
- storing Trust information.

Any exceptional use must be authorised and managed in accordance with Trust procedures.

Professional Use of Images

Employees should ensure that all photographs, videos and recordings:

- support legitimate educational purposes;
- comply with parental consent arrangements;
- are stored securely;
- are retained only for as long as necessary;
- are never uploaded to personal cloud storage or personal social media accounts.

Employees should immediately report any inappropriate images, accidental capture of sensitive material or concerns relating to digital imagery to their line manager or the Designated Safeguarding Lead.

9.5 Communication with Parents and Carers

Employees should use approved communication channels when communicating with parents and carers.

Digital communication should:

- remain courteous and professional;
- relate to legitimate educational matters;
- avoid emotional or confrontational exchanges;
- maintain appropriate boundaries;
- respect confidentiality and data protection requirements.

Employees should avoid using personal social media accounts or private messaging applications to communicate with parents regarding Trust business unless expressly authorised.

9.6 Social Media

The Trust recognises that employees are entitled to participate in social media in their personal lives.

However, employees must recognise that online activity may affect:

- safeguarding;
- professional reputation;
- public confidence;
- relationships within the Trust community;
- their suitability to work with children.

Employees should:

- consider the potential audience for all online content;
- use appropriate privacy settings;
- separate personal and professional identities where possible;
- think carefully before posting comments, images or videos.

Employees must not:

- post confidential information;
- identify pupils without appropriate authority;
- post photographs of pupils using personal accounts;
- engage in online arguments with pupils, parents or colleagues;
- publish material likely to damage the Trust's reputation;
- post discriminatory, offensive or abusive content;
- make comments that undermine safeguarding investigations or disciplinary processes.

Employees remain personally responsible for material they publish online, regardless of privacy settings.

9.7 Relationships Through Social Media

Employees must maintain professional boundaries online.

Employees should not:

- accept friend or follow requests from current pupils on personal social media accounts;
- initiate personal contact with pupils through social networking sites;
- engage in private online conversations with pupils;
- encourage pupils to access personal online profiles.

Where contact through social media occurs unintentionally or arises because of existing family or community relationships, employees should declare this to their line manager where there is any possibility that professional boundaries could be affected.

9.8 Photography, Images and Video Recordings

Images and recordings of pupils are personal data and must be managed responsibly.

Employees must:

- use Trust-approved equipment wherever practicable;
- comply with parental consent arrangements and Trust procedures;
- ensure images are stored securely;
- use images only for authorised educational purposes.

Employees must not:

- use personal mobile phones to routinely photograph pupils;
- retain pupil images on personal devices;
- share images through personal messaging services or social media;
- copy or distribute images without appropriate authority.

Any exceptional use of personal devices must be authorised, justified and managed in accordance with Trust procedures.

9.9 Artificial Intelligence (AI)

The Trust recognises that artificial intelligence technologies are becoming increasingly common within education and may provide valuable opportunities to enhance teaching, administration and professional practice.

Employees may use approved AI technologies where they:

- support educational outcomes;
- improve efficiency;
- comply with legal requirements;
- protect personal data;
- maintain professional standards.

Employees remain personally accountable for all work produced with the assistance of AI.

AI must never replace professional judgement.

Employees must ensure that:

- outputs are reviewed for accuracy;
- information is checked before use;
- decisions affecting children are never based solely upon AI-generated content;
- safeguarding concerns are assessed by appropriately trained professionals;
- confidential information is not entered into public AI systems unless specifically authorised and appropriate safeguards are in place.

The use of AI does not remove an employee's professional responsibilities.

9.10 Data Protection and Confidentiality

Employees are responsible for protecting personal information.

Staff must:

- comply with UK data protection legislation and Trust policies;
- access information only where there is a legitimate professional need;
- ensure information is shared appropriately and lawfully;
- report data breaches immediately;
- dispose of confidential information securely.

Employees must never:

- access records out of curiosity;
- access records relating to family members, friends or colleagues without authority;
- remove confidential information without authorisation;
- share passwords;
- disclose confidential information through insecure communication channels.

Safeguarding information should be shared on a need-to-know basis in accordance with statutory guidance.

9.11 Cyber Security

Every employee contributes to the Trust's cyber security.

Employees should:

- remain vigilant to phishing attempts;

- verify unusual requests for information;
- report suspected cyber incidents immediately;
- complete mandatory cyber security training;
- follow Trust guidance regarding passwords, multi-factor authentication and secure working.

Failure to follow basic cyber security procedures may expose children, employees and the Trust to significant risk.

9.12 Monitoring and Acceptable Use

Employees should have no expectation of complete privacy when using Trust systems for work-related purposes.

The Trust reserves the right to monitor the use of its systems, devices and networks where lawful and proportionate to:

- safeguard children;
- protect Trust information;
- investigate suspected misconduct;
- maintain cyber security;
- comply with legal obligations.

Monitoring will be carried out in accordance with legislation, Trust policies and the principles of fairness, necessity and proportionality.

9.13 Professional Judgement

Technology evolves rapidly and this Code cannot anticipate every new platform or digital tool.

Employees are expected to exercise sound professional judgement before using new technologies and should consider:

- Is this appropriate for my professional role?
- Does this protect children?
- Could this compromise confidentiality?
- Does this maintain professional boundaries?
- Would I be comfortable explaining this use to parents, colleagues, governors or inspectors?
- Does it comply with Trust policies and legal requirements?

Where uncertainty exists, employees must seek advice before using new technologies or digital platforms.

9.14 Home Visits

Home visits should:

- be risk assessed in advance wherever practicable;
- have a clearly identified purpose;
- be authorised by an appropriate leader;
- be recorded appropriately;
- be undertaken in accordance with the Trust's Lone Working and Home Visit procedures.

Employees should avoid situations where they are alone with a child within a private home unless this forms part of an agreed safeguarding or professional arrangement.

10. Confidentiality, Information Sharing, Financial Integrity and Business Interests

10.1 Professional Responsibility

Employees are entrusted with access to information, resources and public funds. This responsibility must be exercised with honesty, integrity and transparency.

All employees are expected to:

- act in the best interests of pupils and the Trust;
- protect confidential information;
- use Trust resources responsibly;
- avoid conflicts between personal interests and professional responsibilities;
- comply with financial procedures and governance requirements;
- declare interests openly and honestly.

Employees must never use their position for personal, financial or professional advantage.

10.2 Confidentiality

During the course of their employment, employees will have access to confidential information relating to pupils, families, colleagues, governors, trustees and the Trust.

Employees must:

- respect the confidentiality of all information obtained through their work;
- access information only where there is a legitimate professional reason;
- store confidential information securely;
- ensure conversations cannot be overheard by unauthorised individuals;
- dispose of confidential material securely;
- continue to maintain confidentiality after employment ends.

Confidential information must never be discussed:

- in public places;
- on social media;
- with family members or friends;
- with colleagues who have no legitimate need to know.

Employees must exercise particular care when working remotely or using mobile technology to ensure confidential information cannot be viewed or overheard by others.

10.3 Information Sharing

The Trust recognises that effective information sharing is essential to safeguarding children and supporting effective education.

Employees should understand that confidentiality is not an absolute duty.

Information should be shared:

- where there is a safeguarding concern;
- where required by law;
- where authorised by Trust procedures;
- where there is another lawful basis for sharing information.

Employees must not refuse to share safeguarding information because of misplaced concerns about confidentiality.

Where uncertainty exists, advice should be sought from the Designated Safeguarding Lead or an appropriate senior leader.

Information shared should always be:

- necessary;
- proportionate;
- relevant;
- accurate;
- timely;
- secure.

10.4 Data Protection

Employees must comply with all data protection legislation and Trust policies relating to the collection, use, storage and disposal of personal information.

Staff must:

- process personal data lawfully, fairly and transparently;
- ensure information is accurate and up to date;
- retain information only for as long as necessary;
- report actual or suspected data breaches immediately;
- complete mandatory data protection training.

Employees must not:

- remove confidential records without authority;
- email personal information using unsecured methods;
- use personal devices where prohibited;
- disclose passwords or security credentials;
- access records without a legitimate business reason.

Unauthorised access to records relating to pupils, family members, colleagues or friends is a serious breach of professional standards and may constitute gross misconduct.

10.5 Records Management

Employees are responsible for ensuring that records created as part of their duties are:

- accurate;
- factual;
- objective;
- timely;
- professional;
- retained in accordance with Trust procedures.

Employees must not:

- alter records inappropriately;
- destroy records without authority;
- falsify documentation;
- create misleading records;
- intentionally omit relevant information.

Trust records may be disclosed during legal proceedings, inspections, complaints, audits or safeguarding investigations and should therefore always be prepared with appropriate care.

10.6 Gifts, Hospitality and Benefits

Employees must not accept gifts, hospitality, rewards or benefits that could influence, or reasonably be perceived to influence, their professional judgement.

Modest expressions of appreciation from pupils or parents may be accepted where they are:

- of low value;
- occasional;
- proportionate;
- consistent with Trust procedures.

Employees must not accept:

- cash or cash equivalents;
- expensive personal gifts;
- hospitality intended to influence decision making;
- gifts linked to procurement or contract decisions;
- repeated gifts that could create an obligation.

Any gift or hospitality above the threshold set by the Trust must be declared and recorded in the Trust's Gifts and Hospitality Register.

Where there is any uncertainty, employees must seek advice before accepting a gift.

10.7 Financial Integrity

Employees are responsible for ensuring that public funds and Trust resources are used properly, efficiently and solely for legitimate Trust purposes.

Employees must:

- comply with financial regulations;
- follow procurement procedures;
- obtain appropriate authorisations;
- declare conflicts of interest;
- protect Trust assets;
- report suspected fraud or financial irregularity immediately.

Employees must not:

- misuse Trust funds;
- falsify financial records;
- authorise expenditure outside delegated authority;
- split purchases to avoid approval limits;
- use Trust resources for personal benefit without authorisation.

The Trust operates a zero-tolerance approach to fraud, bribery, theft, corruption and financial misconduct.

10.8 Procurement and Purchasing

Employees involved in procurement must ensure that all purchasing decisions are:

- fair;

- transparent;
- objective;
- properly authorised;
- capable of independent scrutiny.

Employees must declare any relationship or interest involving:

- suppliers;
- contractors;
- consultants;
- tendering organisations;
- organisations seeking contracts with the Trust.

Employees must withdraw from procurement processes where a conflict of interest exists unless alternative governance arrangements have been formally agreed.

10.9 Bribery and Corruption

Employees must comply with the Trust's Anti-Bribery Policy and all relevant legislation.

Employees must never:

- offer or receive bribes;
- request personal benefits in return for professional decisions;
- influence decisions in exchange for gifts or hospitality;
- misuse their position for financial advantage.

Any suspected bribery, corruption or financial impropriety must be reported immediately.

10.10 Secondary Employment

The Trust recognises that employees may undertake additional employment or self-employment outside their role.

Employees must ensure that secondary employment:

- does not conflict with Trust duties;
- does not affect attendance, performance or wellbeing;
- does not compromise safeguarding responsibilities;
- does not create conflicts of interest;
- does not misuse Trust information or resources.

Employees must notify the Trust where required by contract or Trust policy before commencing secondary employment.

The Trust reserves the right to refuse or place reasonable conditions upon additional employment where there is a legitimate operational, safeguarding or conflict of interest concern.

10.11 Business Interests

Employees must declare any business, commercial or financial interests that may conflict, or appear to conflict, with their duties.

This includes interests involving:

- family businesses;
- consultancy work;
- directorships;

- partnerships;
- charitable organisations where decision-making could be affected;
- companies supplying goods or services to the Trust;
- property or financial interests connected with Trust decisions.

Declarations should be made:

- on appointment;
- annually;
- whenever circumstances change.

The Trust will determine whether any management arrangements are necessary.

10.12 Use of Trust Property and Resources

Trust resources are provided to support education and the effective operation of the organisation.

Employees must:

- use Trust property responsibly;
- protect equipment from damage or misuse;
- report defects promptly;
- return equipment when requested or on leaving employment.

Trust property includes, but is not limited to:

- laptops;
- mobile phones;
- tablets;
- identification badges;
- keys and access cards;
- vehicles;
- teaching resources;
- confidential records;
- software and digital licences.

Employees must not use Trust resources for personal financial gain or unlawful activities.

10.13 Fraud, Theft and Financial Misconduct

The Trust expects the highest standards of honesty.

Any employee who suspects:

- fraud;
- theft;
- financial irregularity;
- procurement malpractice;
- misuse of Trust assets;
- falsification of records;
- corruption;

must report their concerns immediately through the appropriate reporting procedures.

Reports will be investigated fairly, confidentially and proportionately.

Employees who raise genuine concerns in good faith will be supported in accordance with the Trust's Whistleblowing Policy.

10.14 Declaration of Interests

To promote transparency and maintain public confidence, all employees in designated roles—and any other employee required by the Trust—must complete an **Annual Declaration of Interests**.

The declaration should include any:

- financial interests;
- business interests;
- close personal relationships relevant to the Trust;
- governance roles held outside the Trust;
- secondary employment;
- directorships;
- trusteeships;
- relationships with suppliers or contractors;
- other interests that could reasonably be perceived to influence professional judgement.

Employees have an ongoing duty to update their declaration promptly whenever circumstances change.

Failure to disclose a relevant interest may be treated as misconduct and, in serious cases, gross misconduct.

11. Health, Safety, Wellbeing and Fitness for Work

11.1 Purpose

Lighthouse Multi Academy Trust is committed to providing a safe, healthy and supportive environment for pupils, employees, volunteers and visitors.

Health, safety and wellbeing are shared responsibilities. Every employee has a legal and professional duty to take reasonable care of their own health and safety and that of others who may be affected by their actions or omissions.

Maintaining a safe working environment is fundamental to safeguarding children, protecting colleagues and ensuring that the Trust can deliver high-quality education.

11.2 Employee Responsibilities

Employees must:

- take reasonable care of their own health, safety and wellbeing;
- take reasonable care not to endanger others through their actions or omissions;
- comply with all health and safety legislation, Trust policies and local procedures;
- follow reasonable management instructions relating to health and safety;
- use equipment safely and only for its intended purpose;
- report hazards, defects and unsafe practices promptly;
- cooperate with health and safety investigations and audits;
- complete mandatory health and safety training.

Employees must never knowingly place themselves, pupils or colleagues at unnecessary risk.

11.3 Duty of Care

Every employee owes a duty of care to pupils, colleagues and visitors.

This duty includes taking reasonable steps to:

- prevent foreseeable harm;
- supervise pupils appropriately;
- follow safeguarding procedures;
- undertake risk assessments where required;
- respond promptly to accidents or emergencies;
- seek assistance where situations exceed their competence or authority.

Employees must exercise professional judgement when balancing the need to encourage children's independence with the responsibility to protect them from harm.

11.4 Safe Working Practices

Employees are expected to work safely and consistently in accordance with Trust policies.

Staff should:

- follow agreed risk assessments;
- use appropriate personal protective equipment where required;
- maintain safe learning environments;
- report unsafe equipment immediately;
- ensure exits and fire routes remain unobstructed;
- follow emergency procedures;
- supervise pupils appropriately at all times.

Employees must not intentionally ignore or bypass health and safety controls.

11.5 Risk Assessments

Risk assessments play an essential role in protecting pupils, employees and visitors.

Employees responsible for activities, educational visits or specialist areas must ensure that appropriate risk assessments are completed, implemented and reviewed.

Risk assessments should be:

- suitable and sufficient;
- proportionate;
- regularly reviewed;
- amended where circumstances change.

Employees are expected to comply with agreed control measures at all times.

11.6 Educational Visits and Off-Site Activities

Employees involved in educational visits or off-site activities must ensure that appropriate planning, supervision and safeguarding arrangements are in place.

This includes:

- completing required risk assessments;
- following Trust procedures;
- ensuring appropriate staffing ratios;

- maintaining professional boundaries throughout the visit;
- responding appropriately to emergencies;
- ensuring pupils remain appropriately supervised.

The same professional expectations apply away from Trust premises as within school.

11.7 First Aid and Medical Needs

Employees should be familiar with local procedures for responding to illness, accidents and medical emergencies.

Staff must:

- act within the limits of their training;
- seek assistance promptly where required;
- report accidents in accordance with Trust procedures;
- maintain appropriate records.

Employees must not administer medication unless authorised and trained to do so.

11.8 Wellbeing

The Trust recognises that employee wellbeing contributes directly to effective safeguarding, high-quality teaching and positive outcomes for children.

The Trust is committed to fostering a working environment that promotes:

- respect;
- inclusion;
- psychological safety;
- workload management;
- professional support;
- access to appropriate wellbeing resources.

Employees are encouraged to seek support at an early stage where health, wellbeing or personal circumstances begin to affect their work.

Seeking support is viewed as a responsible and professional action.

11.9 Fitness for Work

Employees are expected to present themselves for work in a condition that enables them to perform their duties safely, effectively and professionally.

Employees must:

- be physically and mentally fit to undertake their duties;
- inform their manager where a medical condition may affect their work;
- comply with occupational health recommendations where appropriate;
- notify the Trust where prescribed medication may impair their ability to perform safety-critical duties.

The Trust will consider reasonable adjustments where appropriate and in accordance with its legal obligations.

11.10 Alcohol and Substance Misuse

Employees must not attend work or undertake Trust duties whilst impaired by:

- alcohol;

- illegal drugs;
- psychoactive substances;
- the misuse of prescription medication;
- any substance that may impair judgement, behaviour or professional performance.

Employees must also not:

- consume alcohol during the working day unless specifically authorised for an official Trust event;
- possess or use illegal drugs on Trust premises or during Trust activities;
- permit substance misuse to compromise safeguarding responsibilities.

The Trust recognises that alcohol or drug dependency is a health issue and encourages employees to seek support at the earliest opportunity.

Where an employee voluntarily seeks help, the Trust will seek to provide appropriate support while ensuring that safeguarding responsibilities remain paramount.

However, deliberate breaches of this section, particularly where children are placed at risk, may result in disciplinary action.

11.11 Smoking and Vaping

The Trust is committed to providing a healthy environment for pupils, staff and visitors.

Smoking, vaping and the use of tobacco or nicotine products must comply with Trust policies and relevant legislation.

Employees must not smoke or vape:

- in areas where it is prohibited by law;
- in the presence of pupils;
- during activities where they are responsible for supervising children;
- in Trust vehicles where prohibited.

Employees should recognise that they are role models for children and young people.

11.12 Attendance and Punctuality

Regular attendance and punctuality are essential professional responsibilities.

Employees are expected to:

- attend work reliably;
- arrive punctually;
- comply with absence reporting procedures;
- maintain regular communication during periods of absence where required;
- provide appropriate certification where necessary.

Persistent lateness, unauthorised absence or failure to follow reporting procedures may be managed under the Trust's attendance or disciplinary procedures.

11.13 Violence, Aggression and Personal Safety

The Trust has a zero-tolerance approach to violence, threats, intimidation or abusive behaviour towards employees, pupils or visitors.

Employees should:

- report incidents promptly;

- follow behaviour management procedures;
- seek assistance where personal safety may be compromised;
- avoid placing themselves in situations of unnecessary risk.

Employees should not attempt to manage situations beyond their level of training or authority where doing so could increase the risk of harm.

11.14 Emergency Procedures

Employees must familiarise themselves with local emergency arrangements, including:

- fire evacuation procedures;
- lockdown procedures;
- emergency safeguarding arrangements;
- first aid arrangements;
- critical incident procedures;
- business continuity plans where relevant.

Employees are expected to respond calmly, professionally and in accordance with established procedures during emergencies.

11.15 Reporting Concerns

Employees have a responsibility to report:

- health and safety hazards;
- unsafe working practices;
- accidents and near misses;
- defective equipment;
- risks to pupils or colleagues;
- concerns regarding occupational health and safety.

Concerns should be reported promptly through the appropriate Trust procedures so that appropriate action can be taken.

Employees must never ignore a situation that presents a foreseeable risk of harm.

11.16 Shared Responsibility

Creating and maintaining a safe environment requires the commitment of every employee.

By working collaboratively, following agreed procedures and exercising sound professional judgement, employees contribute to a culture where children, colleagues and visitors can learn and work safely.

The Trust expects all employees to actively support this culture through their everyday actions, decisions and behaviours.

12. Speaking Up, Whistleblowing, Low-Level Concerns and Professional Accountability

12.1 Our Commitment

Lighthouse Multi Academy Trust is committed to fostering a culture of openness, transparency and accountability where employees feel confident to raise concerns without fear of victimisation or reprisal.

The Trust recognises that safeguarding children and maintaining high professional standards depends upon employees being willing to speak up when something does not appear right.

Employees are expected to raise concerns promptly, honestly and professionally, regardless of the seniority or position of the individual concerned.

No employee should ever assume that someone else has already reported a concern.

12.2 Professional Responsibility to Raise Concerns

Every employee has an individual responsibility to report concerns where they believe that:

- a child may be at risk of harm;
- safeguarding procedures are not being followed;
- an employee has behaved inappropriately;
- professional boundaries may have been breached;
- unethical or unlawful conduct has occurred;
- Trust policies are being ignored;
- fraud, corruption or financial misconduct is suspected;
- health and safety may be compromised;
- there is a risk to the reputation or integrity of the Trust.

Employees should act without unreasonable delay.

Failure to report concerns may itself constitute misconduct.

12.3 Low-Level Concerns

The Trust recognises that safeguarding concerns often develop gradually and that seemingly minor incidents may identify emerging patterns of behaviour.

Employees are therefore expected to report any concern, however small, where the behaviour of an adult:

- is inconsistent with this Code of Conduct;
- falls below expected professional standards;
- causes a sense of unease;
- may create uncertainty regarding professional boundaries;
- could reasonably undermine confidence in the individual's suitability to work with children.

Examples may include:

- inappropriate language;
- favouritism towards individual pupils;
- unnecessary private contact with pupils;
- inappropriate use of social media;
- failure to maintain professional boundaries;
- behaviour that appears secretive or unusually defensive;
- repeated disregard for Trust procedures.

A low-level concern does not mean that misconduct has occurred. Reporting allows concerns to be considered objectively, fairly and in context.

The Trust encourages employees to report concerns early so that appropriate support, guidance or intervention can be provided where necessary.

12.4 Self-Reporting

Employees are encouraged to report their own mistakes, errors of judgement or conduct that may fall below expected professional standards.

Self-reporting demonstrates honesty, integrity and professional accountability.

The Trust recognises that:

- individuals may make genuine mistakes;
- openness enables learning;
- early reporting often prevents further risk;
- transparent reporting supports a positive safeguarding culture.

Deliberate concealment or dishonesty is likely to be treated more seriously than an honest error that is reported promptly.

12.5 Whistleblowing

Whistleblowing is the disclosure of information relating to suspected wrongdoing in the public interest.

Employees should use the Trust's Whistleblowing Policy where they reasonably believe that:

- safeguarding arrangements are inadequate;
- unlawful conduct has occurred;
- serious misconduct is taking place;
- financial irregularity or fraud is suspected;
- statutory responsibilities are being ignored;
- children or vulnerable individuals remain at risk;
- concerns have not been appropriately addressed through normal management processes.

Employees who raise genuine concerns in good faith will be supported by the Trust.

Victimisation, intimidation or retaliation against an employee who raises a genuine concern will not be tolerated and may itself constitute misconduct.

12.6 Managing Allegations

Where concerns indicate that an employee or volunteer may have:

- behaved in a way that has harmed a child or may have harmed a child;
- committed a criminal offence against or related to a child;
- behaved towards a child in a manner indicating they may pose a risk of harm; or
- behaved in a way that indicates they may not be suitable to work with children,

the Trust will manage the matter in accordance with statutory guidance, local safeguarding procedures and the Trust's Managing Allegations Policy.

Employees must:

- cooperate fully with investigations;
- maintain confidentiality;
- avoid discussing allegations with colleagues, parents or pupils unless authorised;
- comply with reasonable management instructions throughout the process.

All allegations will be considered fairly, objectively and without prejudgement.

12.7 Confidentiality During Investigations

Employees involved in investigations must maintain strict confidentiality.

Information should only be shared with individuals who have a legitimate professional need to know.

Employees must not:

- speculate about investigations;
- discuss ongoing matters with colleagues;
- share information on social media;
- attempt to influence witnesses;
- interfere with evidence;
- disclose confidential documentation without authority.

Failure to maintain confidentiality may compromise investigations and could result in disciplinary action.

12.8 Duty to Cooperate

Employees are expected to cooperate fully with:

- safeguarding enquiries;
- disciplinary investigations;
- grievance investigations;
- complaints investigations;
- financial investigations;
- external inspections;
- regulatory investigations;
- police enquiries where appropriate.

This includes:

- providing honest information;
- attending meetings when required;
- producing relevant documents;
- preserving evidence;
- following reasonable management instructions.

Knowingly providing false or misleading information during an investigation is likely to constitute gross misconduct.

12.9 Professional Challenge

The Trust encourages constructive professional challenge where this promotes safeguarding, improves practice or strengthens decision making.

Employees should respectfully challenge decisions where they believe:

- children remain at risk;
- safeguarding action is insufficient;
- professional standards are compromised;
- statutory responsibilities are not being met;
- ethical concerns exist.

Challenge should always remain:

- respectful;
- evidence-informed;
- proportionate;
- child-centred;
- solution-focused.

Constructive challenge should never be interpreted as disloyalty.

12.10 Escalating Concerns

If an employee believes that a concern has not been appropriately addressed, they must continue to escalate the matter through the appropriate channels.

This may include:

- the Designated Safeguarding Lead;
- the Headteacher;
- the Chief Executive Officer;
- the Chair of Governors;
- the Chair of Trustees;
- the Trust's Whistleblowing Procedure;
- external safeguarding agencies where appropriate.

Employees should continue to escalate concerns where they reasonably believe that children remain at risk.

12.11 Malicious or Knowingly False Allegations

The Trust recognises that the overwhelming majority of concerns are raised honestly and in good faith.

However, knowingly making false, malicious or vexatious allegations is a serious matter and may result in disciplinary action.

This does not apply where an employee raises a genuine concern that is not subsequently substantiated.

The Trust will distinguish carefully between:

- malicious allegations;
- misunderstandings;
- honest mistakes;
- concerns raised in good faith;
- allegations that cannot be substantiated.

Employees should never be discouraged from reporting genuine concerns because they fear they may be mistaken.

12.12 Learning and Continuous Improvement

The Trust is committed to learning from concerns, complaints, investigations and safeguarding reviews.

Where appropriate, outcomes may lead to:

- changes to policies;
- additional staff training;
- improvements to procedures;
- enhanced supervision;
- revised risk assessments;

- organisational learning across the Trust.

The purpose of learning is to strengthen safeguarding, improve professional practice and reduce the likelihood of similar issues arising in the future.

12.13 Accountability

Professional accountability applies to every employee, regardless of role, seniority or length of service.

Employees are accountable for:

- their decisions;
- their actions;
- their professional judgement;
- their conduct;
- compliance with this Code;
- maintaining the trust placed in them by pupils, families, colleagues and the wider community.

Managers and leaders have additional responsibilities to model exemplary conduct, address concerns promptly and ensure that this Code is applied consistently and fairly.

No employee is exempt from the standards set out in this Code.

12.14 A Culture of Openness

Lighthouse Multi Academy Trust believes that the safest organisations are those in which employees feel confident to speak openly, seek advice, admit mistakes and challenge poor practice.

Every employee has a role in creating this culture.

By raising concerns early, acting with integrity and supporting one another professionally, employees help to ensure that children remain safe, colleagues are supported and the Trust continues to uphold the highest standards of education, safeguarding and public service.

13. Implementation, Compliance, Monitoring and Review

13.1 Commitment

Lighthouse Multi Academy Trust is committed to maintaining the highest standards of professional conduct, safeguarding and ethical practice across all academies and central services.

This Code of Conduct forms a key part of the Trust's safeguarding framework and governance arrangements. It supports the Trust's vision, values and statutory responsibilities by providing a consistent framework for professional behaviour.

All employees are expected to read, understand and comply with this Code throughout their employment.

Compliance with this Code is a condition of employment and forms part of every employee's professional responsibilities.

13.2 Individual Responsibilities

Every employee is responsible for:

- understanding this Code;
- acting in accordance with its principles;
- maintaining appropriate professional standards;
- safeguarding children and promoting their welfare;
- exercising sound professional judgement;
- seeking advice where uncertainty exists;
- reporting concerns promptly;
- completing mandatory training;

- cooperating with Trust procedures and investigations.

Employees remain responsible for their conduct regardless of role, seniority or length of service.

Ignorance of this Code will not normally be accepted as an excuse for failing to meet expected standards.

13.3 Responsibilities of Leaders

Headteachers, Executive Leaders, Directors, Central Team Leaders and all managers have additional responsibilities to ensure that this Code is implemented consistently and fairly.

Leaders must:

- model exemplary professional conduct;
- promote an open and positive safeguarding culture;
- ensure staff understand their responsibilities;
- provide appropriate induction and ongoing guidance;
- address concerns promptly and proportionately;
- encourage professional curiosity and constructive challenge;
- support staff wellbeing while maintaining accountability;
- ensure conflicts of interest are appropriately managed;
- maintain appropriate records;
- monitor compliance with this Code.

Leadership behaviour should consistently demonstrate the values and expectations described within this document.

13.4 Responsibilities of Governors and Trustees

Governors and Trustees play an essential role in providing strategic oversight and assurance that the Trust maintains the highest standards of professional conduct.

They are responsible for ensuring that:

- appropriate policies are in place;
- safeguarding remains a strategic priority;
- effective governance arrangements exist;
- allegations and concerns are managed appropriately;
- conflicts of interest are declared and managed;
- professional standards are consistently applied;
- appropriate assurance is received regarding compliance.

Governors and Trustees should themselves model the behaviours expected within this Code.

13.5 Induction

All new employees, volunteers, agency workers and others working on behalf of the Trust must receive appropriate induction before undertaking their duties.

Induction should include:

- this Code of Conduct;
- safeguarding and child protection procedures;
- professional boundaries;
- whistleblowing arrangements;
- low-level concerns;
- health and safety;
- behaviour expectations;

- relevant Trust policies.

Employees are expected to confirm that they have read and understood this Code.

13.6 Training and Professional Development

Professional standards require continuous learning.

The Trust will provide appropriate training relating to:

- safeguarding;
- child protection;
- professional boundaries;
- equality, diversity and inclusion;
- health and safety;
- cyber security;
- data protection;
- statutory responsibilities;
- emerging safeguarding risks.

Employees are expected to participate fully in mandatory training and apply their learning within professional practice.

Failure to complete mandatory training may be managed through the Trust's capability or disciplinary procedures where appropriate.

13.7 Declarations

To support transparency and effective governance, employees may be required to complete declarations relating to:

- conflicts of interest;
- business interests;
- secondary employment;
- close personal relationships;
- gifts and hospitality;
- criminal matters where disclosure is required;
- other matters identified by the Trust.

Employees have a continuing responsibility to update declarations whenever circumstances change.

13.8 Monitoring Compliance

Compliance with this Code may be monitored through:

- routine management supervision;
- safeguarding audits;
- internal reviews;
- complaints investigations;
- disciplinary investigations;
- safeguarding case reviews;
- performance management;
- governance monitoring;
- internal and external audit activity;
- regulatory inspection.

Monitoring is intended to:

- promote consistency;
- identify emerging risks;
- support professional development;
- strengthen safeguarding;
- ensure public accountability.

13.9 Breaches of the Code

Where concerns arise regarding compliance with this Code, the Trust will consider the circumstances of each case fairly and proportionately.

Depending upon the nature and seriousness of the matter, outcomes may include:

- informal guidance;
- additional training;
- professional supervision;
- management advice;
- capability procedures;
- disciplinary action;
- referral to external agencies where required;
- referral to professional regulatory bodies where appropriate.

Serious or repeated breaches may constitute gross misconduct and could result in dismissal.

Nothing within this Code limits the Trust's statutory safeguarding responsibilities or legal obligations.

13.10 Related Policies

This Code should be read alongside other Trust policies, including but not limited to:

- Safeguarding and Child Protection Policy;
- Keeping Children Safe in Education (current edition);
- Guidance for Safer Working Practice;
- Staff Disciplinary Policy;
- Grievance Policy;
- Whistleblowing Policy;
- Low-Level Concerns Policy;
- Managing Allegations Against Staff Policy;
- Equality Policy;
- Data Protection Policy;
- ICT Acceptable Use Policy;
- Online Safety Policy;
- Health and Safety Policy;
- Gifts and Hospitality Policy;
- Financial Regulations;
- Recruitment and Selection Policy;
- Capability Policy;
- Attendance Management Policy;
- Anti-Bribery Policy;
- Anti-Fraud Policy.

Where there is any inconsistency between this Code and statutory guidance, statutory guidance will take precedence.

13.11 Review of the Code of Conduct

This Code will be reviewed:

- annually;
- following significant changes to legislation or statutory guidance;
- following learning from safeguarding reviews;
- following organisational changes where appropriate;
- where identified through audit or governance review.

Employees are encouraged to contribute constructively to future reviews by providing feedback through appropriate channels.

13.12 Professional Commitment

Every employee contributes to the reputation, culture and effectiveness of Lighthouse Multi Academy Trust.

By working for the Trust, employees accept a professional responsibility to:

- place children at the centre of every decision;
- uphold the highest standards of honesty and integrity;
- maintain appropriate professional boundaries;
- act with fairness and respect;
- safeguard confidential information;
- challenge poor practice;
- support colleagues professionally;
- promote equality, inclusion and dignity;
- exercise sound professional judgement;
- protect public confidence in education.

The Trust recognises that professionalism is demonstrated not only through compliance with rules, but through everyday decisions, behaviours and relationships.

Together, we will create an environment where children are safe, colleagues are valued and every member of the Trust community can thrive.

Professional Reflection

Employees are encouraged to reflect regularly upon their own professional practice and to seek advice whenever uncertain.

The safest organisations are those in which staff feel confident to ask questions, admit mistakes, challenge unsafe practice and continually improve.

Maintaining high professional standards is a shared responsibility and an essential part of safeguarding children and promoting public confidence in education.



Appendix A – Employee Declaration

I confirm that I have:

- read and understood the Lighthouse Multi Academy Trust Staff Code of Conduct;
- had the opportunity to seek clarification where required;
- understand my professional and safeguarding responsibilities;
- agree to comply with this Code at all times;
- understand that breaches of this Code may result in management action, disciplinary action or referral to external agencies where appropriate.

Name: _____

Job Title: _____

Academy/Lighthouse MAT: _____

Signature: _____

Date: _____