



Our school is part of the Embark Federation. The shared vision for our trust is to “create schools that ‘stand out’ at the heart of their communities.” Our trust has four core beliefs; Family, Integrity, Teamwork and Success which are integral to everything we do. The purpose is to enable everyone to be able to ‘Love Learning, Love Life.’

Our policies are underpinned by our vision, beliefs and purpose

Code of Conduct for Staff

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Approval Level	Embark Trust Board

Reviewed / Modified by:	Change History	Advisory committee / groups or specialists	Review / Meeting Date/s
Embark Safeguarding Lead/Embark People and Culture Lead	Amends - Added in Section on AI usage and the principles as full appendix 3 - Added section expected professional behaviour - Added section: Criminal Investigations and Suitability to Work with Children/Ongoing Suitability to Work with Children - Added examples in section 4.3 about different forms of communication	Trust Board	Aug 26

1. Introduction

The Embark Federation and our family of schools values and respects all members of the community. Colleagues are expected to work in co-operation and collaboration, within an ethos of mutual trust and confidence. All employees and volunteers must be committed to promoting the safety, welfare, and interests of children (pupils/students) as paramount. Staff are expected to place the wellbeing, development, and progress of children/young people at the heart of their professional practice.

The public is entitled to expect the highest standards of conduct from all EMBARK Federation employees. To serve the school and the Embark Federation, you should share the Trust's core beliefs, vision, and implement its policies and perform your duties, with integrity, honesty, impartiality and objectivity.

The purpose of the Code is to assist you in carrying out your job by making clear the standards of behaviour the Trust requires you to meet. It incorporates the existing laws, regulations and conditions of service you should be most aware of in your work for the Trust.

2. Scope

The Code applies to all employees of the Embark Federation and the schools they work in. This also applies to secondees, agency staff and individuals with an honorary contract including students on teacher placements.

You should read the Code in conjunction with professional standards, other Trust & school policies, requirements and guidance regarding standards of conduct in particular areas of work. This list is not exhaustive, and you should familiarise yourself with any relevant guidance which may be provided in relation to your particular area of work. You should address any further queries you have to your line manager.

3. Accountability

As an employee, you must act in accordance with the principles set out in this Code, recognising the duty of all public sector employees to discharge public functions reasonably and according to the law.

If you fail to comply with the Code's provisions, this may result in action under the Trust's Disciplinary Procedure.

4. Respectful Professional Behaviour

The Trust is committed to creating a culture where all colleagues are treated with dignity, professionalism and respect. Employees are expected to:

- communicate professionally and courteously with colleagues, pupils, parents and partners;
- contribute to a culture where challenge is welcomed respectfully and concerns can be raised without fear of retaliation;
- avoid bullying, harassment, intimidation, victimisation or behaviour that undermines the wellbeing or dignity of others;
- work collaboratively and constructively, recognising that everyone has a responsibility for maintaining a positive working environment;
- model the Trust's values of Family, Integrity, Teamwork and Success in all professional interactions.

Any behaviour that undermines trust, psychological safety or the Trust's values may be addressed through the Trust's management or disciplinary procedures.

5. Maintenance of Standards

You should inform your line manager in the first instance if you identify any deficiency in the service provided by the Trust or School, resulting from breaches of this Code. If you have concerns about raising the deficiency with your line manager, and wish to maintain confidentiality, you can contact any of the Trust Senior Leadership team. The Trust whistleblowing procedures also exist should you need to make a disclosure.

5.1 Maintain high standards

You must:

- maintain high standards of honesty and integrity in your work and treat all pupils/students, colleagues, parents/carers and visitors with respect and professional courtesy;
- maintain professional boundaries and avoid behaviour which may lead any reasonable adult to question your behaviour, motivations or intentions;
- act in accordance with Professional Standards.

5.2 Safeguarding Pupils/Students

You have a duty to safeguard pupils/students from:

- Physical abuse
- Sexual abuse
- Emotional abuse
- Neglect
- Exploitation

Specific safeguarding issues are outlined by the DfE guidance, Keeping Children Safe in Education, which includes responsibilities in relation to Prevent.

You must take reasonable care of pupils/students under their supervision with the aim of ensuring their welfare and safety. Failure to do so may be regarded as neglect.

You must comply with the Embark Federation Child Protection and Safeguarding Children Policy and Allegations and Concerns raised about Staff, Supply Staff, Contractors and Volunteers Policy. These policies

support the wellbeing of pupils, including co-operation and collaboration with external agencies that support the welfare of children/young people. You must follow guidance in line with safer working practices.

You must read and understand Keeping Children Safe in Education.

5.3 Setting an Example

All staff who work in in the Embark Federation must set examples of behaviour and conduct in order to encourage our pupils/students to do the same.

You must not have any electronic communication, other than via the Trust/school's platforms, and/or accept as friends, pupils/students under the age of 18 including ex pupils. This includes the following in line with KCSIE:

- personal messaging apps
- WhatsApp
- Snapchat
- Instagram
- gaming platforms
- disappearing messages
- private email
- private phone numbers

Expectations in relation to staff use of electronic devices & communication, including the internet, are detailed in the Trust's EMBARK Staff & Volunteer IT User-Agreement-Policy & Online Safety policy. You have a responsibility to familiarise yourself with the policy and adhere to the requirements entailed.

5.4 Dress and Appearance

Your appearance, dress and behaviour are expected to promote appropriate boundaries and working relationships between the pupils and the staff/volunteer body, as role models and responsible adults in a position of trust. You should dress in ways that are appropriate and relevant to your role.

5.5 Conduct Outside Work

You must not behave in a manner which would lead any reasonable adult to question your suitability to work with children or young people including online conduct and social media activity. You must not engage in conduct outside work which could easily damage your own reputation and that of the Embark Federation and School, this is especially important in and around our immediate local community.

6. Criminal Investigations and Suitability to Work with Children/Ongoing Suitability to Work with Children

Employees have a continuing responsibility to remain suitable to work with children. Staff must notify the Headteacher (or Trust Leader where appropriate) as soon as reasonably practicable if they:

- are arrested, charged or convicted of a criminal offence where this may affect their suitability to work with children;
- become subject to police investigation relating to safeguarding matters;
- become subject to any professional regulatory investigation or restriction;
- are disqualified from working with children or become aware of any circumstance that may affect their suitability to undertake their role.

The Trust will consider each matter individually, fairly and proportionately. Disclosure does not automatically result in disciplinary action or dismissal.

7. Use of Artificial Intelligence (AI) Tools

The Trust recognises that Artificial Intelligence (AI) tools may support productivity and administrative tasks when used appropriately. Staff must ensure that the use of AI is consistent with their professional responsibilities and does not compromise safeguarding, confidentiality or data protection, in line with **appendix 3**

8. Disclosure of Information

Information must only be accessed where there is a legitimate professional reason to do so in line with GDPR.

To keep children and young people safe in school you need to share information appropriately so the correct decisions can be made to protect them. You must have compelling reasons to share personal data because sharing with third parties can expose them to unintended risks if not done properly.

Data should be shared in line with the safeguarding procedures and GDPR requirements. You must not disclose any confidential information about colleagues or children that you have as part of your employment with the Trust to anyone outside of the Trust unless using agreed procedures.

You have a duty to adhere to the policy and not disclose information or use information for your personal gain.

Examples of confidential information are (but not limited to):

- information about staff and pupils;
- information about actions of the Governing Body that are not published in Governing Body minutes;
- information accessed by 'privilege' e.g., notices on staff noticeboard;
- information about future school plans/actions that have not been disclosed to parents.

Advice and guidance on the requirements of the Freedom of Information and Data Protection Acts is available from PHP Law and requests may be made through the Trust & Headteacher.

9. Relationships

9.1 The Local Community, Trust, School Users and Other Employees

You should always remember your responsibilities to the community you serve and ensure courteous, efficient, and impartial service delivery to all users, groups, and individuals within that community. These responsibilities apply equally to your conduct with fellow employees, contractors, agency staff, volunteers, and those on student/work experience placements.

You should take positive steps to understand the roles of other colleagues in the children's workforce. You are expected to cooperate with other professional colleagues who have a role in enabling children/young people to thrive and succeed.

9.2 Contractors

If you engage in the provision of work under contract or supervise contractors or have any other official relationship with contractors or have previously had or currently have a relationship in a private or domestic capacity with contractors, you should formally declare that relationship to your line manager - Trust Leader/Headteacher/Chair of Governor.

Orders and contracts must always be awarded on merit, in accordance with Financial Regulations and Standing Orders in Relation to Contracts, and no special favour should be shown to businesses run by, for

example, friends, partners or relatives in the tendering process. No part of the local community should be discriminated against.

As a private citizen, you should be aware of possible conflicts of interest when you buy goods or use the services of firms who have dealings with the School/Trust, and you should follow official procedures relating to the disclosure of any such transactions.

10. Equality, Diversity and Inclusion

You must comply with the Trust's Equality, Diversity and Inclusion Policy and legal requirements relating to equality issues. The Trust is committed to promoting equality of opportunity, preventing unlawful discrimination in all of its activities and to valuing diversity.

11. Conflict of Interests

You must not misuse our official position or information acquired in our duties to further our private interests or those of others. Any situation whereby we could or would reasonably appear to have influenced any decisions or outcomes must be avoided. Examples may include:

- the awarding of contracts;
- the appointment of staff;
- decisions in relation to discipline, promotion or pay and conditions adjustments for another employee who is a relative or with whom you have/have had a close association;
- using your position or information acquired in the course of your employment to further personal interests or for the interests of others.

A declaration of conflict of interest must be made by submission of the business interest form and an appropriate decision will be taken based on:

- external financial or non-financial interest in any existing or proposed contract with the school or other organisational decision;
- membership of any organisation which could conflict with the School/Trust interests.

12. Taking Other Employment

You should not undertake additional employment (paid or unpaid), or allow your name to be put forward for consideration for such work, if your proposed additional work either will or has the potential to:

- create a conflict of interest;
- overlap with official duties;
- make use of material to which you have access by virtue of your position;
- weaken public confidence in the school/Trust;
- impact your ability to undertake your role.

You should, in any case, inform your Headteacher (or Trust Leader if part of the Central Team) of any proposed secondary employment. In general, there is no reason why someone should not be able to work simultaneously in two or more schools or have other employment. This would not in itself create a conflict of interest provided that none of the specific issues set out in the bullet points above would apply.

12.1 For supply staff only.

If you have or are seeking additional employment either paid or unpaid in other establishments, or allow yourself to be considered for such work, the work in question should not:

- create a conflict of interest;

- overlap with official duties;
- make use of material to which you have access by virtue of your position;
- weaken public confidence in the school/Trust.

You should, in any case, inform your Headteacher (or Trust Leader if part of the Central Team) of any proposed secondary employment. In general, there is no reason why someone should not be able to work simultaneously in two or more schools or have other employment. This would not in itself create a conflict of interest provided that none of the specific issues set out in the bullet points above would apply.

13. Stewardship

You must ensure that you use public funds entrusted to you in a responsible and lawful manner and must not utilise property, vehicles or other facilities of the school for personal use unless authorised in advance to do so. You should strive to ensure value for money to the local community and to avoid legal challenge to the school.

Personal Use of Internet and Email – any personal use must be in accordance with the EMBARK Staff & Volunteer IT User-Agreement-Policy.

The following should be considered in making personal telephone calls:

- personal mobile phones should be used for any outgoing personal telephone calls, other than in exceptional circumstances (e.g., no signal available). In these circumstances the school telephone may be used, following the school's procedure for such use, recording and payment;
- such outgoing calls/texts and personal incoming calls should occur infrequently and be kept as short as possible. For those working with children, calls/texts should not be made/taken during lessons, except in emergencies. As stated in the Acceptable Use of IT, Internet & Electronic Communication, 'Staff should not engage in 'recreational' chatting during working time, on email or through instant messaging, that results in lost productivity or distracts other employees from their work.';
- school mobile phones should not be used for personal use, except in an emergency.

Intellectual Property is property which enjoys legal protection and is a result of intellectual effort, including patents, copyright, trademarks, designs and software. Where developed in the course of your duties, such intellectual property is the property of the school & Trust. You should not make use of the Trust or school's intellectual property to conduct private work.

Any copies of material taken for use within a school or Trust setting must only be as allowed under the Copyright Act and under the appropriate licensing agreement.

14. Corruption

You must be aware that it is a serious criminal offence for you to corruptly receive or give any gift, loan, reward or experience advantage for doing or neglecting to do something or showing favour or disfavour to any person in your official capacity.

15. Hospitality and Gifts

The offer of any gift or hospitality, whether from outside or inside the Trust/school, which might be interpreted as an attempt to influence an employee in his or her conduct towards pupils, parents or other employees or influence a decision around provision of a service must be treated with caution. Employees should seek advice if in any doubt. The Trust acknowledges that pupils, parents or fellow employees often wish to make a small gift to employees on specific occasions (such as Christmas or at the end of the

school year) and sees the spirit of giving as one to be nurtured in children and which demonstrates the Trust's values.

Any offer of a gift or inducement above the value of £50 in line with the Bribery act, whether made at specific occasions or casually, should be declared **via appendix 2** to the Trust/School, if the gift is made by, or indirectly by, a person, firm or organisation which, to the knowledge of the employee, has, or seeks to do, business of any kind with the Trust/School or to have an interest in its decisions.

The receipt of minor articles, often by way of trade advertisements, as unsolicited gifts for the Trust/school rather than for personal use (e.g., diaries, calendars, office requisites, etc., which are customarily distributed at Christmas and, occasionally, at other times) is acceptable.

Where there is any doubt, employees should seek guidance from the Trust before accepting any gifts or hospitality offered.

Staff should also take advice before making any gifts to external organisations, or to the employees of such organisations, which either provide services to the Trust/School or which are potential providers of such services. They should recognise that gifts could put themselves and/or the employees of those organisations in a difficult position.

16. Sponsorship

The Trust Board is responsible for approving all sponsorship and will provide guidance to staff on their involvement with any sponsorship, actual or proposed. Staff approached directly by actual or potential sponsors should refer any proposals to their line manager or headteacher for determination in the first instance.

Where the Trust or a Trust school sponsors an event or service, such sponsorship must comply with the Academies Financial Handbook and any other ESFA financial regulations, so that there is no improper benefit to the Trust or its trustees, staff and pupils, including any partner, spouse or relative of any trustee, pupil or employee of the Trust.

17. Contact with the Media

Any enquiries from the media on work-related matters should be referred to the Headteacher and Chair of Governors who should then contact the Trust Leader. You should seek formal authorisation from the Headteacher (or Trust Leader if part of the Central Team), who should consult the Trust's Public Relations Advisers, before you speak, write, or give interviews to the media.

If you wish to publish books, articles or letters you have written in connection with your duties, you must first consult your Headteacher (or Trust Leader if part of the Central Team) who will consult with the Governing Body or Trustees and take legal advice. This includes social media where staff could reasonably be perceived to represent the Trust

Appendix 1 - Acceptable Use / Bring Your Own Device

- Embark Federation and our schools recognise that there may be occasions when staff may need to access school information from their own devices.
- This should be limited and with prior agreement in full recognition that they have a direct personal responsibility for ensuring that the device they choose to use has the benefit of encryption, that is above and beyond a simple password protection.
- Staff must ensure that personal devices such as mobile smart phones, tablets and other portable electronic equipment are set to lock and only open with encrypted passcodes to prevent unauthorised access.
- School will support and enable staff to ensure that their devices are compliant on the rare occasions this should be necessary.
- If any member of staff uses a device without these safeguards in place it will be a disciplinary breach if data is unlawfully accessed by a third party.
- Encryption protection will be available for staff and suitable advice provided.

Own Device Usage Acceptance

I understand and accept that should I choose to access school data on any personal device that I use or own, such a device must have, and use, suitable encryption to secure the data.

Any unlawful access of data on such a device will be my responsibility. I will report any theft or loss to the school office as soon as is practicable.

When exchanging, gifting, upgrading or selling the device I shall ensure that access to any school data is removed and data that relates to school is securely deleted.

Appendix 2 – Gifts and Hospitality Declaration

Please ask school business manager for the form to complete and file.

DATE	NAME	DESCRIPTION OF GIFT/HOSPITALITY AND APPROXIMATE VALUE	PARTY OFFERING GIFT/HOSPITALITY	ACCEPTED/ REJECTED	APPROVED BY

Staff Protocol for Safe and Secure Use of AI

Introduction

Embark Federation recognises staff may choose to use approved AI systems to support their day-to-day working. Whilst AI offers significant benefits, it also brings an array of risks which require careful management.

Embark Federation have created this protocol to outline essential guidelines for ensuring safe and secure use of AI. Your adherence to this protocol is crucial for safeguarding our school community, protecting data, and upholding professional standards.

Embark Federation will ensure you are provided with necessary training to understand and safely use AI.

It is your responsibility to read and comply with the following protocol when using our approved AI systems.

Key principles for responsible AI use

Prioritise Human Judgment

AI should assist not replace, human decision-making.

Staff must ensure that final judgments, particularly those affecting individual are made by humans. This approach allows AI to compliment your professional judgment and expertise rather than replacing them.

Fact-check and critically evaluate

Always fact-check and critically evaluate AI-generated content for accuracy, bias and discrimination before sharing or endorsing it, especially for external communication. AI content is not always accurate or appropriate and may contain inherent biases. Generative AI tools have limited regard for truth and can output biased or harmful information.

Transparency

Be transparent about AI-generated content by including clear labels or notes indicating AI assistance in documents, emails, presentations, and other outputs. Clearly marking AI-generated content helps build trust and ensures others are informed when AI has been used in communications or documents.

Embark Federation expects the following disclaimer to be used where AI has assisted you with a task:

This task/communication has been supported by AI tools in line with Embark Federation Safe and Secure AI Protocol. All content is subject to human oversight and professional judgment.

Use approved systems

You must only use AI systems and Embark Federation provided AI accounts that have been approved by the Embark Federation for work purposes. These accounts are configured to comply with organisational security and oversight requirements, reducing data breach risks. Staff should ensure that any AI systems used in teaching or administration are vetted prior to implementation.

Should you wish to implement an AI system, you need to notify the Embark Federation GDPR lead who will undertake a check of the system and seek advice from the data protection officer as required.

Training and development

Staff will receive necessary training and support to effectively integrate AI into their work, including professional development opportunities focused on AI tools and their ethical integration. Embark Federation will provide relevant training for staff and governors in the advantages, use of and potential risks of AI. Staff have a responsibility to identify their own training and development needs and communicate this with relevant staff within Embark Federation to seek support where required.

Data privacy and personal information risks

Do not input personal data

You must not input identifiable personal information into AI systems without authorisation and a proper legal basis to do so.

This includes full names, addresses, email addresses, phone numbers. Any information inputted to a generative AI system may not remain private or secure.

Avoid inputting special category data

Do not input special category information without appropriate authority and legal basis. Special category data includes but is not limited to health, ethnicity, religion and safeguarding. These data categories require higher levels of care and security.

Entering special category data, or even non-special category data that infers it (e.g. postcode inferring race) is a risk. Children are considered vulnerable data subjects and any process involving their personal data is likely to be 'high risk', meaning that suitable safeguards must be in place.

Sensitive information risk

Do not input Embark Federation's sensitive internal documents such as strategic plans, private or commercially sensitive contracts into third-party AI tools unless explicitly vetted and approved for that purpose.

Staff must always recognise and safeguard sensitive data.

Cyber-crime risk

Entering confidential information or personal data into AI system can contribute to a larger picture that could be used to commit cyber-crime, such as voice impersonation or financial fraud.

Copyright and intellectual property

Take care not to infringe copyright or intellectual property (IP) conventions. This includes avoiding the use of IP, including that of learners, to train generative AI models without appropriate consent.

Deskilling risk

Be aware of the risk of deskilling yourself by over-relying on AI which can lead to automation bias or automation-induced complacency. Generative AI tools cannot replace the judgment and deep subject knowledge of a human expert.

Professional responsibility and accountability

Professional judgment

AI tools should complement your professional judgment and expertise; they must not replace them. You remain professionally responsible and accountable for the quality and content of any output generated by AI.

Comply with policies

Adhere to all relevant Embark Federation policies, including this AI protocol, the staff IT acceptable use agreement, and data protection policies. Failure to comply could breach UK GDPR, data protection obligations and your employment contract.

Avoid unauthorised software

Do not install or attempt to install unauthorised AI systems on a trust/school device or alter settings unless permitted by Embark Federation /school's headteacher/leadership team/IT manager.

Professional conduct

All digital communications with students, parents and carers, and other members of Embark Federation community should be on a professional level when assisted by AI. The communication should be only carried out using official Embark Federation systems and devices.

Reporting concerns**Report incidents immediately**

You must report or communicate any suspected misuse or concerns to the appropriate individual within the school immediately. Within our setting this is [input role of individual here].

This includes incidents involving AI misuse, data breaches, or inappropriate outputs generated by AI. Instant reporting helps mitigate risks and facilitates a prompt response.

Escalation

If an incident involves any illegal activity or the potential for serious harm, it must be escalated through Embark Federation's safeguarding procedures. Where AI is used to support monitoring and incident reporting, human oversight must be maintained to interpret nuances and context that AI might miss.

Seeking advice and clarification

If you are unsure about the appropriate use of an AI tool, particularly regarding data privacy, compliance, or potential risks, seek advice from the designated GDPR lead who will liaise with Embark Federation's Data Protection Officer (DPO) accordingly.

DPIA Process:

For any AI system where personal data is being shared, a Data Privacy Impact Assessment (DPIA) must be considered before implementing the system. You must refer the system to the designated GDPR Lead who will seek the appropriate advice from the DPO.

By following this protocol, we can collectively ensure that AI is used safely, ethically, and effectively to enhance learning and administrative processes in Embark Federation

Date of implementation: 08 August 2026.