Code of Conduct Policy

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AUDIENCE:	ALL STAKEHOLDERS
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APPROVED BY:	CHAIR OF BAT BOARD OF TRUSTEES / PEOPLE COMMITTEE
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Brunel Academies Trust (BAT) is a company limited by guarantee with registration number 10074054 and registered offices at Unit B4C Orbital Retail Park, Thamesdown Drive, Swindon, SN25 4AN; BAT is the parent company and Sole Corporate Member of the subsidiary company Brunel Education (BE). Brunel Education is a charitable company limited by guarantee with registration number 11991915, registered with the Charities Commission of England Wales (Charity Number 1214820) and with registered offices at Unit B4C Orbital Retail Park, Thamesdown Drive, Swindon, SN25 4AN.

Tier 1 policies are centrally held policies relating to Education, Governance, People Services, Finance, ICT and Operations and are the direct responsibility of BAT. Tier 1 policies are created by the BAT Central Services Team but adopted and reviewed by the BAT Board.

We are committed to a sustainable future and to improving the social, economic, and environmental well-being of the community. We are dedicated to environmental improvements that foster a sustainable future and lead to social and economical improvements in the communities we operate within.

Amendments to policy		
Date	**Section**	**Amendment**
August 2025	2	Addition of a bullet point under expected standards of personal and professional conduct
	5.3	Addition of the reference to employee WhatsApp groups
June 2026	1	Values amended
	3	Addition to expectations regarding footwear and nails

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1. Introduction

1.1 BAT vision, mission and values

Brunel Academies Trust delivers high-quality education provision and services to children, young people, and vulnerable adults across all education sectors, including those that are disadvantaged and/or have Special Educational Needs and/or Disabilities. The organisation, collectively known as BAT, has the knowledge, experience, skills and expertise to both develop and deliver a diverse range of quality provisions and services, while maintaining high standards and performance which will improve the life chances and outcomes of all children and young people.

Our Vision is to be a creative education community opening doors, opening minds and realising potential.

Our Mission is to ensure all our children and young people are given every opportunity to be engaged, inspired and empowered to enable them to flourish and lead safe and successful lives.

Our Values The Vision and Mission are underpinned by our shared core values of:

- Be kind
- Be brave
- Be honest
- Be imaginative
- Be inclusive

1.2 Purpose and scope

The purpose of this Code is to ensure that all employees and volunteers are aware of the standards of conduct required of them, and that our provisions are environments where everyone is safe, happy, and treated with respect.

The Code applies to all employees and volunteers, and will help everyone to understand how they can fulfil their obligations in performing their role. The term 'employees' encompasses employees, officers, consultants, contractors, casual workers, agency workers and teachers on ITT placement.

The term 'volunteers' includes all those freely giving of their time to contribute to the work of BAT and its provisions including Governors, Trustees and Members. This includes those on work experience.

The Code itself does not form part of any employee's contract of employment, or worker's contract of engagement, and may be amended at any time in consultation with the recognised Trade Unions.

Breach of this Code, or the policies, standards, and guidance listed below, may result in disciplinary action up to and including summary dismissal. This will apply and disciplinary action may be taken regardless of whether the breach is committed on or external to BAT's sites, and during or outside working hours.

It is acknowledged that this Code cannot cover every eventuality. As such BAT will always have regard to the intent of this Code in its application to matters which may not be explicitly covered.

If any aspect of this Code of Conduct is unclear, employees must contact their line manager or the People Services Team for clarification.

1.3 Key policies, standards and guidance

The following policies, standards, and guidance set out specific requirements and responsibilities to be fulfilled by employees and volunteers, and each form part of this Code:

- The provision's Safeguarding Policy
- Managing Allegations and Low-Level Concerns Policy
- Keeping Children Safe in Education September 2026
- Guidance for safer working practice for those working with children and young people in education settings February 2022
- Whistleblowing Policy
- Part two of the Teacher's Standards: Personal and Professional Conduct
- ICT Acceptable Use Policy (for employees and volunteers)
- Data Protection Policy
- Reference Policy
- Health and Safety Policy
- Gifts and Hospitality Policy
- Conflict of Interest Policy
- Equality, Diversity, and Inclusion Policy

We expect that everyone working at BAT adheres to the seven principles below:

1. Selflessness
Holders of public office should act solely in terms of the public interest.

2. Integrity
Holders of public office must avoid placing themselves under any obligation to people or organisations that might try inappropriately to influence them in their work. They should not act or take decisions in order to gain financial or other material benefits for themselves, their family, or their friends. They must declare and resolve any interests and relationships.

3. Objectivity
Holders of public office must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.

4. Accountability
Holders of public office are accountable to the public for their decisions and actions and must submit themselves to the scrutiny necessary to ensure this.

5. Openness
Holders of public office should act and take decisions in an open and transparent manner. Information should not be withheld from the public unless there are clear and lawful reasons for so doing.

6. Honesty
Holders of public office should be truthful.

7. Leadership
Holders of public office should exhibit these principles in their own behaviour. They should actively promote and robustly support the principles and be willing to challenge poor behaviour wherever it occurs.

The above policies, standards, and guidance are regularly reviewed, disseminated to employees and volunteers and are readily available in provision shared areas, on BAT's website (www.brunel.org.uk/Policies), and from the People Services Team.

It is the responsibility of all employees and volunteers to read and be familiar with the above policies, standards, and guidance and this Code. It is the responsibility of Head of Provisions/Head of Service, Designated Safeguarding Leads, line managers and the People Services Team, to ensure that they are communicated and readily available, and that any breaches are reported and managed appropriately.

The above list is not intended to be exhaustive. Other policies and guidance which provide direction as to responsibilities and standards of conduct required, may be deemed relevant when considering whether there has been a breach of this Code.

2. Expected standards of personal and professional conduct

Our children and young people, colleagues, the communities we serve, and the wider public are entitled to expect the highest standards of conduct from all employees and volunteers. All employees and volunteers must uphold public trust in BAT and our provisions, and must always act with honesty, integrity, impartiality, and in the interests of children and young people.

This includes but is not limited to:

- Maintaining high standards of attendance and punctuality.
- Placing the well-being, safety, and learning of children, young people, and vulnerable adults at the centre of their work.
- Observing appropriate professional boundaries with children and young people, colleagues, and the wider BAT community, acting in a fair and transparent way that would not lead anyone to reasonably assume they were not doing so.
- Creating a safe learning and working environment, and not acting or omitting to act in a way which undermines this.

- Having high expectations for all children and young people, a commitment to addressing underachievement, and working to help children and young people progress regardless of their background and personal circumstances.
- Treating all children and young people, colleagues, and members of the BAT community fairly and with dignity and respect, taking their knowledge, views, opinions and feelings seriously, and valuing diversity and individuality.
- Modelling the characteristics they are trying to inspire in children and young people, including enthusiasm for learning, a spirit of enquiry, honesty, tolerance, social responsibility, patience, and a genuine concern for other people.
- Reflecting on their own practice, developing their skills, knowledge and expertise, and adapting appropriately to learn with and from colleagues.
- Responding sensitively to the differences in the backgrounds and circumstances of children and young people, recognising the key role that parents and carers play in education.
- Seeking to work in partnership with parents and carers, respecting their views and promoting understanding and co-operation to support learning and wellbeing in and out of provision.
- Ensuring that the same professional standards are always applied regardless of culture, disability, gender identity, language, racial origin, religious belief, and/or sexual identity.
- Not undermining fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs.
- Not expressing personal beliefs in a way that may exploit the vulnerability of children and young people or might lead them to break the law.
- Having proper and professional regard for the ethos, policies, and practices of BAT and its provisions, and always acting within the statutory frameworks policies and guidance which set out their professional duties and responsibilities.
- Following reasonable and lawful management instructions, recognising the importance of cooperation, accountability, and working constructively within the expectations set by leadership.
- Not behaving in a manner or taking action which may bring BAT or any of its provisions into disrepute.

3. Standards of appearance

All employees and volunteers must maintain an appropriate standard of dress and personal hygiene and appearance in their role, which promotes a positive and professional image and takes account of health and safety considerations. Clothing and footwear must be smart, safe, and clean; footwear needs to be closed at the toe and heel, and long hair tied back where there is contact with children and young people. Jewellery should be minimal in case of any physical contact with children and young people. Nails should be an appropriate length to maintain safe working practices.

Employees and volunteers must ensure they are dressed in ways which:

- Are appropriate to their role and not likely to be viewed as offensive or revealing.

- Are professional and acts as a role model for our children and young people about how to dress in the workplace.
- Are safe in order to carry out their duties at all times, as applicable including Team Teach techniques related to restrictive physical intervention.
- Do not distract, cause embarrassment, or give rise to misunderstanding.
- Are religious and culturally sensitive, free of any political or otherwise contentious slogans, and not considered to be discriminatory.

Within these general guidelines, cultural, religious, or traditional dress, whether on a day-to-day basis or to mark particular occasions will normally be acceptable at the Head of Provision's/Head of Service's discretion. What is appropriate will vary by provision or function, for example some clothing may leave an employee or CYP vulnerable due to their needs or stage of development. If an employee is unsure if an item of clothing is appropriate, they must speak with their line manager in the first instance.

Lanyards and identity cards, or identity labels, provided by BAT must be worn whilst on BAT premises, and where clothing is provided for health, safety and hygiene and/or uniform purposes, it must be worn.

Provisions may have specific requirements within this dress code due to operational requirements.

4. Safeguarding children and young people

4.1 Safeguarding is the responsibility of everyone

BAT and all BAT provisions are committed safeguarding and promoting the welfare of all children and young people, and we require all employees and volunteers to share this commitment.

All employees and volunteers have a duty to provide a safe learning environment, to safeguard children, young people, and vulnerable adults from harm, and to report any concerns they have. This includes physical, emotional, and sexual abuse, and neglect.

In doing so they must familiarise themselves with, and implement the requirements in, all policies as listed in point 1.3 and any other policies adopted by BAT relating to children and young people.

4.2 Reporting allegations or low-level concerns

Allegations of abuse or any low-level concerns arising in relation to people working in a provision must immediately be reported and managed in accordance with BAT's Managing Allegations and Low-Level Concerns Policy.

Allegations

Allegations which may meet the harm threshold are those which indicate that an employee, a person with permission to be on the premises or carrying out any activity on behalf of the provision, or a volunteer may have:

- Behaved in a way that has harmed a child and young person, or may have harmed a child and young person;
- Possibly committed a criminal offence against or related to a child and young person;
- Behaved towards a child and young person or children in a way that indicates he or she may pose a risk of harm to children or young people; or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children or young people; including behaviour outside of work. This is known as transferable risk.

This applies to any child or young person the employee or volunteer has contact with in their personal, professional, or community life.

Low-level concerns

Low-level concerns are concerns which may not meet the threshold set out above, but may indicate that an adult working in or on behalf of the provision may have acted in a way that, is inconsistent with this Code, including the requirements of Guidance for Safer Working Practice for those working with children and young people in education settings February 2022 (including inappropriate conduct outside of work)

Examples of such behaviour could include, but are not limited to:

- Being over friendly with children, young people, or vulnerable adults.
- Having favourites.
- Taking photographs of children, young people, or vulnerable adults on their mobile phone.
- Engaging with children, young people, or vulnerable adults on a one-to-one basis in a secluded area or behind a closed door.
- Using inappropriate sexualised, intimidating, or offensive language.

We also encourage employees and volunteers to self-refer if they find themselves in a situation that could be misinterpreted. If unsure as to whether behaviour would be deemed a low-level concern, we encourage employees and volunteers to report it.

All reports will be handled in a responsive, sensitive and proportionate way. Unprofessional behaviour will be addressed, and the employee or volunteer supported to correct it at an early stage.

This creates and embeds a culture of openness, trust, and transparency in which our values and expected behaviour are constantly lived, monitored, and reinforced by all employees, while minimising the risk of abuse.

4.3 Whistleblowing

The Trustees of BAT and all Governing Committees are committed to the highest possible standards of transparency, probity, and accountability. They will listen to concerns raised and will take action to address any improper practice.

In line with this commitment, anyone with genuine concerns regarding any aspect of BAT's or a provision's work is encouraged to come forward and voice those concerns and can be confident that they can do so without fear of reprisal or victimisation. The Whistleblowing Policy provides a framework to be used by employees and volunteers to raise concerns, and to be used by BAT in seeking to address and resolve them. It aims to ensure that any concerns are managed in a fair, consistent, prompt and supportive manner, and provides channels for individuals to pursue their concerns further if they are dissatisfied with the response.

Should circumstances arise where individuals have concerns in relation to poor or unsafe practice, or potential failures within a provision's safeguarding regime, which are such that no immediate referral is required, the Whistleblowing Policy provides both internal and external channels for them to raise their concerns.

5. ICT Acceptable Use

5.1 General

BAT's ICT Acceptable Use Policy sets out the standards of conduct required of all employees and volunteers when accessing and using BAT ICT facilities and systems, and where relevant the standards of conduct required external to the workplace. All employees and volunteers must comply with the requirements of the Policy, including those relating to the use of social media and personal devices, a summary of which is provided below. Please refer to the ICT Acceptable Use Policy for further guidance.

5.2 Passwords

Under no circumstances should an employee share their log in details or password with any other person, including fellow employees, agency workers, or children and young people.

5.3 Responsible use of social media

All employees and volunteers must ensure that they establish safe and responsible online behaviours, and ensure that any communication with a third party while acting as a representative of BAT, specifically including children and young people, parents, or carers, through web based or telecommunication interactions take place within explicit professional boundaries. All employees must adhere to the Social Media policy. Social media includes apps like WhatsApp and platforms such as X (Twitter), Facebook, and Instagram.

Employees and volunteers must only communicate with children and young people, parents, and carers using official BAT systems, and any such communication must be in a professional tone and manner.

Employees and volunteers must never send requests to or accept requests from children and young people to communicate via any form of social media, and should not give their personal contact details to children and young people, for example e-mail address, home or mobile telephone numbers, or details of web-based identities. If children and young people locate these by any other means and attempt to contact or correspond with an employee or volunteer, they should not respond and must report the matter to the provision's Designated Safeguarding Lead.

Employees and volunteers must also ensure that they do not bring BAT or any provision into disrepute through their use of social media, this includes the use of employee WhatsApp groups. As part of this, employees and volunteers must ensure that appropriate privacy and security settings are in place. Employees and volunteers should be aware that even in circumstances where they consider their use of social media to be private, inappropriate actions may still amount to a conduct matter to be managed in accordance with BAT's Disciplinary Procedure.

5.4 Use of personal devices

Employees and volunteers must only communicate with children and young people and parents or carers using official BAT systems, such as their work phone number or email address. In no circumstances should personal email addresses or numbers be used.

Employees and volunteers must ensure that if they bring any personal equipment on to a BAT site that there is no inappropriate content on it, and that it is not accessed by children and young people at any time.

Any data, including images, which belong to BAT or children and young people, must only be stored on BAT owned equipment or systems, and must never be uploaded or downloaded to any personal device for any purpose except in a professional capacity by Governors, Trustees, and Members.

Personal devices must never be used to take photos or videos of children and young people, or to make contact with children and young people, parents or carers in a professional capacity, unless required in an emergency, for example to make phone contact whilst on a trip or visit if BAT equipment is not available.

Employees and volunteers should not use personal mobile phones during working hours and phones should be switched off or switched to 'silent mode'. Employees may use personal mobile phones during break periods if they are not on duty and are out of sight of children and young people, in designated areas.

Employees and volunteers (except Governors, Trustees, and Members) must not use their personal email addresses for work related matters, unless formally authorised by the Head of Provision/Head of Service or CEO.

Where Employees or volunteers have relationships with children and young people, parents, or carers by way of family connections or appropriate friendships external to the BAT context, they should declare this to the relevant Head of Provision/Head of Service, or for colleagues working centrally the Head of People

Services, to ensure that any personal communication is on record and cannot be misconstrued.

6. Confidentiality

All employees and volunteers are expected to comply with the relevant provisions of the Data Protection Act 2018 and the General Data Protection Regulation, and will receive appropriate training and guidance. Any information they have access to, or are responsible for, must be managed appropriately and any requirements for confidentiality and security observed. Information must not be disclosed to any person or authority, for example a parent or the police, without observing the correct procedure for disclosure as set out in the provision's Data Protection Policy. Nothing shall prevent a person from disclosing information that they are entitled to disclose under the Public Interest Disclosure Act 1998 as amended, provided that the disclosure is made in accordance with the provisions of that Act/s.

7. Health and safety

7.1 General

It is everyone's responsibility to report Health and Safety concerns in a timely manner.

All employees and volunteers are required to exercise their duty of care by taking responsibility for their own health and safety, and the health and safety of other people who may be affected by their acts or failure to act (omissions). Full guidance regarding health and safety is set out in the provision's Health and Safety Policy, and in any risk assessments relevant to specific roles or circumstances. Both can be accessed via line managers, and employees and volunteers are required to comply with these and to use any protective clothing or equipment as instructed at all times.

7.2 No smoking or vaping policy

BAT operates a no smoking or vaping policy. This applies to all BAT buildings and sites, and to those where BAT services are provided. Employees and volunteers should not allow children and young people to see them smoking or vaping off site during breaks, or prior to starting or when ending work on site.

7.3 Misuse of alcohol or drugs

Employees and volunteers must never jeopardise their own health and safety or that of others, or bring BAT or its provisions into disrepute, through the misuse of alcohol or drugs, whether illegal or legal, including prescribed medication. Where alcohol or drug misuse is identified, employees and volunteers will be offered appropriate support, and individual circumstances will be considered with respect to any disciplinary action that may be taken. Any misuse of alcohol or drugs will be managed under the Alcohol and Substance Misuse Policy.

7.4 Prohibited items

Under no circumstances should anyone bring prohibited items on to BAT premises. Prohibited items may be, but are not limited to:

- Weapons

- Knives
- Alcohol
- Drugs

Prescribed medication, tobacco and vapes must be kept in a secure environment and locked away. These items must not be taken out in view of the CYP.

7.5 Use of Trust Property

Anyone who is issued with Trust property must ensure that it is treated with due respect and used in accordance with this Code of Conduct and relevant Acceptable Use Policy.

8. Equality, Diversity and Inclusion

BAT is committed to equality and values diversity, and as such is committed to fulfilling its Equality Duty obligations. BAT expects all employees to share this commitment, and to comply with BAT's Equality, Diversity and Inclusion Policy.

The Duty and the Policy require that BAT, its employees and volunteers, have due regard to the need to eliminate unlawful discrimination, harassment, and victimisation, advance equality of opportunity, and foster good relations between people who share characteristics, such as age, gender, race and faith, and people who do not share them. All employees and volunteers are required to treat all people with whom they come into contact with dignity and respect, and are entitled to expect this in return.

9. Monitoring

The Chief Executive Officer and Board of Trustees are responsible for monitoring the implementation, use, and effectiveness of this Code, and will receive a report on these matters annually or more frequently if necessary.

This policy has been approved by the People Committee and adopted by the BAT Board of Trustees. The policy will be reviewed every year or earlier if change to legislation.

Signed on behalf of the BAT Board of Trustees:

Signed:  CEO

Signed:  Chair of BAT Board

Date: 17.06.2026