

# Education Development Trust

## GLOBAL CODE OF CONDUCT POLICY

### Maintenance

<b>Policy owner</b>	<b>Director of People</b>
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### Version Control

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If you have questions about how to interpret this policy, please ask the Policy Owner – [hr@edt.org](mailto:hr@edt.org)



## 1. SCOPE

Education Development Trust is committed to the highest standards of openness, integrity and accountability for all employees reflected in personal behaviour and standards of conduct.

The purpose and aim of this Code of Conduct is to provide guidance and raise awareness of the standards and behaviour Education Development Trust expects from all employees.

This policy applies to all employees of Education Development Trust (“the Trust”). The policy also applies to trustees, contractors, agency staff, consultants, volunteers and interns, employees or representatives of partner organisations working for or with Education Development Trust.

For the purposes of this document, the term “employee” refers to all persons who are covered by Education Development Trust’s Code of Conduct policy as clarified within the scope.

## 2. POLICY

### **Key principles of the policy**

The following principles provide guidance on the standards of conduct expected of employees based on what matters to us:

At Education Development Trust, we improve school systems at scale and provide empowering employability and careers services to young people and adults. We own and manage a portfolio of schools and, as a not-for-profit, we invest annually in our programme of education research that informs policymaking around the world as well as our own work. What we do affects how teachers teach, leaders lead, and students learn, and we help to improve the life chances for all.

We commit to an environment where everyone is treated with dignity and respect thus ensuring employees are able to work without fear of harassment, bullying or intimidation.

### **Expected Standards**

This code covers some of the important issues relating to conduct and expected behaviour at work. However, it is not set out to be an exhaustive list of standards, so you are advised to ask for help if you are unsure. The Code gives a brief explanation on what is expected of employees, with the title of a more detailed policy listed alongside, if applicable.



### Standards of Personal Behaviour

Ensure that no employee receives less favourable treatment or is victimised or harassed on the grounds of race, ethnic origin, nationality, gender, disability, marital status, sexual orientation, age, religion, or any personal characteristic. All employees should be supported to reach their full potential. For further information refer to the **Inclusion & Diversity Policy**.

Education Development Trust does not seek to dictate how employees conduct themselves in their personal lives. However, unlawful, or other conduct by employees which has the potential to jeopardise the Trust's reputation or position may lead to action being taken including, in serious cases, the termination of the employee's contract. Threatening, aggressive or violent behaviour or language is not permitted – this applies both during working hours and outside of the work environment if it becomes known.

Employees should not report or attempt to report for duty having consumed drugs or alcohol likely to render themselves unfit and/or unsafe for work. Employees should not use, or be in possession of, illegal substances on Trust and associated workplace premises or when representing the organisation. Failure to abide by these requirements may result in disciplinary action in line with the **Disciplinary Procedure**, including termination of employment.

All absences from work, except for reasons of sickness should be authorised or requested prior to the day. Any instances where an employee is absent from work without prior approval are considered as unauthorised absence. For further information on the above, please refer to the **Sickness Absence Policy & Procedure**.

Employees must ensure that their dress is appropriate for the situation in which they are working and that they present a professional image appropriate to the setting and context within which they are working.

When working in an international context or travelling internationally on behalf of the Trust, employees will be observant of all local laws and be sensitive to local customs. Any acts of unlawful conduct by employees which has the potential to jeopardise the Trust's reputation or position may lead to action being taken including, in serious cases, the termination of the employee's contract.

### Safeguarding Standards

Education Development Trust has a duty to safeguard the wellbeing of all direct beneficiaries of our services including children, young people and adults at risk, in-direct beneficiaries, and all who come into contact with us, including fellow employees. The duty to safeguard includes the duty to report safeguarding concerns/incidents and allegations to the Designated Safeguarding Lead (DSL) or line manager within the



department or business area that the employee works. For a detailed account of the acceptable attitudes and behaviours towards beneficiaries, refer to **Appendix 1 Safeguarding Code of Conduct**.

#### Safety Standards

Employees must adopt a pro-active, responsible, and cooperative attitude towards health and safety and take every reasonable precaution to avoid injury to themselves and others (others being employees and non-employees including members of the public). Any health and safety concern should be reported to either the local Health & Safety representative, or to the Trust's Health & Safety Department. For further information refer to the **Health & Safety Policies and supporting documents**.

The Trust has a duty to report specified accidents and "near miss" \*. Therefore, all employees should record any accident or near miss via their local First Aider. For further information refer to the **Accident and Incident Policy**, and **Incident Category Matrix**.

**\*Near Miss:** this is categorised as any incident that could have resulted in an accident. Knowledge of near misses is very important as research has shown that, approximately, for every 10 'near miss' events at a particular location in the workplace, a minor accident will occur.

The Trust has a duty to ensure the health and wellbeing of employees including those who are designated home-workers. Home-workers should ensure that their work area is fit for purpose, free from distractions and compliant with both Health & Safety and IT requirements. For further information see the **Working from Home Policy & Procedure**.

The Trust has a duty to safeguard employees who are required to work alone and ensure that lone workers are not put at more risk than other employees. Where lone working cannot be eliminated, employees should work with their line manager to risk assess and put in place reasonable control measures. For further information, refer to the **Lone Working Policy**.

The Trust has a duty to ensure that the safety and well-being of all its employees is a top priority. As a global organisation it is committed to taking any measures that can be reasonably expected to reduce the risk of harm and ensure, as far as possible, safety of its employees when travelling to high-risk areas. For further information see the **Duty of Care Policy, Global Mobility Policy, and the Travel Approval Policy**.

#### Compliance Standards

Employees have a right and a duty to raise any matters of concern which they may have, including but not limited to waste, fraud, human trafficking, discrimination. This should normally be through their line manager but where this is not appropriate, they may raise



the issue with HR. No individual who expresses their views in good faith and in line with this guidance will be penalised for doing so. For further information refer to either the **Whistleblowing Policy** or **Grievance Procedure**.

Confidential information obtained in the course of duty, in respect of employees or in connection with the Trust's activities, must only be made available to those employees who have a work-related requirement to view such information. Employees handling confidential information should use only authorised channels of communication for the dissemination of such information and should comply with the applicable **Data Protection Policy** (e.g., GDPR in the UK). Further details on confidentiality can be found in your **Terms and Conditions of Employment**.

Gifts from clients for the benefit of the organisation should be accepted and registered unless there is a good reason not to do so. Personal gifts from clients of modest value (e.g., business diaries, calendars, or chocolates at Christmas) can be accepted but should always be declared refer to **Gifts and Hospitality Policy**. Gifts from suppliers or from others, as well as entertainment or favours which could be construed as an inducement must not be accepted. If in any doubt whether you should accept a gift, please consult your line manager. Further information can also be found in the **Anti-Corruption and Bribery policy**.

There is a requirement to hold an employee Register of Interest within the Trust. The purpose is to assist employees to maintain high ethical standards in the conduct of Education Development Trust's business and also help in dealings with Government agencies. This exercise is in line with our financial year end and will be repeated annually. We will only request completed Declaration of Interest forms from Senior Managers and those in a particularly sensitive role i.e., those with budgetary accountability and/or those where educational conflicts may exist. All other employees are covered by the terms of their contracts and the **Staff Conflict of Interest Policy**. All employees should be reminded of the need to declare any conflicts, as and when they arise, under the terms of the Conflict-of-Interest policy, and line managers should ensure this is communicated within their own teams.

#### IT Equipment and Acceptable Standards

Inappropriate or unprofessional use of social media can pose a series of corporate risks to the organisation. In most situations, you should not accept 'friend requests' on your personal profile through social media sites or messaging apps from 'clients' or beneficiaries you work with (this includes children, young people, parents/carers etc). For further information on the wider issues refer to the **Global Safeguarding Policy and Use of social media Policy**.



Information and the associated processes, systems and networks are valuable assets, and the way in which personal data is managed has important implications for individuals. Through its security policies, procedures and structures, the Trust will facilitate the secure and uninterrupted flow of information, in both internal and external communications. Education Development Trust believes that security is an integral part of the information sharing which is essential to support corporate endeavours. For further information refer to the **Information Security Policy**.

The Trust will not unreasonably prevent employees from using Trust assets as long as it does not interfere or conflict with the work of the organisation. The making of long or numerous personal telephone calls (and emails) is not permitted. For further information refer to the **IT Acceptable Usage Policy**.

This policy will be posted on the organisation's website and is available in multiple languages via the Recite Me accessibility tool. Education Development Trust will provide on an annual basis Code of Conduct policy training for all staff, which is mandatory.

All **media enquiries** should be directed to the Brand & Marketing team [brandandmarketing@educationdevelopmenttrust.com](mailto:brandandmarketing@educationdevelopmenttrust.com) and only nominated spokespeople, as listed on the **PR Protocol**, can speak directly to the media.

### **Breaches of this Code**

This Code of Conduct has been drawn up to provide a source of guidance to all employees. It is not a contract document and can be amended at any time by the Trust. All employees must comply with both the provisions of this code and the associated organisation policies and procedures.

## **3. ROLES**

### **Employees are required to:**

- » Read and adhere to the standards outlined in this policy.
- » Seek clarification on any areas of the Code of Conduct that are not understood.
- » Refer to associated policies for further information.

### **Line Managers are required to:**

- » Read and adhere to the policy.
- » Role model the behaviour standards outlined in the policy.
- » Provide employees with clarification on standard expectations from associated policies where appropriate.
- » Contact HR for support and guidance on conduct issues

### **Human Resources (HR) Colleagues are required to:**

- » Provide advice and guidance to managers and employees when required.



- » Ensure the policy is reviewed and updated as appropriate.
- » Escalate concerns of repeated breaches to Director, People or Senior Manager as appropriate

## **4. RELATED DOCUMENTS**

### **Policies / Procedures / guidance / forms**

- » Inclusion & Diversity Policy
- » Disciplinary Procedure
- » Sickness Absence Policy and Procedure
- » Global Safeguarding Policy
- » Protection from Sexual Exploitation Abuse and Harassment Policy (PSEAH)
- » Health & Safety Policies and supporting documents.
- » Accident and Incident Policy
- » Incident Category Matrix.
- » Working from Home Policy & Procedure.
- » Lone Working Policy.
- » Duty of Care Policy
- » Global Mobility Policy
- » Travel Approval Policy
- » Whistleblowing Policy
- » Grievance Procedure
- » Terms and Conditions of Employment
- » Anti-Corruption and Bribery policy
- » Use of social media Policy
- » Information Security Policy
- » IT Acceptable Usage Policy
- » Consultancy Recruitment & Selection Policy
- » Employment Reference Policy
- » Dignity at Work Policy
- » Data Protection Policy
- » DBS Policy & Procedure
- » Gifts and Hospitality Policy



## Appendix 1

### **Safeguarding Code of Conduct**

Education Development Trust (“the Trust”) promotes a vigilant and safe culture for its employees and beneficiaries, which include children, young adults, adults at risk and all who may encounter the Trust through the course of its work.

The Trust requires that all employees engage in safe, supportive, and respectful interactions with beneficiaries and colleagues at all times and this Safeguarding Code of Conduct aims to assist employees to monitor their own standards and professional practice and reduce the risk of allegations being made against them.

Abiding by the provisions of this Safeguarding Code of Conduct will safeguard children, young adults and adults at risk and ensure that employees working with them do so safely, as any failure to do so may be regarded as gross misconduct and be subject to disciplinary action including dismissal, referral to relevant statutory agencies and where applicable, civil and/or legal action.

#### Underpinning Principles

The Trust expects that all employees working with children and all adult beneficiaries will treat them with respect and provide safe and supportive interactions that foster children’s and young adult’s social, emotional, and academic development.

All employees have a responsibility to keep children and all beneficiaries safe and protect them from exploitation, abuse, harassment, and neglect, and are expected to act, and be seen to act, in the child’s or adult’s best interests. The Safeguarding Code of Conduct is based on the following principles:

- » A child beneficiary is anyone under the age of 18 years.
- » An adult beneficiary is anyone aged 18 years and over.
- » The welfare of a child or adult at risk is paramount.
- » Employees should apply the same professional standards regardless of culture, disability, gender, language, racial origin, religious belief, sexual orientation, and all other protected characteristics as in UK law.
- » Employees should work, and be seen to work, in an open and transparent way.
- » Employees are responsible for their own actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motivations and intentions.





- » Employees should understand that their position is one of power and influence and their relationship with children and adult beneficiaries or others who encounter us through the course of our work is not between equals; they therefore have the responsibility to ensure that this unequal balance of power is not used for personal advantage or gratification.
- » Employees should discuss and/or take advice promptly from their line manager if they have acted in a way which may give rise to a concern.
- » Employees should acknowledge that deliberately invented/malicious allegations are extremely rare and that all concerns must be reported and recorded.
- » Employees must read, understand, and implement the Trust's safeguarding policies and procedures.
- » Employees must maintain confidentiality of personal information about children and their families, young adults, and all beneficiaries, only sharing where legally permissible to do so in the best interests of the child or adult who may be at risk of harm.
- » Employees must not use or be under the influence of alcohol, tobacco, or other drugs in the presence of children or adult beneficiaries and/or community members.

#### Physical Behaviour

Unnecessary physical contact between adults and children should be avoided and all physical contact should always maintain strict physical boundaries and consist only of public and nonsexual contact.

Employees interacting with children must do so in open, public spaces. If one-to-one meetings are necessary for educational or emergency purposes, they should also be conducted in a public area, in a room where the interaction can be observed, or in a room with the door left open and another adult is notified about the meeting. The child should always be given the option of having another adult present.

Employees should be aware of cultural or religious views about touching and be sensitive to issues of gender.

Views of children with vulnerabilities and adults at risk including those that may arise from a physical or learning difficulty should be considered when interacting with them and a written plan in place for any support with intimate care that they may require.

There are occasions when appropriate physical contact may be necessary between an employee and a beneficiary and is acceptable in these contexts:

- » Holding the hand of a young child at the front/back of the line in school or in public spaces, including crossing roads.
- » When comforting a distressed pupil, though prolonged contact should be avoided.
- » When a pupil is being congratulated or praised e.g., hand shake.
- » To demonstrate how to use a musical instrument.



- » To demonstrate exercises or techniques during drama, PE lessons or sports coaching, though minimum contact should be made.
- » To support children with toileting or changing clothes. This must be carried out in a transparent manner whilst maintaining the dignity of the child. Another adult should always be informed prior to assisting a child with these activities.
- » To provide personal care for very young children, including nappy changing and toilet training. Personal care must be carried out in a transparent manner whilst maintaining the dignity of the child and in accordance with local operating procedures that safeguard both the young child and adult undertaking these duties.
- » To give first aid in line with school/local procedures, including record keeping.

*Inappropriate physical behaviour is any contact that abuses, exploits, or harasses a child or adult such as:*

- » Slapping, shaking, pinching, hitting, punching, pushing, grabbing, and kicking.
- » Patting the buttocks.
- » Touching of private body parts.
- » Intimate/romantic/sexual contact.
- » Showing pornography or involving a child/young or vulnerable adult in pornographic activities.
- » Pupils are always entitled to respect and privacy and especially when in a state of undress, including, for example, when changing/showering.

### Sexual Conduct

Any sexual behaviour by an employee with or towards a child/pupil or any adult beneficiary is unacceptable and is prohibited.

*Employees will not:*

- » Engage in any form of communication with a child/pupil/adult beneficiary, which could be interpreted as sexually suggestive, provocative or give rise to speculation e.g., verbal comments, letters, notes, by email or on social media, phone calls, texts, photography, or physical contact.
- » Make sexual remarks to or about a child/pupil/adult beneficiary.
- » Discuss sexual matters with or in the presence of children/pupils other than within agreed curriculum content or as part of their recognised job role.

### Breach of Trust

Employees should clearly understand the need to maintain appropriate boundaries in their dealings with young people. Intimate or sexual relationships between employees and children/pupils is a grave breach of trust and any sexual activity between an employee/teacher and a pupil under 18 years of age may be a criminal offence.



Employees may encounter young people who display attention-seeking behaviour or profess to be attracted to them. Employees should aim to deal with these situations sensitively and appropriately but ensure that their behaviour cannot be misinterpreted. In these circumstances, the employee should ensure that a senior colleague/line manager is aware of the situation. They should make every effort to ensure that their own behaviour cannot be brought into question, does not appear to encourage this and be aware that such infatuations may carry a risk of their words or actions being misinterpreted.

### Behaviour Management

Corporal punishment (physical punishment) is prohibited. Adults must not threaten corporal punishment and must not use or threaten any punishment which could adversely affect a child's well-being.

The appropriate use of 'reasonable force' to control or restrain a child, must only be utilised in extreme circumstances, for example when two children are fighting and refuse to separate without physical intervention. A record of any occasion where physical intervention – force or restraint – is used must be kept and parents/carers must be informed on the same day or as soon as is reasonably practicable.

Employees should keep parents/carers informed of any sanctions or behaviour management techniques used and be mindful of, and sensitive to, factors both inside and outside of the school or programme, which may impact on a child's/pupil's behaviour.

Where a child/pupil has specific needs in respect of particularly challenging behaviour, a positive handling plan, including assessment of risk, should be drawn up and agreed by parents/carers/employees/education or medical professionals, as applicable.

### Communication

All communication between employees and children and all adult beneficiaries should be transparent and about school or programme activities. Communication with children both in the 'real' world and through web-based and telecommunication interactions should take place within explicit professional boundaries. Employees should inform senior management of any relationship with a parent where this extends beyond the usual parent/professional relationship.



The following are examples of appropriate and inappropriate verbal communication:

*Appropriate verbal communication:*

- » Praise and/or positive reinforcement with an educational purpose when used consistently and equally for all children/adult beneficiaries.

*Inappropriate verbal communication:*

- » Profanity, sexual innuendo, or risqué jokes.
- » Yelling, threatening, ridiculing or degrading comments. Employees should avoid shouting at children other than as a warning in an emergency/safety situation.
- » Discussing personal or sexual relationships with or in the presence of children/pupils/adult beneficiaries.
- » Make (or encourage others to make) unprofessional personal comments which scapegoat, demean or humiliate a child/pupil/adult beneficiary, or might be interpreted as such.

Communication with children via technology and web-based communication

E-safety risks are posed more by behaviours and values than the technology itself and employees should ensure that they establish safe and responsible online behaviours while using computers, tablets, phones, texts, e-mails, instant messages such as WhatsApp, social media such as Facebook and Twitter, chatrooms, forums, blogs, websites, gaming sites, digital cameras, videos, webcams, and other handheld devices.

*Appropriate web-based communication:*

- » Employees should ensure that their communications are open and transparent and avoid any communication which could be interpreted as 'grooming behaviour'.
- » If children/pupil/adult beneficiaries locate employees web-based identities and attempt to contact or correspond with them, employees should not respond and must promptly report the matter to their line manager. The child/pupil/adult beneficiary should be firmly and politely informed that contacting employees/teachers in this way is not acceptable.

*Inappropriate web-based communication:*

- » Employees should not seek to communicate/make contact or respond to contact with children/pupils/adult beneficiaries outside of the purposes of their work.
- » Employees should not give their personal contact details to children/adult beneficiaries, for example, e-mail address, home or mobile telephone numbers, details of web-based identities.
- » Employees should not request or respond to any personal information from children/adult beneficiaries other than that which may be necessary in their professional role.



### Transporting children and pupils

Employees should never offer to transport children/pupils outside of their normal working duties, other than in an emergency or where not doing so would mean the child may be at risk. In these circumstances the matter should be recorded and reported to both their line manager and the child's parent(s). Employees should refer to the school's/programme's health and safety policy and/or educational visits policy, which should set out the arrangements under which employees may use private vehicles to transport pupils.

#### *Employees should:*

- » Plan and agree transport arrangements with their line manager and parents/carers in advance.
- » Ensure that if they need to be alone with a child/pupil during transport, this is for a minimum time frame.
- » Be aware that the safety and welfare of the child/pupil is their responsibility until this is safely passed over to a parent/carer.
- » Ensure that any impromptu or emergency arrangements of lifts are recorded and can be justified.
- » Report the nature of the journey, the route and expected time of arrival in accordance with agreed procedures.

#### *Employees should not:*

- » Offer lifts to children/pupils unless the need for this has been agreed by their line manager.
- » Give a child a ride home alone unless they have written permission of the child's parents or in the case of an emergency.



### **Reference Documents**

#### **Department for Education (DfE) non-statutory guidance (best practice)**

DfE non-statutory guidance – Guidance for safer working practice for those working with children and young people in education settings.

<https://www.saferrecruitmentconsortium.org/GSWP%20Sept%202019.pdf>

DfE non-statutory guidance – Use of Reasonable Force

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/444051/Use\\_of\\_reasonable\\_force\\_advice\\_Reviewed\\_July\\_2015](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/444051/Use_of_reasonable_force_advice_Reviewed_July_2015)

#### **DfE statutory guidance**

Teacher Standards

<https://www.gov.uk/government/publications/teachers-standards>

DfE Statutory Framework for the Early Years Foundation Stage

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/596629/EYFS\\_STATUTORY\\_FRAMEWORK\\_2017](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/596629/EYFS_STATUTORY_FRAMEWORK_2017)

**I confirm I have read, understand, and agree to my role relating to safeguarding and all other statements contained within this Code of Conduct policy.**

Signed: \_\_\_\_\_ Date: \_\_\_\_\_

Name: \_\_\_\_\_