



Global Code of Conduct Policy



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Document Control

Document Control	
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Document Distribution / Stakeholders

Document Distribution / Stakeholders				
Name	Organisation	Date issued	Version	Action
All staff	EDT	02/03/2026	8.0	All staff to read the policy. Policy to be added to policy hub. Comms to be sent out.

Document Revision History

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Version	Date	Author	Summary of changes
8.0	02/03/2026	M Sefton – Head of Safeguarding and Inclusion	Routine review – strengthening of standards and updates in line with legislative changes
7.0	12/08/2025	L. Richardson - HR Projects Lead (Policy, Wellbeing & Compliance)	Approved
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Scope

Education Development Trust (edt) 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 edt expects from all employees.

This policy applies to all employees of edt. The policy also applies to trustees, contractors, agency staff, consultants, volunteers and interns, employees or representatives of partner organisations working for or with edt.

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

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 edt, we exist to improve life chances by strengthening education and skills outcomes. We work at scale to improve school systems and deliver tailored employability and careers services to young people and adults. As a not-for-profit organisation, we reinvest annually in education research that shapes our programmes and informs policy and practice internationally. Our work is evidence-led, focused on measurable impact, and delivered in partnership. It influences how teachers teach, how leaders lead and how learners experience education.

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 from your line manager 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 **Global Inclusion & Diversity Policy**.

Edt 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 edt'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 edt 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. For consultants, refer to clause 6 of your contract, Termination.

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**. For consultants engaged on a non-exclusive, as-needed basis, work times and locations should be agreed with the edt engaging manager, and any changes to the schedule promptly communicated.

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 edt, 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 edt's reputation or position may lead to action being taken including, in serious cases, the termination of the employee's contract. For consultants, refer to clause 6 of your contract, Termination.

[Safeguarding Standards](#)

Edt 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. This duty to safeguard includes preventing, identifying, and responding to all forms of harm, abuse, and inappropriate conduct including sexual harassment.

All employees have a 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 edt's Global Property Services Manager. For further information refer to the **Health & Safety Policies and supporting documents**. For consultants, please raise any health and safety concerns with your edt engaging manager as soon as possible.

Edt 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**. For consultants, please raise any accident or incident with your edt engaging manager as soon as possible.

***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.

Edt 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 Working from Home Policy and Procedure do not apply to self-employed consultants providing services to edt.

Edt 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**. Consultants should liaise with the edt engaging manager for lone working risk assessment and reasonable control measures.

Edt 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**. The Duty of Care Policy applies to consultants, who should liaise with the edt engaging manager to complete a Travel Risk Assessment and security plan.

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 edt'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., Data Protection Act 2018 in the UK). Further details on confidentiality can be found in your **Terms and Conditions of Employment**. For consultants, refer to clause 8 of your contract, data protection.

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. For consultants, refer to clause 10.6 in your contract, Miscellaneous.

There is a requirement to hold an employee Register of Interest within edt. The purpose is to assist employees to maintain high ethical standards in the conduct of edt'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. For consultants, refer to clause 4 of your contract, Further Work.

[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, Digital Safeguarding Policy and Use of Global Social Media Policy**.

Roles and Responsibilities

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 or consultancy contract terms and conditions 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

Related Documents

Policies

- Inclusion & Diversity Policy
- Disciplinary Procedure
- Sickness Absence Policy and Procedure
- Global Safeguarding Policy
- Digital Safeguarding Policy
- Protection from Sexual Exploitation Abuse and Harassment Policy (PSEAH)
- Sexual Harassment at Work Policy
- Health & Safety Policies and supporting documents.
- Accident and Incident Policy
- Working from Home Policy & Procedure.
- Lone Working Policy.
- Duty of Care Policy
- Global Mobility Policy
- Travel Approval Policy

- Whistleblowing Policy
- Anti-Corruption and Bribery policy
- Use of social media Policy
- Information Security Policy
- IT Acceptable Usage Policy
- Consultancy Recruitment & Selection Policy
- Employment Reference Policy
- Bullying and Harassment in the Workplace Policy
- Data Protection Policy
- DBS Policy & Procedure
- Gifts and Hospitality Policy

Procedures / guidance / forms

- Incident Category Matrix.
- Grievance Procedure
- Terms and Conditions of Employment
- Terms and Conditions of Consultancy Contract

Appendix One

Safeguarding Code of Conduct

Education Development Trust (edt) is committed to maintaining a vigilant and safe culture for everyone who comes into contact with the organisation. This includes children, young people, adults, adults at risk and all who may encounter edt through the course of its work. All employees share responsibility for upholding this culture and for promoting conduct that protects the dignity, rights and safety of others.

Edt requires that all employees engage in safe, supportive, and respectful interactions with beneficiaries and colleagues at all times. This Safeguarding Code of Conduct aims to assist employees to uphold the standards and professional practice required by the organisation. In doing so, this will reduce the risk of behaviour that could cause harm and lead to allegations of misconduct being made against them.

Abiding by the provisions of this Safeguarding Code of Conduct is a requirement for all staff in order to safeguard children, young people, adults and adults at risk. It ensures 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. For consultants, any safeguarding or misconduct allegation that is substantiated will result in termination of their contract, including where the consultant fails or refuses to take part in related enquiries or investigations.

Underpinning Principles

Edt expects all employees to uphold a safe, respectful and supportive environment for children, young people, adults and adults at risk. Every interaction should promote the dignity, rights and wellbeing of those who come into contact with the organisation and reflect the standards required by the Global Safeguarding Policy.

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, including self-reporting if their conduct or behaviour falls short of these guiding principles
- 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 or Designated Safeguarding Lead 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 edt'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.
- Employees must disclose any relationships or associations (both online and offline) that may have implications for the safeguarding of children or beneficiaries in their work.

Physical Behaviour

Physical behaviour must never place a child or adult at risk of harm, blur professional boundaries or create opportunities for exploitation, abuse or misconduct. Unnecessary physical contact between adults and children should be avoided. Where contact is required, it must be limited to nonsexual, public and age-appropriate interaction that upholds the dignity and rights of the individual. If contact between employees and beneficiaries is required, it must always be safe and appropriate.

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. Another adult should be informed of the meeting, and the child or adult should be offered the option of having someone else present.

Employees must be sensitive to cultural, religious and gender considerations when engaging in any form of physical contact. They must also take account of the specific needs of children with vulnerabilities and adults at risk. Where a child or adult requires intimate or personal care, this must be delivered in line with an agreed written plan that sets out the level of support required and the safeguards that must be followed.

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., handshake.
- 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.
- Play or pretend fighting with children.
- 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. This includes behaviour that is verbal, written, physical, digital or through any other medium. Such conduct represents a serious safeguarding breach and will result in disciplinary action, referral to statutory authorities, and, where relevant, criminal investigation.

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 and Designated safeguarding lead 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.

Employees must not provide private services to children, young people or adult beneficiaries connected to edt, including but not limited to tutoring, babysitting, mentoring, financial assistance, transport or accommodation.

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 relate solely to school or programme activities. Communication with children both face to face or through web-based and telecommunication interactions should take place within explicit professional boundaries and should only be done so using edt approved systems and or devices. 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 and Designated safeguarding lead. 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, Designated Safeguarding Lead 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 with a written risk assessment in place.
- 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.
- Where reasonably practicable, ensure that an additional adult is present when transporting children.

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.gov.uk/government/publications/keeping-children-safe-in-education--2>

<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

DfE non-statutory guidance - Use of Reasonable Force

[Use of reasonable force and other restrictive interventions – draft guidance](#)

DfE statutory guidance

Teacher Standards

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

DfE Statutory Framework for the Early Years Foundation Stage

<https://www.gov.uk/government/publications/early-years-foundation-stage-framework--2>

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:
